



Child Protection Policy 2022-23

Document title:	Child Protection Policy 2022-2023
Audience:	All learners, Corporation members, staff, volunteers, partners working at all College campuses, other external facilities, in the workplace or by distance learning
Version:	1
Approved by:	Corporation
Date approved:	TBC
Date of next review:	September 2023
Document author(s):	Designated Safeguarding Lead
Date issued:	August 2022
Version	1.1

Monitoring and review

- This policy will be reviewed by the Corporation at least every year.

Table of Content

	Page No
1. Scope of the Policy	3
2. Safeguarding Policy Statement	3
3. Definitions	3
4. Policy Aims	4
5. Key Principles	4
6. Legislation and guidance	5
7. Communication with Parents/carers and visitors	8
8. Roles and responsibilities	8
9. Safeguarding Framework	16
10. Procedures for reporting child protection or child welfare concerns:	16
11. Managing Allegations against staff and volunteers working at the College	18
12. Allegations of abuse against another student (child-on-child abuse)	18
13. On-line safety, data protection and the use of mobile phones and digital photographic equipment	19
14. Monitoring attendance	20
15. So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)	20
16. Early Help	21
17. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	22
18. Private fostering	22
19. Up skirting	22
20. Serious Crimes	22
21. Sexual Violence and Sexual Harassment	23
22. Mental Health	23
23. Safer Recruitment	24
24. The Safeguarding Curriculum	24
25. Confidentiality, Information sharing, record keeping and retention	24
26. Reporting and monitoring	25
27. Complaints	25

1. Scope of the Policy:

This policy provides guidance to all adults working or volunteering within the College whether paid or voluntary or directly employed by the College or by a third party.

2. Safeguarding Policy Statement:

The College is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The College seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interest of the child.' (KCSiE 2022)

Safeguarding Practices will be informed by the following 6 key principles:

Empowerment: people are supported and encouraged to make their own decisions and give informed consent.

Prevention: it is better to take action before harm occurs.

Proportionality: the least intrusive response appropriate to the risk presented.

Protection: support and representation for those in greatest need.

Partnership: local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability: accountability and transparency in safeguarding practice.

3. Definitions:

A child includes anyone under the age of 18.

Child protection: *'Part of safeguarding and promoting welfare.* This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding and promoting the welfare of children is defined as 'protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.' (KCSiE 2022)

The definitions of physical abuse, emotional abuse, sexual abuse, and neglect are set out in the DFE guidance, Part 1: Keeping Children Safe in Education 2022.

4. Policy Aims:

The College expects all staff and learners to commit to the following aims:

Prevent – To provide a safe environment for all learners, staff and visitors.

Protect – To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately and in a timely manner by taking appropriate action, to safeguard and promote the welfare of all children.

Promote – To actively promote the welfare of all learners. To take appropriate action to see that all College staff and students are kept safe, both at home and at the College.

5. Key Principles:

- **The child's needs and welfare are paramount.** All children have a right to be protected from abuse and neglect and have their welfare safeguarded.
- Keeping Children Safe in Education (DfE, 2022) reminds us that all staff should maintain an attitude of 'it could happen here' where safeguarding is concerned.
- **Children should be listened to** and their views and wishes should inform any assessment and provision for them. Staff should always act in the best interests of the child, to protect them.
- The College recognises that scrutiny, challenge, and supervision are key to safeguarding children.
- Children have a right to learn ways to keep themselves safe from harm and exploitation.
- The College is committed to working with other agencies to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment. 'Early Help means providing support as soon as a problem emerges, at any point in a child's life.' (KCSiE 2022)
- All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Safeguarding Team, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- 'All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.' (KCSiE 2022)
- All staff have responsibility to report their concerns about a child **without delay** to the College's Safeguarding Team. Whilst the Safeguarding Team will normally make referrals to Children's Services, **anyone** can refer their concerns to local authority children's social care directly in emergencies or if they feel they need to do so.
- Everyone has responsibility to escalate their concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing

to thrive and in need or if the child is at risk of harm. Concerns about a child should always lead to help for a child at some point and the child's situation should improve.

