

Safeguarding Policy, Procedures & Guidance

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Date	August 2023
Person Responsible	Deputy Executive Principal – Teaching, Learning and Improvement (Senior Designated Safeguarding Lead)
Approval/ review bodies	SLT / Corporate Board
Frequency of Review*	12 months

** Policies will be reviewed more frequently if legal changes or good practice require*

Review History:		
Date of review	Reviewed by	Reason for review
Feb 2016	AP EM and S	Annual Review
Nov 2016	AP EM and S	Annual Review – to take account of new DfE guidance
Oct 2017	AP EM and S	Annual Review – to be brought into line with start of academic year.
Oct 2018	AP EM and S	Annual Review – to include new guidance.
Sept 2019	AP EM and S	Annual Review – to include new guidance and change of name from “Vulnerable Adults to “Adults at risk”.
Sept 2020	AP EM and S	Annual Review – to amalgamate with Policies from West Kent & Hadlow
Aug 2021	DS/JM	Annual Review, Update to KCSiE
March 2022	DEP and AP T, L & SS	Interim Review due to staff changes
October 2022	DEP – T, L & I	Annual Review
August 2023	DEP – T, L & I	Annual Review – Change of Title, Introduction of amendments needed as a result of KCSiE 2023.

Table of Contents

1. General Policy Statement	2
2. Objectives.....	3
3. Definitions.....	5
4. Responsibilities.....	7
5. Monitoring and Review	9
Appendix 1 – Categories of abuse and signs and symptoms	11
Appendix 2 - Safeguarding issues which must all be reported to the safeguarding team	15
Appendix 3 – Awareness of the “Prevent” strategy (separate Prevent Policy is available).	20
Appendix 4 - The Designated Staff with Responsibility for Safeguarding Children and Adults at Risk ...	22
Appendix 5 - Dealing with Disclosure of Abuse and Procedure for Reporting Concerns	24
Appendix 6 - Reporting and Dealing with Allegations of Abuse Against Members of Staff	25
Appendix 7 - Recruitment and Selection Procedures	30
Appendix 8 – Online safety	31
Appendix 9 - Safeguarding Children Policy (Nurseries) – Dartford and Gravesend.....	32
Appendix 10 - Safeguarding of Residential Students (Hadlow College)	34

Related Policies and documents:

- Behaviour and Disciplinary Policy and Procedures;
- Children on College Premises Policy Statement;
- Prevent Policy;
- Equality and Diversity Policy;
- Data Protection Policy and Procedures;
- Learner Anti-Bullying Policy;
- Reasonable Force Policy;
- Hadlow Administration of Medicine Policy;
- Learner Substance Misuse Policy;
- Hadlow Missing Persons Monitoring Policy and Procedures;
- External Speakers Policy;
- IT Conditions of Use Policy;
- Health & Safety Policy;
- Enrolment Disclosure Policy and Procedure; and
- Policy on Malicious Communication.
- Further Education Residential Accommodation: National Minimum Standards (2018).
- After-school clubs, community activities, and tuition - safeguarding guidance for providers (2023)

1. General Policy Statement

North Kent College (“the College”) which includes Dartford, Gravesend, Tonbridge and Hadlow College campuses has a statutory and moral duty to ensure that the safeguarding and welfare of children and vulnerable adults within the College is promoted and embedded into all areas of provision. The College expects all members of the college community to share this commitment and it is the responsibility of all staff and volunteers to ensure they carry out their practice in accordance with the duty to safeguard and to take prompt appropriate action when they have concerns about a child or vulnerable adult.

Background

This policy has been developed in accordance with the principles established by the

- Children Acts 1989 and 2004;
- The Care Act 2014;
- Safeguarding Vulnerable Groups Act 2006;
- Human Rights Act 1998;
- Mental Capacity Act 2005;
- Mental Health Act 2007;
- Equality Act 2010;
- Public Interest Disclosure Act 1998;

and related guidance, including:

- 1.1. Keeping Children Safe in Education (2023);
- 1.2. Working Together to Safeguard Children (2018, updated 2023);
- 1.3. Kent and Medway Online Safeguarding Children Procedures;
- 1.4. Kent and Medway Domestic Abuse Strategy 2020 – 2023 (updated 2021);
- 1.5. KCC – Kent Safeguarding Children Multi Agency Partnership Arrangements (March 2022);
- 1.6. KCC – Practice Guidance: Managing Allegations against Members of Staff (2022)
- 1.5 Revised Prevent Duty guidance for England and Wales March 2016 (updated 2023) and local updated information;
- 1.6 DfE Child Sexual Exploitation (February 2017);

- 1.7 HM Government “What to do if you’re worried a child is being abused” (March 2015); and
- 1.8 UKCIS (UK Council for Internet Safety) “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (December 2020).
- 1.9 The Care Act 2014
- 1.10 KCC Kent Adult Social Care and Health Procedures, Practice Guidance and Tools
- 1.11
- 1.12 KMSAB Multi Agency Safeguarding Adults Policy, Procedures and Practitioner Guidance for Kent and Medway (2022)
- 1.13 KMSAB: A quick guide – legal basis for information sharing and what can be lawfully shared (2022)
- 1.14 KMSAB: Managing Concerns around People in Positions of Trust (PiPoT) (2022)
- 1.15 KMSAB: Protocols to safeguarding adults who are at risk of exploitation, modern slavery and human trafficking (2021)
- 1.16 KMSAB: Multi-Agency Protocol for Dealing with Cases of Domestic Abuse to Safeguarding Adults with Care and Support Needs (2022)

Copies of all the above documents are available online.

The Governing body takes seriously its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children and vulnerable adults and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children and vulnerable adults who are experiencing harm or at risk of harm. Any information processed by the College pursuant to this Policy will be processed in accordance with our Data Protection Policy. We recognise this data is sensitive and will handle it in a confidential manner.

