Vulnerable Adult, Child Protection & Safeguarding Policy (Draft)
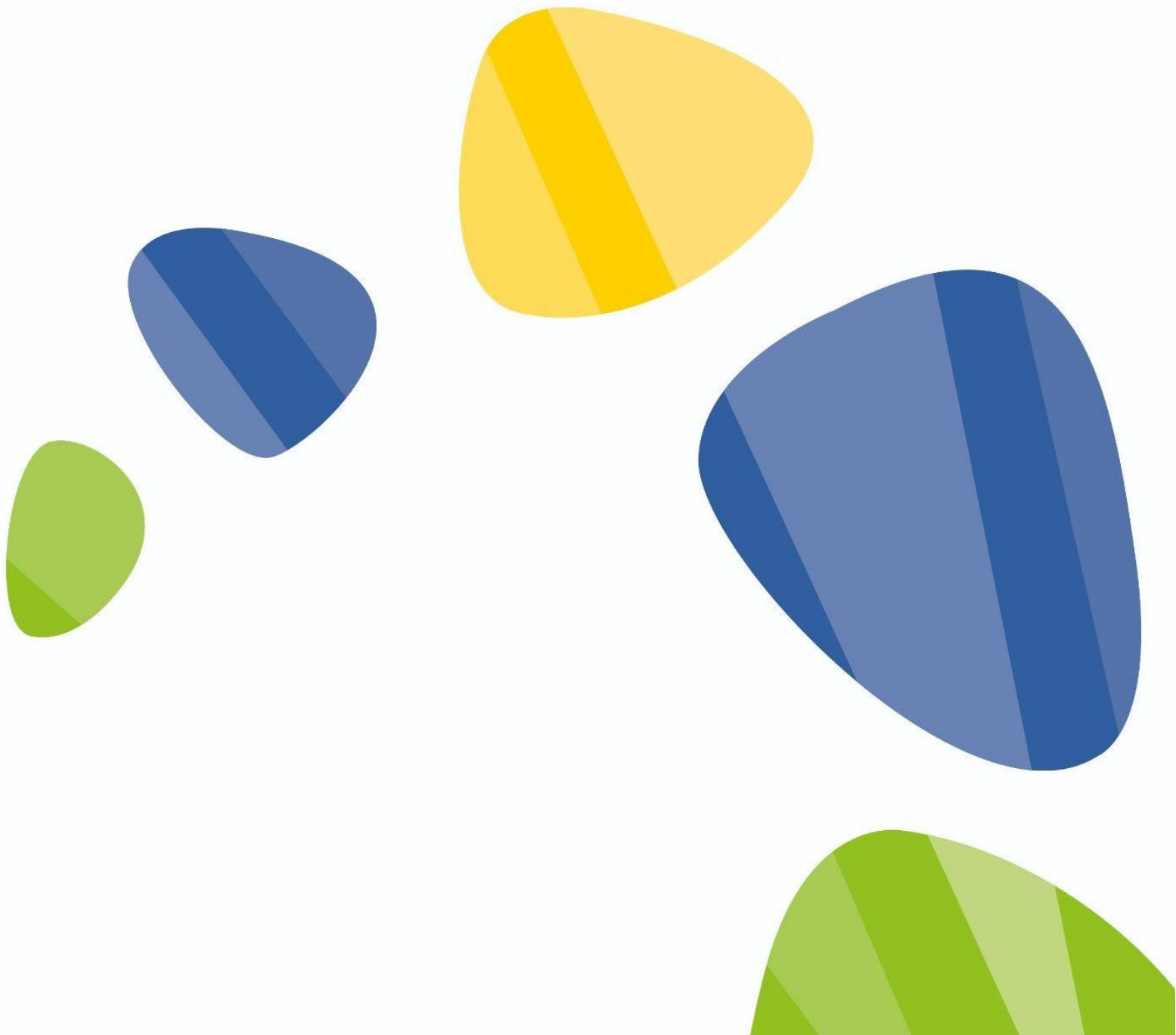
Purpose & Scope: This policy is written to ensure all students, staff, parents, Governors, Trustees, Inspectors, the LA and other relevant stakeholders are fully aware of the purpose, nature of the Vulnerable Adult, Child Protection and Safeguarding Policy to ensure that everyone is aware of how we safeguard students to identify possible signs of abuse and to help keep themselves safe.

Complied by: Kevin Latham & Gareth Ivett	Date: August 2025
Committee: College Board of Trustees	Date agreed by Trustees: Sept 2025
Review Cycle: (annually, 2 years, 3 years): Annually	Review Date: August 2026

Wellbeing in our Trust

We may all be affected by poor physical and mental health at times during our lives and it is important the appropriate support is available in a timely manner.

Health and wellbeing is everyone's responsibility and we encourage an open and honest culture whereby anyone can discuss any issues they may have.

The Trustees of Creating Tomorrow take the health and wellbeing of all employees seriously and are committed to supporting our staff. The Trustees ensure that support for staff is available through:

- Effective line management
- Commitment to reducing workload
- Supportive and professional working environments
- Employee support programs
    - Education Support: telephone number 08000 562561 or website www.educationsupport.org.uk

Policy Review

Our Vulnerable Adult,Child Protection and Safeguarding Policy is always reviewed and written with due regard to the latest statutory guidance and KCSIE. KCSIE is updated annually, coming into force from 1st September each year. Our Trustees ensure that our college is aware of the proposed guidance changes (as highlighted in the draft KCSIE documentation), and plan annual safeguarding updates accordingly.

The trustees have sight of our draft documentation, and the policy will be ratified annually, at the earliest meeting of the trustees following the final publication version of KCSIE for the coming academic year

Contents

1. Key Safeguarding Contacts

At Creating Tomorrow College, the named personnel with designated responsibility for safeguarding are:

Name	Contact Details
Rebecca Partridge, Assistant Principal, DSL	rpartridge@creatingtomorrowcollege.co.uk 07483 045185
Carole Wilson-Frizzell, Assistant Principal, DDSL	cwilson-frizzell@creatingtomorrowcollege.co.uk 07485 303128
Gareth Ivett, Principal, DDSL	givett@creatingtomorrowcollege.co.uk 07990 012330
Sarah Grist, Campus Leader – Daventry Campus, DDSL	sgrist@creatingtomorrowcollege.co.uk 07483 037970
Ben Childs, Campus Leader – Wellingborough Campus, DDSL	bchilds@creatingtomorrowcollege.co.uk 07483 030151
Rachel Bond, Campus Leader – Lutterworth Campus, DDSL	rbond@creatingtomorrowcollege.co.uk 07483 045158
Rachel Parmanum, Campus Leader – Kettering Campus, DDSL	rparmanum@creatingtomorrowcollege.co.uk 07485 314289
Kevin Latham, CEO, DDSL	KLatham@creatingtomorrowtrust.co.uk 01536 856467 / 07825915272

The named personnel with Designated Responsibility regarding allegations against staff are: (Please see the whistleblowing policy for full details and list of appropriate persons to raise a concern with if appropriate)

Designated Senior Manager	Deputy Designated Senior Manager	Chair of Trustees (in the event of an allegation against the Principal or Trust Leadership Team)
Gareth Ivett, Principal	Rebecca Partridge, Assistant Principal	Ian McAlister College Chair of Trustees *Numbers can be obtained from eedwards@creatingtomorrowtrust.co.uk

Name and contact details of the link governor/s for safeguarding

Name	Contact Details
Chair of College Trustees	Ian McAlister, imacalister@creatingtomorrowcollege.co.uk
College Safeguarding Trustee	As above
Janet Duggan MAT Safeguarding Trustee	JDuggan@creatingtomorrowtrust.co.uk *
Chris Moody MAT Chair of Trustees	cmoody@creatingtomororwtrust.co.uk *Numbers can be obtained from Ellie Edwards

Our Data Protection Officer is:	Our Lead for Mental Health is:	Our Prevent SPOC is:	Our designated teacher for looked after children is:
Ali Jones (IT Infrastructure Manager / GDPR Info Manager) ajones@creatingtomorrowtrust.co.uk	Asia Malinowska	Rebecca Partridge	Rebecca Partridge

Name and contact details of the Designated Officer (DO)

Name	Contact Details
Northamptonshire - Andy Smith *Designated Officer*	07850 854309 LADOConsultations@nctrust.co.uk
Northamptonshire - Sheila Kempster Designated Officer	07831 123193 LADOConsultations@nctrust.co.uk
Northamptonshire - Sian Edwards (interim Designated Officer)	07738 636449 LADOConsultations@nctrust.co.uk
Leicestershire County Council DO	Allegations Line: 0116 305 4141 DO email for Referrals and New Enquiries: CFS-LADO@leics.gov.uk

Other contact Numbers

Name	Contact Details
Northants - MASH Multi Agency Safeguarding Hub (option 1, option 1)	*North 0300 126 3000* *West 0300 126 7000*
Prevent Engagement Officers at Northamptonshire Police	*prevent@northants.pnn.police.uk*
Leicestershire - MASH Multi Agency Safeguarding Hub	**Telephone:** 0116 454 1004 Out of hours: 0116 255 1606
Prevent - Action Counters Terrorism (ACT)	*https://actearly.uk/* 0800 0113 764
Channel Helpline	*020 7340 7264*

2. Aim of policy

Creating Tomorrow College recognises our statutory responsibility to safeguard and promote the welfare of all learners. We will endeavour to provide a safe and welcoming environment where learners are respected and valued. All support for learners and young people will be based on their individual needs and rights, this is a person-centred approach to safeguarding (authentic safeguarding), with the child at the heart. When working to safeguard young people, a person-centred approach will be used which means that any procedures consider the rights, feelings and experience of the individual learner.

We will be alert to the signs of abuse, neglect, and exploitation, and follow our procedures to ensure that learners receive effective support, protection and justice.

Safeguarding is everyone's responsibility. We recognise that our college is part of a wider safeguarding system and work closely with the Northamptonshire Safeguarding Adults Board and Leicestershire & Rutland Safeguarding Adults Board and other agencies to promote the welfare of learners. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each learner.