- The College will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child to safeguard them. 'Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children.' (KCSiE 2022)
- The College will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The College will follow the Local Authority and the Local Safeguarding Children Partnership procedures and provide them with information as required.
- Staff, children, and families will need support following child protection processes being followed.

6. Legislation and Guidance:

The **Children Act 2004** requires each person or organisation to which the duties apply to have regard to any guidance given to them by the Secretary of State; specifically:

- Section 10: Co-operation to improve well-being
- Section 11: Arrangements to safeguard and promote welfare
- Section 16k: Guidance by Secretary of State relating to sections 16E-16J

Section 175 (3) of the **Education Act 2002** places a duty on the governing body of an institution within the further education sector to 'make arrangements for ensuring that their functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the institution.'

Colleges must have regard for DfE statutory guidance. This child protection policy should be read alongside Working Together to Safeguard Children (WT 2018) and 'Keeping Children Safe in Education (2022) and all staff must read and understand Part 1 and Annex B of KCSiE (2022).

Working Together to Safeguard Children (2018) makes it clear that protecting children from harm and promoting their welfare depends upon a shared responsibility and effective joint working between different agencies:

'Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.'

In addition, Working Together to Safeguard Children also reinforces the need to take action to provide early help before statutory services are required:

‘Providing early help is more effective in promoting the welfare of children than reacting later. Early Help means providing support as soon as a problem emerges, at any point in a child’s life, from the foundation years through to the teenage years.’ (WT 2018)

The College therefore understands its responsibility to engage with other professionals in Early Help Assessments when a child’s needs according to the Local Safeguarding Children Partnership’s ‘Responding to Need and Level of Needs framework’ sit below the requirement for a statutory assessment.

The Counterterrorism and Security Act 2015 places a duty upon local authorities and educational providers to ‘have due regard to the need to prevent people from being drawn into terrorism’ (CTSA 2015). ‘The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are, “to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism.”’ (**Work Based Learners and the Prevent Statutory Duty 2018**). The DfE has provided statutory guidance for colleges and childcare providers: ‘**Revised Prevent Duty Guidance: England and Wales**’ (DfE 2015). The guidance summarises the requirements of colleges in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Our College will ensure that staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance. Staff will use their judgment in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. Equally, children will be made aware of the risks and support available to them. We will ensure that children are safe from terrorist and extremist material when accessing the internet in College. The Government has developed an ‘educate against hate’ website providing information and resources for colleges and parents to support them to recognise and address extremism and radicalisation in young people.

‘Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **tutors** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for tutors to see visual evidence, and they should not be examining students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version>

‘Tutors **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the tutor has a good reason not to, they should also still consider and discuss any such case with the College’s Designated Safeguarding Lead and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the tutor does not discover that

an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, tutors should follow local safeguarding procedures.’ DfE 2018

The Teaching Standards (DfE 2013) also requires all tutors to uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside College, including:

- treating students with dignity, building relationships rooted in mutual respect, and always observing proper boundaries appropriate to a tutor’s professional position
- having regard for the need to safeguard students’ wellbeing, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others

In addition, the **Sexual Offences Act 2003** makes it clear that all members of staff are in a position of trust and would therefore be committing a criminal offence to have a sexual relationship with a young person below the age of 18, even if that student is over the age of consent. In addition, it would be a breach of trust to have a relationship with any College student over the age of 18. This would result in the issue being addressed under the formal disciplinary procedure and may constitute gross misconduct.