2. Objectives

The Corporate Board is committed to ensuring the College:

- 2.1. Creates a culture of vigilance:
 - 2.1.1. Working to protect children and vulnerable adults from abuse;
 - 2.1.2. Raising the profile of safeguarding with students and staff in all aspects of our work;
 - 2.1.3. Recognising when there are risk factors and knowing how to respond to these;
 - 2.1.4. Educating students on how to keep themselves and others safe and how

to get help when they need it; and

- 2.1.5. Recognising the importance of wider environmental factors in a child or vulnerable adult's life that may be a threat to their safety or welfare. (Contextual Safeguarding or Extra Familial Harm).
- 2.2. Works to prevent impairment to physical and mental health and development;
- 2.3. Ensures provision of safe and effective care;
- 2.4. Provides education through formal and informal processes, where children and vulnerable adults can learn to identify risk and know how to keep themselves safe.
- 2.5. Takes action to enable all children and vulnerable adults to have the best outcome;
- 2.6. Safeguards and promotes the welfare of all students, including apprentices and learners on industry placement programmes;
- 2.7. Where appropriate, refers children and vulnerable adults;
- 2.8. Takes a coordinated approach with organisations and agencies;
- 2.9. Supports children in need and contributes towards the early help offer;
- 2.10. Records and takes action on incidents related to a person's race, religion, disability, sexual orientation and/or transgender identity;
- 2.11. Records and takes action with allegations of sexual violence, abuse and harassment;
- 2.12. Promotes safer recruitment practices;
- 2.13. Names a Senior Designated Safeguarding Lead within the Senior Leadership Team; and a Designated Safeguarding Lead with two Deputies within the Welfare and Safeguarding Team;
- 2.14. Provides safeguarding training to all staff annually;
- 2.15. Offers a curriculum that promotes safeguarding/safety;
- 2.16. Shares information with the key three agencies, Health, Police and Social Services;
- 2.17. Supports students with physical, mental, and/or medical health conditions;
- 2.18. Meets the needs of students with special educational needs and/or disabilities;
- 2.19. Recognises that young people are capable of abusing their peers;
- 2.20. Takes the wishes and feelings of children into account;

- 2.21. Provides staff code of conduct;
- 2.22. Responds promptly to instances where children go missing;
- 2.23. Evidence compliance to the Safeguarding Children Multi-agency Partnership (SCMP) and the Kent and Medway Safeguarding Adults Board (KMSAB);
- 2.24. Appoints a designated person to promote the achievement of care experienced young people; and
- 2.25. Takes appropriate action, including referrals, to see that such students are kept safe, both at College and their place of residence.

3. Definitions

The College procedure applies to all children or any vulnerable adult or adult at risk.

Child/ren

The Children's Act and the UN Convention on the Rights of the Child define a "child" as a person under the age of 18.

Whilst children are deemed vulnerable and in need of protection due to age, they may have additional vulnerabilities. This might include disability, being a carer, communication barriers such as not having English as their first language, additional learning needs, etc.

The College recognises some children and young people may be more vulnerable than others to being victims of certain offence types, including sexual exploitation, human trafficking and modern-day slavery.

Adult at Risk

The Care Act 2014 defines an adult at risk as:

- Someone over the age of 18 who has a need for care and support,
 - Someone who is experiencing or is at risk of neglect or abuse, and
- As a result of the above needs, the adult is unable to protect themselves against the abuse or neglect, or the risk of it.

Vulnerable Adult

Since the implementation of the Care Act 2014, the statutory sector no longer employs the term "vulnerable adult." However, the College continues to utilise this term to acknowledge that **any** individual may experience vulnerability, necessitating support at any time. It is worth noting that even if these needs do not meet the Local Authority's criteria for an "Adult at Risk," the individual may still require extra welfare or safeguarding support, which the College endeavours to provide. The College will therefore continue to use the term 'Vulnerable Adult' to describe any adult in need of additional support for welfare, well-being or safeguarding related matters.

In order to bring into focus those adults for whom this applies, the College will adopt the definition:

Any adult aged 18 or over who, due to disability, mental function, age or illness or traumatic circumstances, may not be able to take care or protect themselves against the risk of significant harm, abuse, bullying, harassment, mistreatment, or exploitation.

Although everyone is vulnerable in some way and at certain times, certain individuals may face higher levels of vulnerability due to their physical or social circumstances. Various factors contribute to increased vulnerability, including:

- is elderly and frail due to ill health, physical disability, or cognitive impairment;
- has a learning disability;
- has a physical disability and/or sensory impairment;
- has mental health needs;
- has a long-term illness or condition;
- misuses substances or alcohol;
- is a carer such as family members and friends;
- is unable to demonstrate the capacity to make a decision and is in need of care and support.

It is important to bear in mind:

- Vulnerability is not always visible;
- Vulnerability is often not a permanent state;
- Anyone can be vulnerable at different stages of life;
- A person with visible vulnerabilities may not perceive themselves as vulnerable;
- Vulnerable people may also pose risks and cause harm.

Refugees and asylum seekers inherently fall under this definition of vulnerability due to their unique circumstances.

Adults can be more at risk of abuse when they live alone, have care and support needs, depend on others, for example to manage their money or find it difficult to communicate.

Abuse can occur in a variety of different settings, including care homes, public places, day centres, the adult's home, hospitals and education settings. Anyone can be an abuser, for example friend, family member, volunteer, neighbour, or care worker.

3.1.

Mental Capacity

The Mental Capacity Act 2005 provides the legal framework for acting and making decisions on behalf of individuals who lack the mental capacity. The Act defines a person who lacks capacity as a person who is unable to make a particular decision or take a particular action for themselves, at the time the decision or action needs to be taken, because of an impairment of or disturbance in the mind or brain.

