

## DOCUMENT DETAILS

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Summary	The purpose of this document is to set out the policy for safeguarding children and vulnerable adults in Nottingham College, and the responsibilities for safeguarding.

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## 1. INTRODUCTION

Nottingham College places the highest importance on safeguarding, and the safety and wellbeing of students is paramount in all College activities. This policy sets out Nottingham College's commitment to action in relation to its duty to safeguard and promote the wellbeing of children, young people and vulnerable adults. There are three main elements to our Safeguarding Policy:

**Prevention:** creating a positive environment, teaching and activities and pastoral support to children, young people and vulnerable adults and maintaining an attitude of 'it could happen here'.

**Protection:** ensuring policies and procedures are in place to minimise the risks to children, young people and vulnerable adults, including well-trained staff who are supported to respond appropriately and sensitively to safeguarding concerns.

**Support:** to children and vulnerable adults and staff who may have been abused or radicalised.

## 2. OBJECTIVE

The objective of this policy is to ensure there is a clear, transparent and robust approach to Nottingham College's statutory and moral duty in relation to all its customers and particularly children, young people and vulnerable adults. It is intended to:

- Ensure appropriate action is taken that will contribute to the safeguarding of all children, young people and vulnerable adults.
- Raise awareness of the importance of safeguarding, young people and vulnerable adults
- Raise awareness regarding issues vulnerable adults may be faced with
- Indicate action to be taken in certain circumstances

This policy covers all children and young people under the age of 18 and Vulnerable Adults including:

- Students and prospective students under 18 enrolled on full and part-time courses
- Apprentices (under 18)
- Elected home educated (under 18)
- Visitors to the College (under 18)
- Children attending the Nottingham College nurseries
- Employees, work experience students or volunteers who are under 18 years of age
- All students classed as vulnerable over the age of 18 years
- Vulnerable Adults

This policy applies to all staff, students, sub contract partners and other College users; including volunteers, external contractors, remote students, apprentices and employers where students have work placements.

### **3. RESPONSIBILITIES**

#### **3.1 Governing Body**

The Governing Body is accountable for ensuring the College has effective child protection policies and procedures in place that are in accordance with guidance issued by the Secretary of State, any Local Authority guidance and locally agreed interagency procedures.

The Governing Body is responsible for liaising with the Chief Executive and Designated Safeguarding Lead over matters regarding safeguarding and child protection, including:

- Ensuring the College has adopted the Interagency Procedures produced by Nottingham and Nottinghamshire Safeguarding Children's Board
- Ensuring the Governing Body considers the College's policy on Safeguarding each year
- Ensuring that each year the Governing Body is informed on how the College and its staff have complied with the policy. This includes receiving a report on training that staff have undertaken
- Overseeing the liaison between Social Care in connection with allegations against the Chief Executive or the Designated Safeguarding Lead. This will not involve undertaking any investigation, but will ensure good communication between the parties and provide information to assist enquiries.
- To assist in these duties, the Governing Body will receive appropriate training as directed by the NSCB.

#### **3.2 Designated Safeguarding Lead**

The College's Designated Safeguarding Lead is the Director of Student Services, who is a member of the College's Senior Leadership Team.

They have a key duty to take the lead responsibility for raising awareness within the College of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for these individuals who are learning within the College. They will receive training in safeguarding and child protection issues and inter-agency working, as required by the Local Safeguarding Children's Partnership and will receive refresher training in accordance with their recommendations.

The Designated Safeguarding Lead will be expected to:

- Oversee the referral of cases of suspected abuse or allegations to Social Services
- Oversee the referral of cases to the Channel programme where there is a radicalisation concern
- Provide advice and support to other staff in relation to Safeguarding and Child Protection issues
- Maintain a record of any child protection referral, complaint or concern (even where the concern does not lead to a referral)
- Ensure that parents/carers of children, young people and vulnerable adults within the College are aware of the Safeguarding Policy
- Liaise with the Local Authority and Nottingham City Safeguarding Children Partnership (NCSCP) and other appropriate agencies
- Ensure that staff receive appropriate training in safeguarding and child protection issues and are aware of this policy

- Provide an annual report to the Governing Body of the College setting out how the College has discharged its duties.
- Report deficiencies in procedure or policy identified by the NCSCP (or others) to the Governing Body at the earliest opportunity.

### **3.3 Deputy Designated Safeguarding Lead**

The College's Deputy Designated Safeguarding Lead is the Lead Safeguarding Officer, and shall support the Director of Student Services in carrying out their role. Some activities relating to the Designated Safeguarding Lead will be delegated to the Deputy Lead and Designated Safeguarding Officers, though the Designated Safeguarding Lead will retain ultimate responsibility for all safeguarding and child protection matters.

