

Safeguarding Policy v1

Version	Date	Policy Author (s)	Review Date
Version 1.0	June 2024	Rebecca O'Farrell, Training Director & Designated Safeguarding Lead	June 2025

Version	Page No.	Paragraph / Bullet	Changes

Signed:



Printed Name: Lewis Hatcher

Job Title: Managing Director

Date: 26th June 2024

ROLE/AGENCY	NAME & ROLE	CONTACT DETAILS
College Designated Safeguarding Lead (DSL) & Child Protection Coordinator	Rebecca O Farrell Training Director	0113 2509507 Rebecca.ofarrell@directskillsgroup.co.uk
Deputy DSO's	Jonathan Graham Chris Stoker-Jones	Jonathan.graham@directskillsgroup.co.uk Chris.stoker-jones@directskillsgroup.co.uk
Governor with responsibility for Child Protection and Safeguarding	Lewis Hatcher	Lewis.hatcher@directskillsgroup.co.uk
Online Safety Coordinator	Lewis Hatcher	Lewis.hatcher@directskillsgroup.co.uk
CSWS Duty and Advice / Front Door Safeguarding Hub	Urgent child protection concern/ initial referral	Education staff – 0113 3760336 Member of the public – 0113 2223301
CSWS Emergency Duty Team (out of hours)	Urgent child protection concern	LEEDS 0113 5350600 childrenEDT@leeds.gov.uk NEWCASTLE 0191 278 7878 edt@newcastle.gov.uk
Education Safeguarding Team	Advice/training	LEEDS 0113 3789685 estconsultation@leeds.gov.uk
Local Authority Designated Officer	Allegations against adults within education setting	LEEDS 0113 3789687 lado@leeds.gov.uk NEWCASTLE 0191 2774636 lado@newcastle.gov.uk
NSPCC Whistleblowing Helpline	Allegations against adults within education setting	0800 028 0285
PREVENT Team	Prevent training/advice	LEEDS 0113 535 0810 prevent@leeds.gov.uk NEWCASTLE 0191 prevent@newcastle.gov.uk

Purpose

This policy aims to ensure that.

- Appropriate action is taken in a timely manner to safeguard and promote children and vulnerable adults' welfare.
- All staff are aware of their roles and responsibilities with respect to safeguarding.
- Staff are trained in recognising and reporting all safeguarding issues. Everyone who comes into contact with a learner has a role to play. All staff should be prepared to identify learners who may benefit from early help.
- A culture of vigilance is upheld to ensure that we will act in the best interests of the learners to protect them both online and offline.
- The systems within college are well promoted, easy to understand and easily accessible for all learners.

The governing committee and all staff at Direct Skills Group ensure the main priority is to safeguard and promote the welfare of all our learners, to minimise the risks and to work with external agencies to ensure thorough arrangements are in place within the College to identify, assess and support individuals who are suffering harm and to keep them safe whilst in our care.

The responsibilities set out in this policy apply (where appropriate) to all learners, staff, governors, visitors/contractors & volunteers. We ensure it is underpinned throughout the teaching of the curriculum.

LEGISLATION AND GUIDANCE

In order to safeguard and promote the welfare of children, young people and vulnerable adults the College will follow the legislation and guidance from.

- Keeping children safe in Education (KCSIE Dec 2023)
 - Working together to safeguard children (2018)
 - Further education and skills handbook (2023)
 - Prevent duty guidance (2023)
 - Government information sharing advice (2018)
 - Equality ACT 2010
 - Public Sector Equality ACT
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DEFINITIONS

Safeguarding and promoting the welfare of children and young people means.

- Protecting Children and young people from maltreatment
- Preventing impairment of children and young people's mental health or physical health or development
- Ensuring that children and young people grow up in circumstances with safe and effective care.
- Taking action to enable all children and young people have the best outcomes.

Child Protection

Refers to activities undertaken to prevent children or young people suffering or being likely to suffer significant harm.

Child– A child is any person under the age of 18.

Young Person– A person from 14 to 17 years of age.

Vulnerable Adults - person aged 18 or over who may need community care services because of a disability (mental or other), age, or illness.

EQUALITY STATEMENT

Some children, young people and vulnerable adults have an increased risk of abuse, and additional barriers can exist for some children, young people or vulnerable adults with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
 - Are young carers
 - May experience discrimination due to their race, ethnicity, disability, religion, gender reassignment, sex or sexual orientation
 - Have English as a second language
 - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues relating to abuse
 - Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
 - Are asylum seekers
 - Children who are in care, previously looked after or any children not growing up with their birth family.
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HUMAN RIGHTS ACT

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

EQUALITY ACT 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, College must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, the Corporation should carefully consider how they are supporting students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. College, could, for example, consider taking positive action to support girls if there was evidence, they were being disproportionately subjected to sexual violence or sexual harassment.

PUBLIC SECTOR EQUALITY ACT

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

The PSED recognises that some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobia or transphobic bullying or racial discrimination. College will remain conscious of disproportionate vulnerabilities and integrate this into our safeguarding procedures.

ROLES AND RESPONSIBILITIES

A new chapter bringing together new and existing guidance to emphasise that successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families. This includes principles for working with parents and carers to centre the importance of building positive, trusting, and co-operative relationships to deliver tailored support to families, and expectations for multi-agency working that apply to all individuals, agencies and organisations working with children and their families, across a range of roles and activities.

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff (including those not directly employed by the College), volunteers, and governors in the College. Our policy and procedures also apply to extended College and off-site activities. All staff will be required to read this policy as part of their induction arrangements as well as the documents referenced in training and support section of this policy.

All staff will read and understand their statutory responsibilities outlined in Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2023 and review this guidance at least annually.

All staff will be aware of.

Our systems which support safeguarding, including reading and understanding their professional responsibilities as outlined in Guidance for Safer Working Practice (February 2022), understanding the role of the designated safeguarding lead (DSL and DSO), reading and understanding the College behaviour policy and their safeguarding responses to children absent from education.

The early help process and their role in it, including being alert to emerging problems that may warrant Early Help intervention, particularly those identified in Part 1 of KCSIE (2023) All staff should be reporting emerging problems that may warrant early help intervention.

Children's behaviours can be indicative of their emotional wellbeing and can be linked to mental health. They should be aware of behaviours that may communicate that poor wellbeing can be an indicator of factors such as abuse, neglect, or exploitation. Staff should understand the children's experiences such of abuse, neglect, trauma, and adverse childhood experiences can impact on children's mental health, behaviour, and education.

The process for making referrals to local authority children's social work service (CSWS) and for statutory assessments that may follow a referral, including the role they might be expected to play. Wherever possible, speak to the DSL, a DSO or Managing Director in the absence of the DSL or DSO first to agree a course of action. In the absence of a DSL or DSO being available, staff must not delay in directly contacting children's social work Duty and Advice team or the police if they believe a child is at immediate risk of significant harm.

Our partnership with other agencies in the best interests of the child, young person a. Requests for service to CSWS will (wherever possible) be made by the Designated Safeguarding Team, to the CSWS Duty and Advice team (0113 3760336). Where a child already has a child protection social worker, the College will immediately contact the social worker involved or in their absence, the team manager of the child protection social worker.

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as Female Genital Mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

The College procedures for recording any cause for concerns and passing information on to a DSL or DSO and reporting procedure.

The signs of different types of abuse and neglect both online and offline. They must know the signs of specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE) FGM, radicalisation and serious and violent crime.

All staff to be aware safeguarding incidents/ behaviours can occur outside College both in person or online or be associated with outside factors. CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Children absent from education/absconding during the college day and how this can also be a sign of CCE, including involvement in County Lines.

THE DESIGNATED SAFEGUARDING LEAD(DSL) AND SAFEGUARDING OFFICERS (DSO'S)

Our DSL is Rebecca O'Farrell (Training Director). The DSL takes lead responsibility for child protection and wider safeguarding.

The ideal situation is to have the trained DSL or DSO available on site at all times. Where this is not possible (e.g. due to staff absence), the DSL or DSO's will be available to be contacted via phone or online video – for example when working from home.

