

Ada, National College for Digital Skills

Safeguarding and Prevent Policy

| Version | Purpose / Changes | Author | Date |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|
| 1 | Development of the original policy | Vicky Clarke | October 2019 |
| 2 | Additions made following updates in Keeping Children Safe in education (2020), appendix on coronavirus college closure and amalgamation of Prevent Policy | Vicky Clarke | 15.09.2020 |
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| Executive Lead: | Sixth Form Principal & Dean |
| Document Owner: | Designated Safeguarding Lead (Sixth Form) |
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KEY CONTACTS FOR SAFEGUARDING AT ADA

| COLLEGE SAFEGUARDING TEAM | |
|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Sixth Form Designated Safeguarding Lead (Child and Vulnerable Adult Protection) | Malini Sarkar malini@ada.ac.uk 0203 1050 125 |
| Sixth Form Designated Prevent Lead | Malini Sarkar malini@ada.ac.uk 0203 1050 125 |
| Apprenticeship Designated Safeguarding Lead (Child and Vulnerable Adult Protection) | Tom Fogden tom@ada.ac.uk 0203 1050 125 |
| Apprenticeship Designated Prevent Lead London | Tom Fogden tom@ada.ac.uk 0203 1050 125 |
| Apprenticeship Deputy Designated Safeguarding Lead London (Child and Vulnerable Adult Protection) | Brooke Shadrake brooke@ada.ac.uk 0203 1050 125 |
| Apprenticeship Designated Safeguarding Lead (Child and Vulnerable Adult Protection) | Geoff Stevenson geoff@ada.ac.uk 0203 1050 125 |
| Apprenticeship Designated Prevent Lead Manchester | Geoff Stevenson geoff@ada.ac.uk 0203 1050 125 |
| Apprenticeship Deputy Designated Safeguarding Lead Manchester (Child and Vulnerable Adult Protection) | Claire McDonald clairemcd@ada.ac.uk 0203 1050 125 |
| Ada Safeguarding Governor | Steve Stanley stanleyeducationassociates@gmail.com |
| LOCAL AUTHORITY CONTACTS HARINGEY | |
| Single Point of Access | 020 8489 4470 / 0000 Follow up email to: sga@haringey.gcsx.gov.uk |
| Local Authority Designated Officer | 020 8489 2968 / 1186 lado@haringey.gov.uk |
| Haringey Local Safeguarding Children's | 020 8489 3145 |

| | |
|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board | lscb@haringey.gov.uk |
| Haringey Prevent | Concerns about a child: Call the Single Point of Access Concerns about an adult: 0208 489 3884 or 0208 489 1280 Concern that a learner is currently involved in terrorist activity: Police or the anti-terrorist hotline immediately on 0800 789 321 |
| LOCAL AUTHORITY CONTACTS TOWER HAMLETS | |
| Single Point of Access | 020 8489 4592 /5652 /5762 / 4582 |
| Local Authority Designated Officer | 020 8489 2968 / 1186 lado@towerhamlets.gov.uk |
| Tower Hamlets Local Safeguarding Children's Board | 020 8489 1472 lscb@towerhamlets.gov.uk |
| Tower Hamlets Prevent | Concerns about a child: Call the Single Point of Access Concerns about an adult: 0208 489 3884 or 0208 489 1280 Concern that a learner is currently involved in terrorist activity: Police or the anti-terrorist hotline immediately on 0800 789 321 |

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| LOCAL AUTHORITY CONTACTS MANCHESTER | |
| Single Point of Access | 0161 219 2843 / 0161 234 1973 / 0161 234 1975 |
| Local Authority Designated Officer: Majella O'Hagan | 0161 234 1214. qualityassurance@manchester.gov.uk |
| Manchester Local Safeguarding Children's Board | 0161 234 5001 |
| Manchester Prevent | Concerns about a child: Call the Single Point of Access: 0161 219 2843 Concerns about an adult: 0161 234 5001 Concern that a learner is currently involved in terrorist activity: Police or the anti-terrorist hotline immediately on 0161 856 9305 |

POLICY STATEMENT

As a college we are committed to safeguarding and promoting the welfare of all of our learners. Safeguarding determines the actions that we take to keep learners safe and protect them from harm (see appendix one) in all aspects of their college life, including the actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the college. As such, this overarching policy will link to other policies which will provide more information and greater detail.