In addition to the responsibilities outlined in section 3.2 above, the Deputy Designated Safeguarding Lead will be expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Refer cases of suspected radicalisation to the Channel Programme
- Decide whether it is necessary to initiate a Multi-Agency Request for Services (MARF) or Multi-Agency Safeguarding Hub (MASH) Referral and who will take the lead
- Act as contact for young people who are looked after or leaving care.
- Liaise with Secondary Schools which send pupils to the College to ensure that appropriate arrangements are put in place
- Liaise with the manager responsible for employers and training organisations that receive children or young people from the College on long term placements, to ensure the appropriate safeguards are put in place.

### **3.4 Designated Safeguarding Officer**

To ensure that there is sufficient support for safeguarding issues throughout the College, Designated Safeguarding Officers who have received Designated Safeguarding Lead training will be available to support First Response Officers and any member of staff on safeguarding and child protection issues.

These DSOs will be expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Refer cases of suspected radicalisation to the Channel Programme
- Act as contact for young people who are looked after or leaving care.
- Liaise with Secondary Schools which send pupils to the College to ensure that appropriate arrangements are put in place
- Liaise with the manager responsible for employers and training organisations that receive children or young people from the College on long term placements, to ensure the appropriate safeguards are put in place.
- Provide advice and support to other staff in relation to Safeguarding and Child Protection issues
- Maintain a record of any child protection referral, complaint or concern (even where the concern does not lead to a referral)

### **3.5 First Response Officers**

First Response Officers will be suitably trained staff members who will act as first point of contact for any safeguarding or child protection concerns. Where further action is required, they will liaise with their Designated Safeguarding Officer to agree next steps and hand over the case for referral, if required.

### **3.6 Director of People and Development Services**

The Director of People and Development Services will be expected to:

- Carry out appropriate checks on applicants to the College, including CRB/DBS checks at the correct level.
- Work with the OD and People Services team to ensure that all staff are trained to an acceptable standard, by establishing and maintaining a training plan/schedule and monitoring compliance with this, ensuring action is taken for non-compliance.
- Ensure that safeguarding policies and practices are a core part of the staff induction, which should include the safeguarding policy, behaviour policy, and the role of the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, Designated Safeguarding Officers and First Response Officers.
- Develop, monitor and advise on the implementation of procedures for dealing with allegations against staff which are consistent with Children's Safeguarding Partnership/Social Care procedures and national guidance.
- Manage the progress of allegations against staff, liaising with the Designated Safeguarding Lead, and other agencies as required.
- Manage the progress of allegations made against supply/temporary members of staff with the Designated Safeguarding Lead, and other agencies as required.

### **3.7 College Staff**

All College staff are expected to:

- Establish and maintain an ethos where children and those who are vulnerable feel secure and are encouraged to talk and are listened to.
- Include in the curriculum and 'core' activities opportunities for children and vulnerable adults to acquire skills and attitudes to both resist abuse in their own home and to prepare themselves for responsibilities including parenthood in their adult lives. To encourage a belief in equality of opportunity, celebrate diversity and challenge extreme views
- Ensure all staff, whether permanent, temporary or volunteers are made aware of the College's safeguarding policy and share our commitment to safeguarding and promoting the welfare of children and vulnerable adults.

### **3.8 Teaching Staff**

In addition to 3.7 above, teaching staff are expected to maintain public trust in the teaching profession as part of their professional duties, as laid out in Teaching Standards 2012.

There is a specific legal duty on teaching staff to report concerns of Female Genital Mutilation (FGM) immediately to the Police, in addition to reporting through the normal Safeguarding procedure.

Teaching staff should be aware of any welfare, safeguarding or child protection concerns that may affect their students in order to promote educational outcomes. It is the responsibility of the DSL to ensure that this information is disseminated accordingly.

#### 4. DEFINITIONS

##### 4.1 General Definitions

For the purposes of this policy, the following words and phrases have the meanings as indicated:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in 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. Children may be abused by an adult or adults or by another child or children.
- **“Child” or “Children”** means a person(s) under the age of 18.
- **“Channel”** forms a key part of the Government Prevent Strategy (see below for Prevent definition). The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism and extremism.
- **“College premises”** means all buildings and land owned or operated by the College.
- **“College staff”** means all College employees, authorised agency staff and volunteers working on behalf of the College.
- **“Extremism”** is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. Also included in the definition is extremism calls for the death of members of the UK armed forces, whether in this country or abroad.
- **“Prevent”** refers to the Prevent Strategy, published by the Government in 2011, which is part of the Government’s overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK by stopping people becoming terrorists or supporting terrorism.
- **“Radicalisation”** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **“Safeguarding”** is the process of protecting vulnerable people, whether from crime or other forms of abuse.
- **“Terrorism”** is defined in the Terrorism Act 2000 (TACT 2000). In summary, this defines terrorism as 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.
- **“Vulnerable adult”** means any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. It should be noted that the definition of a vulnerable adult means that this can be a transient category for some individuals.