During term time, the DSL/DSO's will be available during College hours for staff to discuss any safeguarding concerns. Where a trained DSL or DSO is not on site, in addition to the above, the Training Director will be responsible for co-ordinating safeguarding. The DSL can be contacted at all times by email (Rebecca.ofarrell@directskillsgroup.co.uk)

When the DSL is absent, one of the DSO's will act as cover (Jonathan Graham or Chris Stoker-Jones)

The DSL and DSO's will be given the time, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- contribute to the assessment of children by providing as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm
- refer suspected cases, as appropriate, to the relevant body (children's social care Duty and Advice team, Channel programme, and/or police), and support staff to comply with their mandatory reporting duties in cases where FGM has been identified
- ensure that all staff involved in direct case work of vulnerable children, where there are child protection concerns/issues, have access to regular safeguarding supervision (Ref: LCC Framework for Supervision (2022))
- keep the Managing Director informed of any issues and liaise with local authority officers and relevant professionals for child protection concerns as appropriate
- respond to domestic abuse notifications from the local authority and providing support to children and their families as appropriate
- ensure representation at appropriate inter-agency meetings
- provide reports as required for meetings. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- contribute to the preparation, implementation and review of inter-agency child protection plan or any multi-agency risk management plan that children are subject to
- work with other agencies in line with Working Together to Safeguard Children. When to call the police (NPCC 2020) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- All responsibilities of the DSL are set out in Annex C of KCSIE (2023) – Role of the designated safeguarding lead.

All designated safeguarding leads and Designated Safeguarding Officers must read and comply with these at all times.

GOVERNING COMMITTEE

The governing committee will approve this policy at each review and hold the Managing Director to account for its implementation and any actions/recommendations made by the Local Authority in respect to strengthening the College's safeguarding arrangements.

The governing committee and Managing Director will create a strong culture of safeguarding in College in order to ensure that safeguarding and child protection are underpinned throughout the curriculum.

The governing committee will appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full governing body.

In the event of a safeguarding concerns, or an allegation of abuse is made against the Managing Director the chair of governors will act as the 'case manager'.

The local governing committee will ensure that the College has appropriate IT filtering and monitoring systems in place and should be informed in part, by the risk assessment required by the Prevent Duty in order to limit children's exposure to online risks.

The local governing committee will ensure Policies/procedures/training is in place for all staff. The provision follows safer recruitment processes and have clear allegation management processes.

The local governing committee will supply information as requested by the LSCP and the Local Authority Education Safeguarding Team.

All responsibilities are set out in Part Two of KCSiE (2023) – The management of safeguarding. The local governing committee will ensure that the College is fully compliant with their statutory safeguarding responsibilities.

THE MANAGING DIRECTOR

The Managing Director is responsible for the implementation of this policy, including:

- Ensuring that staff and volunteers are informed of this policy as part of their induction
 - Ensuring this policy is displayed on the College website
 - Ensuring that the roles and responsibilities of the DSL and DSOs as referenced in Annex C of KCSiE (2023) are reflected in their job description
 - ensuring that the DSL has appropriate time, training and resources, and that there is always adequate cover if the DSL is absent
 - ensuring that all staff undertake appropriate safeguarding and child protection training and update every three years
 - acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
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- ensuring that all recommendations made by the Local Authority in relation to strengthening the College's safeguarding arrangements are actioned in a timely fashion

CONFIDENTIALITY AND INFORMATION SHARING

Confidentiality is an issue that needs to be understood by all those working with children, young people or vulnerable adults particularly in the context of safeguarding.

College recognises that the only purpose of confidentiality in this respect is to benefit the child, young person or vulnerable adult. Staff should never promise a child that they will not tell anyone about an allegation/report of abuse, they must pass any cause for concerns immediately to a designated safeguarding lead.

Confidentiality is addressed throughout this policy with respect to recordkeeping, dealing with reports of abuse, allegations of abuse against staff, information sharing and working with parents.

Timely information sharing is essential for effective safeguarding. College will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE 2018). This guidance reduces the risk of harm to children and young people and promotes their wellbeing.

All staff must considerately follow the relevant data protection principles which allow them to share (in the context of their role) and withhold personal information, as provided for in the Data Protection Act 2018 and GDPR.

To promote positive educational outcomes for vulnerable children, information that can help to support positive outcomes being achieved will be shared with colleagues in College that are not a DSL's or DSO where appropriate.

Further details on information sharing can be found in

- Chapter one of [Working together to safeguard](#) includes a myth-busting guide to information sharing
 - At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. [Information sharing advice](#) The seven golden rules for sharing information will be especially useful.
 - at [ICO](#) which includes information about your obligations and how to comply, including protecting personal information, [Sharing data to safeguard children FAQs](#) and providing access to official information
 - in [Data protection: toolkit for Colleges](#) -- Guidance to support Colleges with data protection activity, including compliance with the UK GDPR.
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WORKING WITH PARENTS AND OTHER AGENICIES TO PROTECT CHILDREN

Parents/carers will be made aware of our College procedures in respect to taking any reasonable action to safeguard the welfare of our learners. In cases where the College has reason to be concerned that a Child, young person or vulnerable adult may be suffering significant harm, ill treatment, neglect or other forms of harm, staff will follow the procedures for responding to suspected cases of child abuse or neglect outlined in this policy document and contact CSWS Duty and Advice team to discuss their concerns.

Following from guidance in KCSiE (2023), we will endeavour wherever possible to obtain at least two emergency contacts for every learner within College case of emergencies.

In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the child.

Parents/carers are informed about our Safeguarding and Child Protection policy through the college website and newsletters etc.

Parents and carers will be signposted to the relevant organisation for support (Annex B)

Substantive changes to strengthen how local multi-agency safeguarding arrangements (local authorities, integrated care boards and the police) work to safeguard and protect children locally, including with relevant agencies. Changes include clarifying the roles and responsibilities of safeguarding partners, distinguishing between Lead Safeguarding Partners (LSPs) and Delegated Safeguarding Partners (DSPs), introducing a partnership chair role, emphasising the role of education in safeguarding arrangements and strengthening accountability by clarifying expectations for information-sharing, independent scrutiny, funding, and reporting. Agencies are encouraged to consider the importance of voluntary, charity and social enterprise (VCSE) organisations within arrangements to improve oversight, engagement, and consistency. This chapter also highlights the importance of considering naming and engaging voluntary, charity, social enterprise organisations and sports clubs in published local arrangements if they are not already.

This revision has a renewed focus on how organisations and agencies provide help, safeguarding and protection for children and their families. There are three sections: Early help, Safeguarding and promoting the welfare of children, and Child protection. Early help strengthens the role of education and childcare settings in supporting children and keeping them safe, including information on a child's right to education and risk factors for practitioners to consider when identifying children and families who may benefit from early help. The approach to working with families has been strengthened throughout the guidance, outlining the role of family networks, including stronger guidance on the use of family group conferences to improve family network engagement in decision making and supporting children. Safeguarding and promoting the welfare of children clarifies a broader range of practitioners can be the lead practitioner for children and families receiving support and services under section 17 of the Children Act 1989, and the requirements on local authorities and their partners to agree and set out local governance arrangements. It clarifies the role of children's social care in supporting disabled children and their families, children at risk of, or experiencing, harm outside the home, children in mother and baby units (in prisons) and children at risk from people in prison and people supervised by the probation service. Child protection introduces new national multi-agency child protection standards to set out actions,

considerations and behaviours for improved child protection practice and outcomes for children. It clarifies the multi-agency response to all forms of abuse and exploitation from outside the home, consideration of children at risk of experiencing extra-familial harm in all children's social care assessments and includes resources to support practitioners understanding of the response to online harm.

OUR ROLE IN PREVENTING ABUSE

We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

We will ensure that all learners are taught about safeguarding throughout the curriculum this will be inclusive of online safety.