We understand that learners can be abused by adults or by other learners. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of child on child abuse) through training, education and robust response procedures.[1]

The aim of this policy is to;
- promote safeguarding and child protection and to provide information about how we work to keep learners safe;
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
- provide all members of staff with the information required to meet their safeguarding duty and protect learners from harm;
- provide stakeholders with clear information relating to the college's safeguarding and vulnerable adult/child protection procedures; and to
- ensure that we are protecting learners from maltreatment or harm.

3. Scope

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the college. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

4. Definitions

Safeguarding and promoting the welfare of learners is defined in Keeping Children Safe in Education (KCSIE) 2025 as;
- Providing help and support to meet the needs of learners as soon as problems emerge;
- protecting learners from maltreatment, whether that is within or outside the home, including online;

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[1] For full details about how we work to prevent and respond to child on child abuse, please see Appendix A.

- preventing impairment of learners mental and physical health or development;
- ensuring that learners grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all learners to have the best outcomes.

For the purposes of this policy, the term 'safeguarding' refers to everything that the college does to keep learners safe and promote their welfare, including (but not limited to):

- Supporting learners' health, safety and well-being, including their mental health.
- Providing early help support, to improve outcomes for learners and families at the earliest possible opportunity;
- Meeting the needs of learners with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of learners with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.
- Online safety and associated issues.
- Appropriate arrangements to ensure college security, taking into account the local context.
- Keeping learners safe from risks, harm and exploitation.
- Child protection.

Child protection is part of safeguarding and refers to activities undertaken to prevent learners suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on learners of all forms of domestic abuse, including where they see, hear or experience its effects. Learners may be abused in a family or an institutional or community setting, by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Learners may be abused by an adult, adults, or by another learner.

Neglect is a form of abuse and is the persistent failure to meet a basic physical and/or psychological needs, likely to result in the serious impairment of health or development[2].

Child on child abuse (this term also is applicable for vulnerable adults) refers to the abuse of a learner perpetrated by another learner. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between learners (sometimes known as "teenage relationship abuse");
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this

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[2] See Appendix B for more information about abuse and neglect.

may include an online element which facilitates, threatens and/or encourages sexual violence);

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[3]

Within this policy:
- **'Parent or Families'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, kinship carers, and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the college.
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the young person involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of learners) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- Keeping Children Safe in Education (2025) may be abbreviated to 'KCSIE'.

5. Legislation and statutory guidance

Creating Tomorrow Trust and College adheres to all relevant safeguarding legislation, statutory guidance and guidance from the local Safeguarding Children and Adult Boards. This includes (but is not limited to):
Statutory Guidance:
- Keeping Children Safe in Education (2025)
- Working together to Safeguard Children (2023)
- Working Together to Improve School Attendance (2024)
- Children Missing Education (2016)

Legislation
- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006

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[3] Keeping Children Safe in Education (2025)

- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance, updated 2023)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015
- The Human Rights Act (1998)
- The Equality Act (2010)
- The Public Sector Equality Duty (PSED

Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: [Home - Northamptonshire SCP](#)

Guidance from the Northamptonshire Safeguarding Adults Board can be found here: https://www.northamptonshiresab.org.uk/Pages/default.aspx

Guidance from the Leicestershire & Rutland Adult Safeguarding Board can be found here https://lrsb.org.uk/adults

The college also has regard relevant to non-statutory guidance relating to safeguarding, including:
- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Meeting digital and technology standards in schools and colleges (DfE)
- Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)

This policy links with other college policies and procedures, including:
- Conduct Policy, including our procedures for searching, screening and confiscation
- Staff Code of Conduct and Low Level Concerns Policy
- Complaints policy
- Health and safety policy including fire evacuation and lockdown procedures
- Attendance policy
- IT and Online safety policies
- SEND policy
- Equality policy
- First aid policy
- Curriculum policy
- Designated teacher for looked-after and previously looked-after children policy
- Privacy notices
- Manual Handling
- Safer Recruitment Policy
- Use of Physical Intervention Policy
- Whistleblowing Policy

This policy also complies with our funding agreement and articles of association.

6. Equality Statement

We are committed to anti-discriminatory practice and recognise learner's diverse circumstances. Some learners are at an increased risk of abuse, both offline and online, and additional barriers can exist for some learners with respect to recognising or disclosing it.

We ensure that all learners have the same protection, regardless of any barriers they may face.

All of our learners have special educational need and disabilities (SEND), and we are fully aware that our learners, due to their additional vulnerabilities are particularly at risk of abuse. Please see Section 12 for further details about how we work to support learners with special educational needs and disabilities (SEND).

We give special consideration to learners who:
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions

7. Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting learners' welfare, including their educational outcomes. Colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping learners safe. Lawful and secure information sharing between colleges, Children/Adult's Social Care, and other local agencies, is essential for keeping learners safe and ensuring they get the support they need.

The college adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018). Please see the Data Protection Policy and Privacy Notice for more information.

7.1 Sharing information with parents
Creating Tomorrow College will ensure the Safeguarding and Vulnerable Adult, Child Protection Policy is available publicly via the college website and paper copies can be made available on request to the college.

Where appropriate, we will discuss any concerns about a young person with the young person's family. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the family would increase the risk to the young perosn, we will discuss this with the local authority children/adult's social care team before doing so (see Section 7.2 for more details). In the case of allegations of abuse made against other learners, we will normally notify the parents of all the learners involved.

7.2 Consent
The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All

relevant information can be shared without consent if to gain consent would place a young person at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of learners. All professionals responsible for learners should not assume that someone else will pass on information that they think may be critical to keeping a young person safe.

As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and vulnerable adult & child protection information.

When considering whether, or not, to share safeguarding information (especially with other agencies), Creating Tomorrow College will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

All staff in college will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a young person that they will not tell anyone about an allegation, as this may not be in the young person's best interests.
- Staff who receive information about learners and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a learner is suffering, or at risk of, serious harm.[4]

8. Roles and responsibilities

Safeguarding and vulnerable adult/child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:
- Conduct policy
- Pastoral support system
- Planned tutorial programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  o Healthy and respectful relationships
  o Boundaries and consent
  o Stereotyping, prejudice and equality
  o Body confidence and self-esteem
  o How to recognise an abusive relationship (including coercive and controlling behaviour)
  o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support

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[4] See Working Together to Safeguard Children (2023) for more information.

o   What constitutes sexual harassment and sexual violence and why they're always unacceptable

8.1 Governing bodies and Trustees

Governing bodies and Trustees have a strategic leadership responsibility for Creating Tomorrow College's safeguarding arrangements. The trustees will appoint a senior board level (or equivalent) Trustee Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full board of trustees. This is always a different person from the DSL. The Trustee Safeguarding Lead is Ian McAllister. The Trust Trustees will appoint a Safeguarding Trustee (at Creating Tomorrow this is Janet Duggan, JDuggan@creatingtomorrowtrust.co.uk)

Trustees will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Trustees will ensure that the college is working with local safeguarding partners and that the college contributes to multi-agency working, adhering to Working Together to Safeguard Children (2023). All trustees will read KCSIE (2025) and a record will be kept of this.

Part 2 of KCSIE (2025) sets out the responsibilities our Trustees will adhere to this guidance at all times. As part of these responsibilities' trustees will;
- ensure that they comply with their duties under statutory guidance and legislation; including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our college's local multi-agency safeguarding arrangements;
- work to facilitate a whole college approach to safeguarding, by ensuring that safeguarding and vulnerable adult/child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the college are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning;
- ensure that the college takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the college has an effective vulnerable adult/child protection policy, which is published on the college website and/or available by other means and review this annually;
- ensure that the college has systems in place to allow learners to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the college takes safeguarding concerns seriously and takes the wishes and feelings of learners into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the college has a suitable conduct policy for learners and a staff behaviour policy or Code of Conduct;
- ensure that all staff undergo safeguarding and vulnerable adult/child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;
- consider a whole-college approach to online safety, including the use of mobile technology in college;
- ensure that there are clear systems and processes in place for identifying when learners may be experiencing mental health problems;
- ensure that learners are taught about safeguarding, including online safety. See

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section 11.6 and Appendix E of this policy for further information;

- ensure that appropriate safeguarding arrangements are in place to respond to learners missing education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep learners safe online
- regularly review the effectiveness of college filters and monitoring systems. They should ensure that the leadership team and relevant staff are:
    - · aware of and understand the systems in place
    - · manage them effectively
    - · know how to escalate concerns when identified
- ensure that there are appropriate procedures in place to manage both allegations against staff (including supply staff, volunteers and contractors, and concerns that do not meet the harm threshold (low-level concerns) [5] , and
- respond to allegations of abuse against the Principal or the Trust Leadership Team. The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Principal or the Trust Leadership Team, where appropriate (see section Appendix D).

8.2 The Principal
The Principal is responsible for the implementation of this policy. The Principal will:
- ensure that this policy is reviewed annually and ratified by the board of trustees;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named trustee for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After learners' to promote the educational achievement of learners looked after and previously looked after;
- appoint a lead for online safety – at college this is Carole Wilson-Frizzell
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with learners;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- make decisions regarding all low-level concerns,
- refer cases where a person is dismissed or left due to risk/harm to a young person to the Disclosure and Barring Service as required;
- ensure that the college works with social care, the police, health services and other services to; promote the welfare of learners; provide a co-ordinated offer of early

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[5] See Appendix D for more details.

help when need is identified; contribute to inter-agency plans for learners subject to child protection plans (if relevant) and to protect learners from harm;
- following a serious incident, where there has been a risk to life, or a death, to liaise with the local authority Education Safeguarding Team;
- safeguard learners' wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children/adult's social care (from the host local authority or placing authority) have access to the college to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (2025);

8.3 The Designated Safeguarding Lead (DSL)
The full responsibilities of the DSL are set out in Annex C, KCSIE (2025).

The DSL is a member of the Senior leadership team. Our DSL is Carole Wilson-Frizzell. The DSL takes lead responsibility for vulnerable adult & child protection and wider safeguarding.