All adults are presumed to have capacity to give or withhold consent to the sharing of confidential information, unless there is evidence to the contrary. It is likely a proportion of adults at risk whose information may be shared will lack mental capacity to make particular decisions about sharing information (or more generally) for themselves because of existing health issues or infirmity.

Section 1 of the Mental Capacity Act sets out the five statutory principles that apply to mental capacity:

- A person must be assumed to have capacity unless it is established that they lack capacity;
- A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so are taken without success;
- A person is not to be treated as unable to make decisions merely because he/she makes an unwise decision;
- An act done or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests;
- Before the act is done, or the decision made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is least restrictive of the person's rights and freedom of action.

The College will deal with capacity issues in accordance with these principles. Where there is doubt or difficulties arise in relation to capacity, advice will be sought from appropriately qualified mental health professionals.

Other Terms

The College recognises the definitions of abuse, sexual harassment and other related terms as detailed in Appendix 1 and Appendix 2.

4. Responsibilities

In pursuit of these aims, the Corporate Board will approve and annually review The Safeguarding Policy, Procedures and Guidance with the aim of:

- 4.1. Raising awareness of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for children and vulnerable adults learning within the College;

- 4.2. Aiding the identification of children and vulnerable adults for significant harm, and providing procedures for reporting concerns;
- 4.3. Establishing procedures for reporting and dealing with allegations of abuse against members of staff;
- 4.4. Ensuring that all adults who have access to students have been checked through the Disclosure and Barring Service (DBS), as to their suitability and that serious concerns are reported to the local LADO and the DBS; and
- 4.5. Providing an environment in which learners feel safe, secure, valued, and respected and know that they will be listened to.

In developing the policies and procedures, the Corporate Board will consult with, and take account of, guidance issued by the relevant government departments and other relevant bodies, and groups including the Safeguarding Children Multi-agency Partnership (SCMP) and the Kent and Medway Safeguarding Adults Board (KMSAB).

The College works closely with the three partners – Health, Police and Social Services. The College will refer concerns that a child or adult might be at risk of significant harm to the appropriate agencies as agreed with the Safeguarding Children Multi-agency Partnership (SCMP) and the Kent and Medway Safeguarding Adults Board (KMSAB).

The College will notify appropriate agencies if there is an unexplained absence of a child who is the subject of a Child Protection Plan. The College will also notify agencies if any young person under the age of 18 is missing from education. This also applies to adults if there is a significant concern for their safety and well-being.

The College will work collaboratively with relevant agencies in their enquiries regarding safeguarding matters, including attendance at case conferences and core groups.

The Corporation nominated David Martin as Governor with special responsibility for safeguarding for the academic year 2023/24 and onwards. All Governors must undertake safeguarding training as part of their induction and update this regularly.

All staff working with children and vulnerable adults will receive training to familiarise themselves with safeguarding issues and responsibilities and the College procedures and policies, with online refresher training at least every three years and regular updates within each academic year. Annually, staff should ensure they have an accessible account to log in to the safeguarding recording system (MyConcern) to ensure they remain 'active' users.

The designated member of the senior leadership team (SLT) with responsibility for safeguarding is Senior DSL - Rhiannon Hughes, Deputy Executive Principal - Teaching, Learning and Improvement and from 5th December 2022 the DSL will be Rebecca Skinner – Head of Welfare & Safeguarding.

The college also maintains a team of Level 3 trained staff to manage safeguarding across all college sites including two Deputy Designated Safeguarding Leads (DDSLs) and several Designated Safeguarding Officers (DSOs).

All members of staff have been provided with the update to "*Keeping Children Safe in Education*" (2023) that covers statutory safeguarding information and guidance.

Members of staff must confirm they have read and understood this and must successfully complete an online quiz. The aim is for all staff to have completed this exercise by October half-term. Any staff not completing the training within the expected timeframe may be subject to Disciplinary Action.

All new members of staff must complete online safeguarding training modules provided by the college as part of their induction and within 4-weeks of commencing at the college.

All staff complete an online training module on Safeguarding within the Safety Media site and this is retaken every three years, with regular updates within each academic year.

Guidance from the ESFA (Education & Skills Funding Agency) in September 2017 means the College will inform the ESFA if we are subject to an investigation by the local authority or the police. This applies only to safeguarding incidents where the institution or one of its sub-contractors is subject to investigation. The Senior DSL will take responsibility for contacting the ESFA under such circumstances.

The Corporate Board will receive from the Senior Designated Safeguarding Lead an annual report which reviews how the duties have been discharged.

Use of College premises for non-college activities

In line with KCSiE (2023) when services or activities are provided under the direct supervision or management of our college staff, our arrangements for safeguarding will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate. This applies regardless of whether or not the people who attend any of these services or activities attend the College. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

5. Monitoring and Review

Safeguarding is not graded specifically in the Ofsted Education Inspection Framework, but it remains a limiting factor for inspection and will be referenced in the Leadership and Management section of an inspection report.

A judgement will be made on whether arrangements for safeguarding learners are effective. The residential accommodation at Hadlow for 16–18-year-old students is inspected under the Social Care Common Inspection Framework (“SCCIF”), updated September 2022.

For all inspections, inspectors will be looking for evidence that *‘the provider has a culture of safeguarding that supports effective arrangements to identify learners who may be at risk; which responds in a timely way; and that staff recruitment is managed and any allegations are dealt with appropriately.*

The Corporate Board must ensure that there is liaison with the Chief Executive and Executive Principal and Senior DSL over matters regarding Safeguarding Children and Vulnerable Adults, including:

- 5.1. Ensuring the College has procedures and policies which are consistent with the SCMP and KMSAB procedures;
- 5.2. Ensuring the Corporate Board considers the College policy on Safeguarding Children and Vulnerable Adults annually; and
- 5.3. Ensuring each year the Corporate Board is informed of how the College and its staff have complied with the policy, including but not limited to, a report on the training that staff have undertaken.