Other relevant issues will be addressed throughout their training such as self-esteem, relationship and sex education, online safety, online bullying, sexting, child exploitation (CSE/CCE), sharing nudes and semi-nudes, female genital mutilation 18 (FGM), preventing radicalisation, child on child abuse and consent.

Relevant issues/ indicators will be addressed throughout other areas of the curriculum. This will include.

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

ONLINE SAFETY

We ensure that children are safeguarded from potentially harmful and inappropriate online material The College Internet policy is reflective of the requirements set out in KCSIE (2023) in regard to the 4 C's content, contact, conduct and commerce. The College online safety policy is aligned to the College behaviour policy and reflects our approach to issues of online safety (including the sharing of nudes and semi-nude) that empowers us to protect and educate the whole college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate overseen by the governing body.

Annually an online safety review is carried out via the 360 safe website.

Whilst considering our responsibility to safeguard and promote of the welfare of our learners and provide them with a safe environment to learn in we will ensure that we have the appropriate filters and monitoring systems in place. The DSL will take the lead with the filter and monitoring systems and ensure the processes are in place which will be mapped against the DFE standards for filter and monitoring and cyber security standards.

Further details can be found.

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

LEARNERS WITH ADDITIONAL NEEDS

We accept that children, young people and vulnerable adults have a right to be safe, some learners may be more vulnerable to abuse both online and offline. The governing body ensures our children protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children e.g.

- Those with a disability physical or mental
- Special educational needs
- Communication barriers
- Mental health issues
- Those living with domestic violence or drug/alcohol learning disabilities.
- Children who are in care or previously looked after.

Further information can be found here.

- [SEND Code of Practice 0 to 25 years](#)
- [Supporting Pupils at College with Medical Conditions](#)

CHILDREN AT RISK OF SPECIFIC FORMS OF ABUSE

We recognise the fact that a child or young person who identifies as LGBT is not in itself an inherent risk factor for harm, however children who are LGBT can be targeted by other children. LGBT inclusion is included as part of the curriculum and a range of support is available from members of staff. The full lists of learners at risk of specific forms of abuse is outline is KCSIE part 1 ANNEX B

PREVENT

All staff are made fully aware of the prevent strategy. The strategy's three objectives are:

- To challenge the ideology that supports terrorism.
- To protect vulnerable people.
- To support sectors and institutions where there are risks of radicalisation.

If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they must seek advice appropriately with the DSL who must contact the Education Safeguarding Team or the local counter terrorism team.

The DSL annually updates the College prevent risk assessment and action plan.

[Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-duty-guidance-for-england-and-wales)

RADICALISATION, EXTREMISM AND TERRORISM

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. 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.

If any staff member is concerned about a change in the behaviour of an individual or see's something that concerns them, they must seek advice appropriately with the DSL who must contact the Education Safeguarding Team or the Prevent Education Officer.

We will assess the risk of learners being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This includes being able to demonstrate a general understanding of the risks affecting children, young people and vulnerable adults in the area and a specific understanding of how to identify individual learners who may be at risk of radicalisation and what to do to support them. The Education Safeguarding Team and the Prevent team can advise and identify local referral pathways.

Effective early help relies on all staff members to be vigilant at all times and be aware of the nature of the risk for children, young people and vulnerable adults, and what support may be available. Our College will ensure that all staff members will undertake Prevent awareness training at induction and then annually thereafter.

CHILD ON CHILD ABUSE

We recognise that children, young people and vulnerable adults are capable of abusing other children including online. It is very clear that this type of abuse will always be treated seriously. Our College has a zero-tolerance approach to such attitudes and behaviours.

All concerns around child-on-child abuse will be taken seriously, reported, investigated, recorded and managed in line with the child protection procedures outlined in this policy. Our College will ensure that at least one member of the Colleges safeguarding team has completed training on 'understanding and managing harmful sexual behaviour in education settings'. The DSL is responsible for providing support to all learners involved in incidents of child-on-child sexual abuse.

We recognise that sexual violence and/or sexual harassment can happen anywhere including educational settings both in person and online. Where concerns of sexual violence or sexual harassment are witnessed, disclosed or reported to the College (including those that have happened outside of College) the concern will be taken seriously.

In responding to such concerns, the DSL must contact the Duty and Advice team if appropriate and follow the principles set out in Part 5 of KCSiE (2023) and the DfE guidance on Sexual Violence and Sexual Harassment (2021).

We will ensure that the needs of children who may have sexually harmed others will be considered separately from the needs of those who have/may have been subject to sexual harm. Children who have/may have sexually harmed others will be responded to in a way that meets their needs as well as protecting others within the education setting through a multi-agency risk assessment management plan (RAMP). Where appropriate there must be a coordinated multi-agency approach to risk assessment which will include involvement of parent/carers, social care, health, police and youth justice (where appropriate).

We will ensure that all children, young people or vulnerable adults who may have/have been sexually harmed will be taken seriously and that they will be supported and kept safe.

In instances where allegations of sexual violence and/or harassment are found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else. In cases where the report is found to be deliberately invented or malicious we will take the appropriate disciplinary action in keeping with the College's behaviour policy.

Where child exploitation (i.e., criminal, sexual, trafficking, modern day slavery etc.), or the risk of it, is suspected, staff must notify the designated member of staff for child protection, in line with the child protection policy reporting systems.

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

- Bullying including cyber bullying.
 - Abuse in intimate personal relationships between children.
 - Physical abuse such as kicking, shaking, biting and hitting causing physical harm.
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- Sexual Abuse

FEMALE GENITAL MUTILATION (FGM)- MANDATORY REPORTING

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences.

Any teacher within the College who discovers that an act of FGM appears to have been carried out on a learner under the age of 18 must immediately (in consultation with the DSL) report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty 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. Teachers must never examine learners.

Any other staff member who discovers that an act of FGM appears to have been carried out on a learner under the age of 18 must speak to the DSL and follow our local safeguarding procedures.

Any staff member who suspects a learner is at risk of FGM or discovers that a learner aged 18 or over appears to have been a victim of FGM], must speak to the DSL and follow our local safeguarding children's partnership procedures.

CHILDREN ABSENT FROM EDUCATION

A child absent from education is a potential indicator of abuse or neglect. Where a child is reported to be absent from education, we will comply with our statutory duty to inform the local authority of any learner who falls within the reporting notification requirements outlined in Children Missing Education – Statutory guidance for local authorities (DfE September 2016) and follow the Leeds Children's Services LA procedure and contact: cme@leeds.gov.uk. Tel: 0113 3789686.

Staff members must follow the college's procedures for dealing with children who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

County Lines is a term used to describe gangs and organised criminal networks involved in supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines." It involves Child Criminal Exploitation as gangs use children and vulnerable people to move and store drugs and money across the country. County Lines activity and the associated coercion, intimidation, violence, weapons, and exploitation has a devastating impact on young people, vulnerable adults, and local communities. Staff will remain vigilant, and concerns will be raised to a member of the safeguarding team. Further information can be found in the governments [Missing Children and Adults Strategy](#).

MENTAL HEALTH

All staff are aware that mental health problems can in some cases be an indicator of abuse, neglect or exploitation. Teaching staff are in a good position to observe learners on a day-to-day basis to identify any behaviours that suggest they may be experiencing mental health issues. If staff have a mental health concern that is also a safeguarding concern regarding a learner they must follow the reporting procedure (APPENDIX 5)

SAFER COLLEGE CULTURE

The governing board will ensure that the following appropriate policies and procedures are in place and shared with staff at the point of induction, in order for appropriate action to be taken in a timely manner to safeguard and promote a learner's welfare:

- whistleblowing/confidential reporting policies (guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken when staff have concerns about any adult's behaviour)
- The procedures for managing children who are absent from education.
- Guidance on Safer Working Practices
- Safeguarding and Child Protection policy (including online safety).
- Behaviour Policy
- The names, roles and responsibilities of the designated safeguarding lead and any deputies.

SAFER RECRUITMENT

The College pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in part KCSIE (2023)

We will keep and update a single central record which demonstrates the relevant vetting checks required including: an Enhanced DBS check, identity and qualifications.