AIMS

- To provide staff with the framework to promote and safeguard the wellbeing of learners and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the college.
- To demonstrate our commitment to protecting learners.

PRINCIPLES AND VALUES

Safeguarding is everyone's responsibility. As such it does not just rest with the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) to take lead responsibility in all of the areas covered within this policy.

Some areas, such as Health and Safety, are a specialist area of safeguarding. There is a separate Health and Safety policy.

Safeguarding processes are intended to put in place measures that minimise harm to learners. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the college.

All learners in our college are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the learners, take their worries seriously and share the information with the safeguarding lead. Should the concern relate to a member of staff the information should be taken to the Principal (in the case of a concern in the Sixth form) or the Dean (in the case of concern in the Apprenticeship Programme) unless the concern is about the Principal or the Dean. In this instance it should be addressed to the CEO or Chair of the Board.

In addition, we provide learners with information of who they can talk to outside of college both within the community and with local or national organisations who can provide support or help.

As a college, we review this policy at least annually in line with DfE, Haringey LSCB (Local Safeguarding Children Board), Manchester and any other relevant guidance.

Proactively Create a Safe Environment

We recognise that high self-esteem, confidence and good lines of communication with a trusted adult help to protect learners. We aim to equip our learners with the recognition, language and skills needed to keep themselves safe.

The college will therefore:

- maintain a college environment where learners feel safe
- utilise curriculum activities to include opportunities which equip learners with the skills they need to stay safe, build self-esteem, develop the skills to think independently and make sensible decisions based on their own judgements
- ensure learners know that there are adults in the college whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
- ensure learners know that there are adults in trusted positions external to the college, whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
- equip learners with the knowledge and skills they need to recognise and avoid risky behaviour in the real and virtual world
- follow this policy and any other guidance offered to the college, to ensure that learners are within the safest possible environment

AREAS OF SAFEGUARDING

Within Keeping Children Safe in Education (2022) and the Ofsted Education Inspection Framework (2022), there are a number of safeguarding areas directly highlighted or implied within the text.

These areas of safeguarding have been separated into issues that are emerging or high-risk issues (Part 1 of this policy); those related to the learners as an individual (Part 2 of this policy); other safeguarding issues affecting learners (Part 3 of this policy); and those related to the running of the college (Part 4 of this policy).

DEFINITIONS

'Safeguarding' is defined in Keeping Children Safe in Education (September 2022) as protecting children from maltreatment; preventing impairment of children's mental and physical 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. Our safeguarding practice applies to every learner enrolled on a Sixth Form programme of study, including beyond their eighteenth birthday (see below).

The term Staff applies to all those working for or on behalf of the college, full time or part time, in either a paid or voluntary capacity. This also includes parents and members of the Board.

Child refers to all young people who have not yet reached their eighteenth birthday. On the whole, this will apply to learners of our college; however, the policy will extend to visiting children and learners from other

establishments, including those learners at our college who reach their eighteenth birthday whilst still studying with us. It is important to note that through the apprenticeship programme, we may have vulnerable adults enrolled on our programme.

The term vulnerable adult refers to an adult (someone aged over 18) who may be vulnerable to abuse or maltreatment, or who has needs for care and support, or is experiencing or is at risk of abuse or neglect, or as a result of needs is unable to protect themselves against abuse or neglect or the risk of it. Our safeguarding policy refers to both children and vulnerable adults within any of our programmes of study.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step parents and foster carers.