##### 4.2 Definitions of Abuse

Abuse of children can be categorised into four areas (as defined by the Children’s Act 1989):

**“Neglect”** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

**“Physical Abuse”** includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**“Emotional Abuse”** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**“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 child 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. They may also include non-contact activities, such as involving children in looking at, or in the production of; sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Additional forms of abuse**

In addition, Keeping Children Safe in Education identifies that there are wider safeguarding issues that should be considered and acted upon. The statutory guidance lists specific issues and provides further links to information on all these areas. The specific areas are:

- Child Sexual Exploitation

- Child Criminal Exploitation
- Domestic Violence
- Fabricated or induced illness
- Female Genital Mutilation (FGM)
- Gangs and Youth violence
- Mental Health (this includes mental health as an indicator of abuse and mental health issues that are safeguarding concerns)
- Radicalisation
- Teenage Relationship Abuse
- Bullying, including Cyberbullying
- Drugs
- Faith Abuse
- Forced Marriage
- Gender-based violence/Violence against Women and Girls
- Honour-based abuse
- Private Fostering
- Sexting
- Trafficking
- Peer-on-Peer Abuse

## 5. POLICY STATEMENT

The College will:

- Comply with all legal and statutory duties in relation to safeguarding and wellbeing of children, young people and vulnerable adults.
- Take a preventative approach to protecting children, young people and vulnerable adults from potential harm, damage, radicalisation or being drawn into terrorism (violent and non-violent extremism).
- Take all appropriate actions to address concerns about the welfare of children, young people and vulnerable adults.
- Have particular regard to children, young people and vulnerable adults who:
  - Are disabled and have specific additional needs
  - Have special education needs (whether or not they have an Education, Health and Care Plan)
  - Are young carers
  - Are showing signs of being drawn into anti-social or criminal behaviour; including gang involvement and associated organised crime groups
  - Are frequently missing from care or from home
  - Are misusing drugs and alcohol
  - Are at risk of modern slavery, trafficking or exploitation
  - Have family circumstances presenting challenges for them, such as substance misuse, adult mental health problems, or domestic abuse
  - Are looked after or have previously been looked after (care leavers)
  - Have returned to their family home from care
  - Are showing early signs of neglect or abuse
  - Are at risk of radicalisation or exploitation

- Are privately fostered
- Have a social worker
  
- Work to agreed local policies and procedures in full partnership with other local agencies.
- Plan, implement, monitor and review policies and procedures to ensure the maximum is done to provide a safe environment for children, young people and vulnerable adults in the College.
- Take all reasonable measures to ensure that risks of harm to children, young people and vulnerable adults' welfare is minimised by the appropriate:
  - Risk assessment and management
  - Health and Safety procedures
  - Staff selection, recruitment, induction, supervision and training
  - Selection of partners delivering services to the College
  - Creation and promotion of an open work culture
  - Reacting to and reporting abuse
  
- Ensure that concerns that a child, young person or vulnerable adult is at risk of significant harm are referred in a timely manner to the person's local Social Care Services.
- Ensure that all staff receive adequate training to familiarise themselves with safeguarding, child protection issues and responsibilities and the College's policies and procedures, with refresher training at least every three years.
- Have specific and robust processes in place to respond to allegations against a member of staff.
- Convene a Safeguarding Committee to oversee the implementation and development of the policy and procedures, share best practice and develop training and information resources for staff.
- Ensure that best practice and learning is shared across the College through a Safeguarding network.
- Empower children, young people and vulnerable adults to develop a healthy and safe lifestyle to help them manage risks, develop judgement on acceptable behaviour, resist unhelpful pressure and challenge extremist narratives. This will be done through an effective personal and employability tutorial framework and pastoral and targeted support for students.

## **6. RECORDS**

Effective monitoring and recording is vital in ensuring the College meets its safeguarding obligations. Monitoring is particularly valuable as teachers and support staff are in daily contact with students and are familiar with monitoring them. They are uniquely placed to observe the behaviour of children and are likely to know what is 'normal' or 'usual' for a particular child. Any concerns should be recorded on the Safeguard system at the earliest opportunity. Where access is not available, contact should be made with a First Response Officer or Designated Safeguarding officer, and the concern logged on Safeguard as soon as it is available. Full recording requirements are detailed in the procedure document.

