

## Safeguarding Policy, Procedures & Guidance

Author	Deputy Executive Principal – Teaching, Learning and Improvement (Senior Designated Safeguarding Lead)
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*\* Policies will be reviewed more frequently if legal changes or good practice require*

Review History:		
Date	Reviewed by	Reason for review
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
Mar 2022	DEP and AP TLSS	Interim Review due to staff changes
Oct 2022	DEP – T, L & I	Annual Review
Aug 2023	DEP – T, L & I	Annual Review – Change of Title, Introduction of amendments needed as a result of KCSiE 2023.
Sept 2024	DEP – T,L&I and APTLSS	Annual Review – reflect changes in KCSiE 2024
Sept 2025	DEP – T,L&I and APTLSS	Annual Review – reflect changes in KCSiE 2025

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### **NKC and Hadlow 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.

### **Related National Policies and Guidance:**

- [Keeping Children Safe in Education \(Updated2025\).](#)
- [Working Together to Safeguard Children \(2023\).](#)
- [Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers \(2024\).](#)
- [Kent and Medway Safeguarding Children Partnership Procedures Manual.](#)
- [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 Acts [2005](#) and [2007](#);
- [Equality Act 2010](#); and
- [Public Interest Disclosure Act 1998](#)

and related guidance, including:

- [Keeping Children Safe in Education \(Updated 2025\). Working Together to Safeguard Children \(2018, updated 2023\)](#);
- [Kent and Medway Online Safeguarding Children Procedures](#);
- [Kent and Medway Domestic Abuse Strategy 2024-29](#);
- [KCC – Kent Safeguarding Children Multi Agency Partnership Arrangements \(March 2022\)](#);
- [KCC – Practice Guidance: Managing Allegations against Members of Staff](#);
- [Revised Prevent Duty guidance for England and Wales \(2015, updated 2024\)](#);
- [DfE Child Sexual Exploitation \(2017\)](#);
- [HM Government “What to do if you’re worried a child is being abused” \(March 2015\)](#); and
- [UKCIS \(UK Council for Internet Safety\) Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2015\)](#);
- [The Care Act 2014](#)
- [KCC Kent Adult Social Care and Health Procedures, Practice Guidance and Tools](#)
- [KMSAB Multi Agency Safeguarding Adults Policy, Procedures and Practitioner Guidance for Kent and Medway \(2024\)](#);

- [KMSAB: A quick guide – legal basis for information sharing and what can be lawfully shared \(2022\)](#)
- [KMSAB: Managing Concerns around People in Positions of Trust \(PiPoT\) \(2022\)](#)
- [KMSAB: Protocols to safeguarding adults who are at risk of exploitation, modern slavery and human trafficking \(2024\)](#)
- [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 Safeguards and promotes the welfare of children
  - 2.1.3 Raising the profile of safeguarding with students and staff in all aspects of our work;
  - 2.1.4 Recognising when there are risk factors and knowing how to respond to these;
  - 2.1.5 Educating students on how to keep themselves and others safe and how to get help when they need it; and
  - 2.1.6 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 Provides education through formal and informal processes, where children and vulnerable adults can learn to identify risk and know how to keep themselves safe.
  - 2.2.1 Takes action to enable all children and vulnerable adults to have the best outcome;

- 2.2.2 Safeguards and promotes the welfare of all students, including apprentices and learners on industry placement programmes;
- 2.2.3 Where appropriate, refers children and vulnerable adults;
- 2.2.4 Takes a coordinated approach with organisations and agencies;
- 2.2.5 Supports children in need and contributes towards the Early Help offer;
- 2.2.6 Records and acts on incidents related to a person's sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics);
- 2.2.7 Records and acts on allegations of sexual violence, abuse and harassment;
- 2.2.8 Promotes safer recruitment practices;
- 2.2.9 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;
- 2.2.10 Provides safeguarding training to all staff annually;
- 2.2.11 Offers a curriculum that promotes safeguarding and safety;
- 2.2.12 Shares information with the key three agencies, Health, Police and Social Services;
- 2.2.13 Meets the needs of students with special educational needs and/or disabilities;
- 2.2.14 Recognises that young people are capable of abusing their peers;
- 2.2.15 Takes the wishes and feelings of children into account;
- 2.2.16 Provides staff code of conduct;
- 2.2.17 Responds promptly to instances where children go missing;
- 2.2.18 Evidence compliance to the Safeguarding Children Multi-agency Partnership (SCMP) and the Kent and Medway Safeguarding Adults Board (KMSAB);
- 2.2.19 Appoints a Designated Member of Staff to promote the achievement of Care Experienced young people; and
- 2.2.20 Takes appropriate action, including referrals, to safeguard students in all settings, including at the College, in their residences, and in any other environment.