<https://www.gov.uk/government/publications/sexual-offences-act-2003-remedial-order-2012>

The College will also take account of additional guidance including:

- The Education Inspection Framework (Ofsted, 2022)
- Further Education and Skills Inspection Handbook (Ofsted, 2022)
- Inspecting safeguarding in early years, education, and skills settings (Ofsted, 2022)
- Safeguarding disabled children: Practice guidance (The Children’s Society, 2009)
- Revised *Prevent* Duty Guidance: for England and Wales (DfE, 2015)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, 2019)
- Liverpool multi-agency self-harm practice guidance (Liverpool CAMHS, 2016)
- What to do if you are worried a child is being abused: Advice for practitioners (DFE, 2015)
- Criminal Exploitation of children and vulnerable adults: County Lines (DFE, 2017)
- Child Sexual Exploitation: definition and guide for practitioners (DFE, 2017)
- Sexting in schools and colleges (UK Council for Child Internet Safety, 2016)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers (HMG, 2018)
- Sexual violence and sexual harassment between children in schools and colleges (DFE, 2018)
- The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (HMG, 2010)
- Disqualification under the Childcare Act (DfE, 2006)

- Other DFE statutory guidance including: attendance and children who go missing from home or care which is found here: <https://www.gov.uk/topic/colleges-colleges-childrens-services/safeguarding-children>

7. Communicating with parents/carers and visitors:

The College is committed to the principles of Working Together to Safeguard Children (2018) which states that a 'child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.' (WT2018)

The College Safeguarding Policies should be available on the College website:

'Our College is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children by reporting anything that might suggest a child is being abused or neglected.'

The College also has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and police, health, and Children's Services. Colleges are not able to investigate child protection concerns but have a legal duty to refer them. In most instances the College will be able to inform the parents/carers of its need to make a referral; however, sometimes the College can in certain circumstances share information without the consent of the family and may be advised by Children's Services or Police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The College follows legislation that aims to act in the interests of the child.

The College will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child and family.

All visitors should be informed about the College expectations with regards to their conduct in the College. Visitors are expected to follow the College safeguarding policies and report any safeguarding concern to the safeguarding team.

The names and photographs of the Designated Safeguarding Lead, Safeguarding Operational Lead, U16s Safeguarding Lead and Safeguarding Officer are displayed in each centre.

8. Roles and responsibilities:

The Principal is: **Elaine Bowker**

The Chair of Governors is **Tony Cobain**

The Strategic Designated Safeguarding Lead for Child Protection is: **Aamir Butt**

The Operational Designated Safeguarding Lead for child protection is **Steven Panter**

Those trained to provide cover for the role of Designated Safeguarding Lead are:

Members of the Safeguarding Team and Safeguarding Duty Managers

The nominated Safeguarding / Child Protection Governor is **Steve Sankson**

The nominated governor for dealing with allegations against the Principal is: **Tony Cobain**

The Governing body should ensure that:

- The College meets the statutory responsibilities set out in Keeping Children Safe in Education (KCSiE 2022) and Working Together to Safeguard Children (WT 2018).
- The College has a strategic duty to provide Early Help together with other agencies and support children and families by carrying out early help assessments, drawing upon the Liverpool Safeguarding Children Partnership's 'Responding to Needs Framework.'
- The child protection policy is reviewed at least annually by the full governing body and available to parents/carers, via the College's website.
- The policy is available to staff and volunteers via SharePoint
- All adults working within the College are aware of the College's Code of Conduct and this guidance is in keeping with the guidance for safer working practice for those working with children and young people in educational settings (Safer Recruitment Consortium, 2019)
- The College's practice is reviewed in line with Local Authority guidance, Liverpool Safeguarding Children Partnership (LSCP) priorities and procedures and any actions identified in the Local Authority 175 Audit are completed.
- There is a named Designated Safeguarding Lead who is a member of the College's Senior Leadership Team. There are colleagues trained to provide cover for the role.
- The College has procedures in keeping with the LSCP for dealing with any allegations made against any adult working within the College.
- There is a nominated governor, usually the chair, who is the case manager for managing any allegations against the Principal.
- There is an additional nominated safeguarding governor to liaise with the Designated Safeguarding Lead and champion child protection/safeguarding on behalf of the governing body.
- The College follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with young people. The Chair of Governors and safeguarding governor together with the Principal review the College's Single Central Record.
- The College itself is a safe environment where the views of children and families are listened to and where children are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.
- The College has appropriate filters and monitoring systems in place in respect of internet use and encourage safe and responsible use of new technologies.
- The College has policy and procedures in place to ensure online safety for all its staff and students and that any abuse or unacceptable behaviour is challenged and dealt with.