All recruitment materials will include reference to the College's commitment to safeguarding and promoting the wellbeing of the learners.

We will ensure that all recruitment panels include at least one person that has undertaken the safer training as recommended by the Local Authority/Leeds LSCP.

For individuals who have lived or worked outside the UK, in addition to the same checks as all other staff, the College will complete any additional checks required to satisfy themselves that the individual is suitable to work with children. (selection process).

TRAINING & SUPPORT

All staff members will be made aware of systems within our College that support safeguarding, and these will be explained to them as part of our staff induction. This includes: the College's safeguarding and child protection policy; the Colleges safer working practice document and the College's whistleblowing procedures.

We recognise the stressful and traumatic nature of child protection work. Support is available for any members of staff – please refer to "Child Protection and Safeguarding Advice Contact List" at the front of this policy. Access to regular and timely supervision is an essential form of support for all designated safeguarding staff. Children's Services Education Safeguarding team are also potentially available for advice and support (Tel: 0113 3789685).

The DSL and DSO's must have attended the Children's Services Education child protection training course. They will attend refresher training at least every two years. The DSL & DSO's will undertake Prevent Awareness Training to enable them to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

We will ensure all staff receive induction and are updated on the appropriate actions to their roles and responsibilities, especially staff new to the College. All staff will access basic child protection training including online safety as part of the College's induction arrangements and refresher training at least every three years.

All staff should have regular safeguarding, child protection training and online safety updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Access to training can be via the Children's Services Education Safeguarding Team and the LSCP.

Governors, including the nominated governor will attend specific training for their role, updated at least every three years.

Any training accessed through third party/independent providers must reflect the LSCP protocols and the LSCP minimum standards checklist. This training will be recorded by the College on a separate database.

The Managing Director and at least one member of the governing body that is not a staff governor must complete the National Safer Recruitment Training and refresh this training every five years.

CHILD PROTECTION RECORDS

The responsibility to maintain, process, share, transfer and store child protection and safeguarding records in accordance with the Data Protection Act 2018 and the GDPR principles is the responsibility of the DSL and any DSO's. Child protection information will be held securely on OneDrive with access being restricted to the DSL and their deputies,

The following information must be kept securely with restricted access, whether paper or electronic:

- chronology (summary of significant events and the actions and involvement of the College/college)
- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.
- all completed child protection cause for concern records.
- any child protection information received from the child's previous educational establishment.
- records of discussions, telephone calls and meetings with colleagues and other agencies or services
- professional consultations
- letters and emails sent and received relating to child protection matters.
- referral forms sent to CSWS, other external agencies or education-based services.
- minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate.

Where there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the learner or others (i.e. self-harming or harmful sexualised behaviour), this information must be shared with the destination provision prior to the learner starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The DSL will also consider if it would be appropriate to share any information with the new education setting in advance of a learner leaving, for example prior to a transfer programme.

Where a vulnerable young person is moving to an alternative further Education establishment, consideration will be given to the learners wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases where it is deemed appropriate, relevant child protection information must be shared via the FE Safeguarding Information Sharing Form only. The original records will be retained and archived. Due consideration must be given to the sharing of any additional information requested by the receiving establishment.

Where the destination further educational setting is unknown the original records will be retained by the College

Learner records will be transferred in a secure manner within 5 days or for an in-year transfer or within 5 days of a start of a new term, for example, through secure electronic file transfer or by hand. When hand-delivering learner records, a list of the names of those pupils whose records are being transferred and the name of the college they are being transferred to must be made and a signature obtained from the receiving college as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the must be retained for audit purposes.

If a learner moves from our College, child protection records will be forwarded onto the named DSL at the new education setting, with due regard to their confidential nature. Good practice suggests that this will always be done with a face-to-face handover between designated staff, or a verbal conversation is had over the telephone if a face-to-face handover is not possible. A signed receipt of file transfer or electronic delivery and read receipt must be obtained for audit purposes by the delivering College.

If sending by post, records will be sent "Special Delivery". A note of the special delivery number will also be made to enable the records to be tracked and traced via Royal Mail.

For audit purposes a note of all pupil records transferred or received will be kept in electronic format. This will include the child's name, date of birth, where and to whom the records have been sent, and the date sent and/or received.

If the DSL member of staff resigns from their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder.

In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Managing Director to ensure that the new post holder is fully conversant with all procedures and case files.

All DSLs receiving current (live) files or closed files must keep all contents enclosed and not remove any material.

All receipts confirming file transfer must be kept in accordance with the recommended retention periods. (further details in section 24-archiving)

SAFE DESTRUCTION OF A LEARNER RECORD

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction will be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation, or they will contain information which is confidential to College or the Local Education Authority. If we retain paper files, these will be shredded prior to disposal.

DEFINITIONS AND INDICATORS OF ABUSE

We expect staff to use the following information to ensure appropriate and sensitive response to concerns, allegations or disclosures.

The categories of abuse outlined below, provide the legal framework to assist all those people working with learners to acknowledge and apply the principles of good working practice to their roles and responsibilities.

You will need to understand:

- How to identify signs of abuse
- The child protection referral process
- How to implement the highest standards of personal and professional practice within their area in order to ensure that learners feel safe, and staff do not leave themselves to open allegations of abuse.

LEGAL DEFINITIONS OF ABUSE

ABUSE

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to prevent harm. Harm can include treatment that is not physical as well as the impact of witnessing ill treatment of others such as domestic violence.

NEGLECT

Neglect is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. It may involve a parent or carer failing to.

- Provide adequate food, shelter and clothing,
- Failing to protect from physical harm,
- Danger or failure to ensure access to appropriate medical care or treatment.

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

PHYSICAL ABUSE

Somebody may abuse or neglect a learner by inflicting harm, or by failing to act to prevent harm. Learners may be abused in a family or in an institution or community setting by those known to them or, more rarely, by a stranger. Physical abuse may involve.

- Hitting
 - Shaking
 - Throwing
 - Poisoning
 - Burning or scalding
 - Drowning
 - Suffocating
 - Generally causing physical harm to a learner.
-

Physical harm may also be caused when parent/carer/advocate feign the symptoms of, or deliberately causes ill health to a learner whom they are looking after.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a learner to take part in sexual activities, whether or not the learner is aware of what is happening. The activities may involve.

- Physical contact, including penetrative or non-penetrative acts.
- Non-contact activities, such as involving students in looking at, or in the production of, pornographic material or watching sexual activities or encouraging students to behave in sexually inappropriate ways.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a learner such as to cause severe and persistent adverse effects on the learner's emotional development. It may involve.

- Conveying to a learner that they are worthless or unloved inadequate, or valued only insofar as they meet the needs of another person.
- It may involve causing learners frequently to feel frightened or in danger, other exploitation or corruption.

Some level of emotional abuse is involved in all types of ill treatment of a learner, although it may occur alone.

CHILD ON CHILD ABUSE

Children can abuse other children, and this is classed as child-on-child abuse. This can happen both inside and outside of College. It takes many forms and can include (but is not limited to)

- Bullying (including cyberbullying),
- Abuse in intimate relationships, sometime this is known as 'teenage relationships abuse'.
- Physical abuse
- Sexual violence such as rape
- Sexual harassment
- Consensual and nonconsensual sharing of nude or semi-nude images
- Upskirting
- Initiation type violence, abuse or humiliation used as a way of initiating a person into a group, this can include an online element.

The college recognises that there are other forms of abuse of potential significance to students.

DOMESTIC ABUSE

Children/young people can witness and be adversely affected by domestic abuse/violence in their home. This can have a serious, long lasting emotional and psychological impact. Staff need to recognise this and inform the DSL if they think a young person is being affected by incidents occurring at home.

BULLYING

we recognise that bullying is deliberate, hurtful behaviour that can take many forms. It can be verbal, physical, psychological, social and technological, it does and can include actions such as physical assaults, sarcasm, taunts, threats, gestures, unwanted physical contact, inappropriate use of a cell phone or computer, graffiti, stealing or hiding personal items. Bullying in some forms can constitute a criminal act. Bullying can happen both in person and online.