### **3. Definitions**

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

#### **3.1 Safeguarding and promoting the welfare of children**

The College will adopt the definition as outlined in *Working Together to Safeguard Children, 2023*:

- 3.1.1 providing help and support to meet the needs of children as soon as problems emerge;
- 3.1.2 protecting children from maltreatment, whether that is within or outside the home, including online;
- 3.1.3 preventing impairment of children's mental and physical health or development;
- 3.1.4 ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- 3.1.5 promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- 3.1.6 taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

#### **3.2 Safeguarding vulnerable adults**

The College will adopt the definition as outlined in Care and support statutory guidance issued under the Care Act, 2014.

- 3.2.1 protecting the rights of adults to live in safety, free from abuse and neglect;
- 3.2.2 people and organisations working together to prevent and stop both the risks and experience of abuse or neglect;
- 3.2.3 people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action; and
- 3.2.4 recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

### 3.3 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, mental health challenges, being a carer, cultural or language barriers, or being part of a marginalised group, 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 exploitation, human trafficking, and modern-day slavery, abuse, discrimination, neglect or bullying.

### 3.4 Adult at Risk

The Care Act 2014 defines an adult at risk as:

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

### 3.5 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.

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:

- 3.5.1 **Are elderly and frail**, due to physical health issues, disability, or cognitive impairments.
- 3.5.2 **Have learning disabilities** that affect their ability to process information and make decisions.
- 3.5.3 **Live with physical disabilities** or sensory impairments that limit their daily functioning.
- 3.5.4 **Experience mental health challenges**, including chronic mental illness.
- 3.5.5 **Suffer from long-term medical conditions** that require ongoing care and support.
- 3.5.6 **Struggle with substance or alcohol misuse**, impacting their well-being and decision-making.
- 3.5.7 **Serve as primary carers for others**, such as family members or friends, which may affect their own health.
- 3.5.8 **Lack the capacity to make informed decisions** and require care and support in managing their affairs.

It is important to bear in mind:

- 3.5.9 Vulnerability is not always visible;
- 3.5.10 Vulnerability is often not a permanent state;
- 3.5.11 Anyone can be vulnerable at different stages of life;
- 3.5.12 A person with visible vulnerabilities may not perceive themselves as vulnerable;
- 3.5.13 Vulnerable people may also pose risks and cause harm.
- 3.5.14 Refugees and asylum seekers inherently fall under this definition of vulnerability due to their unique circumstances.
- 3.5.15 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.
- 3.5.16 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.

### **3.6 Mental Capacity**

The Mental Capacity Act 2005 provides the legal framework for acting and making decisions on behalf of individuals who lack 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 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:

- 3.6.1 A person must be assumed to have capacity unless it is established that they lack capacity;
- 3.6.2 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;
- 3.6.3 A person is not to be treated as unable to make decisions merely because he/she makes an unwise decision;
- 3.6.4 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;
- 3.6.5 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.

### **3.7 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, where relevant, 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 lead responsibility for safeguarding for the academic year 2024/25 and onwards. All Governors must undertake safeguarding training as part of their induction and update this regularly.

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 (supported by **Rachael Moore**, Assistant Principal – Teaching, Learning and Student Services) and the **DSL is Rebecca Skinner** – Head of Welfare & Safeguarding.

The College also maintains a team of Level 3 DSL trained staff to manage safeguarding across all college sites including two Deputy Designated

Safeguarding Leads (DDSLs) and several Designated Safeguarding Officers (DSOs).

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 (using the online ACCESS training modules).

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 regular updates within each academic year.

All members of staff have been provided with the update to “Keeping Children Safe in Education” (2025) 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.

Annually, staff should log in to the safeguarding recording system (MyConcern) to ensure they have an accessible account to log safeguarding concerns, and they remain ‘active’ users.

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.

#### **4.6 Use of College premises for non-college activities**

In line with KCSiE (2025) 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 there are arrangements in place for the provider to liaise with the College on these matters where appropriate. This applies regardless of whether 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 graded by Ofsted as “met” or “not met.” During an inspection the college may be given the opportunity to address minor improvement to its safeguarding practice, if the necessary steps can be taken the standard is deemed as “met.” If the college is judged not to have met the required safeguarding standards and more significant improvements are needed, the inspection may be suspended provided the necessary issues can be resolved in 3 months and other aspects of the inspection are complete.