- The College scrutinises the impact of its training strategy so that all staff, including temporary staff (supply teachers) and volunteers, are aware of the College's child protection procedures. All staff must have child protection training which is regularly updated. The Designated Safeguarding Leads and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training requirements.
- The governors are given guidance / training to enable them to ensure that College meets its statutory safeguarding requirements.
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, students taken off roll, the views and progress and participation of vulnerable students.
- All safeguarding practices are quality assured by the Designated Safeguarding Lead, including the auditing of safeguarding records and the supervision of the Safeguarding Operational Lead, Safeguarding Officer, and other members of the safeguarding team.
- The governing body have appointed an appropriately trained designated person to promote the educational achievement of children who are looked after
- Governing bodies are accountable for ensuring the College has effective policies and procedures in place in line with local and national guidance, and for monitoring the College's compliance with them. Neither the Governing Body nor individual governors have a role in dealing with individual child protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Principal will ensure that:

- The Single Central Record is up to date and the safer recruitment practices set out in Keeping Children Safe in Education (KCSiE 2022) are followed in line with the College's Recruitment and Selection Policy and Procedures. At least one member of every recruitment panel has attended safer recruitment training.
- Job descriptions and person specifications for all roles make specific reference to child protection and safeguarding.
- There is a listening culture within the College where both staff and children can raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- The Designated Safeguarding Leads have a job description in line with the requirements of Keeping Children Safe in Education (KCSiE 2022) and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Leads who have undertaken the same training.
- The curriculum provides opportunities to help students stay safe especially when online. Children should be aware of the support available to them.
- Reasonable checks are made on visiting speakers in line with the External Speakers Protocol, part of the Use of College Premises Policy.

- Principals should ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

Designated Safeguarding Lead

The Designated Safeguarding Lead will quality assure the College’s child protection practices including the auditing of safeguarding records and the supervision of the Safeguarding Operational Lead, Safeguarding Officer and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately, and that staff’s emotional needs are met.

‘Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.’ KCSiE 2022

KCSiE2022 sets out the broad areas of responsibility for the Designated Safeguarding Lead:

Managing Referrals

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority children’s social care as required.
- Support staff who make referrals to local authority children’s social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

Work with Others

- act as a point of contact with the three safeguarding partners.
- Liaise with the Principal to inform him or her of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the “case manager” (as per Part Four of KCSiE 2022) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member).
- Liaise with staff (especially support staff, College nurses, IT technicians and the named person with oversight of SEN in a College) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice, and expertise for staff.

Undertake training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff.
- Are alert to the specific needs of children in need, those with special educational needs and young carers.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations, and practitioners.
- Can keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the College with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- Can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at college.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and any measures the College may put in place to protect them.

Raise Awareness

The Designated Safeguarding Lead should:

- ensure the College's child protection policies are known, understood, and used appropriately.
- Ensure the College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the College in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection files

- Where children leave, the College ensure their child protection file is transferred to the new college where known. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained. Receiving colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new college in advance of a child leaving. For example, information that would allow the new college to continue supporting victims of abuse and have that support in place for when the child arrives.
- The college have in place a highly secure child protection online monitoring system (CPOMS) to log all concerns and actions with regards to vulnerable students.

Availability

During term time the Designated Safeguarding Lead (or a deputy) will be available (during College hours) for staff in the College to discuss any safeguarding concerns.

The Designated Safeguarding Lead will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Additional duties of the Designated Safeguarding Lead

In addition to the role outlined in Keeping Children Safe in Education 2022 the Designated Safeguarding Lead is also expected to ensure that:

- The social worker is informed when a child subject to a child protection plan or a child in need plan moves to a new setting, where College has been made aware.
- A training log is kept of all child protection training include the names of those attending. All staff must have regular training and updates.