When the DSL is absent, the Deputy Designated Leads will act as cover.
Any deputies will be trained to the same standard as the designated safeguarding lead.

All DSL's have a college email and work phone as shown in the table below and are contactable both in and outside of college hours.

Name	Contact Details
Rebecca Partridge, Assistant Principal, DSL	rpartridge@creatingtomorrowcollege.co.uk 07483 045185
Carole Wilson-Frizzell, Assistant Principal, DDSL	cwilson-frizzell@creatingtomorrowcollege.co.uk 07485 303128
Gareth Ivett, Principal, DDSL	givett@creatingtomorrowcollege.co.uk 07990 012330
Sarah Grist, Campus Leader – Daventry Campus, DDSL	sgrist@creatingtomorrowcollege.co.uk 07483 037970
Ben Childs, Campus Leader – Wellingborough Campus, DDSL	bchilds@creatingtomorrowcollege.co.uk 07483 030151
Rachel Bond, Campus Leader – Lutterworth Campus, DDSL	rbond@creatingtomorrowcollege.co.uk 07483 045158
Rachel Parmanum, Campus Leader – Kettering Campus, DDSL	rparmanum@creatingtomorrowcollege.co.uk 07485 314289
Kevin Latham, CEO, DDSL	KLatham@creatingtomorrowtrust.co.uk 01536 856467 / 07825915272

There will always be at least one DSL / Deputy on site at all times.
During out-of-hours/out-of-term activities there will be a DSL rota made available to all staff so that staff can access a DSL at any time.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for vulnerable adult & child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

The Designated Safeguarding Lead will;
- Act as a source of support and expertise on matters relating to safeguarding and vulnerable adult & child protection to ensure that other members of staff can carry out their safeguarding duty;
- Advise on the response to safeguarding concerns;

- Liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2023);
- Identify if learners may benefit from early help;
- Refer suspected cases, as appropriate, to the relevant body (local authority children/adult's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the college with regards to their responsibilities under the Prevent duty and provide advice and support on protecting learners from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff that work directly with learners have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2025);
- Ensure all staff that do not work directly with learners have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in college with the knowledge, skills and support required to safeguard learners;
- Take responsibility for the accurate and timely recording of safeguarding and vulnerable adult/child protection concerns and take overall responsibility for safeguarding and vulnerable adult/child protection files;
- Take responsibility for the transfer of safeguarding files when a young person leaves the college;
- Attend or ensure an appropriate representative attends multi-agency safeguarding or vulnerable adult/child protection meetings;
- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure learners with additional vulnerabilities are safeguarded;
- Unless delegated to member of the leadership team, take responsibility for online safety and understanding the filtering and monitoring systems and processes in place;
- Support learners who have experienced or are experiencing safeguarding or vulnerable adult/child protection issues by using information they hold about learners with a social worker to make decisions in the best interests of the young person's safety, welfare and to help promote educational outcomes. This will include ensuring that staff know who these learners are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that learners in this group might face and the additional academic support and adjustments that they could make to best support these learners;
- Promote a 'culture of safeguarding', in which every member of the college community acts in the best interests of the young person
- Regularly meet with the safeguarding link trustee to review safeguarding at the college; and
- Liaise with the Principal regarding safeguarding cases and issues.
- Have a good understanding of harmful sexual behaviour and how to support learners in the event that this issue arises;
- Know what local specialist support is available to support all learners involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that learners must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

<u>8.4 All staff</u>
Staff play a particularly important role because they are in a position to identify concerns in order to provide help for learners. All staff;
- have a responsibility to provide a safe environment, where learners can learn;
- will be trained so that they know what to do if a young person tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse, neglect and exploitation;
- will be made aware of systems in the college that support safeguarding and vulnerable adult/child protection;
- will be made aware of safeguarding issues that put learners at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a young person makes a disclosure of abuse and never promise confidentiality when a young person makes a disclosure;
- will be made aware of and should be clear on the college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a young person may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify learners who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to children/adult's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a young person's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and vulnerable adult/child protection training to cover all of the above, as well as online safety (including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns);
- Reinforce the importance of online safety when communicating with families. This includes making families aware of what we ask learners to do online (e.g. sites they need to visit or who they'll be interacting with online)
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- all tutors should safeguard learner wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the conduct policy and the safeguarding response to learners who are absent from education, particularly on repeat occasions and / or for prolonged periods.

All staff that are employed to work within Creating Tomorrow Trust, Trustees will be provided with a copy of, and must read, Part 1 and Annex A of Keeping Children Safe in

Education (2025) annually and will receive annually updated training on their safeguarding roles and responsibilities.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and vulnerable adult/child protection, there is an expectation that if staff are unclear on any aspects of college safeguarding policy or practice, they speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

9. Recognising Abuse: Training

The college is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

9.1 All staff
- All staff members will undertake safeguarding and vulnerable adult/child protection training at induction (including whistle-blowing procedures) to ensure they understand the college's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify learners at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and vulnerable adult/child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, as applicable.

Tutors will receive training to ensure that they can manage behaviour effectively to ensure a safe educational environment and they should have a clear understanding of the needs of all learners.

9.2 The DSL and Deputy DSLs
- The DSL and Deputy DSLs will undertake vulnerable adult/child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training, including any necessary training to support their understanding of the IT filtering and monitoring systems and processes in place.

9.3 Trustees
- All Trustees receive safeguarding training (including online safety) at induction, which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and ensuring there is a whole college approach to safeguarding.

This includes training on:
- o the Prevent duty.
- o Online safety.
- o The expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal or a member of the Trust Leadership Team, they will receive training in managing allegations for this purpose.

9.4 Recruitment – interview panels
At least one person conducting any interview for a post at the college will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2025), and will be in line with local safeguarding procedures.

9.5 Supervision
- All staff who have contact with learners and families will have supervision which will provide them with support, coaching and training, promote the interests of learners and allow for confidential discussions of sensitive issues.
- Staff at Creating Tomorrow Trust & College will be offered supervision depending upon their role and needs. Some staff will be offered regular individual supervision to manage their workload, whereas others may be offered supervision as a group or when particular issues may arise.

9.6 Specific safeguarding issues
Staff will also receive specific training on the following issues and action will be taken if the college suspects that a young person is at risk of or is the victim of;
- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child on child abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including child on child abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between learners outside of

these environments (including online). All staff are expected to consider whether learners are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of;
- learners in the court system;
- learners missing education;
- learners with family members in prison;
- learners who are homeless;
- learners who have or have had a social worker;
- learners who are young carers;
- learners looked after or previously looked after (including those living in kinship care arrangements); and
- learners with mental health problems.

10. Recognising and responding to abuse: How to take action

If a member of staff, parent or member of the public is concerned about a learner's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead/s without delay. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children/adult's social care.

Although any member of staff can make a referral to children/adult's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

All staff will be alert to indicators of abuse (including child on child abuse) and will report any of the following to the Designated Safeguarding Lead immediately;
- any concern or suspicion that a young person has sustained an injury outside what is reasonably attributable to normal physical activity;
- any concerning behaviours exhibited by learners that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a young person's presentation;
- any indicators that a young person may be experiencing peer on peer abuse;
- any concerns relating to people who may pose a risk of harm to a young person; and/or
- any disclosures of abuse that learners have made.

More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found at Appendix A.

The following procedures are in line with statutory guidance (see Section 5) and the Local Safeguarding Children Partnership's Threshold Guidance [6]. Referral procedures can be found in section 10.5.

10.1 Reporting systems for our learners
Where there is a safeguarding concern, we will take the young person's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.
To achieve this, we will:

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[6] http://www.northamptonshirescb.org.uk/schools/toolkits-docs-schools/thresholds-and-pathways/

- Put systems in place for learners to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for learners
- Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Learners at Creating Tomorrow College are informed how to report safeguarding concerns through the college's induction and tutorial programmers. They are also taught what constitutes a safeguarding concern through these programmers

10.2 If a young person discloses that they are suffering or at risk of suffering abuse

If a young person discloses that he or she has been abused in some way, the member of staff/volunteer will:
- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the young person to talk freely;
- reassure the young person, but do not make promises which it might not be possible to keep;
- never promise a young person that they will not tell anyone - as this may ultimately not be in the best interests of them;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping) using My Concern, or if not able to access a computer make a written note and transfer to My Concern as soon as possible; and
- pass the information to the Designated Safeguarding Lead without delay. Alternatively, if appropriate, make a referral to children/adult's social care and/or the police directly (see 10.5), and tell the DSL as soon as possible that you have done so.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

Bear in mind that some learners may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a young person.

10.3 If a young person is suffering or likely to suffer harm, or in immediate danger

If you think that a young person is suffering or at risk of suffering significant harm, you must report this to the designated safeguarding lead immediately. On occasions when the designated safeguarding lead is not available, it should be reported to the deputy safeguarding lead without delay or a senior member of staff.

Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a young person may be suffering or at risk of suffering harm. **Anyone can make a referral to children/adult's social care.** If anyone other than the DSL

makes a referral to children/adult's social care or to the police, they should inform the DSL as soon as possible.

<u>10.4 If you have concerns about a young person (as opposed to believing a young person is suffering or likely to suffer from harm, or is in immediate danger)</u>
Figure 1 on page 24 illustrates the procedure to follow if you have any concerns about a learner's welfare. Where possible, speak to the DSL first to agree a course of action (see 10.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children/adult's social care, using the [Northamptonshire Thresholds Guidance](#) / [Leicestershire Thresholds Guidance](#) If it is decided to make a referral to children/adult's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 7.2 for more details.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:
- managing any support for the child internally via the college's own pastoral support processes;
- an Early Help Assessment; or
- a referral for statutory services where the young person is or might be in need or suffering or likely to suffer significant harm.

<u>10.5 Early help</u>
All staff should be prepared to identify learners who may benefit from early help. Early help is support for learners of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children/adult's social care for assessment for statutory services if the young person's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a young person's needs. It is important for learners to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a referral to children/adult's social care if the young person's situation does not appear to be improving.