### **6.1 What should be recorded?**

- Patterns of attendance
- Changes in mood
- Changes in classroom functioning
- Relationships (with peers and adults)
- Behaviour
- Statements, comments, stories, drawings
- General demeanour and appearance
- Parental interest and comments
- Home/family changes
- Medicals
- Response to PE/sport
- Injuries/marks, past and present

## **6.2 When is recording needed?**

When there is a concern over:

- Marks on a child's body
- Unusual, significant changes in behaviour
- Mood changes
- Puzzling statements or stories from a child
- Information from others
- If requested by another agency, for example, following an Initial Child Protection Conference

## **6.3 Formal recording**

Where a formal referral to a Designated Safeguarding Officer has taken place, the Designated Safeguarding Officer will ask the referring member of staff for both children and vulnerable adults to provide a written record within 24 hours of the original concern being raised. This should be through Safeguard. Details of recording requirements are set out in the Safeguarding Procedure document.

## **6.4 Confidentiality**

6.4.1 Confidentiality and trust should be maintained as far as possible. The degree of confidentiality will be governed by the need to protect the child, young person or vulnerable adult who is always the primary concern. The child, young person or vulnerable adult must, at the earliest opportunity in the disclosure, be informed of the need to pass the information on.

6.4.2 The College will comply with the requirements of the Data Protection Act 2018, and the UK General Data Protection Regulation which allows for the disclosure of personal data where necessary to protect the vital interests of the a vulnerable adult.

In some cases the main restrictions on disclosure of information are:

- Common Law duty of confidence
- Human Rights Act 1998

- Data Protection Act 2018
- UK GDPR

Each of these must be considered separately. Other statutory provisions may also be relevant, but in general, legislation does not prevent the sharing of information if:

- Those likely to be affected provide their consent
- The public interest in safeguarding the child's welfare overrides the need to keep the information confidential
- Disclosure is required under a court order or other legal obligation.

## **7. RAISING CONCERNS ABOUT THE SAFEGUARDING PRACTICES WITHIN THE COLLEGE**

7.1 All staff, volunteers, sub contract partners and students should feel able to raise concerns about poor or unsafe practice and potential failures within the College's safeguarding policies and procedures and know that such concerns will be taken seriously by the College's Senior Leadership Team.

7.2 Staff, volunteers, sub-contract partners and students should follow the Whistleblowing Policy if they have any concerns about the practices at the College.

7.3 Where they do not feel able to use the College policies, the NSPCC Whistleblowing helpline is available and details are available on the safeguarding pages of StaffNet and on StudentNet.

## **8. REFERENCES**

This policy has been developed in accordance with and under the guidance of the:

- Children's Act 1989 and 2004
- Education Act 2002 and 2011
- Keeping Children Safe in Education (Jan 2021)
- Working Together to Safeguard Children (March 2015)
- Safeguarding Children and Vulnerable Groups Act (2006)
- Safeguarding Children and Safer Recruitment in Education (2007)
- Counter Terrorism and Security Act 2015
- Nottingham and Nottinghamshire Safeguarding Children Board Inter-agency Child Protection Procedures and Practice Guidelines
- Nottingham College Recruitment and Selection policy
- Nottingham College Missing Student procedure

## **9. MEASURES**

The effectiveness of this policy will be monitored and measured in a variety of ways. These will include:

- Regular reporting on safeguarding incidents to the Governing Body
- Measuring staff confidence in managing safeguarding incidents
- Individual training and development records
- Development of appropriate mechanism for assessing experience of those reporting safeguarding concerns, or being subject to safeguarding enquiries

- Feedback from partners on quality and appropriateness of referrals

## 10. APPENDICES

Appendix 1: Nottingham College Safeguarding Procedures

Appendix 2: Nottingham College Safeguarding structure & contacts

Appendix 3: Statutory Agencies Contact information

Appendix 4: References and further guidance

## APPENDIX 1: SAFEGUARDING PROCEDURES

### 1.0 Introduction

The Nottingham College Safeguarding Policy establishes the principles within which the College will work to ensure the safety and welfare of all children, young people and vulnerable adults at the College. This document is intended to provide practical guidance for colleagues who are responsible for taking action under the Policy, and should be read in conjunction with the Policy itself.

### 2.0 Responding to Concerns

2.1 Where any member of staff, student or governor has a concern about a student they must report it immediately. There are a number of reasons why a student or staff member might need to report a concern:

- In response to something a student has said
- In response to signs or suspicions of abuse
- In response to allegations made against a member of staff or volunteer, carer, parent
- In response to bullying
- Observation of inappropriate behaviour/views
- In response to anything which makes a student/young or vulnerable person uncomfortable.