- Child protection records are kept securely and separately from the child's normal file. Records will be transferred and/or retained in keeping with the Local Authority's and NSPCC guidance.
- The College attends and contributes to child protection case conferences and child in need meetings, ensuring actions are completed in a timely manner. The College will complete the LSCP agency report ahead of each child protection conference.
- The College escalates its concerns with other agencies when a child's needs are not being met following the Local Safeguarding Children Partnership Escalation and Resolution Policy.
- All members of the Safeguarding Team have received appropriate training; that all referrals made are quality assured and the supervision is provided to the Safeguarding Team to monitor all decisions and action taken and the wellbeing of each team member.
- All staff read and understand part 1 of the guidance – Keeping Children Safe in Education 2022 and make available to them other key documents and guidance.

Director of Human Resources should:

- maintain single central record containing the following information about all staff:
 - DBS checks for all staff
 - Barred List checks for teaching staff
 - Records of completion of mandatory safeguarding and Prevent Training
- ensure that there are systems in place to follow up noncompliance
- Support the Principal in investigating allegations against staff

All staff (and volunteers) should:

- Contribute to ensuring students learn in a safe environment.
- Read and understand as a minimum Part 1 and Annex A of Keeping Children Safe in Education 2022 and engage in training which enables them to identify children who may need additional help or who are suffering or likely to suffer significant harm and take appropriate action.
- Staff should understand the specific safeguarding issues outlined in Part 1, e.g., fabricated or induced illnesses, faith abuse. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and consensual or non-consensual sharing of nude images and/or videos can put children in danger.
- Staff should be alert to the signs of child-on-child abuse and take appropriate action. They should be aware that in some cases victim of sexual abuse may not consider themselves as victims or may not want to come forward for a variety of reasons. Recognising signs of concern is extremely important in this context.
- Recognise that any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs
 - has Learning Support needs or special educational needs (whether they have a statutory Education, Health and Care Plan or not)
 - is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care or is in care
- is showing early signs of abuse and/or neglect
- is a privately fostered child
- is experiencing housing issues
- are young parents (or about to become young parents)
- has been excluded from school
- Report any concerns about a child's welfare without delay to:
 - the Safeguarding Team (or Duty Manager) in line with published procedures
 - the Safeguarding Officer
 - the Designated Safeguarding Lead, or in their absence a senior member of staff.
- Understand that any member of staff can make a referral to Children's Services should that be required, informing the Safeguarding Team of any action taken.
- Report any concerns without delay about the behaviour of a worker towards a child to the Principal, Designated Safeguarding Lead, Chair of Governors or if required the Local Authority Designated Officer for Allegations against Staff.
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if a child remains at risk or their needs are not met. This includes the understanding that any member of staff can make a referral to Children's Services if required to do so.
- Tutors and those providing teaching **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out on someone under 18.
- Follow the College's policies including this child protection policy and the College's code of conduct for adults and the 'Guidance for safer working practice for those working with children and young people in education settings' (Safer Recruitment Consortium, 2019)
- Be aware safeguarding issues can manifest themselves via child-on-child abuse
- Understand that some children, including those with Special Educational Needs or those Looked After, may be more vulnerable to abuse. The DfE has recommended additional practice guidance 'Safeguarding Disabled Children' (The Children's Society, 2009)
- Understand that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
 - being more prone to peer group isolation than other children

- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying – without outwardly showing any signs; and
 - ‘communication barriers and difficulties in overcoming these barriers.’ (KCSiE 2022)
- Have access to the College’s Code of Conduct and Whistleblowing policy. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285
 - Have access to ‘What to do if you are worried a child is being abused – Advice for practitioners’ (DfE, 2015)

9. Safeguarding Framework:

In addition to this child protection policy the College has procedures or policies in relation to other areas for safeguarding children including as examples:

- Attendance
- Anti-bullying including cyber bullying
- Alternative and off-site provision
- Behaviour for learning
- Code of conduct for staff, governors, and volunteers (guidance on safer working practices)
- Children in care (Looked After Children)
- Data protection
- Educational visits procedures
- Emergency planning
- Emergency Evacuation Procedures
- First Aid Procedure for Young Persons
- Online Safety
- Risk Assessment Guidelines
- Safe recruitment practices
- Safeguarding advice for visitors
- Sexual Abuse Policy (Child-on Child abuse)
- Single Equality Scheme and Action Plan
- Special educational needs and disabilities policy
- Whistleblowing.