We recognise that any young person can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a young person;
- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded

from schools, colleges and in Alternative Provision or a Learner referral unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage, and;
- is or has previously been privately fostered;

10.6 Referrals

If it is appropriate to refer the case to local authority children/adult's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children/adult's social care assessments should consider where learners are being harmed in contexts outside the home, so the college will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves.[7]

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:
- By telephone contact to the Multi-Agency Safeguarding Hub (MASH):
  - **Northamptonshire:** 0300 126 7000 (option 1)
  - **Leicestershire:** 0116 454 100, Out of hours: 0116 255 1606
- By using the online referral form found at:
  - Northamptonshire MASH ONLINE REFERRAL
  - Leicestershire MASH ONLINE REFERRAL
- In an emergency outside office hours, contact children/adult's social care out of hours team (0300 126 7000) or the Police[8]
- If a young person is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

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[7] The NSCP Case and Conflict Resolution Protocol can be found here: http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/
https://northamptonshire-self.achieveservice.com/en/service/Make_a_children_s_referral_to_Northamptonshire_s_MASH
https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx
[8] The Designated Safeguarding Lead may make use of the NPCC guidance **'When to call the police'**.
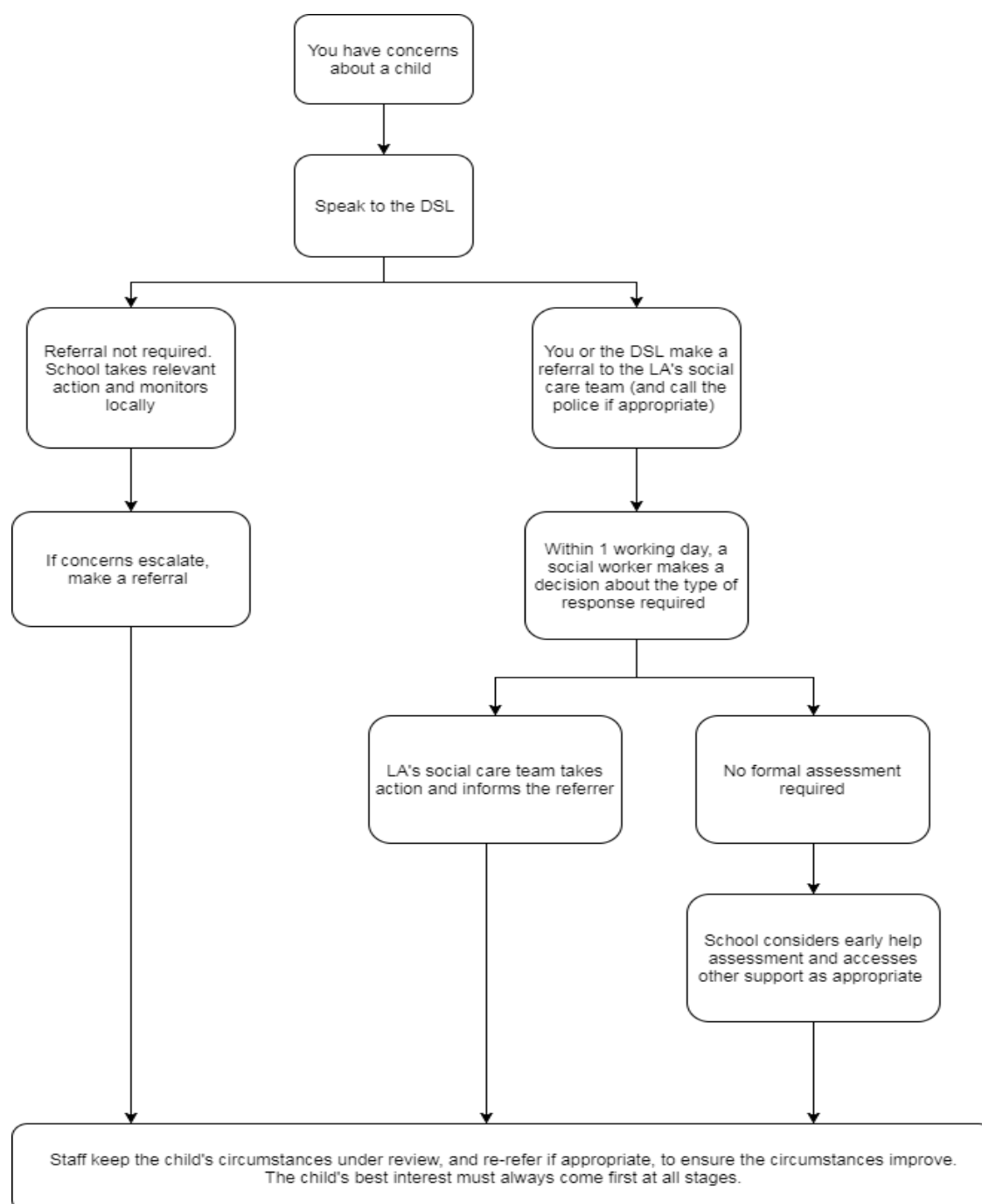
11. Specific safeguarding issues

For more information relating to specific safeguarding issues, please see Appendix B. For more information child on child abuse please see Appendix A.

<u>11.1 Female Genital Mutilation (FGM)</u>
Any tutor who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a learner under 18 must immediately report this to the police, personally. This is a statutory duty, and tutors will face disciplinary

sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children/adult's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for tutors mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a learner age 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

11.2 Radicalisation and extremism
All colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL should be informed immediately.

We adhere to the Prevent Duty statutory guidance (2023)

Creating Tomorrow Partnership has 3 clear values of Respect, Inclusion and Community, and we take our responsibilities creating a tolerant and cohesive society very seriously.

11.3 Learners potentially at greater risk of harm
The college recognises that some learners need a social worker due to abuse, neglect, exploitation or family circumstances and that abuse and trauma can leave learners vulnerable to further harm, as well as educational disadvantage.

The DSL will hold information relating to social workers working with learners at the college. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

We will also take action to promote the educational outcomes of and to protect;
- Children missing education (under 18);
- Children missing from home or care (under 18).

There are other familial issues that can have a detrimental impact on learners. We work with other agencies in line with Keeping Children Safe in Education (2025) to support learners and families in the following circumstances:
- Young people facing the court procedures and/or young people in the court system.
- Young people with family members in prison.
- Young people who are homeless.
- Young people who need a social worker.

11.4 Mental health
Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one. Where learners have suffered abuse, neglect, and exploitation or other potentially traumatic adverse experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these students/intern's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a young person we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the young person in and out of college.

If you have a mental health concern about a young person that is also a safeguarding concern, take immediate action by following the steps in Section 10.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, college will provide information and signposting services to learners and families and assist with the teaching of emotional health and wellbeing to learners in our curriculum

Refer to the Department for Education guidance on [mental health and behaviour in schools][9] for more information.

11.5 Child on child abuse
The college takes all reports and concerns about child on child abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of the college premises, or online.

Child on child abuse is a term that can also be applied to vulnerable adults.

In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how the college prevents, responds to and supports victims of child on child abuse can be found at Appendix A.

11.6 Online safety, including filtering and monitoring
Our online safety policy is set out in a separate document and more information can be found in Appendix E of this policy. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

All staff are made aware of the college policy on Online Safety which sets our expectations relating to:
- creating a safer online environment – including training requirements, filters and monitoring;
- what staff should be alert to, what to report and how staff should report any concerns – including those related to the efficacy of filtering and monitoring systems;
- giving everyone the skills, knowledge and understanding to help young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within college and on college trips/outings;
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

Staff must read the *Online Safety Policy* in conjunction with our Code of Conduct in relation to personal online behaviour.

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[9] https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

Any concerns related to learner's safety online (either safeguarding or technical) should be reported to the DSL immediately.

<u>11.7 Learners who are gay, lesbian, bisexual, or gender questioning</u>
We recognise that a young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other learners. In some cases, a young person who is perceived by other learners to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as young people who are.
We will:
- Create a culture where these young people are able to speak out and share their concerns;
- Support and safeguard these young people in line with guidance and legislation;

12. Learners with special educational needs and disabilities (SEND)

We recognise that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation in this group, including;
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- learners being more prone to peer group isolation than other learners;
- the potential for learners with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and/or
- communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for learners with SEN and disabilities.

More information can be found about local support for young people with SEND here:
- [Northamptonshire's Local Offer: SEND Local Offer](#)[10]
- [Leicestershire's Local Offer: SEND Information Hub](#)[11]
- [SEND Code of Practice](#)[12]

13. Learners with a social worker and those that have previously needed a social worker

Learners may need a social worker due to safeguarding or welfare needs. We recognise that a young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. We work with the local authority to ensure that we are providing effective support for this group of young people.

The role of virtual school head now includes a non-statutory responsibility for oversight of the attendance, attainment and progress of learners under 18 with a social worker.

The DSL and all members of staff will work with and support social workers to help protect vulnerable young people.

Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare and educational outcomes. For example, it will inform decisions about;
- responding to unauthorised absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.

We have contact plans for learners with a social worker, and other young people who we have safeguarding concerns about, for circumstances where they won't be attending college.

14. Looked after and previously looked after children (16-18)

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
Appropriate staff have relevant information about the young person's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children's social workers and relevant virtual school heads.
- We have appointed a designated teacher, **Carole Wilson-Frizzell,** who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).[12] If it becomes relevant at the college.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:
- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how learner premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

15. Record-keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing using My Concern. This includes instances where referrals were or were not made to another agency. If in doubt about recording requirements staff should discuss this with the DSL.

When a young person has made a disclosure, the member of staff/volunteer should;
- record as soon as possible after the conversation, using My Concern;
- Do not destroy the original notes in case they are needed by a court, hand to the DSL who will ensure they are uploaded to the as a file to the concern;
- record the date, time, place, and any noticeable non-verbal behaviour and the

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[12] https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children

words used by the young person;
- Use a body map to indicate the position of any injuries if relevant and attach as a file;
- record statements and observations rather than interpretations or assumptions

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will include:
- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

If a young person for whom the college has, or has had, safeguarding concerns moves to another college, the DSL will ensure that their vulnerable adult/child protection file is forwarded promptly and securely, and separately from the main learner file.
To allow the new college to have support in place when the young person arrives, this should be within:
- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

Appendix C sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks. Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff.

16. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

Safety is at the heart of the curriculum for all learners in our Trust.
To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.
Our curriculum is based around 3 themes of safety:
- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Condict policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE – planned within the college Tutorial programme), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

17. Safer working practice

We work to create and embed a culture of openness, trust and transparency, in which our values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (September 2022).[13]

Trustees and senior leaders will ensure that this policy is adhered to by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

Trustees will help to identify any weakness in the college safeguarding system.
Staff are expected to adhere to the staff Code of Conduct at all times. In the event of any concerns or allegations, the college will deal with them promptly, in line with local guidance and KCSIE (2025).

17.1 Staff use of mobile phones

Staff are allowed to bring their personal phones to college for their own use but will limit such use to non-contact time when learners are not present. Staff members' personal

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[13] https://www.saferrecruitmentconsortium.org/

phones will remain in their bags or cupboards during contact time with learners. Staff will not take pictures or recordings of learners on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the college.

Please refer to the college Acceptable Use of ICT Policy and Mobile Device Policy

18. Safeguarding concerns about and allegations against members of staff

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 (Allegations that may meet the harm threshold) and Section 2 (Concerns that do not meet the harm threshold) of KCSIE (2025) and Northamptonshire Safeguarding Children Partnership / Northamptonshire Safeguarding Adults Board/ Leicestershire Adult Safeguarding Board guidance. See Appendix D for more details.

18.1 Allegations that may meet the harms threshold

Allegations that may indicate that a person will pose a risk of harm if they continue to work in their present position or in any capacity with young people in a college include:

- staff having behaved in a way that has harmed a child or vulnerable adult, or may have harmed a child or vulnerable adult;
- staff possibly committing a criminal offence against or related to a child or vulnerable adult;
- staff behaving towards a child/children or vulnerable adult/s in a way that indicates they may not be suitable to work with children/vulnerable adult; and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children/vulnerable adults.

This includes behaviour or incidents that have occurred both in college and outside of college

Allegations against the Principal, Chief Executive Officer, Chief Operating Officer or Chief Finance Officer

If an allegation is made against the Principal, CEO, COO or CFO (Trust Executive Team), it must be reported to the Chair of Trustees who would be the case manager. The Chair of Trustees can be contacted via email imacalister@creatingtomorrowcollege.co.uk

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply tutor or volunteer other than the Principal of Trust Leadership Team, it must be reported to the Principal without delay. This includes supply staff, volunteers and anyone working in or on behalf of the college, whether paid or unpaid. Allegations of abuse against staff must be reported to the Principal or College Chair of Trustees as appropriate and not discussed directly with the person involved.

The Principal or College Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer intervention.

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a learner has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns or would have been removed if they had not have resigned.

18.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2025) and local Safeguarding Children Partnership guidance.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a young person does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Examples of such behaviour could include, but are not limited to:
- Being overly friendly with learners
- Having favourites
- Taking photographs of learners on their mobile phone
- Engaging with a learner on a one-to-one basis in a secluded area or behind a closed door
- Humiliating learners

We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a young person and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of the college from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2025).

Reporting low level concerns

Low level concerns should be reported to the Principal either via conversation, phone call or encrypted email.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The Principal may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Principal will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within college are identified, the college will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

We will retain low level concerns information for a period of until the person is no longer employed by the college (this is recommended)

18.3 Supply staff

Although the college does not directly employ supply teachers/tutors, we will ensure that any concerns or allegations against supply teacher/tutors are handled properly. We will never cease to use a supply teacher/tutor for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

The Trustees will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher/tutor whilst they carry out their investigation.

The college will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant college policies.

19. Complaints and concerns about safeguarding policies

19.1 Complaints against staff
Complaints against staff that are likely to require a vulnerable adult/child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 18).

19.2 Other complaints
When responding to complaints, we aim to:
- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy

- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into college improvement evaluation processes
- We will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.
- Creating Tomorrow academies trust & College will aim to give the complainant the opportunity to complete the complaints procedure in full.
- Throughout the process we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

For more information please see Creating Tomorrow Complaints Procedures, these can be found on our website, or by contacting the college.

19.3 Whistle-blowing
Creating Tomorrow Trust has a whistleblowing policy and this is to support all workers to be confident that their concerns will be taken seriously and that they will be protected from unfair treatment if they raise a concern.

The trust is committed to the highest standards of openness, probity and accountability. It encourages an open dialogue between staff, leaders, governors and trustees to ensure concerns are resolved at the earliest opportunity.

It is important to the college that any wrongdoing within the college is reported and properly dealt with. The college recognises that staff are valuable eyes and ears within the college and therefore encourages all individuals with concerns to come forward and voice these.

If an individual has concerns about anything happening within the college they should read the policy, which sets out the way in which individuals may raise concerns and how they will be dealt with.

20. Use of college premises for non-college activities

Creating Tomorrow Trust is committed to working with the local community and this may include local groups / organisations using college facilities.

Use of facilities will be limited to communal areas and no access will be given to areas where there may be access to more sensitive information, for example the office or staffroom.

The college will ensure that the organisation is aware of all safety procedures, for example fire exits, and a point of contact will be given in case of emergency.

Where another body is providing services or activities (regardless of whether or not the young people who attend these services/activities are learners on the college roll) we will:
- Seek assurance that the other body has appropriate safeguarding and child/vulnerable adult protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the college about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the college premises, including in any transfer of control agreement and that any agreement to use the premises would be terminated if the other body fails to comply.

In the event that the college receives an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for young people, we will follow our safeguarding policies and procedures, including informing the LADO.[14]

21. How we safeguard learners at campuses open to the public

Creating Tomorrow College stands at the forefront of providing not just education, but also a nurturing environment where students can flourish both academically and personally. In recognition of the diverse needs of our student body and the dynamic nature of modern education, we are deeply committed to ensuring the safety and well-being of our students in environments that extend beyond the confines of traditional campus boundaries.

As our campuses are open to the public, we understand the paramount importance of striking a delicate balance between fostering independence, upholding the rights of our students as adults, and fulfilling our duty to safeguard. This delicate equilibrium forms the cornerstone of our approach to safeguarding, where we strive to create an environment that empowers students while providing the necessary support and guidance to navigate the complexities of public spaces with confidence and resilience.

Assessment:
We begin by conducting comprehensive assessments to understand each student's individual needs, capabilities, and risks. This initial evaluation allows us to tailor our safeguarding strategies effectively and identify areas where additional support may be required.

Education Delivery:
Upon assessment, we deliver targeted education on personal safety, risk awareness, and appropriate behaviour in public spaces. Through workshops, training sessions, and educational materials, we empower students with the knowledge and skills necessary to navigate open campuses safely and confidently.

Further Assessment:
During the delivery of education, we continuously monitor and assess students' progress in applying safeguarding principles and advised practice. This ongoing evaluation enables us to adapt our support strategies and provide additional guidance or interventions as needed.

Gradual Independence:
We believe in promoting gradual independence among our students, allowing them to develop essential life skills while ensuring their safety remains a top priority. Our approach emphasises a gradual transition from supervised to independent access to campus facilities, supported by clear guidelines and supervision where necessary.

Range of Safeguarding Strategies:
To facilitate independent access to our open campuses, we employ a range of safeguarding strategies tailored to meet the diverse needs of our student body. These may include:

- Visible signage outlining campus rules and safety guidelines
- Access control measures, such as ID checks and security personnel
- Designated safe zones and emergency assistance points

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[14] Further information can be found here: https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settingscode-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providersrunning-out-of-school-settings

- Regular patrols and monitoring of campus areas
- Collaborative partnerships with local police and community organisations

Supportive Environment:
Above all, Creating Tomorrow College is committed to fostering a supportive environment where students feel empowered to assert their rights as adults while receiving the necessary guidance and protection. Our approach to safeguarding reflects this commitment, balancing the promotion of independence with the proactive mitigation of risks to ensure the well-being of all members of our college community.
By adopting a gradual and graded approach to safeguarding, we aim to equip our students with the skills, knowledge, and confidence they need to navigate open campuses safely and responsibly, empowering them to thrive both academically and personally during their time at Creating Tomorrow College.

Three Stages of Support

Stage 1: Escort by College Staff Team
During Stage 1 of our approach, students will be accompanied by a designated member of the college staff team at all times while moving around the college grounds. This stage serves as an introductory phase, providing students with direct supervision and guidance as they familiarise themselves with campus facilities and protocols. Key features of Stage 1 include:

Direct Supervision: Students will be paired with a trained member of the college staff team who will accompany them throughout their movements on campus. This ensures immediate assistance and support in navigating unfamiliar areas and addressing any concerns or questions that may arise.

Orientation and Education: Staff members will use this stage as an opportunity to orient students to campus layouts, emergency procedures, and safety protocols. Through interactive discussions and demonstrations, students will gain essential knowledge about identifying potential risks and accessing support when needed.

Structured Activities: Activities during Stage 1 may be structured to facilitate gradual exposure to different areas of the college grounds while ensuring a controlled environment. This may include guided tours, group activities, or supervised visits to specific facilities.

Regular Assessments: Ongoing assessments will be conducted to evaluate students' readiness to progress to the next stage of independence. Feedback from both students and staff members will inform adjustments to support strategies and individualised interventions as necessary.

Stage 2: Supervised Independent Access
As students demonstrate increased confidence and proficiency in navigating campus environments, they will transition to Stage 2, which involves supervised independent access to college grounds. While students will have more autonomy during this stage, they will continue to receive guidance and oversight from college staff to ensure their safety and well-being. Key features of Stage 2 include:

Supervised Independence: Students will be granted opportunities to explore designated areas of the college grounds independently, with periodic check-ins and supervision from staff members. This stage encourages students to apply previously learned safety measures while gradually assuming greater responsibility for their movements.

Defined Boundaries: Clear boundaries and guidelines will be established to delineate areas accessible to students during Stage 2. Staff members will provide guidance on safe routes,

designated meeting points, and areas off-limits to students, promoting responsible behaviour and risk awareness.