KEY PERSONNEL

Personnel within the College

The Designated Safeguarding Lead (DSL) for the Sixth Form is Malini Sarkar, Assistant Principal. The Designated Safeguarding Lead (DSL) for the Apprenticeship team London is Tom Fogden, COO and Dean. The Deputy Designated Safeguarding Lead (DDSL) for the Apprenticeship team London is Brooke Shadrake, Compliance Manager. The Designated Safeguarding Lead (DSL) for the Apprenticeship team Manchester is Geoff Stevenson, Regional director and the Deputy Designated Safeguarding Lead (DDSL) for the Apprenticeship team Manchester is Claire McDonald, Delivery Manager.

The broad areas of responsibility for the DSL are as follows, as stipulated in Keeping Children Safe in Education (2022):

Managing referrals

The DSL is expected to:

- refer cases of suspected abuse to the local authority Children's Social Care as required;
- support staff who make referrals to the 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 employment 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

The DSL is expected to:

- Liaise with the Principal or CEO as appropriate, to inform them of safeguarding issues especially ongoing enquiries under Section 17 and 47 of the *Children Act 1989* and police investigations.
- As required, liaise with the Case Manager and the designated officer(s) at the local authority for child protection concerns.
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- make sure that staff know which children are experiencing challenges with welfare, safeguarding

or child protection (including those with a social worker), understand their academic progress and attainment, and maintain a culture of high aspirations for them.

- Support teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them.

Training requirements

The DSLs and DDSLs will receive training to provide them with the knowledge and skills required to carry out the role. In addition, their knowledge and skills will be refreshed at regular intervals, 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 intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular how local authorities conduct a child protection case conference and a child protection review conference and be able to attend, those with special educational needs and young carers;
- are able to keep detailed, accurate and secure written records of concerns and referrals;
- understand and support the College with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting learners from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses;

All staff training

- All staff must undergo annual safeguarding training in relation to part one of the Keeping children safe in education, as well as any necessary updates within the KCSIE guidance.
- All staff must read and acknowledge understanding of The Keeping children safe in education (2022) guidance.
- All staff SHOULD encourage a culture of listening to learners and taking account of their wishes and feelings in accordance with the colleges safeguarding requirements.
- All staff to have a clear understanding of how to deal with learner's disclosures in accordance with the colleges safeguarding policy, as well as the reporting mechanisms within each relevant setting
- All staff must receive annual Prevent training, to ensure staff are able to identify and correctly report all concerns relating to extremism.

Raising awareness

- The DSL should ensure the college's safeguarding and child protection policies are known, understood and used appropriately;

- Ensure this policy is reviewed annually (as a minimum) and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with the Board regarding this;
- Ensure this policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made, recognising the role of the college in this process.
- Link with the local children's safeguarding board (LSCB) (Haringey), to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Extremism and Radicalisation

In accordance with the Revised *Prevent Duty Guidance for England and Wales (July 2015)* and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)* the Designated Safeguarding Lead has, in addition, the following responsibilities:

- Acting as the first point of contact for parents, learners, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
- Coordinating Prevent duty procedures in the College;
- Liaising with local Prevent coordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
- Undergoing training through Workshops to Raise Awareness of Prevent (WRAP) or other appropriate training;
- Maintaining an ongoing training programme for all college employees via the weekly internal staff professional development sessions, induction training for all new employees and keeping records of staff training; and
- Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

Deputy DSL

If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL(s). The Deputy DSL has also undertaken training to provide them with the knowledge and skills required to carry out the role. In this policy, reference to the DSL includes the deputy DSLs where the DSL is unavailable.

Multi-agency working

Colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the college contributes to multi-agency working in line with statutory guidance *Working Together to Safeguard Children*. It is especially important that colleges understand their role in the new safeguarding partner arrangements.

Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area

within the local authority; and the chief officer of police for a police area in the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. Governing bodies, proprietors, management committees and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their new local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. The three safeguarding partners should make arrangements to allow all schools (including multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in the new safeguarding arrangements.

Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners.²

Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All colleges should allow access for children's social care from the local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

Key agency links for the Sixth Form:

- Metropolitan Police (via Safer Schools Team)
- Haringey Prevent
- Haringey Children's Services
- Haringey MASH team

Working with Industry Partners and Coaches

Ada works closely with a range of industry employers to bring real-world work experience into the classroom who will always be accompanied in the college by a member of staff. Where the college works with industry partners, safeguarding procedures are followed when learners visit different premises. When industry partners visit the college site, DBS checks are taken wherever possible or alternative safeguarding measures are put in place, such as accompanying visitors at all times, having visible photograph identification and assigning visitor toilets. Some industry volunteers take part in the coaching programmes. All coaches complete safeguarding training as part of their induction process and complete full DBS checks.

INFORMATION SHARING

Arrangements are in place that set out clearly the process and principles for sharing information within the college and with the three safeguarding partners, other organisations, agencies and practitioners as required. College staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Staff can manage this via submitting incidents through CPOMS (see appendices two and three).

The Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. 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.

Colleges should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that colleges can withhold education data under the GDPR; they should do so where the serious harm test is satisfied.

HIGH RISK AND EMERGING SAFEGUARDING ISSUES

Preventing Radicalisation and Extremism

The aim of the government's Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This is part of an overall counterterrorism strategy called CONTEST. In the Counter-Terrorism and Security Act 2015 this has simply been expressed as "prevent people from being drawn into terrorism".

The government's Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Prevent work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats is currently from terrorist organisations in Syria and Iraq, and Al Qa'ida associated groups. But terrorists associated with the extreme right also pose a continued threat to our safety and security. The white supremacist ideology of extreme right-wing groups has provided both the inspiration and justification for people who have committed extreme right-wing terrorist acts. More recently online groups such as Incel groups (involuntary celibate) have been behind hate-fuelled ideology characterised by white male supremacy, oppression of women and the glorification and encouragement of male violence. Staff should have an awareness of these types of extremist groups that exist and use this policy to act upon any evidence of extremism that they encounter.

The Government has defined extremism in the Prevent strategy as: *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces"*

The Prevent Duty requires that all staff are aware of the signs that a learner may be vulnerable to radicalisation.

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups.

There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame.

The risks will need to be considered for political, environmental, animal rights or faith-based extremism that may lead to a learner becoming radicalised. Staff will receive awareness training in order that they can identify the signs of learners being radicalised as part of the ongoing staff training throughout the year.

As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values of: Democracy, The rule of law, Individual liberty, Mutual respect and Tolerance of those of different faiths and beliefs through the curriculum.

Any learner who is considered vulnerable to radicalisation will be referred by the DSL to the relevant local authority's children's social care, where the concerns will be considered in the MASH (Multi-agency Safeguarding Hub) process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the college will attend and support this process. Guidance on this process can be found at: <https://www.gov.uk/government/publications/channel-guidance>

Gender Based Violence

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

The government has a strategy looking at specific issues that women and girls face. Within the context of this safeguarding policy the following sections are how we respond to violence against girls. Female genital mutilation, forced marriage, honour based violence and teenage relationship abuse all fall under this strategy.

Female Genital Mutilation (FGM)

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM is illegal in the UK. On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. In these situations, the DSL and/or Principal will be informed and the member of teaching staff will call the police to report suspicion that FGM has happened. At no time will staff examine learners to confirm this.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the staff will inform the DSL who will report it as with any other child protection concern.