10. Procedures for reporting child protection or child welfare concerns:

- All concerns should be reported without delay to the **Safeguarding Number (01512523733)** following the College’s published Safeguarding Guidelines/Reporting Procedures. This should be followed by a written account of the concerns completed on the College’s Safeguarding System (CPOMS).
- Consideration will need to be given to immediately protecting the child and contacting the police and/or ringing for an ambulance if the child is injured or at risk of immediate harm.

- The Designated Safeguarding Lead or Deputy Designated Safeguarding Leads will take immediate action and will make a referral to Children’s Services by telephone if a child is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing.

Area	Children Services
Liverpool	233 3700
Halton	907 8305 0345 050 0148 (emergency duty team)
Knowsley	443 2600
Sefton	934 3391 920 8234 (emergency duty team)
St Helens	(01744) 676600 0845 050 0148 (emergency duty team)
Wigan	(01942) 828300
Wirral	606 2008
Merseyside Police	709 6010 or 101 999 in emergencies

- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will follow the LSCP and Local Authority multi-agency procedures and consider the child’s needs alongside the LSCP’s Levels of Needs/Responding to Needs Framework (threshold document) and consider whether an Early Help assessment (level 2 and 3) or referral to Children’s Services is needed (level 4).
- Concerns about a child should always lead to help for a child. The College may need to escalate its concerns with Children’s Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed.
- The College will always seek to follow the Local Safeguarding Children Partnership procedures which can be found on their website:

<http://liverpoolscb.proceduresonline.com/>
<http://www.proceduresonline.com/pancheshire/halton/index.html>
<http://children.haltonsafeguarding.co.uk/procedures-guidance/>
<https://www.knowsleyscb.org.uk/professionals/multi-agency-procedures/>
<https://seftonlscb.safeguardingpolicies.org.uk/may-2017/procedures-manual/11-introduction>
<https://www.wirralsafeguarding.co.uk/procedures/>
<https://www.wigan.gov.uk/WSCB/index.aspx>

Part 1 of Keeping Children Safe in Education (DFE 2022) provides key flowcharts and guidance to support staff and volunteers’ understanding and decision making. This will support staff to make a referral themselves should that become necessary. The Safeguarding Team should be informed, as soon as possible, following the need for another

member of staff to make a referral. Guidance is also available on the NSPCC website:
<https://www.nspcc.org.uk/preventing-abuse/>

Concerns that a child is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel referral being made to the Local Authority's Prevent and Channel team.

11. Managing allegations against staff and volunteers working at the College

All staff and volunteers must report any concerns about a member of staff's behaviour towards children to the Principal. Concerns can also be discussed with the Designated Safeguarding Lead. Concerns about the Principal should be raised with Chair of Governors or nominated governor. The College's policy and procedures will support everyone to act. Concerns can also be taken directly to the Local Authority Designated Officer (L.A.D.O.), if needed, via Children's Services. Section 4 of the DfE guidance Keeping Children Safe in Education (2022) provides further guidance.

College should ensure strict compliance of the Staff Code of Conduct. There may be times when the concern raised against a member of staff does not meet the reporting threshold (Low-level concern). College, through its safeguarding training and induction inform all staff (permanent, casual, volunteers and agency) about their responsibility to report even the small concerns they may have about another member of staff. HR should record all concerns and investigate them thoroughly to ensure that any of the reported concerns are addressed and dealt with appropriately. Designated Safeguarding Lead should be consulted when making these decisions. In most cases these concerns will be addressed through conversation with concerned staff, appropriate training and reminder of professional behaviour as per the Staff Code of conduct. However, in some cases there will be a need for formal action and reporting to LADO. The guiding principle should be the potential of risk to young people in the College.