We provide training and learning materials to assist both learners and teaching staff to consider this unacceptable type of behaviour and will take appropriate action if it is identified. There is a separate bullying policy.

HARASSMENT

Harassment is closely associated with aspects of bullying and occurs when an individual feels that they are subject to behaviour that is unacceptable. Such behaviour may include simple name – calling or an action that is designed to upset or worry another person. Harassment in some forms can constitute a criminal act. Harassment can happen both in person and online.

GROOMING

Grooming is the process by which an offender prepares a young person or vulnerable adult for sexual activities. This method can be used by any offender. This process is usually carefully planned, stage-managed, premeditated and can take weeks and even months to establish, and can include the following:

- Build the trust of the learner.
 - Show favouritism.
 - Gain the trust of the learner's carers.
 - Isolate the learner from friends/family.
 - Foster intimidation and secrecy. Offenders usually put a great deal of effort into ensuring that a learner remains quiet. Apart from promises, threats and bribes, offenders usually take advantage of a powerless learner by presenting a distorted view of what is happening.
 - Boundary violations. This may begin with an innocent touching.
- Grooming can happen both in person and online.

CHILD SEXUAL EXPLOITATION (CSE)

CSE is the next step after grooming. It involves exploitative situations and relationships where young people receive something, for example, food, gifts, drugs etc. Exploitation is an imbalance of power over the victim which increases as the relationship develops and can involve coercion, intimidation and/or enticement including pressure from peers to have sex. Further information on CSE is available from the DSO's.

CHILD CRIMINAL EXPLOITATION (CCS)

Similar to the above in terms of how the young person is exploited but it relates to criminal activities rather than sexual. Examples have been forced to work in a cannabis factory, county lines, shoplifting/pick pocketing for someone else or threatening other young people.

FORCED MARRAIGES

Forced marriages is a marriage conducted without the full consent of both parties and where duress is a factor. It is an entirely separate issue from an arranged marriage with is freely entered into and the two should not be confused. 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, 154 Section 5B (6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case. 156 threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages." Any disclosure of a forced marriage by a learner must be referred to the DSL and the procedures carried as outlined in the flow chart in Appendix 2.

RADICALISATION

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Staff also need to be aware of Prevent guidance which aims to prevent people from being drawn into terrorism and the Channel programme which focuses on providing early intervention support for those identified as being vulnerable to being drawn into terrorism.

This is covered in more detail in the radicalisation policy and information for staff.

EXTREMISM

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

TERRORISM

Terrorism is the use or threat of action which: involves serious violence against a person. involves serious damage to property. endangers a person's life.

CHANNEL

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency panel, which will discuss individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required.

COUNTY LINES

County lines are a network between an urban centre and county location (for example in this area a county location could be Yeadon, Harrogate) where drugs are sold often over a mobile phone. Children and vulnerable people are used to transport drugs, cash or even weapons. It can involve intimidation, blackmail and serious violence.

Sometimes gangs form a secure base in the home of a vulnerable person, forcing assistance through violence or exploiting a drug dependency, this is called Cuckooing. Children as well as adults are used as drug runners, it is common for gangs to have access to several addresses. Leaders or dealers can enter into relationships with

vulnerable young females, which can also lead to sexual exploitation or domestic violence. Young people can have drugs or money stolen and become indebted, needing to continue to supply to pay the money back. Once involved it is extremely difficult for young people to get out, the fear of, and actual extreme violence forces them to continue, alongside threats or violence and even death to family members.

UP-SKIRTING

The Voyeurism (Offences) Act 2019, commonly known as the Up-skirting Act, is where someone takes a picture under a person's clothing (not necessarily) a skirt without their permission/knowledge with the intention of viewing their genitals or buttocks. This is a criminal offence and should be reported to the police.

CONTEXTUAL SAFEGUARDING

Although this is not a term relating to abuse, staff need to be aware of its meaning. Initially designed to respond to events outside the control of the family, mainly child on child abuse, it focuses on disrupting/changing harmful contexts rather than just supporting/involving the family. For example, if a take-away was known as somewhere gang members recruited drugs runners then then take-away and gangs would be targeted, and their activities disrupted rather than just the family being given support/having intervention. The thinking behind this is that often peers have a strong influence than family on young people.

CHILDREN WITH SPECIAL EDUCATION NEEDS AND DISABILITIES

When working with children with special educational needs and disabilities, staff need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child. The LSCP have a multi-agency protocol to support professionals in making informed judgements for bruising in non-independently mobile children.
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances
- Invasive procedures

HARMFUL SEXUAL BEHAVIOURS (sometimes referred to as HSB)

Harmful sexual behaviour (HSB) is a term used to describe sexual actions that are outside what is safe for a young person's stage of development. It includes actions that can harm either the child or young person themselves, or another person. It can include:

- frequently and intentionally accessing age-inappropriate sexual material online
 - using inappropriate language
 - undertaking mutual sexual activity, they are not ready for with peers
-

- sending and receiving illegal images
- sexual interactions where there are significant power differences, lack of consent, or through force or threats.
- engaging in abusive or sexually violent sexual behaviour online or offline

HOMELESSNESS

Homelessness or at risk of becoming homeless present a risk for learner welfare. The DSL and DSO are aware of contact details and referral routes so they can raise concerns at the earliest opportunity. Signs that a family may be at risk include household debt, rent arrears. When a referral or discussion with the Local Housing Authority takes place, this must not and should not replace a referral into local authority children's social care if a child is at risk or has been harmed.

MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms including sexual exploitation, forced labour, slavery, forced criminality and removal of organs. Further signs that somebody may be a victim of modern slavery can be found.

[Modern slavery](#)

RESPONDING TO CHILDREN, YOUNG PEOPLE OR ADULTS WHO REPORT ABUSE

- Stay calm.
 - Do not transmit shock, anger or embarrassment.
 - Reassure them, Tell them you are pleased that they are speaking to you.
 - Never enter into a pact of secrecy. Assure her/him that you will try to help but let them know that you will have to tell other people in order to do this. State who this will be and why.
 - Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
 - Tell them that it is not their fault.
 - Encourage them to talk but do not ask "leading questions" or press for information.
 - Listen and remember.
 - Check that you have understood correctly what they are trying to tell you.
 - Communicate that s/he has a right to be safe and protected.
 - Do not tell them that what they have experienced is dirty, naughty or bad.
 - Do not take photographs or make videos of any injuries reported by a child.
 - It is inappropriate to make any comments about the alleged offender.
 - Be aware that they may retract what they have told you. It is essential to record all you have heard.
-