The Board also commits to review the implementation of safeguarding across all sites, along with their own obligations and awareness of current issues, including the identification of any further training for Governors as required, on an annual basis.

Appendix 1 – Categories of abuse and signs and symptoms

The College aims to create a culture of professional curiosity where staff are aware of students' welfare and are alert to indicators of safeguarding concerns or abuse. Although these signs do not necessarily indicate there is a safeguarding concern or that someone has been abused, they may help staff to recognise something is wrong. The possibility of abuse should be considered if a staff member has any concerns about a student and advice and support sought from a Designated Safeguarding Lead.

Students with learning difficulties may exhibit some of these signs (e.g., reluctance to get undressed for physical activities, constant tiredness). These are not necessarily signs of abuse but symptoms of their condition and may be more pronounced when the student is uncertain e.g., when starting college. However, it must also be remembered that disabled young people are three times more likely to experience abuse or neglect than non-disabled peers.

The Corporation recognises the following as definitions of abuse, using the acronym PENS:

1. Physical Abuse

Physical abuse causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating or otherwise causing physical harm to a child or adult at risk. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Possible signs and symptoms:

- unexplained recurrent injuries or burns;
- improbable excuses or refusal to explain injuries;
- wearing clothes to cover injuries, even in hot weather;
- refusal to undress for activities;
- bald patches;
- chronic running away;
- fear of medical help or examination;
- self-destructive tendencies;
- aggression towards others;
- fear of physical contact - shrinking back if touched;
- admitting that they are punished but the punishment is excessive (such as a child being beaten every night to “make him study”); and/or
- fear of suspected abuser being contacted.

2. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or adult at risk, such as to cause severe and persistent adverse effects on the child or adults emotional development.

It may involve conveying to children and adults they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or adult opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children or adults who are at risk. These may include interactions that are beyond the child or adults developmental capability. It can also be overprotection and limitation of exploration and learning, or preventing the child or adult participating, resulting in limitations to social interaction and development.

Emotional abuse may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children or adults to feel frightened or in danger, or the exploitation or corruption of a child or adult.

A level of emotional abuse is involved in all types of maltreatment of a child or adult at risk, though it may occur alone.

Possible signs and Symptoms:

- physical, mental and emotional development lags;
- sudden speech disorders;
- continual self-depreciation (“I’m stupid, ugly, worthless, etc.”);
- over-reaction to mistakes;
- extreme fear of any new situation;
- inappropriate response to pain (“I deserve this”);
- neurotic behaviour (rocking, hair twisting, self-mutilation); and/or
- extremes of passivity or aggression.

3. Neglect

Neglect is the persistent failure to meet a child’s or adult at risk’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s or adult health or development.

Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- 3.1. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- 3.2. protect a child from physical and emotional harm or danger;

- 3.3. ensure adequate supervision (including the use of inadequate care-givers); and/or
- 3.4. ensure access to appropriate medical care or treatment.

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

Possible signs and symptoms:

- constant hunger;
- poor personal hygiene;
- constant tiredness;
- poor state of clothing;
- emaciation;
- untreated medical problems;
- no social relationships;
- compulsive scavenging; and
- destructive tendencies.

4. Sexual Abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or vulnerable adult is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

Abuse may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, images or other media of sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming and the apparent consent of the child or adult in preparation for abuse (including via the internet).

Sexual abuse can be carried out by anyone including children and vulnerable adult.

Possible signs and symptoms:

- Being excessively affectionate or knowledgeable in a sexual or inappropriate way;
- medical problems such as chronic itching, pain in the genitals, venereal diseases;

- other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia;
- personality changes such as becoming insecure or clinging;
- regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- sudden loss of appetite or compulsive eating;
- being isolated or withdrawn;
- inability to concentrate;
- lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder;
- starting to wet again, day or night/nightmares;
- become worried about clothing being removed;
- suddenly drawing sexually explicit pictures; and/or
- trying to be “ultra-good” or perfect; overreacting to criticism.

Appendix 2 - Safeguarding issues which must all be reported to the safeguarding team

All staff must be aware safeguarding incidents and/or behaviours can be associated with factors outside the college environment and can occur also between children. All staff, and especially the Designated Safeguarding Leads must consider whether children or vulnerable adults are at risk of abuse or exploitation in situations outside their families. Known as contextual safeguarding, extra-familial harms take a variety of different forms and children and vulnerable adults can be vulnerable to grooming and to multiple harms.

Sexual violence and sexual harassment:

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

As set out in Part one of Keeping children safe in education (KCSIE), all staff working with children are advised to maintain an attitude of 'it could happen here'.

Ofsted's review of sexual abuse in schools and colleges revealed how prevalent sexual harassment and online sexual abuse is for children and young people and that the issues are so widespread that they need addressing for all children and young people.

Nationally collected statistics show there has been a sharp increase in reporting of child sexual abuse to the police in recent years. Figures that include all child sexual abuse cases show the police recorded over 83,000 child sexual abuse offences (including obscene publications) in the year ending March 2020.

In the year ending March 2019, the police recorded 73,260 sexual offences where there are data to identify the victim was a child. Around one-quarter (27%) of these were rape offences.

These totals are likely to be a significant under representation of the true number of offences against young people in this age group.

Police recorded crime data (England and Wales) for year ending March 2020 indicated 51.9% of female victims and 62.4% of male victims of sexual offences were aged between 5 and 19.

NSPCC's 'How safe are our children' report 2020 found girls are particularly vulnerable to sexual abuse, accounting for around 90% of victims of recorded rape offences against 13- to 15-year-olds in England, Wales and Scotland.