It is important for College staff to note that if an incident has occurred outside of the College, it should still be reported.

2.2 On receipt of safeguarding information regarding a child, vulnerable adult or member of staff:

- Stay calm
- Reassure the person reporting their concern that they have done the correct thing in telling you
- Listen carefully to what is being said and take them seriously
- Do not promise confidentiality
- Explain that you have a duty to tell a First Response Officer or Designated Safeguarding Officer, and that their concerns may be shared with others who could play a part in protecting them or the individual concerned.
- Reassure them that they will be involved in decisions about what will happen wherever possible. For concerns that involve potential risk to children, this cannot always be guaranteed.
- If they have specific communication needs, provide support and information in a way that is most appropriate to them, or seek support to do this
- Do not be judgemental or jump to conclusions.
- Record in writing exactly what is being said, if you cannot do this at the time, then record immediately afterwards. See Section 3 for recording requirements.

### 3.0 Reporting concerns

3.1 Any allegation, disclosure or suspicion of harm or abuse needs to be taken seriously and handled in a sensitive manner. Individual members of staff should never deal with disclosures in isolation.

**3.2 If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children or Adult Social Care immediately. Anyone can make a referral.** If this ever happens, the Designated Safeguarding Lead must be informed at the earliest opportunity.

3.3 On receipt of a concern, the matter must be reported immediately to the appropriate First Response Officer (FRO) for advice and support. Details of First Response Officers and Designated Safeguarding Officers are at Appendix 2.

3.4 The First Response Officer will discuss with you the concern or information you have.

3.5 It will be agreed following consultation with the FRO what the next action will be, which may include the following:

- Referral to the Designated Safeguarding Officer for onward referral to the appropriate organisation
- Referral to the Designated Safeguarding Officer for advice and support
- Contact with the person reporting
- Contact with the parents/guardians

3.6 The First Response Officer or Designated Safeguarding Officer will advise you of what further involvement you should have.

3.7 The First Response Officer or Designated Safeguarding Officer will confirm in writing, where appropriate, to Statutory Agencies.

### 4.0 Recording requirements

4.1 During or immediately after a disclosure record the following:

- Names of those present during the disclosure/allegation
- Address and contact of the young person
- Date of Birth
- Ethnic Origin
- Other agencies already involved
- Date and time of the conversation
- Place where the alleged incident took place
- Brief description of the concern or allegation
- Any visible injuries
- Any alleged injuries
- Young person's preferred action
- Next steps and follow up agreed.

### 5.0 Support

The College recognises that colleagues who have been involved with a child, young person or vulnerable adult who has suffered harm, or appears to be likely to suffer harm may require

support. Colleagues can obtain support from the Designated Safeguarding Officers, their line manager, Union representative, HR or via the Employee Assistance Helpline (0800 328 1437)

## **6.0 First Response Officer Responsibilities**

6.1 First Response Officers are suitably trained colleagues who can provide first line support and advice for any member of staff who has safeguarding concerns. They will be able to ascertain whether the concerns raised require referral to a Designated Safeguarding Officer (DSO) or whether they are able to deal with the issue at the first point of contact.

6.2 Any decisions made by the FRO should be recorded as soon as is practicable on Safeguard, including reasons for referral, or not to the DSO.

## **7.0 Designated Safeguarding Officer responsibilities**

7.1 Designated Safeguarding Officers are well trained, experienced colleagues who are responsible for liaising with the appropriate statutory agencies in relation to safeguarding and child protection concerns. They will also act as experts in supporting FROs to make decisions in relation to disclosures.

7.2 Where the DSO decides that a referral is appropriate to Statutory Agencies, they must do so as soon as is practicable, and within 24 hours of receiving the allegation.

7.3 The name and contact details of the duty officer's name to which the referral is made should be recorded within Safeguard.

7.4 The student and referring member of staff should be informed of the action being taken and the reasons for the decision. This should happen before Social Care are informed unless doing so would place the young person at greater risk. In this case, both the student and colleague should be contacted as soon as safety considerations for the young person permit.

7.5 There will be a monthly DSO meeting to discuss specific cases, lessons learnt and training and information opportunities.

## **8.0 Managing allegations against a member of staff**

8.1 Managing allegations of abuse by members of staff must be in accordance with Keeping Children Safe in Education (DfE 2021) and Nottingham City and Nottinghamshire Safeguarding Children Board Allegations against Staff or Volunteers guidance.