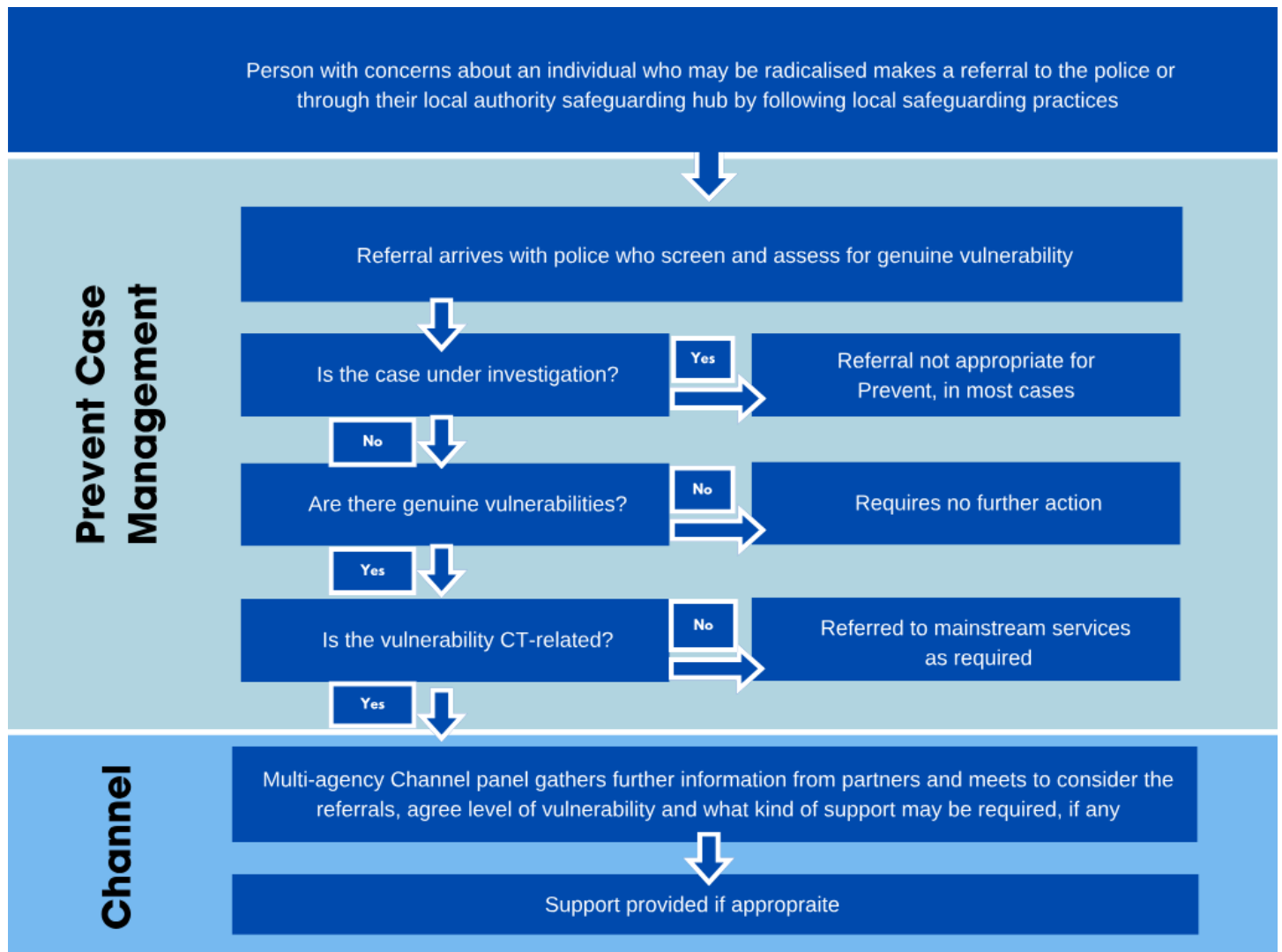
- At the end of the conversation, tell them again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using their own language. Include any questions you may have asked. Do not add any opinions or interpretations.

REMEMBER - It is not the staff's role to investigate reports of abuse. Their role is to observe that something may be wrong, ask about it, listen, be available and respond appropriately.

WHAT NEXT

Remember you must not deal with this yourself. All reports of abuse must be recorded and responded to in keeping with the professional roles and responsibilities.

PREVENT REFERRAL PROCESS



GUIDELINES AND PROCEDURES

Introduction

Direct Skills Group expects staff to use the following information to ensure appropriate and sensitive response to concerns, allegations or disclosures.

The categories of abuse outlined below, provide the legal framework to assist all those people working with learners to acknowledge and apply the principles of good working practice to their roles and responsibilities.

All divisional areas and support teams within Direct Skills Group will need to understand:

- How to identify signs of abuse
- The child protection referral process
- How to implement the highest standards of personal and professional practice within their area in order to ensure that learners feel safe, and staff do not leave themselves to open allegations of abuse.

What you should do if you suspect abuse

The college has a duty of care to all learners and members of staff. The member of staff dealing with a suspicion, concern or a learner's disclosure will need to make a judgement about the seriousness of the allegation and to whom they should report. For guidance, this may be as follows:

- Where allegations are less serious or urgent and involve a learner, the member of staff should initially contact the learner's Tutor.
- Where allegations are of a (more) serious nature, the member of staff should report direct to the DSL.
- Where allegations involve a member of staff or DSO, this should be reported directly to the Managing Director
- It is recommended that all staff should use the referral procedures outlined in these guidelines and procedures. However, the right of any individual to make direct referrals to child protection agencies is acknowledged.

All reports of cases outlined above relating to learners should be forwarded to a DSO/DSL for confidential recording. Matters relating to staff will be recorded by the DSL or Managing Director

If any individual feels that the organisation has not responded appropriately to concerns, they can contact the relevant child or adult LSCB referral and assessment team or the police directly for advice which may result in recourse to other College procedures.

Suspicions, disclosures or concerns should not be discussed with anyone, other than those named above.

All suspicions, disclosures or concerns must be reported as soon as possible.

What the College will do when abuse is reported to a DSO, or a disclosure is made.

The DSO(s) will follow up all referrals and disclosures made directly by students or via staff in accordance with this policy, the guidelines and procedures and as appropriate to the specific circumstances of the referral.

- The DSO will not make any decisions alone but will discuss actions with another appropriate DSO before taking action.
- As appropriate, the DSL will seek further advice from the relevant child or adult Safeguarding referral and assessment team (according to the location of the learner's residence) or make a direct referral.
- The College will co-operate with the requirements of the relevant child or adult Safeguarding referral and assessment team, LCSB or Police in helping them to further investigate the referral e.g. provide confidential interviewing facilities for the learner.
- The DSL will follow up, as appropriate, the involvement of any other staff or learner in the referral or disclosure.
- This may require the signposting of appropriate support for that individual e.g. it may be appropriate for staff to make anyone affected by the reporting of abuse aware of the Counselling service offered by the College as a means of support and, with their agreement, to make an appointment for them.
- Support may also be required for the learner who made the initial disclosure; The DSO's will assess the situation and make a referral to an outside agency if appropriate.
- Where appropriate disciplinary action will be implemented in accordance with the Staff or Learner Disciplinary Policies e.g. in cases where abuse has been as a result of bullying by another learner.
- Any referral may also involve following through the College's Complaints Procedures.
- Any outcomes from a referral or disclosure will be reviewed and the next steps taken as appropriate and in accordance with the relevant College policies and procedures.
- Staff should be aware that information regarding a referral or disclosure should only be shared on a need-to-know basis, and the appropriate consent gained. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk (Information sharing 2018). The DSO's or DSL should always be consulted prior to information sharing and a record kept of the decision taken and why.

What to do if a young person, vulnerable adult or member of staff has talked to you about abuse or asks you to listen.

Remember – it is not your responsibility to solve the problem, but it is your responsibility to act and pass on the information.

PROCEDURE

1. Reassure the learner that you will **listen** to what they have to tell you.
2. Tell the learner that you may need to share the information with someone else who needs to know and who can help them. **Do not promise to keep it confidential.**
3. Make sure that the location of where you are is both safe and not isolated (it is appropriate to consider your own safety and reputation).
4. If possible, tell another member of staff where you are and why.
5. Listen but do not make promises you cannot keep.
6. If possible, go over what has been said.
7. Ask the learner what they want to happen next; in some cases, the student has the right just to be listened to and may not wish the matter to be taken any further.
8. If the learner is in danger, escort them to the nearest appropriate location (this location should offer security, confidentiality and opportunity for sensitivity) so immediate action can be taken.
9. Tell the learner what you intend to do with the information and with whom you would like to share it.
10. As soon as possible, record what was said on a cause for concern form using the learner's own words, sign and date. If the information is later recorded electronically, keep the initial notes secure.

PREVENTION OF ABUSE

Direct Skills Group will ensure that, wherever possible, every effort is made to implement its vision and values in order to ensure that students feel secure, that they are encouraged to talk and will be listened to. It will aim to do this by respecting:

CONFIDENTIALITY

It is important that staff should clearly understand issues of confidentiality when working with learners particularly in the context of child protection.