The college makes it clear there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, it will not be tolerated and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys".

Challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts is unacceptable. Dismissing or tolerating such behaviours risks normalising them.

Not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

It is important to understand all of the above can be driven by wider societal factors beyond college, such as everyday sexist stereotypes and everyday sexist language.

This is why a whole college approach (especially preventative education) is important.

Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the Head of ALS.

Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Whilst not the focus of Government advice is on children, colleges should be aware their staff can be victims of sexual violence and sexual harassment. Any staff who consider themselves to be victims or at risk of such abuse should report their concerns directly to the Senior DSL and the Head of HR.

The Government definition of **sexual violence** refers to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

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

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

Sexual Harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated. It can create a hostile, offensive or sexualised environment.

Victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will likely 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.

The College safeguarding team follow Government guidance in all allegations of sexual violence and sexual harassment.

Child on Child abuse, including “sexting”.

Staff must be aware children can abuse other children (referred to as child on child abuse). This is most likely to include, but not limited to:

- bullying (including cyber bullying);
- physical abuse such as hitting, shaking, biting or other physical abuse;
- sexual violence and abuse (as detailed above);
- sexual harassment, such as sexual comments, remarks jokes and online sexual harassment;
- initiation or hazing violence or rituals;
- youth produced sexual imagery (sexting);
- The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. "Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim."

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

The College recognises that CSE and CCE involve grooming and exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases affection) in return for engaging in sexual or criminal activities.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

County lines:

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

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

“Honour based” abuse

‘Honour-based’ abuse (HBA) encompasses a range of crimes which have been committed to protect or defend the honour of a family and/or a community. Abuse can include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Staff must report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fcdo.gov.uk

By law staff must report to the police cases where they discover an act of FGM appears to have been carried out. They should also discuss any such case with the DSL who will involve children’s social services as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the member of staff does not discover an act of FGM appears to have been carried out) or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

Mental Health

Mental health problems can, in some cases, be an indicator that a person 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.

Staff are well placed to observe learners day-to-day and identify those whose behaviour suggests 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 staff are aware of how these childhood experiences, can impact on mental health, behaviour and education. If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken, following the safeguarding policy and speaking to the Designated Safeguarding Lead or a Deputy.

Children missing from education

All staff should be aware children/vulnerable adults, going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding concerns. If staff are unable to contact a learner and have concerns about their safeguarding, they must report this to the DSL who will take appropriate action.

Domestic abuse

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, religion, socio-economic status, sexuality, or background.

If staff are concerned a student may be a victim of domestic abuse, there are signs they can look out for:

- being withdrawn, or being isolated from family and friends;
- having bruises, burns or bite marks;
- having their finances controlled, or not being given enough money to buy food or drink;
- not being allowed to leave their house, or stopped from going to college or work;
- having their internet or social media use monitored, or someone else reading their texts, emails or letters;
- being repeatedly belittled, put down or told they are worthless;
- being pressured into sex or sexual contact; and/or
- being told that abuse is their fault, or that they are overreacting

Staff should refer to Annex A of KCSIE for a summary of all safeguarding categories.

Whilst we have provided a description for several safeguarding concerns, this is not an exhaustive list and for more information, definitions and resources, please refer to the College Welfare & Safeguarding Tile on MyDay which will take you to the extensive resource site.

Appendix 3 – Awareness of the “Prevent” strategy (separate Prevent Policy is available).

THIS - Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism.

The statutory Prevent Duty Guidance for Further Education Institutions (Updated April 2023) summarises the requirements for colleges.

1. Colleges are expected to assess the risk of children or vulnerable adults being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.
2. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Boards (“LSCBs”).
3. The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. All staff have undertaken training on Fundamental British values which incorporated Prevent awareness.
4. Colleges must ensure learners are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure suitable filtering is in place. It is also important schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty which can be accessed through the staff Safeguarding page on StaffNet.

1. Leadership will:
 - 1.1. establish or use existing mechanisms for understanding the risk of radicalisation;
 - 1.2. ensure staff understand the risk and build the capabilities to deal with it;
 - 1.3. communicate and promote the importance of the duty;
 - 1.4. write and regularly update a Prevent Action Plan;
 - 1.5. ensure staff implement the duty effectively;
 - 1.6. work in partnership with local Prevent co-ordinators, the police and local authorities;
 - 1.7. ensure all members of the safeguarding team and other key staff have undertaken training on “Prevent for safeguarding”; and
 - 1.8. Provide awareness training for all students.

2. Equality:

- 2.1. This duty will complement the institution's responsibility under the Equality Act 2010 and cover student welfare, including equality and diversity, the safety of students and staff and ensure there is awareness of the risks of being drawn into terrorism through Prevent awareness training.

3. Staff:

- 3.1. All staff must understand the factors that make people vulnerable to being drawn into terrorism and challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism. Staff must have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.

Appendix 4 - The Designated Staff with Responsibility for Safeguarding Children and Adults at Risk

The Senior DSL with lead responsibility for Safeguarding Children and Vulnerable Adults (the designated person) is Rhiannon Hughes, Deputy Executive Principal – Teaching, Learning & Improvement. She is a member of the College SLT. She has a duty to take lead responsibility for raising awareness with staff of issues relating to the safeguarding and welfare of children and vulnerable adults. She is responsible for ensuring she has received current and up to date training (Level 3) in Safeguarding Children and Vulnerable Adults, including undertaking refresher training at least every two years, ensuring knowledge and skills are refreshed at least annually. She should keep up to date with developments in Safeguarding Children and Adults at Risk.

The Senior DSL is responsible for ensuring all four campuses have trained DSLs and DSOs and procedures in place.