8.2 This procedure should be applied when there is such an allegation or concern that a person who works with children, has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved in a way that indicates he / she is unsuitable to work with children.

8.3 These behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if it claimed to be consensual (see ss16-19 Sexual Offences Act 2003);

- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
  - Other 'grooming' behaviour which may not meet the criminal threshold, but gives rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.);
- Possession of indecent photographs / pseudo-photographs of children.

**8.4** All staff who have, or received concerns about the conduct of any colleague; permanent, temporary or voluntary must report the matter immediately. Any concerns should be reported to the Designated Safeguarding Lead and the Director of Organisational Development and HR. If, within two hours of the initial concern arising it has not been possible to contact the nominated member of staff, the matter must be reported to the Chief Executive Officer.

8.5 If the concern is in relation to the designated member of staff, the matter should be reported to the Chief Executive Officer.

8.6 If the concern is in relation to the Chief Executive Officer, the matter should be reported to the Chair of Governors.

8.7 The procedures laid down in the Nottingham City and Nottinghamshire County Safeguarding Children Board should be followed:

[http://nottinghamshirescb.proceduresonline.com/p\\_alleg\\_against\\_staff.html](http://nottinghamshirescb.proceduresonline.com/p_alleg_against_staff.html) along with the Nottingham College Code of Conduct and Disciplinary policy as appropriate.

## **9.0 Potential Indicators of Abuse**

There are a number of common factors, which can be potential indicators of abuse in children, young people and vulnerable adults. It is important to remember that many of the characteristics and signs detailed can also be typical for some individuals, so whilst it is important to be vigilant in such matters, staff should also be tactful in their approach. This information is provided as a guide only and further support should be sought following the guidance in the Policy and Procedures documents where there are possible safeguarding concerns.

### **9.1 Potential indicators of physical abuse**

- Injuries to any part of the body
- Individuals who find it painful to walk, sit down, to move their jaws or are in some other kind of pain
- Injuries which are not typical of the bumps and scrapes associated with regular activities e.g. injuries of an unusual shape/type or with very clearly defined marks that may be the result of being hit with an object;
- The regular occurrence of unexplained injuries
- Frequent injuries, where explanations may be confused
- Conflicting explanations of how the injuries were sustained
- Furtive/secretive behaviour
- Uncharacteristic aggression or withdrawn behaviour
- Compulsive eating or sudden loss of appetite
- Sudden ill coordination
- Difficulty staying awake
- Wider concerns about the family/home life situation.

### **9.2 Potential indicators of emotional abuse**

- Poor attachment relationships with children
- Unresponsive or neglectful behaviour towards the individual's emotional or psychological needs
- Persistent negative comments about the individual
- Inappropriate or inconsistent developmental expectations of the individual
- Parental problems that supersede the needs of the child/vulnerable adult
- Dysfunctional family relationships including domestic violence
- Emotional indicators such as low self-esteem, unhappiness, fear, distress, anxiety
- Behavioural indicators such as attention seeking, opposing, withdrawn, insecure
- Physical indicators such as failure to thrive/faltering growth, delay in achieving developmental, cognitive or educational milestones

### **9.3 Potential indicators of sexual abuse**

- Signs of blood or other discharge on the individual's clothes
- Awkwardness in walking or sitting down
- Stomach pains
- Bed wetting
- Tiredness
- Extreme variations in behaviour e.g. anxiety, aggression or withdrawal
- Sexually provocative behaviour or knowledge that is incompatible with the individual's age and understanding
- Drawings and or written work which are sexually explicit and inappropriate for the context of the work (indirect disclosure)
- Direct disclosure

### **9.4 Potential indicators of neglect**

- Abnormal growth including failure to thrive
- Recurrent infection
- Unkempt dirty appearance
- Poor body hygiene
- Inadequate/unwashed clothes
- Hunger
- Listlessness
- Attachment disorders
- Indiscriminate friendliness
- Poor social relationships
- Poor concentration
- Developmental delays
- Low self-esteem
- Insufficient food, heating and ventilation in the home
- Risk from animals in the household
- Inappropriate sleeping arrangements and inadequate bedding
- Dangerous or hazardous environment

### 9.5 Potential indicators of radicalisation

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism or radicalisation. HM Government 'Channel' guidance indicates factors which may have a bearing on someone becoming vulnerable can include:

- Peer pressure
- Influence from other people or via the internet
- Bullying
- Crime against the individual or their involvement in crime
- Anti-social behaviour
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity
- Personal or political grievances

9.5.1 Assessment for vulnerability uses a consistently applied vulnerability assessment framework built around three criteria's. These are:

- Engagement with a group, cause or ideology
- Intent to cause harm
- Capability to cause harm

### 9.6 Potential Indicators of engagement with an extremist group, cause or ideology

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology

### 9.7 Potential indicators of Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any **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.