LADO details and referrals

Ray Said -LADO

T: 0151 233 0840

M: 07841727309

email: ray.said@liverpool.gov.uk

Pauline Trubshaw – Deputy LADO

T: 0151 233 0846

M: 07716702034

email:pauline.trubshaw@liverpool.gov.uk

12. Allegations of abuse against another student (child-on-child abuse)

All concerns must be reported and discussed with the Safeguarding Team (or Designated Safeguarding Lead or Duty Manager). This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting (youth produced sexual imagery). Staff should recognise that children can abuse their peers. Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by children should never be passed off as 'banter' or 'part of growing up'. The DfE states *'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as*

normal between young people and should not develop high thresholds before taking action.' (KCSiE 2022).

Children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. Children who are LGBT or perceived to be, may also be targeted by their peers, and harassed or assaulted.

Victims of child-on-child harm will be supported by the College's pastoral system and referred to specialist agencies including, as examples, 'CAMHs', 'Brook' and 'Barnardo's'. A risk assessment may need to be in place. The College curriculum will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' or 'initiation/hazing' behaviours.

Additional guidance on protecting children from online abuse is available on the NSPCC website:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/legislation-policy-practice/>

13. On-line safety, data protection and the use of mobile phones and digital photographic equipment

Staff should also report any concerns about sexting (youth produced sexual imagery) to the Safeguarding Team, Deputy Designated Safeguarding Lead or senior member of staff who will follow the guidance in: Sexting in schools and colleges: Responding to incidents and safeguarding young people (UK Council for Child Internet Safety) (<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis> provides clarity as to how staff should respond to these incidents).

The College's on-line/E-safety/Acceptable User policy clearly outlines the way in which the College uses technology and the measures in place to ensure safe and responsible use by all. There is a clear code of conduct for staff and volunteers which sets out the use of new technologies, mobile phones, and personal photographic equipment around children. The College will consider Looked After Children (Children in Care) who might be put at risk by being included in publicity materials or College photographs.

The DfE highlights the risks of new technologies:

'The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation – technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate, or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Staff should bring immediately to the attention of the Safeguarding Team any behaviours by adults or children themselves that may be risky or harmful.

Government guidance called; Teaching online safety in school (DfE, 2019c) which outlines how schools can ensure pupils understand how to stay safe online. A protocol for video conferencing was produced at the start of lockdown to be included within the Acceptable User Policy.

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

14. Monitoring attendance

A child missing from an education setting is a potential indicator of abuse or neglect including exploitation. Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, particularly on repeated occasions. The College will follow the pan-Merseyside missing children protocol. Unauthorised absence will be closely monitored. The attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or persistent absentees. Colleges should also scrutinise the attendance of off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, are children in need, are Children Looked After and/or SEN will be monitored on a regular basis.

The College will seek to ensure it has at least two emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable and the child has not attended College.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriages.

15. So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As

appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the College's Designated Safeguarding Lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, teachers should follow the College safeguarding procedures.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. College can play an important role in safeguarding children from forced marriage.

16. Early Help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs or is a young carer
- has special educational needs (whether they have a statutory Education, Health and Care Plan).
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home:
 - is at risk of modern slavery, trafficking, or exploitation.
 - is at risk of being radicalised or exploited.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child

Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children (2018). More information on statutory assessments is included at paragraph 48. Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children 2018.

17. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males, females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information around definitions and indicators are included in Part 1 of Keeping Children Safe in education (2022). The college takes instances of exploitation very seriously and takes immediate action to support students who are vulnerable.

18. Private fostering

Our College has a mandatory duty to report to the local authority if they believe a child is subject to a private fostering arrangement. (This does not include close family relatives e.g., grandparent, brother, sister, uncle, or auntie.) A private fostering arrangement is made without the knowledge of the local authority for the care of a child under the age of 16 years (under 18 for children with disabilities) whereby the child is in the care of someone other than their parent or close relative. Further guidance is available in Keeping Children safe in Education (DfE 2022). When a child is privately fostered a social worker must carry out an assessment to ensure the placement is appropriate and consider any support needed.