Forced Marriage

www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PR_ACT/CE_GUIDELINES_v1_180614_FINAL.pdf

In the case of children: *'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'* In developing countries, 11% of girls are married before the age of 15. One in three victims of forced marriage in the UK are under 18. It is important that all members of staff recognise the presenting symptoms, know how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

Policies and practices in this college reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to learners who may be at risk of forced marriage, teachers and college leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

Characteristics that may indicate forced marriage

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from college, including truancy;
- a fall in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and learners being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual learner's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Honour Based Violence

Honour-based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse

- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff believe that a learner is at risk from honour-based violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the learner is at immediate risk the police will be contacted in the first place. It is important that if honour-based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Teenage Relationship Abuse

<https://www.go11.uk/go11ernment/publications/this-is-abuse-summary-report>

<https://www.go11.uk/go11ernment/publications/statutory-guidance-framework-controlling-or-coercive-behaviour-in-an-intimate-or-family-relationship>

Advice for colleges on how to prevent and respond to report of sexual violence and harassment between children can be found at: <https://www.go11.uk/go11ernment/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Research has shown that teenagers don't understand what constitutes abusive behaviours such as controlling behaviours, which could escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to and that this abuse was prevalent within teen relationships.

Further research showed that teenagers don't understand what consent means within their relationships. They often held the common misconception that rape could only be committed by a stranger down a dark alley and didn't understand that it could happen within their own relationships. This led to these abusive behaviours feeling 'normal' and therefore left unchallenged as they were not recognised as being abusive.

In response to this the college will provide education to prevent teenagers from becoming victims and perpetrators of abusive relationships by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships.

Staff should be aware that learners are at risk from their peers and should follow safeguarding procedures as with any other safeguarding concern.

The Toxic Trio

The term 'Toxic Trio' has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred. They are viewed as indicators of increased risk of harm to children and young people. In a review of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

Domestic Violence

Domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what a normal relationship is.

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

Indicators that a child is living within a relationship with domestic abuse can include the following (NB: this is not an exhaustive list):

| | | |
|--------------------------|------------------------------|--------------------------------|
| Withdrawn | suddenly behaves differently | anxious |
| Clingy | depressed | aggressive |
| problems sleeping | eating disorders | wets the bed |
| soils clothes | takes risks | misses college |
| changes in eating habits | obsessive behaviour | self-harm/ thoughts of suicide |
| Nightmares | drugs | alcohol |

These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

If staff believe that a learner is living with domestic abuse, this will be reported to the DSL to be considered for referral to children's social care.

Parental Mental Health

<https://www.go11.uk/go11ernment/publications/the-mental-health-strategy-for-england>

The term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent/ carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement
- A child missing college regularly as (s)he is being kept at home as a companion for a parent / carer
- Adopt paranoid or suspicious behaviour as they believe their parent's delusions
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

Parental Substance Misuse

Substance misuse applies to the misuse of alcohol as well as problem drug use, defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.'

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour Bullying (including due to poor physical appearance)
- Isolation - finding it hard to socialise, make friends or invite them home Tiredness or lack of concentration
- Child talking of or bringing into college drugs or related paraphernalia Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on Poor attendance or

late arrival

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for children's social care.

Children Missing from Education

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/395138/Children_missing_education_Statutory_guidance_for_local_authorities.pdf

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time for a child to be missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

DSLs and staff should consider:

Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the college site or are they absent from the site?

- Is the child being sexually exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other learners routinely missing the same lessons, and does this raise other risks or concerns?

Is the lesson being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the college of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
- Do the parents appear to be aware?
- Are the learner's peers making comments or suggestions as to the location of the learner?

Continuous missing days: Has the college been able to make contact with the parent? Is medical evidence being provided? Are siblings attending college (either our or local colleges)?

- Did we have any concerns about radicalisation, FGM, forced marriage, honour-based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?

Any learner who is absent for three days and there is no contact with parents/carers, a home visit will be conducted to check on the welfare of our learner. For those learners on child protection plans and care orders, children's social care will be made aware of their absence from college. The college will view absence as both a safeguarding issue and an educational outcomes issue. The college may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

Children Missing from Home or Care

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Research shows that children run away from conflict or problems at home or college, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

The Association of Chief Police Officers has provided the following definitions and guidance.

'Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'

An absent person is: 'A person not at a place where they are expected or required to be.'