The residential accommodation at Hadlow for 16–18-year-old students is inspected under the [Social Care Common Inspection Framework \(“SCCIF”\), updated 2024](#)

When evaluating Safeguarding, inspectors are considering whether:

- The provider establishes an open and positive safeguarding culture that puts learners’ and apprentices’ interests first
- Leaders take an effective whole-provider approach to safeguarding

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:**

- 1.1. unexplained recurrent injuries or burns;
- 1.2. improbable excuses or refusal to explain injuries;
- 1.3. wearing clothes to cover injuries, even in hot weather;
- 1.4. refusal to undress for activities;
- 1.5. bald patches;
- 1.6. chronic running away;
- 1.7. fear of medical help or examination;
- 1.8. self-destructive tendencies;
- 1.9. aggression towards others;
- 1.10. fear of physical contact - shrinking back if touched;
- 1.11. admitting that they are punished but the punishment is excessive (such as a child being beaten every night to "make him study"); and/or
- 1.12. 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 adult's 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction.

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:**

- 2.1. physical, mental and emotional development lags;
- 2.2. sudden speech disorders;
- 2.3. continual self-depreciation ("I'm stupid, ugly, worthless, etc.");
- 2.4. over-reaction to mistakes;
- 2.5. extreme fear of any new situation;
- 2.6. inappropriate response to pain ("I deserve this");
- 2.7. neurotic behaviour (rocking, hair twisting, self-mutilation); and/or
- 2.8. 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:**

- 3.5. constant hunger;
- 3.6. poor personal hygiene;
- 3.7. constant tiredness;
- 3.8. poor state of clothing;
- 3.9. emaciation;
- 3.10. untreated medical problems;
- 3.11. no social relationships;
- 3.12. compulsive scavenging; and
- 3.13. 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 a child or adult in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children or vulnerable adults.

### **Possible signs and symptoms:**

- 4.1. Being excessively affectionate or knowledgeable in a sexual or inappropriate way;
- 4.2. medical problems such as chronic itching, pain in the genitals, venereal diseases;
- 4.3. other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia;
- 4.4. personality changes such as becoming insecure or clinging;
- 4.5. regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- 4.6. sudden loss of appetite or compulsive eating;
- 4.7. being isolated or withdrawn;
- 4.8. inability to concentrate;
- 4.9. lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder;
- 4.10. starting to wet again, day or night/nightmares;
- 4.11. become worried about clothing being removed;
- 4.12. suddenly drawing sexually explicit pictures; and/or
- 4.13. trying to be “ultra-good” or perfect; overreacting to criticism.

## **Appendix 2 - Safeguarding issues which must all be reported to the Welfare and 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 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 college. 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. It should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys".

The College will challenge 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 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, and the college will raise awareness of the issue through specific training for staff and students.

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:

1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
2. the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
3. 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 (or deputy).

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.

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.

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

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

1. a child under the age of 13 can never consent to any sexual activity
2. the age of consent is 16
3. sexual intercourse without consent is rape

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#).

**Sexual Harassment:** Defined as 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college. Sexual harassment is likely to violate a person'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.

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

1. sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
2. sexual "jokes" or taunting
3. physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim
4. displaying pictures, photos or drawings of a sexual nature
5. upskirting (this is a criminal offence), and
6. online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - 6.1. consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of those aged under 18 is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for colleges
  - 6.2. sharing of unwanted explicit content
  - 6.3. sexualised online bullying
  - 6.4. unwanted sexual comments and messages, including, on social media

- 6.5. sexual exploitation; coercion and threats, and
- 6.6. coercing others into sharing images of themselves or performing acts they're not comfortable with online

It is important that the College considers sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their Peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

If a complainant is deemed to have known or to have reasonably been expected to know that an allegation was unfounded, the allegation of harassment may be judged to be vexatious or malicious, and disciplinary action may be taken against them. No action will be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

The College Welfare and Safeguarding Team follows Government guidance in all allegations of sexual offences (Appendix 12 Flowchart for Managing Allegations of Sexual Offences) and will be logged on MyConcern.

#### Child-on-child abuse, including "sexting".

Staff must be aware children can abuse other children (referred to as child-on-child abuse) and that it can happen both inside and outside of college and online. This is most likely to include, but not limited to:

1. bullying (including cyber bullying);
2. abuse in intimate personal relationships between children
3. physical abuse such as hitting, shaking, biting or other physical abuse;
4. sexual violence and abuse (as detailed above);
  - 4.1. sexual harassment, (as detailed above); 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;
  - 4.2. consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
  - 4.3. upskirting, typically involves taking a picture under a person's clothing without consent, with intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm ([The Voyeurism \(Offences\) Act 2019](#));
  - 4.4. initiation or hazing violence or rituals;

## 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, locally and throughout 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 several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

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

So-called ‘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](mailto: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. For further information see:

1. [Mandatory Reporting of Female Genital Mutilation – procedural information;](#)
2. [FGM Fact Sheet;](#)

3. [FGM Resource Pack; and](#)

4. [Multi-agency statutory guidance on female genital mutilation](#)

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. Students can self-refer to the College's mental health service. Both staff and students can access resources via MyDay pages. 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 who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

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, socioeconomic status, sexuality, or background.