The key points to consider are:

- Child protection legislation overrides GDPR rules where the safety of the learner is judged to be at risk. It is the responsibility of the DSL to make this judgement.
 - Learners need to be aware that staff cannot guarantee confidentiality and must be clearly told that any information that they might give may need to be shared with others who need to know. Consent here may not be possible but is always desirable and will be in accordance with the learner's Learning Agreement. It may be helpful to explain to the learner why the information needs to be referred on, the difference between confidentiality and secrecy and that only those who need to know and who can help them will be told.
 - Confidentiality should never be broken without informing the learner.
-

- Issue relating to Child Protection should only be discussed by those who need to know and must **never** be discussed in general staff meetings or conversations.
- In line with the policy, liaison with other agencies will only be conducted with consent from the DSL.

TRAINING

- Staff should update their basic awareness training via www.safeguardingchildren.co.uk prior to attending bespoke additional training workshops to further explore opportunities to demonstrate good practice.
- Full use is made of specialist staff to deliver 'hot topics' recognising the value of things such as finances, sexual orientation, prevent, self-esteem, pregnancy, alcohol, bullying, online safety etc.

ADDITIONAL INFORMATION REGARDING THE PREVENTION OF ABUSE

At Direct Skills Group, other factors are taken into consideration to prevent the abuse of learners:

RECRUITMENT OF LEARNERS

Child protection issues arise with regard to the recruitment of learners because a potential learner may have a history which means they pose a threat to other students in the College. This is by the following procedures.

Interviews

- An interview must be a strict prerequisite for entry on to any course.
- The interview must only be conducted by a member of Direct Skills Group staff who are experienced in interviewing.
- The interview should not be regarded as a formality and offers made will be dependent upon facts and information revealed by the interviewee and references.
- Where learners reveal a background which may put other learners at risk, a risk assessment must be completed and the learner's acceptance onto the course carefully considered.
- Further information can be obtained in the Admissions Policy. For staff interview procedures refer to the HR policy.

References – Learners

- At least one closed reference prior to enrolment that meets specific course requirements which has been obtained directly by Direct Skills Group
-

- The referee will be told the type of course/activity that the learner has applied to and be asked to state whether there are any known reasons to doubt the learner's suitability for having access to others.
- The closed reference should be from the learner's last educational establishment. In the case of applications from mature learners, a personal referee who is not a relative may be more appropriate.

RECRUITMENT OF STAFF

Human Resources (HR) will continue to ensure that safe recruitment practices are upheld for all staff and that current legislation is adhered to.

As part of due diligence Direct Skills Group will carry out an online search on shortlisted candidates. This may help identify any incidents or issues that have previously occurred and are publicly available online. Direct Skills Group may then explore this with the candidate at interview. This is stated within the job advert.

Where the individual's role is a "regulated post" as defined by the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) HR will ensure that all the statutory pre-employment checks are adhered to. Any staff giving cause for concern will be investigated and, if necessary, subject to the college's disciplinary procedure, and reported to the Police and/or Independent Safeguarding Authority (Disclosure and Barring Service will effect from 1st December 2012).

Human Resources will continue to provide appropriate training and professional development in order to allow all staff to carry out their job effectively and implement the highest standards of personal and professional practice.

EMPLOYERS

Where Direct Skills Group contracts sub-contractors or has a sub-contracting arrangement, it will ensure that the agency or body has appropriate policies in place and agrees to comply with College policies.

WORKING WITH OTHER AGENCIES

Staff will liaise where necessary with the LSCB and attend conferences and training if required, in accordance with LSCB procedures.

Where possible staff will continue to develop close links with feeder Colleges to share information and support young people at risk.

WORK EXPERIENCE, WORK PLACEMENT AND APPRENTICESIPS

We have a duty of care to all our learners and no less than those employed as Apprentices and who attend on a part-time basis. The education of both apprentices and employers on child protection issues is essential. The

contract/agreement for apprentices must include a guidance note on child protection and how to recognise the signs in their employees.

Photography

The following information is provided as a guide to minimise the risk of photographic images being used or stored in an inappropriate way.

- The Data Protection Act applies to photographs of learners where this can be classed as personal data. This may apply to:
 - Photographs of learners which are taken for official College use, for example as part of the learner record or the issuing of identification passes.
 - Photographs taken of learners in class or during any teaching and learning or other college activity.
 - Any photograph of a learner that is stored electronically by the College.
- Permission should always be obtained from the learner before taking a photograph, and also from the parent/carer/advocate where the learner is under 18, how the image will be used. This should cover all possible future uses of the image for example use in printed marketing material, on the website, in posters or on notice boards. A photograph should never be used for any other purpose than that agreed with the subject at the time permission is given.
- Where the media/press are involved in taking photographs of learners, the learners, and their parent/carer/advocate where the learner is under 18, must agree to the use of the photographs by third parties and be aware that the images may appear/be used in the media.
- In order to minimise the risk of learner images being used in an inappropriate way, visiting photographers must wear official ID badges and be supervised at all times by Direct Skills Group staff member.

COLLEGE VISITORS

The College is open and accessible to adults and attracts customers from outside the College who wish to use our commercial facilities e.g. Salons. The College is aware of the associated risks and staff are trained to be alert to this. When working with adults our learners are always supervised. The College works closely with other authorities to ensure that learners are not put at risk.

CONTRACTORS

Involves all contracts and/or one-off requirements for the provision of works at The Direct skills Group, where a member of a provider's personnel may come into contract with a learner(s), or sensitive personal information in relation to them, will require those providers' personnel to hold DBS clearance.

In order to offer protection to its learners, The Direct skills Group expects that relevant providers' personnel engaged in the provision of these contracts will have the same level of DBS clearance, monitoring and verification as would expect of its directly employed staff. Therefore, it is crucial for staff to ensure that where

appropriate, an enhanced DBS is sought and confirmed in writing. This is vitally important in not only protecting learners, but those staff involved in the procurement of goods/services.

VOLUNTEERS

Volunteers are subject to the same scrutiny in terms of statutory checking as employed staff, if they are undertaking “regulated” activity. **Under no circumstances will a volunteer for whom a DBS Disclosure is necessary be left unsupervised with students.** However, not all volunteers undertaking activities that would otherwise be described as “regulated” are subject to DBS checking. Under the Protection of Freedom Act, volunteers undertaking “regulated” activity are not subject to compulsory Vetting and Barring procedures **if they are supervised.** Each case will be considered on its own merits.

In coming to a decision on the Risk Assessment, the college will consider:

- The duration, frequency and nature of contract with learners, and then.
 - What the college knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers.
 - Whether the volunteer is well known to others in the college community who are likely to be aware of behaviour that could give cause for concern.
 - Receipt of a reference from the volunteer’s current employer, of from other voluntary activities where referees would advise on suitability; and
 - Any other relevant information about the volunteer or the work they are likely to do.
-

GLOSSARY OF TERMS

Adults Authorities

Include any local social services organisations which provide support for adults, including all students over the age of 18.

Allegations

When someone reports specific unacceptable behaviour where abuse/harm may have occurred.

Barring list (previously List 99)

List 99 contains the names, dates of birth and teacher reference number of people whose employment has been barred or restricted, either on ground of misconduct or on medical grounds

Child

A person under the age of 18 years. A child becomes an adult on the date of their 18th Birthday.

Concern

Inappropriate or unacceptable behaviour or communication e.g. favouritism, negligence.

DBS

Disclosure and Barring Service

DSL

Designated Safeguarding Lead

DSO

Designated Safeguarding Officer

Disclosure

Is when a person tells someone they are harmed or abused in some way.

ISA

Independent Safeguarding Authority

LADO

Local Authority Designated Officer

Learner

For the purpose of this policy this term covers any children or young people under the age of 18 and any vulnerable adults who are studying at Direct Skills Group

LSAB

Local Safeguarding Adult Board

LSCB

Local Safeguarding Children Board

Staff

Those individuals employed by Direct Skills Group

Volunteers

Those individuals who work at the college in an unpaid capacity and help out within the classroom.

Vulnerable adults

Persons aged 18 or over with:

- A learning or physical disability
- A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
- A reduction in physical or mental capacity

Young Person

A term used to define 'children' of college age who are under the age of 18.