Emergency Support: Students will receive guidance on accessing emergency assistance and support services, including the availability of staff members and emergency contact information. Regular drills and simulations will reinforce students' preparedness to respond effectively to potential safety threats or emergencies.

Progress Monitoring: Ongoing monitoring and assessment will continue during Stage 2 to track students' progress and identify areas for further support or intervention. Staff members will maintain regular communication with students to address any challenges or concerns that may arise.

Stage 3: Independent Access with Safeguarding Strategies
In Stage 3, students will achieve full independence in accessing college grounds while equipped with a comprehensive understanding of safeguarding strategies to mitigate potential risks effectively. This stage marks the culmination of our approach, where students demonstrate the ability to navigate public spaces autonomously while prioritising their safety and well-being. Key features of Stage 3 include:

Autonomous Movement: Students will have unrestricted access to all areas of the college grounds, allowing them to move freely between facilities and engage in activities independently. This stage reflects the ultimate goal of fostering self-reliance and empowerment among students.

Safeguarding Skills: Through targeted education and training, students will develop advanced safeguarding skills to identify, assess, and respond to potential risks proactively. This includes strategies for personal safety, conflict resolution, and seeking assistance from appropriate authorities or support services.

Risk Management: Students will be equipped with the knowledge and tools to assess and manage risks encountered in public spaces, including strategies for avoiding unsafe situations and de-escalating potential conflicts. Regular reinforcement and review of safeguarding principles will ensure students' ongoing preparedness and resilience.

Supportive Resources: While enjoying independent access, students will continue to have access to supportive resources and assistance as needed. This may include access to dedicated support staff, online resources, and peer support networks to reinforce students' sense of security and well-being.

By implementing this three-stage approach, Creating Tomorrow College aims to empower students with the skills, knowledge, and confidence they need to navigate college grounds safely and independently, while upholding our commitment to safeguarding their welfare at all times.

See Appendix F for the college assessment criteria

22 Policy implementation, monitoring and review

The policy will be reviewed annually by the board of trustees. It will be implemented through the college induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

This policy links with other college policies and procedures, including:

- Conduct Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Anti-bullying Policy
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- E-Safety Safety Policy
- SEND Policy
- Single Equality Duty (Equality) Policy
- Relationship and Sex Education Policy
- First Aid Policy
- Learning and Teaching Policy
- IT Acceptable Use Policy
- Privacy notices

Appendix A: Child on child abuse (note: child on child also refers to vulnerable adults)

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety, where learners are free from harassment or abuse of any kind. We take a zero-tolerance approach to sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

We know that even if we do not receive any reports relating to child on child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our learners – to come forward to share any concerns about child on child abuse so that we can take action to keep all learners safe.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between vulnerable adults/children (sometimes known ad 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[15]

All learners are capable of abusing their peers and we recognise that girls are more likely to be the victims of child on child abuse and boys' perpetrators. All child on child abuse is unacceptable and will be taken seriously.

<u>Harmful sexual behaviour (HSB)</u>

We recognise that learner's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. We refer to problematic, abusive and violent sexual behaviour as 'harmful sexual behaviour'.

When responding to HSB, we will:
 Consider the behaviours in a vulnerable adult/child protection context;
- Consider the ages and developmental stages of the young person involved;

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[15] Keeping Children Safe in Education (2025)

- Take action in line with local thresholds and pathways guidance and relevant statutory guidance; and
- Seek specialist support as required.

We will take action at the earliest possible point, to safeguard learners and to prevent problematic, abusive and/or violent behaviour in the future.

We recognise that learners displaying HSB have often experienced their own abuse and trauma and we will offer support as required.

Staff training

All staff are made aware that children/vulnerable adults can abuse other children/vulnerable adults, that this can happen online or in person, at college or outside of college. All staff will receive training so that they can confidently recognise the indicators and signs of child on child abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the college's policy and procedures with regards to child on child abuse and the crucial role that they play in preventing it and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Procedures for minimising opportunities for child on child abuse

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child on child abuse to occur. In order to do this, and to establish a safe environment for all learners, we:

- have a robust conduct policy, which makes it clear that we have a zero tolerance approach to any kind of child on child abuse;
- Have communication and safety at the heart of everything we do, ensuring our young people have a voice
- ensure staff understand what is meant by child on child abuse and the college policy on child on child abuse by ensuring part of annual staff safeguarding training, and regular safeguarding updates through the year;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, an unsafe environment for young people and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it; and
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported.

How we address child on child abuse within the curriculum and across the college

Safety is at the heart of the curriculum for all learners in our Trust.
To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.
Our curriculum is based around 3 themes of safety:
- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences

- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

Elements of child on child abuse will be covered in an age and developmentally appropriate way such as online safety, 'mate crime', financial abuse, cuckooing etc.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously. We ensure that learners are aware of our safeguarding and child/vulnerable adult protection procedures, including how to raise concerns about child on child abuse, by:
- speaking to a Trusted Adult
- having pastoral support
- highlighting who the safeguarding leads are

Additional Vulnerabilities

We recognise that some learners may be more vulnerable to child on child abuse than others. For example, young people who have already experienced abuse, those that have special educational needs or disabilities (SEND), young people living in care or have previously lived in care and learners who are LGBTQ+, may be more likely to face child on child abuse than other learners. We recognise that females are more likely to be the victims of child on child abuse than males. Some young people may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. We work to protect young people with additional vulnerabilities by:
- Having a respectful, inclusive and open culture where discrimination is not tolerated and challenged at all levels
- Training staff to recognise signs and indicators and heighten awareness of the vulnerabilities faced by our learners

How to report concerns

Our learners
If a young person witnesses or experiences any form of child on child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it.
If a young person discloses to a member of staff outside of college, the member of staff should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the college will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting peer on peer abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In college, learners can:

- Speak to a trusted adult
- Speak to a designated safeguarding lead

All of these methods can be used to report any form of harm or abuse or can be used by students to share worried or concerns about any issue, including child on child abuse.

In the event that a student reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the young person/s involved and we will ensure that we are listening to the voice of the young person when deciding on the

best course of action to take. We will always act in the best interests of learner. Following any disclosures or reports of child on child abuse, we will review our college systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our learners to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Our staff
Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 9 and must report concerns immediately.

Others
We encourage everyone to report any form of abuse or harm perpetrated by or against our learners. Any concerns should be reported to the Designated Safeguarding Lead, using the details on the front page of this policy.

Wider concerns
We strive to create a safe and welcoming environment for all learners. If you have any concerns about our culture of safeguarding, policy or procedures, please direct these to the **safeguarding lead immediately, or follow our college Complaints Policy.**

What happens when an allegation of child on child abuse is made?
We will adhere to Keeping Children Safe in Education (2025) when responding to incidents of child on child abuse. The college takes child on child abuse seriously and will respond to all concerns or disclosures of child on child abuse, including those that have occurred outside of college and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead will decide what further action is necessary.

Our starting point regarding any report of child on child sexual harassment or violence should always be that there is a zero tolerance approach, it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.

The subsequent action taken will vary depending on the type of child on child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report.

The Designated Safeguarding Lead will always consider the following;
- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- both the chronological ages and developmental stages of the young people involved;
- any power imbalance between the learners, including consideration of the age of young people and their special educational needs or disabilities;
- the impact on the victim;
- that sexual violence and sexual harassment can take place in intimate personal relationships between young people;
- if the alleged incident is a one-off or a sustained pattern of abuse;

- if are there ongoing risks to the victim, other learners or college staff; and
- Other related issues and wider context, such as links to criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may
- Seek further information from those involved and witnesses.
- Undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other learners.
- Decide to manage the concern internally.
- Organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- Refer the victim and/or the perpetrator to local services for Early Help.
- Refer the case to Children/Adult's Services via a MASH referral.
- Liaise with social workers working with young person involved (if applicable).
- Make a report to the police.
- Liaise with specialist services.

In the event of a disclosure of child on child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider:
- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other young people, (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2025).

Recording procedures
- Child on child is recorded through My Concern and categorised as child on child abuse.
- The college present a Key Performance Indicator document to trustees which includes specific information and analysis of safeguarding concerns and categories

Where a case of child on child abuse has been identified the lead DSL, with another senior member of staff, will assess risk and put in place appropriate measures.
The risk assessment will be carefully monitored and formally reviewed monthly.
Members of staff will follow the procedures for recording a disclosure as outlined in Section 9 of this policy.

How we support victims of child on child abuse
The college recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Young people who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The college will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

College will adhere to the following principles when support a victim of child on child abuse:
- The needs and wishes of the victim are paramount
- Consideration of the developmental stage of the victim, the nature of the

allegations and risk of further abuse
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report

Support that may be offered:
- In-college counselling / support
- Referral to Early Help and Social Care
- Referral to Children and Young People's Independent Sexual Violence Advisors (if applicable)
- Referral to Child / Teenage Adolescent Mental Health Service (if applicable)
- Access to NHS services
- Access / referral to Rape and Sexual Assault Centres (support to access GP or through 111)
- Childline / Internet Watch Foundation (to remove sexual abuse online images and videos)

If a victim of child on child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

How we will support alleged perpetrators and perpetrators of child on child abuse
We have a responsibility to safeguard and support all learners. We will adhere to KCSIE (2025) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The college has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend college. Options may include
- Tutoring
- Access to remote education with appropriate face to face activities
- Work experience away from the college campus

We recognise that learners who perpetrate child on child abuse may be being abused themselves. The college will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse. The Designated Safeguarding Lead will take advice from children/adult's social care, specialist services and the police as necessary.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered.

There are always consequences to actions, and the college may choose to impose a sanction on the alleged perpetrator following an incident of child on child abuse. In this case, we will follow the college conduct policy in determining the level and severity of sanction.