Domestic abuse is an act or repeated acts over time from one person towards another with whom they are **personally connected**. Both individuals must be 16 years or older. The acts are threatening, controlling, coercive, or physically, emotionally, psychologically or economically abusive.

Individuals are personally connected if any of the following conditions apply: they are or have been married, they are or have been civil partners, they have agreed to marry (regardless of whether that agreement has been terminated), they have entered into a civil partnership agreement (regardless of its termination), they are or have been in an intimate personal relationship, they each have or have had a parental relationship concerning the same child, or they are relatives.

The [Domestic Abuse Act 2021](#) recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. All children can witness and be negatively affected by domestic abuse within their home when it occurs between family members. Experiencing domestic abuse can lead to serious, lasting emotional and psychological impacts, and some children may blame themselves for the abuse or may be forced to leave their family home as a result.

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

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

Staff should refer to Annex A and Annex B 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 (see: [Prevent Policy](#)).

[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 England and Wales \(updated March 2024\)](#) replaces the ‘Revised Prevent duty guidance: for England and Wales’, the ‘Prevent duty guidance: for further education institutions in England and Wales’, and the ‘Prevent duty guidance: for higher education institutions in England and Wales’ of 2015 (updated in April 2021).

The overall aim of our counter-terrorism strategy, CONTEST, is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. Prevent remains one of the key pillars of CONTEST, alongside the other three ‘P’ work strands:

1. Prevent: to stop people becoming terrorists or supporting terrorism
2. Pursue: to stop terrorist attacks
3. Protect: to strengthen our protection against a terrorist attack
4. Prepare: to mitigate the impact of a terrorist attack

The Guidance summarises the requirements for specified authorities (including colleges):

**Leadership and Training:** Specified authorities must establish effective leadership and appoint a senior management lead for Prevent initiatives. All education providers should ensure that relevant staff receive comprehensive training on radicalisation, extremist ideologies, and their role in countering terrorism. They should highlight the importance of Prevent and the critical role staff play in countering terrorism. Designated Safeguarding Leads (DSLs) and Prevent Leads should undergo in-depth training, updated at least every two years, to effectively make referrals and work with Channel panels. Specified authorities should also demonstrate an awareness of radicalisation risks by ensuring and recording that appropriate staff undertake training. Prevent requirements form part of the setting’s wider safeguarding responsibilities. The guidance should be read alongside [‘Working together to safeguard children’](#) and [‘Keeping children safe in education’](#).

**Collaboration and Risk Management:** Authorities should collaborate with local Prevent leads, police, and local authorities through multi-agency forums. Education providers must cooperate with local authority-led Channel panels to share necessary information for assessing risk and support needs. Specified authorities may need to share information to ensure individuals at risk of radicalisation receive appropriate support, complying with data protection legislation. Regular risk assessments are essential to understand and manage radicalisation risks, enabling a tailored approach to support. Specified authorities should have proportionate and appropriate capabilities to manage risk. The Prevent [national referral form](#) should be used when making referrals. Settings should disrupt efforts to radicalise others and prevent the spread of terrorist-linked content by denying platforms for such activities.

**Understanding and Addressing Extremism:** Staff interacting with the public should be familiar with ‘radicalisation’, ‘terrorism’, and ‘extremism’, knowing how to escalate concerns to the DSL or Prevent Lead, who can then refer to the police or local authority. Awareness should extend to both violent and non-violent extremism, including divisive narratives linked to terrorism. Prevent aims to limit exposure to radicalising narratives, both online and offline, and create environments where extremist ideologies are challenged. Resources such as [Educate Against Hate](#) and [GOV.UK Prevent duty training](#) provide valuable information on these topics.

**Policies and Due Diligence:** Education providers should implement clear policies to identify and support individuals at risk of radicalisation, informed by local threat assessments. Settings should conduct a risk assessment for potential radicalisation risks to learners or staff and create an action plan to address identified risks. Settings should ensure that training materials are context-appropriate, sourced from authoritative entities, and do not undermine Prevent. Providers should conduct due diligence on external advice and training resources, ensuring that materials do not support extremist narratives.

**Preventing Exploitation and Promoting Values:** Measures must be in place to prevent the exploitation of facilities by radicalisers, ensuring that event spaces and IT equipment are not used to spread extremist narratives. Settings should not provide a platform for offences to be committed, such as encouraging terrorism, glorifying acts of terrorism, or supporting proscribed terrorist organisations. Educational settings should encourage respectful discussions on sensitive topics while fostering an environment that upholds Fundamental British Values—democracy, rule of law, individual liberty, and mutual respect, and respect for protected characteristics under the Equality Act 2010. Additionally, Further and Higher Education institutions should uphold freedom of speech and academic freedom while conducting due diligence when awarding Prevent funding or contracts.