The DSLs will be responsible for:

1. overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies;
2. managing safeguarding referrals and taking appropriate action for each case;
3. providing advice and support to other staff on issues relating to Safeguarding Children and Vulnerable Adults;
4. maintaining electronic records of referrals, interventions, or concern (even where that concern does not lead to a referral);
5. regularly reviewing and reporting on safeguarding concerns logged on helpdesk to identify general areas of concern/trends and implementing targeted support if needed;
6. ensuring parents of children and vulnerable adults within the College are aware of the College's Safeguarding Policy, Procedures and Guidance;
7. liaising with the SCMP (Safeguarding Children Multi-agency Partnership) and the Kent and KMSAB (Medway Safeguarding Adults Board) and other appropriate agencies;
8. liaising with secondary schools and other agencies to ensure a smooth transition for vulnerable learners and those known to have safeguarding concerns;
9. liaising with employers and training organisations that receive children or vulnerable adults from the College on long-term placements to ensure appropriate safeguards are put in place;
10. ensuring staff receive training in Safeguarding Children and Vulnerable adults and are aware of the College procedures;
11. ensuring a designated member of staff for safeguarding is available at all times the college is open for staff to discuss concerns;
12. Provide a safeguarding duty rota for out of hours where students are in residential

accommodation (Hadlow College main site undertaken by the DSO Residential Manager, the campus senior leaders and the Senior DSL);

13. ensuring a designated member of staff for safeguarding is contactable in the event of an emergency out of normal College hours (for example, if students are on an educational trip);
14. ensuring staff understand the mandatory duty to report known cases of female genital mutilation; and
15. ensuring appropriate filtering and monitoring systems are in place to protect students from harmful online material.

The Senior DSL will provide an Annual Report to the Corporate Board setting out how the College has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the SCMP (or others) to the Corporate Board at the earliest opportunity.

Other designated members of staff with responsibility for Safeguarding Children and Vulnerable adults issues are detailed in Section 4 of the policy.

These designated members of staff:

1. report to the Senior DSL on safeguarding issues;
2. know how to make an appropriate referral;
3. are available to provide advice and support to other staff on issues relating to Safeguarding Children and Vulnerable Adults;
4. have particular responsibility to be available to listen to children and vulnerable adults studying at the College;
5. deal with individual cases, including attending case conferences and review meetings as appropriate; and
6. have received training in Safeguarding Children and Vulnerable Adults issues and receive refresher training at least every two years.

Appendix 5 - Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

If a child or vulnerable adult tells a member of staff about possible abuse:

1. inform the person you must pass the information on, but only those that need to know about it will be told. Inform them who you will report the matter to;
2. listen to the person, do not directly question them;
3. never stop a person who is freely recalling significant events;
4. make a detailed factual note of the discussion, taking care to record when and where it happened and who was present, as well as what the person said;
5. note facts, using the words of the person disclosing. Do not ask leading questions.
6. the member of college staff who is the first person to receive a report or see an injury should make detailed notes of what is seen or heard of the disclosure;
7. Immediately contact a DSL to inform them of the disclosure – don't tell other adults or young people what you have been told.
8. contact with those having parental responsibility for the child or vulnerable adult involved should not be undertaken by the first person. Contact a DSL for advice and support.
9. it may be necessary in exceptional circumstances for the child or vulnerable adult to be seen initially by the DSL on the College premises without the prior knowledge of those having parental responsibility for the child or vulnerable adult. If such an interview is necessary, then the DSL should be available to attend, particularly if this is requested by the child or vulnerable adult;
10. If any allegation is made regarding a member of staff, this must be referred immediately to the Chief Executive and Executive Principal and Senior DSL. **DO NOT DISCUSS WITH ANY OTHER MEMBER OF STAFF OR STUDENT.**
11. Never think abuse is impossible in your college, or assume an accusation against someone you know well and trust is untrue.
12. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people. Social Services and Police staff are the people trained to do this. You could cause more damage and spoil possible criminal proceedings.

If a safeguarding issue is raised out of college hours, either in residency or as part of a supervised college trip, the member of staff in charge must contact the on-duty DSL who will give advice and guidance.

Appendix 6 - Reporting and Dealing with Allegations of Abuse Against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to supply staff and volunteers. The word “staff” is used for ease of description.

1. Introduction

- 1.1. The College accepts there is a risk in all educational institutions that a member of staff may seek to cause harm to children or vulnerable adults within their institution. Moreover, due to their frequent contact with children and vulnerable adults, staff may have allegations of child abuse made against them. The College recognises an allegation of child abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. It is imperative those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.
- 1.2. The College recognises the Children Act 1989 states the welfare of the child is the paramount concern. It is also recognised hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

2. Receiving an Allegation from a Child or Vulnerable Adult

- 2.1. A member of staff who receives an allegation about another member of staff from a child or vulnerable adult, or who has concerns regarding the behaviour or attitudes of another member of staff (including “low-level” concerns) - either from direct experience or from reports by a colleague or learner(s) - should follow the guidelines set out hereafter for dealing with disclosure.
- 2.2. In accordance with updates to Keeping Children Safe in Education in September 2023, any allegation or concern regarding a member of staff should be reported immediately to the Senior DSL, DSL or Head of HR who will then act to deal with any immediate risk and report the allegation or concern to the Chief Executive and Executive Principal at the earliest opportunity. At the Chief Executive and Executive Principal's discretion, the Senior DSL and/or the Head of HR will decide who the most appropriate colleague is to investigate and address any concerns. Should the allegation be against the Chief Executive and Executive Principal or Senior DSL it should be reported directly to the designated Link Governor for Safeguarding. In all other cases, the designated investigating officer should:
 - 2.2.1. obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Chief Executive and Executive Principal or Senior DSL; and
 - 2.2.2. record information about times, dates, locations and names of potential witnesses.