Where a learner is cautioned or receives a conviction related to an incident of child on child abuse, the college will:
- update the risk assessment to ensure relevant protections are in place for all the learner at the college
- if not done already, consider any suitable action in line with the conduct policy
- If the perpetrator(s) remains in the same college as the victim, the college will be very clear as to the expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour

and any restrictions the college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.
- ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict,

A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and others at the new setting.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting young people and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

How we will support other learners who may have been affected by child on child abuse
Even though all allegations of child on child abuse will be managed confidentially, we are aware that other learners, and staff, may be affected, especially if the outcome is a conviction and therefore in the public domain.

The college will offer any affected learners access to:
- Progress Coaches
- Counselling, as appropriate
- Referral to external partners

The college will offer any affected staff access to:
- Supervision
- Counselling

Local Safeguarding Arrangements and making referrals
The college adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership/ Northamptonshire & Leicestershire Safeguarding Adults Board
For further details of how the college works with partner agencies in responding to safeguarding incidents (including incidents of child on child abuse), please see the main body of this policy.

Parents / Carers
Parents / carers will be informed of incidents unless sharing information puts a young person at greater risk of harm. Learners will always be encouraged to speak to parents about child on child abuse unless it puts them at greater risk of harm.

Whole college response
We will keep detailed records of any incidents of child on child abuse and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:
- Dedicate more teaching time to a particular issue or topic;
- Deliver additional staff training

The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- [Keeping Children Safe in Education](#) (2025) part five
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Stop it Now Sexual Behaviours Traffic Light Tool](#)
- [NSCP Thresholds Document](#) (note: this is currently under review)
- [NSCP Safeguarding Children Procedures,](#)
- [When to call the police – guidance for schools and colleges](#)

When appropriate the designated safeguarding lead may seek further advice from local or national safeguarding contacts.

Appendix B: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

Emotional abuse may involve:

- Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person 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
- Non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people

to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a young person is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect their child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- Provide a suitable education (updated Working together to Safeguard children 2023)

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

Young people who are absent from education and missing from education

Young people being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or criminal exploitation (particularly county lines), or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a young person may be absent or become missing from education, but some young people are particularly at risk. These include learners who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend an education provider
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with learners who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, neglect, and exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where young people are already known to local authority children/adult's social care and need a social worker where being absent from education may increase known safeguarding risks within the family or the community.

We will always follow up with parents/carers when learners are not at college. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the college as soon as possible where these contact details change.

This includes informing the local authority if a young person leaves the college without a new college being named, and adhering to requirements with respect to sharing

information with the local authority, when applicable, when removing a young person's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a young person is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children/adult's social care team, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

Financial Abuse:
Financial abuse involves the unauthorized or improper use of a young person's financial resources by a parent, caregiver, or any other individual in a position of trust. This may include stealing money or possessions, coercing a young person into giving away their money, or exploiting their financial resources for personal gain. Financial abuse can severely impact a young person's well-being, causing stress, deprivation of essential needs, and hindering their ability to achieve financial independence in the future.

Modern Slavery:
Modern slavery encompasses various forms of exploitation where a young person is subjected to forced labour, servitude, or trafficking for the purposes of exploitation. This could include being forced to work under threat or coercion, being controlled through debt bondage, or being trafficked for sexual exploitation or criminal activities. Modern slavery exploits vulnerabilities and restricts a young person's freedom, often causing physical and psychological harm.

Organisational Abuse:
Organisational abuse occurs within institutions or settings responsible for the care and well-being of young people, such as schools, residential homes, or youth organisations. This abuse may involve neglecting duty of care, failing to address safeguarding concerns, or creating a culture that allows abuse to occur unchecked. Organisational abuse can undermine trust in institutions meant to protect young people and requires robust governance, oversight, and accountability to prevent and address effectively.

Child criminal exploitation
Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

Indicators of CCE can include a young person:
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children/adult's social care team and the police, if appropriate.

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Vulnerable people can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious violence
Signs that a young person is at risk from, or involved with serious violent crime include:
- include increased absence from college;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries; and/or
- unexplained gifts or new possessions, which could also indicate that learners have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as
- being male;
- having been frequently absent or permanently excluded from college; and/or

- having experienced maltreatment and having been involved in offending, such as theft or robbery.

If a member of staff suspects a young person is involved in or at risk of serious violent crime, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children/adult's social care team and the police, if appropriate.

Child sexual exploitation
Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

Young people often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a young person:
- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children/adult's social care team and the police, if appropriate.

Cybercrime
Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;
- unauthorised access to computers (illegal 'hacking'), for example accessing a college's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to

commit further offence, including those above.

Young people with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a young person and possible risk of being drawn into cybercrime, the designated safeguarding lead (or a deputy) will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. We may also refer to children/adult's social care if we think a young person is suffering or is at risk of suffering harm.

Domestic abuse

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse).

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All learners can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Domestic abuse can impact on learners through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on learners. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Learners who witness domestic abuse are also victims.

Older learners may also experience domestic abuse and/or violence in their own personal relationships. See Appendix A: Child on child abuse for more details.

At Creating Tomorrow College we work in partnership with North Northamptonshire Council / West Northamptonshire Council / Leicestershire Council and Northamptonshire / Leicestershire Police to identify and provide appropriate support to learners who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North Northamptonshire Council / West Northamptonshire Council / Leicestershire Council will share police information with the Designated Safeguarding Lead(s) of all domestic incidents where one of our learners has been affected. On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt.

All information sharing and resulting actions will be undertaken in accordance with the 'NSCP Protocol for Domestic Abuse – Notifications to Schools'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The DSL will provide support according to the young person's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare.

The DSL [and deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a young person has been harmed or is at risk of harm, the DSL will also make a referral to children or adult's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation

The DSL will make sure that staff have access to appropriate training to equip them to be alert to learners affected by FGM or at risk of FGM.

Section 11.1 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a learner is at risk of FGM.

Indicators that FGM has already occurred include:
- A learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learner already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise
    - Being repeatedly absent from college, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a learner may be at risk of FGM include:
- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to

attend a special occasion to "become a woman"
- o Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- o Requesting help from a tutor or another adult because she is aware or suspects that she is at immediate risk of FGM
- o Talking about FGM in conversation – for example, a girl may tell other learners about it (although it is important to consider the context of the discussion)
- o Being unexpectedly absent from college

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Forced marriage legislation applies to non-binding, unofficial 'marriages' as well as legal marriages.

Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:
- Speak to the learner about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the learner to a progress coach as appropriate

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.
Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered learners are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered learners are affected by abuse, neglect, and exploitation, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Colleges have a mandatory duty to report to the local authority where they are aware or suspect that a young person is subject to a private fostering arrangement. Although colleges have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the colleges. However, it should be clear to the colleges who has parental responsibility.

College staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the young person involved to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the college, we will take steps to verify the relationship of the adults to the young person who is being registered.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Learners may be susceptible to radicalisation into terrorism.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

Colleges have a duty to prevent learners from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify learners at risk.

We will assess the risk of learners in our college being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our learners to stay safe online at college and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in learners' behaviour. The government website Educate Against Hate[16] and the charity NSPCC[17] say that signs that a learner is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

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[16] https://educateagainsthate.com/signs-of-radicalisation/

[17] https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/

- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Learners who are at risk of radicalisation may have low self-esteem or may be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a learner, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the college's measures to prevent radicalisation are set out in other college policies and procedures, including:
- Conduct policy
- Online Safety Policy

Missing learners

Our procedures are designed to ensure that a missing young person is found and returned to effective supervision as soon as possible. If a young person goes missing, we will:

If missing from college site:
- Contact police with full details of individual including description and clothing
- Contact families
- Staff members to make a sweep of local area in a vehicle

If missing from college care when on an off-site trip:
- Contact main college / site who will:
  - Contact police with full details of individual including description and clothing
  - Contact families
- Staff to reassure students in the group

If missing from home:
- Support families to contact police
- Follow-up conversation

All incidents will be recorded online either via My Concern or Arbor depending upon the context

Appendix C: Safer recruitment

We adhere to Part 3 of Keeping Children Safe in Education at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

We will record all information on the checks carried out in the college's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Pre-appointment safer recruitment

We will include the following in all job advertisements:
- our commitment to safeguarding and promoting the welfare of learners;
- clear confirmation that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Where a role involves engaging in regulated activity relevant to learners, we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to learners.

All applicants will be provided with a link to the Trust website and the:
- college Safeguarding and Vulnerable Adult/Child Protection Policy, and
- statement on the recruitment of ex-offenders

Applicants

We require applicants to provide:
- personal details, current and former names, current address and their national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references; and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

We will not accept copies of curriculum vitae in place of an application form.

Shortlisting and selection

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with learners. For more details of what this will contain, please see Part 3 of Keeping Children Safe in Education (2025).

At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and/or gaps in unemployment.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with learners.

When asked to provide references, we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with learners and provide the facts of any substantiated safeguarding allegations.

We will also inform candidates that we will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online that we may wish to explore with candidates at interview. (Specific guidance can be obtained from the Trust HR team)

New staff
When appointing new staff, we will:
- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including the barred list information, for those who will be engaging in regulated activity with learners);
- obtain a separate barred list check if an individual will start work in regulated activity with young people before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: [criminal records checks for overseas applicants](https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants)[18]
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Regulated activity means a person who will be:
- Responsible, on a regular basis in a college, for teaching, training, instructing, caring for or supervising learners; or
- Carrying out paid, or unsupervised unpaid, work regularly in a college where that work provides an opportunity for contact with learners; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff
If we have concerns about an existing member of staff's suitability to work with learners, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children)[19];
  or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under

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[18] https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants
[19] https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children

the [Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009](#)[20]; or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the college has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with learners
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the college.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Governance

- All trustees and members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board will have their DBS check countersigned by the secretary of state.

All trustees and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)[21]). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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[20] http://www.legislation.gov.uk/uksi/2009/37/contents/made
[21] https://www.legislation.gov.uk/ukpga/2008/25/section/128

- The Chair of Trustees will have their DBS check countersigned by the secretary of state.