**IT Usage and External Speakers:** Further and higher education institutions should have clear policies governing the use of IT equipment and networks for researching terrorism and counter-terrorism. Providers should consider filtering access to harmful content. Additionally, settings must assess the risks posed by external speakers and events, ensuring that they do not provide a platform for promoting terrorism or extremist ideologies. When deciding whether to host a particular speaker, settings should carefully consider whether the views expressed could encourage participation in or support for terrorism. Due diligence is recommended when evaluating potential speakers.

## **Department for Education**

The DfE has also published advice on [Prevent duty: safeguarding learners vulnerable to radicalisation](#) which can be accessed through the staff Safeguarding page on StaffNet.

The Prevent duty requires education providers to help prevent individuals from becoming terrorists or supporting terrorism by safeguarding learners from extremist ideologies and radicalisation. It is crucial to consider the needs of children, young people, and adult learners

throughout the safeguarding process, integrating radicalisation concerns into existing safeguarding practices.

### **Key Guidelines:**

Safeguarding learners susceptible to radicalisation into terrorism relies on effective partnerships. To comply with the Prevent duty, colleges providers must demonstrate:

1. Productive cooperation with local Prevent staff, police, and local authorities; and
2. Coordination through existing multi-agency forums.

Strong partnerships will help ensure an understanding of referral routes for safeguarding against radicalisation and extremism.

By adhering to these guidelines, education providers can effectively fulfil their Prevent duty and contribute to the safeguarding of all learners.

The College will:

1. identify the Prevent referral process within the Local Authority;
2. establish partnerships with Local authority Prevent leads, DfE regional Prevent coordinators, local authority children or adult services, safeguarding children partnership and local policing teams;
3. contact partners to understand the local risk and threats;
4. understand radicalisation and why learners may be susceptible to being drawn into terrorism;
5. be familiar with available support (social care, police, Prevent teams) for individuals at risk and consider how assistance can be provided by the College; and
6. consider how curriculum can build resilience to radicalisation for all learners.

### **Staff Responsibilities**

All staff should remain vigilant for concerning behavioural changes in learners and report these to the Designated Safeguarding Lead (DSL) or Prevent Lead immediately. Recognise that vulnerable learners may be susceptible to various risks, including sexual exploitation, extremism and radicalisation, or serious violence. Staff should refer to the Safeguarding Policy and Prevent Policy.

If staff need to report extremism concerns about an adult working in the College they should speak to the Senior DSL, DSL or Head of HR immediately.

## 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 when the college is open for staff to discuss concerns;

12. ensuring staff understand the mandatory duty to report known cases of female genital mutilation; and
13. 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 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, ask open questions to ensure clarity and accuracy;
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 (or Deputy) 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 Deputy Executive Principal – Teaching, Learning & Improvement (Rhiannon Hughes), Assistant Principal – Teaching, learning & Student Services (Rachael Moore), Head of Welfare & Safeguarding (Rebecca Skinner) or Director of People (Kerrie Francis), who will inform the Chief Executive & Executive Principal. They will then decide whether it meets the threshold to make a referral to the Local Authority Designated Officer (LADO). **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; and
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/Trip Leader must contact their UK based Senior Contact Manager who will contact the Senior DSL who will give advice and guidance.

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

The procedures apply to all staff, whether teaching, 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 2025, 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 if not made directly through our online systems; 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 Director of People should make an initial assessment of the allegation, consulting with the Senior DSL; 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 be referred to the LADO and where applicable, the police; 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 by delegated authority) 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. This should be completed once agreed with LADO and/or police; 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**

- 1.1. 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 to 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.
- 1.2. Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and is therefore not an indication of culpability. The College will follow process set out in the Staff Disciplinary Policy and Procedures, and guidance from the LADO, when making a decision to suspend an employee from their duties.
- 1.3. In the event that 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 of the decision and reasons for the decision in writing. They will also be expected to co-operate fully with any investigation and to ensure they are available for interview during their normal working hours.
- 1.4. 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:
  - 1.4.1. 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
  - 1.4.2. 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.
- 1.5. 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. 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. It should always be documented in our own college systems for record.
- 6.2. In consultation with the Senior DSL, Director of People, 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 (2025). 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 Senior 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; this includes raising awareness of the correct and safe use of AI, misinformation, disinformation, fake news and conspiracy theories.

Computer activity within the College is always monitored and improper use may 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), **Jemma Hudson** (Deputy) and **Kare Barham** 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.

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 DSL 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 2025. 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 2025:

*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.*

## Appendix 11 - Safeguarding Risk Assessment Guidance

### 1. Scope

The guidance herein relates to all North Kent College, “the College”, which includes Hadlow College.

### 2. Introduction

The essence of risk management is dealing with uncertainties and reducing or removing risk factors. It is **not** about eliminating, avoiding, or removing *all* risk.