19. Up skirting

All staff are made aware that 'up skirting' is now a criminal offence. A definition has been included which describes up skirting as, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2022)

20. Serious crimes

Specific guidance is in force to support schools and colleges in recognising where students may be at risk from serious crimes. The guidance sets out what we as college staff look out

for: “All staff are aware of indicators, which may signal those children are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs” (DfE, 2019) and what school and college staff need to know: “All staff are aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance.” (DfE, 2019)

21. Sexual Violence and Sexual Harassment

The designated safeguarding leads are aware that the DfE published detailed advice on sexual violence and harassment to support schools and colleges has been incorporated in the KCSiE 2022.

Reports of sexual violence and sexual harassment are taken seriously by the College. These incidents are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide us with the foundation for a calm, considered and appropriate response to any reports.

KCSiE 2022 provides effective safeguarding practices and principles for schools and colleges to consider in their decision-making process.

Any decisions are for the College to make on a case-by-case basis, with the designated safeguarding leads taking a leading role and using their professional judgement, supported by other agencies, such as local authority children’s social care and the police as required.

22. Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained mental health professionals in college attempt to make a diagnosis of a mental health problem. College staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff in college are aware of how these children’s experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action is taken, following the child protection policy, and speaking to the Designated Safeguarding Lead or a deputy.

23. Safe recruitment

The College will ensure that all appointments follow its recruitment policy and the guidance set out in Keeping Children Safe in Education (DfE 2022). At least one member of the appointments panel will have undertaken safer recruitment training. The College will undertake all the required DfE pre-employment checks and where appropriate record these checks on the single central record and retain evidence in personnel files. The College will seek written confirmation that third-party organisations including contractors and alternative education providers have undertaken appropriate checks.

The College is required to investigate relevant staff who fall within the scope of Disqualification under the Childcare Act 2006 and establish they are not disqualified. The criteria for disqualification under the 2006 Act and the 2018 Regulations includes inclusion on the Disclosure and Barring Service (DBS) Children's Barred List or committing a relevant offence.

24. The safeguarding curriculum

The College will ensure it has a curriculum map which sets out how to help children keep themselves safe from harm. Children will be supported to develop their understanding, at the appropriate age, of risks including using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. Children will also learn about the wider safeguarding curriculum which for children would include road safety, anti-bullying and know how to seek support when needed. The College will ensure the curriculum promotes British Values as set out in the Counter Terrorism and Security Act 2015.

25. Confidentiality, information sharing, record keeping and retention

The College understands the need to keep child protection and safeguarding records securely.

The College Safeguarding team will ensure that all safeguarding records are transferred to the educational provider where a student destination is known or where records are requested by a new provider. College will transfer records securely to the next setting and discuss the child's needs. The College will retain records in keeping with Local Authority and NSPCC guidelines:

<https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2019.pdf>

Staff cannot promise children confidentiality but must always act in the best interests of the child and share disclosures made by the child or others with the Safeguarding Team, who will

work within the principles outlined in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG, 2018)

Staff will be told of concerns about a child on a 'need to know basis'.

The College will aim to seek consent of parents before sharing information with other agencies, however legislation states that colleges and other agencies can share information without the consent of a parent/carer depending upon circumstances.

26. Reporting and Monitoring

The Designated Safeguarding Lead is responsible for reporting safeguarding data and analysis to the governing body every term. Governors are presented with 3 reports every year. The reports will provide assurance to governors about the College's compliance status with regards to its legal obligations as well as safeguarding records for relevant terms along with an analysis. The report also highlights any prevalent issues and trends that require College's attention.

The designated Safeguarding Lead, through termly meetings of "Safeguarding and Wellbeing Strategy Group" seek assurances from all stakeholders around compliance with the safeguarding requirements: The membership of the group include Deputy Principal, Designated Safeguarding Governor, Director of HR, Head of IT, Deputy Safeguarding Lead, Director of Progression, Head of Student Services and Director of Estates.

Group seeks assurance around DBS checks, Safeguarding training compliance, web and online filtering and monitoring, digital safety and digital education, site safety and security etc.

27. Complaints

Complaints about safeguarding should follow the College's complaints policy.

The College and Local Authority also have whistleblowing procedures.

(The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285)