- 2.3. The DSL and Head of HR should make an initial assessment of the allegation, consulting with the Senior DSL, the designated Governor, and the Local Authority Designated Officer ("LADO") prior to any investigation and:
- 2.3.1. Where the allegation is either a potential criminal act or indicates the child has suffered, is suffering or is likely to suffer significant harm, the matter should; and
- 2.3.2. It is important the Chief Executive and Executive Principal or the Senior DSL does not investigate the allegation. The initial assessment should be based on the information received and is a decision solely on whether, or not, the allegation warrants further investigation or disciplinary action.

3. Enquiries and Investigations

- 3.1. Child protection enquiries by Social Services or the Police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures.
- 3.2. The College shall hold in abeyance its own internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.
- 3.3. If there is an investigation by an external agency, for example the Police, the Chief Executive and Executive Principal (or Senior DSL by delegated authority) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Chief Executive and Executive Principal is responsible for ensuring the College gives every assistance with the agency's enquiries. He will ensure appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Chief Executive and Executive Principal (or Head of HR by delegated authority) shall advise the member of staff that they should consult with any external representative, for example, a trade union.
- 3.4. The Chief Executive and Executive Principal (or Senior DSL) will consult with the Police or other investigating agency (e.g. Social Services) particularly in relation to timing and content of the information provided and shall:
- 3.4.1. inform the learner or parent/carer/guardian making any allegation that the investigation is taking place and what the likely process will involve;
- 3.4.2. ensure the parents/carers/guardians of any learner under the age of 18 or vulnerable adult making any allegation have been informed the allegation has been made and what the likely process will involve;
- 3.4.3. inform the member of staff against whom the allegation was made of the fact the investigation is taking place and what the likely process will involve; and
- 3.4.4. inform the Chair of the Corporation (and/or designated Governor) of the

allegation and the investigation.

- 3.5. The Chief Executive and Executive Principal (or Senior DSL) shall keep a written record of the action taken in connection with the allegation.
- 3.6. In the event of an allegation or concern that has already had an impact on one or more students, the Senior DSL will coordinate with the safeguarding team to ensure appropriate support is offered to any affected individuals, including external support if required.

4. Suspension of Staff

- 4.1. Suspension should not be automatic, but reasonable precaution should be employed in each case to ensure the safety of learners primarily, and of the member(s) of staff involved. In respect of staff other than the Chief Executive and Executive Principal, suspension can only be carried out by the Chief Executive and Executive Principal (or by the Head of HR by delegated authority). In respect of the Chief Executive and Executive Principal, suspension can only be carried out in accordance with the provisions of the Corporation's Special Committee.
- 4.2. Suspension may be considered at any stage of the allegation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- 4.3. Suspension should only occur for a good reason. For example:
 - 4.3.1. where a child and/or adult is at risk; and/or
 - 4.3.2. where the allegations are, potentially, sufficiently serious to justify dismissal on the grounds of gross misconduct;
- 4.4. where necessary for the good and efficient conduct of the investigation.
- 4.5. If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.
- 4.6. If the Chief Executive and Executive Principal (or Chair or Vice Chair, of the Corporation) considers suspension is necessary, the member of staff (other than a Senior Postholder) shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.
- 4.7. Where a member of staff (other than a Senior Postholder) is suspended, the Chief Executive and Executive Principal (or Chair, or Vice Chair of the Corporation) should address the following issues:
 - 4.7.1. the Chair of Governors should be informed of the suspension in writing;
 - 4.7.2. the Chair should consider providing the Corporate Board with a report that a member of staff has been suspended pending investigation; the

detail given to the Corporate Board should be minimal;

- 4.7.3. the senior staff who need to know of the reason for the suspension should be informed, but strict confidentiality should be observed, particularly in cases of criminal investigation to minimise the risk of jeopardising any police investigation; and
 - 4.7.4. depending on the nature of and reasons for suspension, the Chief Executive and Executive Principal should consider with the nominated Governor, whether a statement to the students of the College and/or parents/carers/guardians should be made, taking due regard of point 4.7.3 and the need to avoid unwelcome publicity.
- 4.8. The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals. In the case of a criminal investigation, the Police would be responsible for providing updates.
- 4.9. The suspension should remain under review, in accordance with the Corporation's disciplinary procedures.

5. The Disciplinary Investigation

- 5.1. The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.
- 5.2. Where the member of staff has been suspended but no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling or further support.
- 5.3. The child or children or vulnerable adult making the allegation and/or their parents/carers/guardians should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

6. Allegations without foundation

- 6.1. Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept, and consideration given to a referral to the local Social Services or agency as determined by local arrangements in order that other agencies may act upon the information.
- 6.2. In consultation with the Senior DSL, Head of HR, and/or designated Governor, the Chief Executive and Executive Principal shall:
 - 6.2.1. inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support to that member of staff;

- 6.2.2. inform the parents/carers/guardians of the alleged victim the allegation has been made and of the outcome;
- 6.2.3. where the allegation was made by a child or vulnerable adult other than the alleged victim, consideration to be given to informing the parents/carers of that child or vulnerable adult; and
- 6.2.4. prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming the above action had been taken.

7. Records

- 7.1. It is important documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e., substantiated, unfounded and unsubstantiated information will be kept on the file of the person accused in line with Keeping Children Safe in Education (2023). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
- 7.2. If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College's statutory duty to inform the LADO.