The process of risk assessment has three main stages:

**Identify the risk** – have a good look at the situation, people involved, location, course and contextual factors, and spot what could go wrong.

**Analyse the risks** – decide how serious and likely the risks are.

**Control the risks** – do whatever you think is necessary to reduce the chances of things going badly wrong.

We then need to ask ourselves if we are willing to accept the reduced risk.

### 3. Circumstances

Risk assessments can come about from various sources i.e., information received from an alleged victim or witness, or even the alleged perpetrator themselves. Information may also come from other domains such as police, social services, schools, or parents/carers.

Always have respectful uncertainty and professional curiosity, be aware of being drawn in to ‘siding’ with one side. If you find yourself getting drawn to a side, consider why this might be, what is this person saying or indicating that’s causing you to lean towards them? Could this be a sign that they are manipulating a situation? In your role, you must remain impartial and objective.

### 4. Identifying risks

Identifying risks involves scrutinising all operations involving learners, home situation, staff/volunteers and the wider college community and asking:

**What are the risks?**

**What could go wrong?**

What are the potential dangers, potential risky situations, or problems that might occur because of, or related to student(s) being on site? The aim is to produce a full list of risks. Consider the five areas below that may be put at risk:

**People** – Learners (including alleged victim, witnesses, perpetrator(s)), the wider college community (children, young people, vulnerable adults, staff, volunteers), the public, others.

**Property** – premises, equipment, vehicles, financial assets.

**Income** – current and future income (i.e. consideration for withdrawals).

**Reputational** – reputation with learners, parents/carers, supporters, community, future students etc.

**Liability** – legal and moral, claims and associated costs.

## 5. Analysing and assessing risks

The next step is to analyse and assess the risks on the full list. All risk assessment works based on two key dimensions:

**Who may be harmed?**

**How likely is this to happen?** (Chances are, likelihood of occurrence / probability of happening).

**How serious would this be if it did happen?** The ‘ouch factor’ (severity of impact / magnitude of harm).

**The interplay between these questions.**

These two key dimensions (see above) – ‘chances are’ (likelihood of occurrence/probability of happening) and the ‘ouch factor’ (severity of impact/magnitude of harm) – can be graded qualitatively or quantitatively on a scale of 1-5. The two scores are then multiplied together for your risk factor.

For example, on a five-point scale the risk of a volunteer stealing from a client would be unlikely (score 2) but intolerable (5) = total score of 10. The risk of a sprained ankle in a football match could be possible (4) but trivial (1) = 4.

Chances / likelihood of risk happening				
Very Low	Low	Medium	High	Very High
<i>Rare</i>	<i>Unlikely</i>	<i>Moderate</i>	<i>Likely</i>	<i>Almost Certain</i>
<i>Impossible</i>	<i>Remote</i>	<i>Possible</i>	<i>Probable</i>	<i>Likely</i>
<b>Score 1</b>	<b>Score 2</b>	<b>Score 3</b>	<b>Score 4</b>	<b>Score 5</b>

‘Ouch’ factor / severity of impact				
Negligible	Slight	Moderate	Severe	Major
Insignificant	Minor	Moderate	Significant	Catastrophic
Superficial	Marginal	Moderate	Critical	Fatal
<b>Score 1</b>	<b>Score 2</b>	<b>Score 3</b>	<b>Score 4</b>	<b>Score 5</b>

The matrix shows the pattern of scores if you give the risk a score between 1 and 5 and multiply the two scores together.

<i>Likelihood</i>						
<b>Very High</b> Almost / Certain	5	10	15	20	25	
<b>High</b> Likely / Probable	4	8	12	16	20	
<b>Medium</b> Moderate / Possible	3	6	9	12	15	
<b>Low</b> Unlikely / Remote	2	4	6	8	10	
<b>Very Low</b> Rare / Impossible	1	2	3	4	5	
	<b>Negligible</b> Insignificant / Superficial	<b>Slight</b> Minor / Marginal	<b>Moderate</b>	<b>Severe</b> Significant / Critical	<b>Major</b> Catastrophic / Fatal	<b>Severity</b>

Those that appear in the bottom left corner of the risk matrix (coloured green) are clearly much less of a concern than those in the top right corner (coloured red). The acceptable risk tolerance level we are willing to accept are colour-coded green and yellow (1-7), we will not accept risks graded 8-25 (colour-coded orange and red).

The decision to keep a learner on site, depends on the nature of the allegation, level of access they will have to the alleged victim, predicted recurrent risk and other details and circumstances identified.

Deciding on the severity of alleged harm is not an exact science and must be reliant on a degree of 'common sense', therefore, grading the risk and the risk matrix only provides a partial judgement on risk.