Checking the identity and suitability of visitors

All visitors to the site will be required to sign in and wear a lanyard with an authorised visitor badge. Across our trust we operate a colored lanyard system:
- Blue - staff, DBS cleared
- Black - Trustees DBS cleared & Students (specifically marked lanyards)
- Green - visitors (supply staff, contractors etc) DBS cleared
- Red - visitors, no DBS certificate - will be supervised at all times

All visitors will be required to verify their identity to the satisfaction of staff and leave their belongings in a safe place. If keeping them with them then to ensure items such as mobile phone(s), are kept away from use.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in via the visitor's book and wear a visitor's lanyard/badge.

Visitors to the college who are visiting for a professional purpose, such as educational psychologists and college improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide annually written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the college any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using college facilities is not seeking to disseminate extremist views or radicalise learners or staff.

Staff who supervise learners on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect learners from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learner on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix D: How the college responds to allegations that may meet the harms threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply tutor or volunteer or contractor, has:

- behaved in a way that has harmed a young person, or may have harmed a young person, or
- possibly committed a criminal offence against or related to a young person, or
- behaved towards a young person in a way that indicates he or she may pose a risk of harm to learners, or
- behaved or may have behaved in a way that indicates they may not be suitable to work with young people.

It applies regardless of whether the alleged abuse took place in the college or elsewhere. Allegations against a tutor who is no longer teaching and historical allegations of abuse will be referred to the police.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective vulnerable adult/child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

For more information about how the college responds to low-level concerns (concerns do not meet the harms threshold) please see Section 18 of this policy, please also see our Trust Complaints Procedures.

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a young person or other learners is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. We will seek views from our Trust HR Business Partner, the local authority designated officer/s, the police and/or Children or Adult's Social Care (as appropriate).

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the learner concerned.
- Providing an assistant to be present when the individual has contact with young people
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to young people.
- Moving the learner to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted, if appropriate.
- Temporarily redeploying the individual to another role in a different location, for example to a school or other work for the Trust.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or Chair of Trustees where the Principal or Trust Leadership Team is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children/adult's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to learners or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children/adult's social care services, where necessary). Where the police and/or children/adult's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with others at the college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children/adult's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or Children/Adult's Social Care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available through:
  - Trade Union representation
  - Employee support programs
    - Health Assure (confidential counselling support available through Perkbox account).
    - Education Support: telephone number 08000 562561 or website www.educationsupport.org.uk
- Inform the families of the learner involved about the allegation as soon as possible if they do not already know (following agreement with children/adult's social care

services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against tutors (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a tutor will be advised to seek legal advice

- Keep the parents or carers of the learner involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person.
- If the college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

Additional considerations for supply staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the college, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will never cease to use a supply teacher/tutor for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The trust board will discuss with the agency whether it is appropriate to suspend the supply teacher/tutor, or redeploy them to another part of the college, while the college carries out the investigation

We will involve the agency fully, but the college will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children/adult's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the college's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a young person, or if they think the person otherwise poses a risk of harm to a young person, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the student/adult who made the allegation, if they are still attending the college.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the learner(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a learner.

Confidentiality

The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the local authority's designated officer, police and children/adult's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a learner involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the colleg will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

- Records of substantiated, unsubstantiated, and unfounded accusations should be retained until the individual reaches their pension age or for 10 years from the date of the allegation, whichever is longer.

- The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.
- Some records related to investigations or institutional failures may need to be kept for up to 75 years (this will be recommended within a formal outcome)

Where records contain information about allegations of sexual abuse, we will preserve these record. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References
When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons
After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the college's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):
- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For referrals regarding adults in education and other information on the role of the Designated Officer please visit the appropriate local authority website

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the college's internal procedures.

Appendix E: Online Safety

Teaching learners to stay safe online and keeping learners safe online in college is a crucial part of safeguarding. It is essential that learners are safeguarded from potentially harmful and inappropriate online material. We take a whole college approach to online to protect and educate learners, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Our approach to online safety runs through every aspect of our work with learners and the community, including (but not limited to):
- having robust processes (including filtering and monitoring systems) in place to ensure the online safety of learners, staff, volunteers and governors
- protecting and educating the whole college community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- setting clear guidelines for the use of mobile phones for the whole college community

- establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- curriculum planning;
- tutor training;
- the role and responsibilities of the designated safeguarding lead; and
- parental engagement;

This appendix complements and should be read alongside our Online Safety policy. Staff must read the Online Safety Policy in conjunction with our Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction, with regular updates and formal annual training thereafter.

The Designated Safeguarding Lead (DSL) takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place. The DSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep learners safe whilst they are online at the college.

Risks to learners
The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as learners or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We refer to these four areas of risk when planning our approach to online safety and ensuring that we are safeguarding learners against a broad spectrum of potential online harms.

Filtering and monitoring
Our filtering and monitoring procedures, including our review process, are informed by the DfE guidance manual 'Meeting digital and technology standards in schools and colleges'[22].
For more information about the filtering and monitoring standards we adhere to, see 'Filtering and monitoring standards for schools and colleges' (March 2022).[23]

Colleges can use the DFE 'Plan technology for your school service' to self-assess against the filtering and monitoring standards.

In order to keep learners safe when using college IT equipment, we
- Educate learners about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology

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[22] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges
[23] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoringstandards-for-schools-and-colleges

- o Keeping personal information private
- o How to recognise unacceptable behaviour online
- o How to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they're a witness rather than a victim
- Put in place robust filtering and monitoring systems to limit learners' exposure to the 4 key categories of risk (described above) from the college's IT systems:
  - o Internet filtering via Smoothwall
  - o Device monitoring via Smoothwall Monitoring and Senso
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Ensure acceptable use of ICT via filtering and alerting systems:
  - o Smoothwall internet filtering
  - o Device monitoring via Smoothwall Monitor and Senso
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when learners are not present
  - o Staff will not take pictures or recordings of learners on their personal phones or cameras
  - o Make all learners, parents/carers, staff, volunteers and governors / trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in college, use of the college's ICT systems and use of their mobile and smart technology
  - o Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones
  - o Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our college community
- Provide regular safeguarding and children/vulnerable adult protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the vulnerable adult/child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our college's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website.

We are aware that "over-blocking" can lead to unreasonable restrictions as to what learners can be taught with regard to online teaching and safeguarding and mitigate against this by using age appropriate settings within our monitoring software. The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

Generative AI- The college will take account of guidance published by the DFE Generative AI: product safety expectations to support us to use generative artificial intelligence safely.

How to report online safety concerns

If learners, parents or staff have any concerns about online safety, or need to make a disclosure, they should speak to the Designated Safeguarding Lead or deputy without delay. The contact details for these members of staff can be found on the front of this policy.

Cybersecurity

We ensure that we have the appropriate level of security protection procedures in place in order to safeguard systems, staff and learners and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. This is informed by the DfE document 'Cyber security standards for schools and colleges'.[24]

Regular review of our approach to online safety

We recognise that technology, and risks and harms related to it evolve and changes rapidly.

We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their learners face. This is informed by local and national training, regular updates and the DfE guidance 'Meeting digital and technology standards in schools and colleges'.[25]

More information

For more information about online safety, please see Part 1 of Keeping Children Safe in Education (2025)

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[24] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-forschools-and-colleges
[25] https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-forschools-and-colleges

Appendix F: Assessment Criteria for 3 stages of Safeguarding Students in Campuses Open to the Public

Assessment for Progression Between Stages for Safeguarding at Campuses Open to the Public

	Stage 1	Stage 2 Transition Statement	Stage 2 Secure	Stage 2 to 3 Transition Statement
Safety Awareness	Demonstrates basic understanding of safety protocols and follows staff guidance consistently.	Shows increasing awareness of safety risks and hazards, actively seeks guidance when unsure.	Shows a good understanding of safety protocols and consistently follows them under staff supervision.	Demonstrates advanced safety awareness and independently applies protocols to various situations.
Independence Skills	Requires constant supervision and guidance from staff members for movements around campus.	Demonstrates growing confidence in navigating campus independently under staff supervision.	Navigates campus independently under staff supervision but may require occasional guidance.	Achieves full independence in navigating campus grounds without staff supervision.
Risk Assessment & Management	Relies on staff members to identify and mitigate potential risks during movements on campus.	Begins to identify and avoid basic risks independently, seeks staff support for more complex situations.	Identifies and avoids basic risks independently, seeks staff support for more complex situations.	Proactively assesses and manages risks, demonstrates sound judgment in navigating challenging situations.
Communication & Decision Making	Relies heavily on staff members for communication and decision-making during movements.	Communicates intentions and seeks guidance proactively, makes simple decisions independently.	Communicates intentions and seeks guidance proactively, makes simple decisions independently.	Communicates confidently and makes informed decisions autonomously in various situations.
Adapatbility & Resilience	May become anxious or overwhelmed in unfamiliar situations, relies on staff for reassurance.	Demonstrates increased adaptability and resilience, manages minor challenges independently.	Demonstrates increased adaptability and resilience, manages minor challenges independently.	Exhibits high levels of adaptability and resilience, effectively handles unexpected challenges with confidence.
Collaboration & Team work	Primarily observes staff members' actions during movements, limited participation in group activities.	Engages more actively in group interactions, demonstrates willingness to collaborate with peers and staff.	Engages more actively in group interactions, demonstrates willingness to collaborate with peers and staff.	Collaborates effectively with peers and staff when necessary, while primarily operating independently.
Refelction & Learning	Limited ability to reflect on personal experiences, relies on staff feedback for learning.	Begins to reflect on own experiences and identify areas for improvement, seeks feedback from staff and peers.	Begins to reflect on own experiences and identify areas for improvement, seeks feedback from staff and peers.	Actively engages in self-reflection and seeks opportunities for continued learning and growth independently.
Consistency & Reliability	Requires consistent supervision to maintain safe behaviour and adherence to protocols	Demonstrates consistent and reliable behaviour, follows safety guidelines independently under staff supervision.	Demonstrates consistent and reliable behaviour, follows safety guidelines independently under staff supervision.	Maintains consistent and reliable behaviour without staff supervision, adheres to safety guidelines autonomously.

By using these clearly defined assessment criteria, staff members can accurately evaluate students' progress and determine their readiness to transition between stages, ensuring a structured and supportive approach to student development and safeguarding.