APPENDIX 1

CONTACT DETAILS

Leeds Safeguarding Children Board Duty and Advice Team – 0113 376 0336

Leeds Child Protection Team - 0113 3951716

Adult Social Care – Leeds – 0113 22 4401

Bradford Safeguarding Children Board – 01274 437500

Out of hours emergency – 01274 431010

CSWS Emergency Duty Team (out of hours)	0113 5350600	childrenEDT@leeds.gov.uk
Education Safeguarding Team	0113 3789685	estconsultation@leeds.gov.uk
Local Authority Designated Officer	0113 3789687	lado@leeds.gov.uk
NSPCC Whistleblowing Helpline	0800 028 0285	
PREVENT Team	0113 535 0810	prevent@leeds.gov.uk

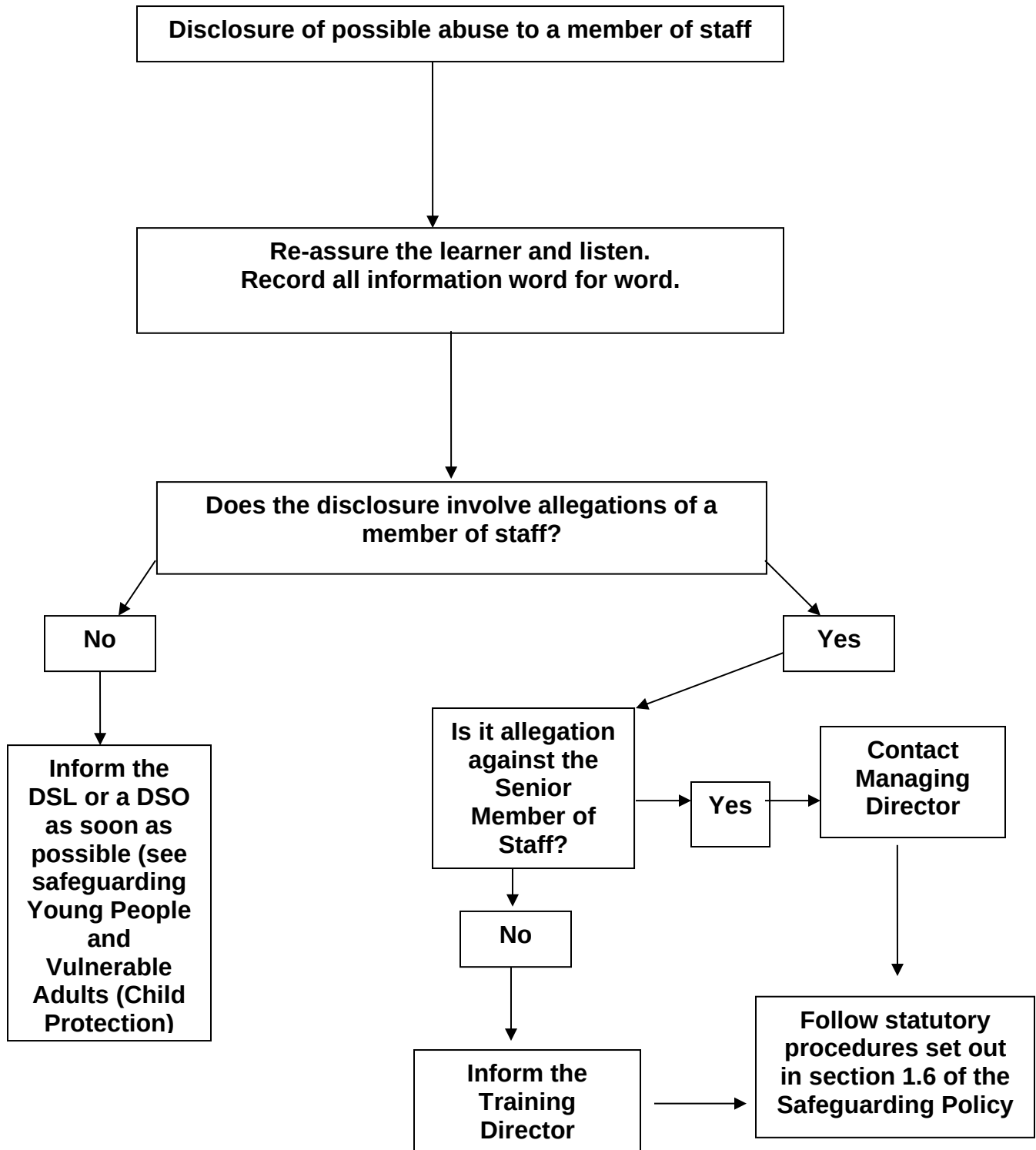
Childline – 0800 111111

NSPCC – 0808 800 5000

Adult Social Care – 01904 555111

APPENDIX 2

SAFEGUARDING PROCEDURES FOR DEALING WITH CONCERNS OR DISCLOSURES



If you suspect that any physical abuse may have been self-inflicted (i.e. self-harm or a suicide attempt), you should contact the DSL or DSO's

Please also consider whether or not you need to contact a first aider.

Once the information has been passed on to the relevant personnel, the learner will be giving appropriate support, a referral will be made to the relevant child or adult social services where appropriate and those involved will be informed of the outcomes (within the rules of confidentiality).

APPENDIX 3

CAUSE FOR CONCERN FORM – CONFIDENTIAL

Please note do not interpret what is seen or heard, simply record only the facts. After completing, please pass immediately to Rebecca O’Farrell - DSL

Name of young person_____ Class_____

Name of staff member completing form_____

Day_____ Date_____ Time_____ Place_____

(of observed behaviour/discussion/disclosure)

Nature of incident/concern including relevant background, details of any injuries etc. (Record young person’s word verbatim where possible, continue on separate sheet if necessary. Remember to sign that sheet as well).

Signed_____ Date_____

Action/passed to_____

Now pass this form to the DSL or Managing Director in a sealed envelope and do not store any copies.

Please remember that you are reporting and not investigating this incident.

Cause for concern forms are available from the reception area of Direct Skills Group

APPENDIX 4

DESIGNATED SAFEGAURDING LEAD (DSL)

Purpose of this Role

- To promote positive safeguarding procedures and practices so that all our learners feel safe.
- To provide a level of support to staff which ensures consistency in the implementation of the College's safeguarding procedures (as specified in the Safeguarding Young People and Vulnerable Adults (Child Protection Policy) and Keeping Children Safe in Education.

Specific Duties

- To take lead responsibility for safeguarding and child protection (including on-line safety) and understand the unique risks associated on-line.
 - To have a thorough understanding of the Safeguarding Young People and Vulnerable Adults (Child Protection) Policy and Keeping Children Safe in Education
 - To act as a key point of referral for learners and staff so that the College can respond swiftly and appropriately to all suspicions or allegations of abuse.
 - To follow up all referrals and disclosures made directly by students or via staff in accordance with the policy, the guidelines and procedures and, as appropriate, to the specific circumstances of the referral. This will involve:
 - ❖ Receiving information form, and offering advice to, staff, volunteers, children, and young people, vulnerable adults, parents, carers about concerns relating to vulnerable adult or child protection issues,
 - ❖ Assessing this information promptly and taking appropriate action,
 - ❖ Maintaining secure records of this information
 - ❖ Ensuring that the information is held centrally in the College's safeguarding file.
 - To be familiar with:
 - ❖ Local and national safeguarding legislation and guidance,
 - ❖ Procedures for referral to the local authority's children and vulnerable adults.
 - To know how to contact, and establish links, with Local Safeguarding Children Boards and the relevant people within children's and adult services or police so that referrals can be made.
 - To maintain appropriate levels of training
 - To maintain confidentiality regarding safeguarding cases at all times
 - To refer cases to the Channel programme where there is a radicalisation concern.
 - To refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required and to the Police where a crime has been committed.
 - To undertake refresher training at least every 2 years and Prevent awareness training.
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APPENDIX 5

CONCERNS REGARDING A LEARNER