## 6. Controlling risks

Once risks have been identified and assessed, the next step is to decide on the strategies for dealing with them. There are three basic approaches:

**Reduce or remove the risk.**

**Minimise the harm if the risk materialises.**

**Transfer the liability.**

It is recommended that a minimum of 2 persons undertake separate risk assessments when making decisions after disclosures are received about an individual(s).

These should be completed separately and both points of view discussed until consensual agreement is reached rather than one form being completed by one person and reviewed by another, or one form completed with the two people together.

Consider:

- The seriousness of the alleged offence itself and the circumstances around it
- The chances or opportunities in the College for this to happen again.
- The severity of the impact this would have if it were to happen again.
- What measures can effectively be put in place to minimise the risk.

## 6.1. Factors to Consider

### 6.1.1. General

Has this already been reported to police? Outcome?

Other information from other agencies – what else can we learn from social services/police/parents?

Statement from alleged victim and any potential witnesses

Attitudes to allegation?

Will alleged victim take the matter further with police? If not, why not? Not blaming but understanding reasons for their decision.

What is victim's understanding of reporting/not reporting this matter – immediate consequences for all, long term consequences?

What level of supervision can be given to ensure paths do not cross?

Consider how circumstances may be managed to decrease risk, if possible.

The frequency of review and whether a further risk assessment may be desirable in certain circumstances after a period of agreed time.

### 6.1.2. Static Risk Factors

Factors that are always present:

**Prior criminal/behaviour history** – number, type, and age of convictions are best practice indicators of future re-offending. Research shows the number of offences committed is an indicator of future re-conviction.

**Prior history of alleged victim** – prior false allegations, wider contextual/child-on-child (peer-on-peer) issues

**Breaches** – Breach of previous College restrictions, Bail Conditions, Court Orders, increase risk.

**Criminal Versatility** – Research evidence suggests that generic offenders are more prolific and are more likely to re-offend than offenders who specialise in one type of offence, i.e., Violence

against the person, Sexual Offences, Burglary, Robbery, Theft and Handling, Fraud and Forgery, Criminal Damage, Drug Offences, Motoring Offences, Public Order Offences.

**Severity of Offence / Did offences include any of the following?**

Research indicates when certain factors present there is an increased likelihood of further incidents of serious harm.

- 6.1.2.1. Carrying or using offensive weapon;
- 6.1.2.2. Any violence, threat of violence or coercion;
- 6.1.2.3. Excessive use of violence or sadistic violence;
- 6.1.2.4. Arson;
- 6.1.2.5. Physical damage to property (but not if caused when committing another offence i.e., Burglary/Theft); and/or
- 6.1.2.6. Sexual element to offending i.e., theft of underwear.

**Why did the offence(s) happen? (Circumstances)** – Consider specific motivational factors - sexual motivation, financial motivation (this will probably include most offences of dishonesty), addiction/perceived need, emotional state, racial motivation or hatred of other identifiable groups, thrill seeking.

**Disinhibitors present at time of offending and/or now** – alcohol, drugs, non-compliance with medication for psychiatric problems, use of pornography, emotional state, mental health issues, additional learning needs (**SEND/EHCP**)

**Do offences form part of an established pattern?** Might not be same category of offence but could stem from same motivation i.e., burglary, break-ins, thefts, fraud (financial) or offences could all be alcohol-related i.e., drink/driving, drunk and disorderly, assault when under the influence of drink.

**Dynamic Risk Factors** – Factors which are likely to change and increase or reduce risk and other factors affect likely risks for the subject:

These relate to changes in the learner's lifestyle, attitude, and behaviour since the alleged incident:

**Maturity** – Research indicates that risk reduces after age 24.

**Time gap since offence** – If 10 years + significantly reduce risk, if within last 2 years treat with more caution and weigh against other factors, especially if still under age 24. Beware of re-occurring pattern over extensive periods of time i.e., regular gaps or periods when couldn't offend due to being in young offenders' provision or prison etc.

**Evidence of positive changes in lifestyle/stability** – accommodation, relationships, employment, training and education, associates, drugs and alcohol, emotional wellbeing.

**Evidence made to address issues relating to offending behaviour** – Anger Management Course, counselling for emotional problems, seeking help for drug/alcohol abuse.

**Positive references** – is there positive feedback from tutors, HoCs, etc.

### 6.1.3. **Alleged Perpetrator Profile:**

What has he/she learnt from these events, how, in what ways?

Ask about the impact of the offences on others? (To see if there is empathy for the alleged victim).

What increases the likelihood of such things happening/this behaviour, what decreases the likelihood? Have they taken steps to reduce risk from these behaviours? Do they know how to do this? How likely are the riskier circumstances and what might precipitate risky behaviour in your view.

The vocational course – understand the course well, is there anything within the course that may increase the risk to the alleged victim or others within the wider college community?

What is his/her approach to keeping themselves out of trouble?