Appendix 7 - Recruitment and Selection Procedures

The College's recruitment and selection procedures take account of the following, in line with Safer recruitment practices:

1. The procedures apply to staff and volunteers who may work with children or vulnerable adults.
2. The post or role, along with the key selection criteria should be clearly defined.
3. Vacancies should be advertised widely to ensure a diversity of applicants.
4. The College requires documentary evidence of academic/vocational qualifications.
5. The College requires two references (at least one professional).
6. The College checks on any identifiable employment gaps.
7. The College verifies the identity of appointees with an official form of photographic evidence.
8. Every member of appointed staff, including volunteers and temporary/agency staff, is subject to checking through the Disclosure and Barring Service (maintain sensitive and confidential use of the applicant's disclosure).
9. The College uses a variety of selection techniques through a shortlisting and interview process (e.g. qualifications, previous experience, interview, reference checks).
10. Every interview includes questions specifically relating to the applicant's understanding of safeguarding and Prevent, and answers to these questions also form part of the selection criteria.
11. Wherever possible, interviews should involve a member of HR staff, or a manager who has received safer recruitment training.
12. An online search will be conducted on a prospective member of staff.

College Governors

All newly appointed members of the Corporation will be informed in their letter of appointment that they will be subject to a Disclosing and Barring Service ("DBS") check as a requirement of the College. Each of the current Governors is subject to a DBS check and updates.

Appendix 8 – Online safety

The College makes every effort to ensure access to inappropriate material and websites on the internet via the College's IT network is discouraged and, where possible, blocked.

There is a designated Online Safety Officer, Sean McCormick (Director of IT).

Access to the College network and the internet is subject to the College's Information Technology Conditions of Acceptable Use (Staff) and Information Technology Conditions of Acceptable Use (Student) Policies.

The DSL will ensure appropriate filtering and monitoring systems are in place to protect students from harmful online material, and the College is committed to educating students in the safe use of online resources (whether in College or outside) through its tutorial programme.

Computer activity within the College is monitored at all times and improper use will result in disciplinary action for both staff and students.

Appendix 9 - Safeguarding Children Policy (Nurseries) – Dartford and Gravesend

The College Nursery, Bright Beginnings, has a duty to be aware that abuse does occur in our society. This statement sets out the procedures that will be taken if we have a reason to believe a child in our care is subject to either emotional, physical, sexual abuse or neglect. Please refer to the Bright Beginnings Nursery Policy for more details.

Our prime responsibility is the welfare and well-being of all the children in our care. As such, we believe we have a duty of care to the children, parents/carers and staff to act quickly and responsibly in any instance that may come to our attention.

Bright Beginnings will have a Designated Safeguarding Lead (DSL) available at all times, who is trained in child protection issues and procedures.

Lynne Tomlinson, Nursery Manager, Sarah Williams (Deputy) and Jemma Hudson (Deputy) are the current DSLs and will be available to offer support and advice to other members of staff whilst maintaining confidentiality.

To allow us to voice our concerns and seek out any explanations, a meeting would be arranged with the relevant parents/carers before deciding on what action to take, if appropriate. However, a meeting may not be arranged if a child could sustain significant harm.

Bright Beginnings has a duty to make a referral of any suspicions around abuse or needs of the child to the County Duty Office. This will be the responsibility of the Nursery Manager who will contact the County Duty Officer. Any written documents will be kept; however, confidentiality will be respected at all times.

The Children Act 1989 (section 47(1)) places a duty on the Local Authority/Local Safeguarding Children Board to investigate such matters.

Bright Beginnings will follow the procedures set out in the Local Safeguarding Children Board Documents and, as such, will seek their advice on all steps taken subsequently. They may also have to inform Ofsted.

The nursery has a duty to comply with all statutory guidance linked to safeguarding including:

1. Disqualification under the Childcare Act 2006 – updated 2018;
2. Keeping Children Safe in Education (KCSIE);
3. Early Years Foundation Stage (EYFS); and
4. Working Together to Safeguard Children.

In the event of an allegation against a member of staff, Area Children's Officer (Early Years) West Kent, Children's Safeguards Unit, is to be contacted as soon as possible. (Please see policy re allegation against staff).

For advice, staff can call the Nursery Area Safeguarding Advisor 03000 414 302

If staff prefer to speak to someone in the College, the College Senior Designated Safeguarding Lead is Rhiannon Hughes.

Appendix 10 - Safeguarding of Residential Students (Hadlow College)

The safeguarding of students living in accommodation on campus follows the College Safeguarding Policy. There is no separate policy required in relation to a student being resident.

In addition to the College Safeguarding Policy, we operate an out of hours emergency contact during term time. The rota is agreed at the start of each Term.

Safeguarding out of college hours, is also covered by Residential Manager, Karen King, who lives on campus, and Residential Support Officers, who have Level 3 safeguarding training. RSO's residing on campus are available to respond to a safeguarding concern if the Senior Safeguarding Lead, or their delegate is unavailable in person, as detailed in Keeping Children Safe in Education 2023. The Vice Principal – Land-based Curriculum and the Senior Designated Safeguarding Lead will also form part of the out of hours support contact.

Availability - During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and/or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead, to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

As a part of the residential National Minimum Standards, there must be additional policies and documents in place. These are listed in the Safeguarding Policy (page 2) and where relevant each document refers to residential specific guidance, examples being, the Visitors' Policy, the student Behaviour Policy and the *Medication Policy*.

Further detail regarding safeguarding residential students is available in Keeping Children Safe in Education 2023.

Boarding schools, residential special schools, residential colleges, and children's homes have additional requirements in regard to safeguarding. These relate to National Minimum Standards and regulations for the relevant setting and all schools and colleges with residential provision for children must comply with their obligations relating to them.

Schools and colleges that provide such residential accommodation and/or are registered as children's homes should, amongst other things, be alert to the extra vulnerabilities of SEND children in such settings, inappropriate pupil or student relationships and the potential for child-on-child abuse, particularly in schools and colleges where there are significantly more girls than boys or vice versa. They should, generally led by the designated safeguarding lead, work closely with the host local authority and, where relevant, any local authorities that have placed their children there.