- students who appear with unexplained gifts or new possessions;
- students who associate with other young people involved in exploitation;
- students who suffer from changes in emotional well-being;
- students who misuse drugs and alcohol;
- students who go missing for periods of time or regularly come home late; and
- students who regularly miss school or education or do not take part in education.

## 9.8 Potential indicators of Child Sexual Exploitation

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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.

In addition to the above indicators of CCE, indicators of CSE can be;

- students who have older boyfriends or girlfriends
- students who suffer from sexually transmitted infections or become pregnant

## 10. PEER ON PEER ABUSE

10.1 Peer on Peer abuse is a specific form of abuse, that whilst covered within the categories outlined in the Policy and Procedures, requires a specific focus within the College as it is recognised that it is a particularly sensitive and complex area of safeguarding students within the College.

10.2 All staff should recognise that students are capable of abusing their peers and that inappropriate behaviour should never be tolerated or passed off as 'banter' or 'part of growing up'.

10.3 Peer on Peer abuse is often gender specific, such as girls being inappropriately touched or sexually abused by boys; boys may be more vulnerable to initiation or hazing type violence and rituals.

10.4 Types of Peer on Peer abuse include:

- Physical abuse such as;
  - Biting
  - Kicking
  - Hitting
  - Hair Pulling
- Sexually harmful behaviour such as;
  - inappropriate language
  - touching
  - sexual assault
- Bullying, which can be;
  - physical
  - name calling
  - Homophobic etc.
- Cyberbullying
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing
- Prejudiced behaviour
- Teenage relationship abuse

- Upskirting

### **10.5 Expected response from staff**

It is important to deal with a situation of peer abuse immediately and sensitively. As with any safeguarding concern, it is important to gather the information as soon as possible to ascertain the true facts. This should be done objectively, with consideration of intent. Where it is deemed that any party involved in the peer on peer abuse is at risk, then a safeguarding referral should be made. Where there is a potential criminal act, the police should also be informed.

## **11. Dealing with sexting (or youth produced sexual imagery)**

11.1 The College will make reference to the UKCIS guidance when dealing with incidents of sexting. All incidents of sexting should be initially dealt with as a safeguarding concern, and the College will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of the young people involved.

11.2 The incident will be referred to the police and/or social care immediately if:

- The incident involved an adult
- There is reason to believe the young person is being coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- The imagery suggests sexual acts that are unusual for the young person's developmental stage, or are violent
- The imagery involved sexual acts and any young person under the age of 13 (i.e below the age of legal consent)
- There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example the young person is presenting as self-harming.

The DSL should be notified as soon as is practicable of the referral if they have not been involved in the original decision to refer.

If none of the above apply, the usual safeguarding process should be applied.

## **12. Online Safety**

12.1 Due to an increase in online learning, it is essential that students are safeguarded from potentially harmful and inappropriate online material. Additionally, any safeguarding concerns that are identified by staff when online should be reported in the same manner and urgency, using Nottingham College Safeguarding Procedures.

12.2 Staff should ensure that they adhere to the guidance regarding Online Safeguarding Processes, applicable to all online learning, support and communication with students. A specific contract of Online Safety and Behaviour Contract should be reinforced by all staff to students when engaging online or remotely.

12.3 Nottingham College has robust filtering and monitoring systems installed on all college owned devices. Any breaches the online safety standards should be referred through the usual safeguarding process.

12.4 All users, all Students and staff, all members of the College community who have access to the College IT systems, both on the premises and remotely have a role in ensuring that e-Safety embedded within the organisation. Any user of systems must adhere to and sign a hard copy of the e-Safety Rules and the Acceptable Use Policy