What is his/her attitude to children's/vulnerable adult's safety/suitable boundary keeping?

How might them attending College be possible given what we know - i.e. what additional boundaries would he/she agree to? i.e. constant supervision, regular meetings with a supervisor/ small group, logged entrance on/off site through reception only?

Would he/she agree to a clearly defined agreement in relation to what activities they engage in, in the College, whether or not they are solely activities with children or vulnerable adults?

How would he/she react if others came to know about the allegations inadvertently and how does he/she think the College community might react?

Other information – Consider any information relevant, i.e., family situation, who they have to care for, work and home, who does he/she particularly relate to/befriend at College, i.e., vulnerable learners with additional learning needs, single females? Etc.

#### 6.1.4. **General Risks to Consider**

The below list is not exhaustive:

- 6.1.4.1. Risk of assault;
- 6.1.4.2. Risk of victim/witness intimidation (threats, harassment, violence);
- 6.1.4.3. Risk of harm to alleged perpetrator (threats, harassment, violence);
- 6.1.4.4. Wider college community; and
- 6.1.4.5. Reputational damage

Ongoing management of risk in the College context often involves the need to consider that the subject of the assessment will have an ongoing relationship with the College even if he or she is not allowed to be on site.

Good practice in the pastoral care and management of risk would suggest that a small group (3-5 people) such as a 'circle of support', should manage those who present an ongoing risk and continue to be part of College life.

A formal signed agreement could be developed with the subject's involvement, concerning the pastoral care offered by the College and the boundaries that he or she should maintain.

This agreement should be reviewed regularly, at least termly and when circumstances change.

Careful attention needs to be given in developing the agreement concerning how the subject may continue their course, while priority is given to the management of risk.

## 7. **Recommendations**

These are extremely useful and will help to clarify issues. Recommendations will include an assessment of whether the College can supervise someone adequately. Also consider – who else should know? What level of knowledge about this should be known in the local situation? What level of knowledge would decrease risk? Is there a case for a 'need to know group'?

Examples (in blue) of a Risk Assessment Form (1-7=tolerable, 8-25=not tolerable).

Name: Age: Curriculum Area: Campus: HoC:

	Information	MM Alleged to have sexually assaulted female learner (FF)			Current			Revised			Tolerable?
	Risk	Mitigating Factors	Safeguarding Measures to Minimise Risk	Likelihood	Severity	Risk Grade	Likelihood	Severity	Risk Grade	Y/N	
1	MM sexually assaults same or another learner	Police have taken no further action (NFA) in their criminal investigation. Learner does not support police investigation. Both learners have been onsite together for last 4 months. No prior allegations made about MM. MM and FF were in relationship at time of alleged offence. Alleged offence took place in a car off site, is therefore contextual and unlikely to reoccur in context of course duties.	MM to be supervised on the course MM to not be alone with FF or other female learners MM's card be blocked and only access site via reception MM to be met at reception by tutor MM to be placed on an interim safeguarding agreement with Monitoring & Support Group (MSG) MM to complete safeguarding tutorial.	2	4	8	1	4	4	Y	
2	Offences against MM, including assault, verbal abuse, harassment due to third parties obtaining confidential information on MM	Limited people will be aware of the allegation College community is supportive in nature and unlikely to engage in acts of aggression/abuse/harassment	There will be an interim safeguarding agreement in place, other than those on the MSG, information will not be publicly available, and all data will be stored according to secure Tutor/WSO to hold supervisory sessions with MM to allow MM to raise concerns he may have MM also has Head Welfare & Safeguarding or WSO contact details should he have concerns or issued to be raised	1	3	3	1	3	3	Y	

	Information	MM Alleged to have sexually assaulted female learner (FF)		Current			Revised			Tolerable?
				Likelihood	Severity	Risk Grade	Likelihood	Severity	Risk Grade	Y/N
	Risk	Mitigating Factors	Safeguarding Measures to Minimise Risk							
3	MM alone on premises when other learners may be present	College is rarely 'empty' with staff freely coming/going The under 16 children on site are looked after by staff from the nursery	MM's card to be blocked and only access site via reception MM to be met at reception by tutor	2	2	4	1	2	2	Y
4	Reputational damage	College risk assessment	As risk 1	2	3	6	1	3	3	Y

Additional rows should be added to include further risks as necessary.

**Name of person(s) completing risk assessment:**

**Date:**

**Role:**

**Signed:**

## Appendix 12 - Flowchart for Managing Allegations of Sexual Offences

This flowchart should be considered as a general guide for how allegations of Sexual Offences will be managed but it cannot account for all variables in each case. Considerations may need to be made for SEND and any additional vulnerabilities, therefore each case must be dealt with on a case-by-case basis and may, as a result, deviate from this flowchart where this is in the best interests of the individuals involved.