**APPENDIX 2 – Safeguarding Structure for Nottingham College**

Designated Safeguarding Lead:	Rachel Wadsworth, Director of Student Services	07530 617274	
Deputy Designated Safeguarding Lead:	Lauren Tubby, Lead Safeguarding Officer	07971 109943	
<b>City Pod</b> (covering Adams, Stoney Street, High Pavement, City Hub, London Road, Hadyn Road)			
<b>DSL</b>	<b>Contact</b>	<b>FRO</b>	<b>Contact</b>
Rachel Wadsworth	0115 914 6287	Helen Bird	07971 693977
Lauren Tubby	07971 109943	Linda McDonald	07912 070409
Joanne Edgerton	07843 340104	Helen Bird	07971 693977
Alex Stewart	07971 109951	Wendy Walker-Graham	07949 072050
Richard Holness	07758 966250	Vickie Nardoni	0115 884 2385
Damian Fidler	07843 340095	Jon Laud	07921 250471
		Michelle Rensler	07545 562720
		Lesley Wiggins	07866 0039781
		Ruth Ajaib	07580 566902
		Nikki Jackson	07976 318233
		Caroline Sheard	0115 8380097
		Carl Ara	0115 9146287
		Jane Morley-Bass	07773 337343
		Amanda Ball	0115 8380029
		Zoe Scott	0115 8380706
		Julie Jardine	07909 990674
		Phil Tomlinson	0115 8380514
		Mary Flintoff	07484 760708
		Phil Coates	0115 8380065
		Jane Fletcher	0115 8380459
		Adam Beazeley	07545 903692
		Caroline Glorioso	079715 13023
		Robin Atherly	07973 829 453
		Samantha Yeomans	0115 8380819
		Mandi Chandler	
<b>Basford and South City Pod (covering Basford, Arthur Mee, Highfields &amp; Ruddington)</b>			
Helena Greeley	07791 871513	Gary Horsley	07949 723572
Jamie Flack	07971 109827	Rob Moore	
Margaret Lane	07973 827185	Jon Rawson	07545 903691
Rebecca Butcher	07973 843325	Trevor Burton	07909 990424

		Mark Johnson	07734 510897
		Kirsty Walsh	07734 510892
		Noel Kulasingham	0115 9100100 (3420)
		Yvonne Walker	0115 8380073 (7073)
		Lesley Valentine	07786 803774

**APPENDIX 3 Statutory Agencies Key contacts**

	Children's Social Care	Adult Care
Nottingham City Council	Multi Agency Support Team: 0115 8764800	0300 300 3333 Out of Hours emergency contact: 0115 876 1000
Nottinghamshire County Council	Multi Agency Support Team: 0300 500 80 90 Out of Hours emergency contact: 0300 456 4546	Multi Agency Support Team: 0300 500 80 90 Out of Hours emergency contact: 0300 456 4546
Derby City Council	01332 641172 Out of Hours emergency contact: 01332 786968	01332 717777 Out of Hours emergency contact: 01332 786968
Derbyshire County Council	08456 058 058	08456 058 058
Leicester City	0116 454 1004	0116 454 1004
Leicestershire & Rutland	0116 305 0005	0116 305 0004 Out of Hours emergency contact: 0116 255 1606
Lincolnshire	01522 782111 Out of Hours emergency contact: 01522 782333	01522 782155 Out of Hours emergency contact: 01522 782333
Nottinghamshire Police	Non-emergency calls 101 Emergency calls 999	
Derbyshire Police	Non-emergency calls 101 Emergency calls 999	
Nottinghamshire Safeguarding Children Board	0115 9773917	
Nottingham City Safeguarding Children Board	0115 8765367	

## APPENDIX 4 - References

### **Legislation**

[Children Act 1989](#)

[Children Act 2004](#)

[Safeguarding Vulnerable Groups Act 2006](#)

[Children and Families Act 2014](#)

[section 175 of the Education Act 2002](#)

[Female Genital Mutilation Act 2003](#)

[Children and Young Persons Act 2008](#)

[Education Act 2011](#)

### **Local procedures & guidance**

Nottinghamshire and Nottingham City Safeguarding Children Partnership procedures

<http://nottinghamshirescb.proceduresonline.com/>

New arrangements for Nottingham City Safeguarding Board

<https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/nottingham-city-safeguarding-children-board/>

### **National Guidance**

[Working together to safeguard children](#)

[Keeping children safe in education \(2021\)](#)

[Multi Agency Practice Guidelines on Female Genital Mutilation](#) - available on the Foreign and Commonwealth Office website.

[Multi Agency Practice Guidelines on Forced Marriage](#) - available on the Foreign and Commonwealth Office website.

[What to do if you are worried a child is being abused](#) - available on the Department for Education website

[Safeguarding disabled children - Practice guidance, July 2009](#) - available on the Department for Education website

[Safeguarding children who may have been trafficked](#) - available on the Department for Education website

[Safeguarding children in whom illness is fabricated or induced](#) - available on the Department for Education website

[Safeguarding children and young people from sexual exploitation](#), - available on the Department for Education website

[Forced Marriage guidance](#) - available on the Foreign and Commonwealth Office website

[Prevent duty guidance: for further education institutions in England and Wales](#)

[UKCCIS Sexting in Schools and Colleges](#) – available on the UKCCIS website

[Sexual violence and sexual harassment between children in schools and colleges](#) – available on Department for Education website