All cases classified as 'missing' by the police will receive an active police response - such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed. The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to 'missing'.

Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Toxic Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum seeking children there will be pressure to make contact with their trafficker

As a college we will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or directly contact the police ourselves.

Child Sexual Exploitation (CSE)

<http://paceuk.info/>

Sexual exploitation of children is not limited by the age of consent and can occur up until the age of 18.

CSE involves children being in situations, contexts or relationships where they (or a third person) receive 'something' as a result of them performing sexual activities. It can be perpetrated by individuals or groups, males or females, children or adults. It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears to be consensual.

The 'something' can include food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money. Child sexual exploitation can happen via technology without the child being aware; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, manipulation, deception and intimidation are common. Involvement in exploitative relationships are often characterised by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing college or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour

CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

As a college we educate all staff in the signs and indicators of sexual exploitation. We identify learners who are at risk and the DSL will share this information as appropriate with children's social care.

Trafficked Children

Human trafficking is defined by the UN High Commission for Refugees in respect of children as a process that is a combination of:

- Movement (including within the UK);
- For the purpose of exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK. There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy;

- Has a history with missing links and unexplained moves;
- Is required to earn a minimum amount of money every day;
- Works in various locations;
- Has limited freedom of movement;
- Appears to be missing for periods;
- Is known to beg for money;
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good;
- Is one among a number of unrelated children found at one address;
- Has not been registered with or attended a GP practice;
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault);
- Prevalence of a sexually transmitted infection or unwanted pregnancy;
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation / the child has been seen in places known to be used for sexual exploitation;
- Evidence of drug, alcohol or substance misuse;
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner;
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding;
- Persistently missing, staying out overnight or returning late with no plausible explanation;
- Returning after having been missing, looking well cared for despite having not been at home;
- Having keys to premises other than those known about;
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity;
- Truancy/ disengagement with education;
- Entering or leaving vehicles driven by unknown adults;
- Going missing and being found in areas where the child or young person has no known links; and/or
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

If staff believe that a child is being trafficked, this will be reported to the DSL to be considered for referral to children's social care.

Child Criminal Exploitation including County Lines

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

See paragraph above on CCE for further information. County Lines is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. Gangs and organised criminal networks will exploit vulnerable children and adults to move and store drugs and/or money involved in the operation, using coercion, intimidation, violence (including sexual violence) and weapons.

Technologies

Technological hardware and software are developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

We recognise that our college specialising in developing digital skills amongst young people, which could lead to our learners being exposed to risks, through their involvement with technology. We take this risk seriously and regularly highlight to learners the risks they may be exposed to and how to protect themselves.

Online Safety and Social Media use

<https://www.thinkuknow.co.uk/Teach/>
<http://www.saferinternet.org.uk/>

With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint

The College will therefore seek to provide information and awareness to both learners and their parents through:

- Acceptable use agreements for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online
- Information included in letters, website and the Ada Portal
- Parents evenings
- Campaigns

Cyberbullying

[https://assets.publishingservice.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying Advice for Headteachers and College Staff 121114.pdf](https://assets.publishingservice.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_College_Staff_121114.pdf)

Central to the College's anti-bullying policy is the principle that bullying *is always unacceptable and that all learners have a right not to be bullied*. We also recognise that we must take note of bullying perpetrated outside college which spills over into the college and so we will respond to any cyber-bullying we become aware of carried out by learners when they are away from the site. Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself." By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to whether any criminal act has been committed. The college will pass on information to the police if it feels that it is appropriate or are required to do so.

Sexting

<https://www.saferinternet.org.uk/advice-centre/teachers-and-professionals/teaching-resources/sexting-resources>

'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots, sexual poses and explicit text messaging. While sexting often takes place in a consensual relationship between two young people, the use of Sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

The college will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the college for advice.

Gaming

<https://www.childnet.com/parents-and-carers/hot-topics/gaming>

Online gaming is an activity that the majority of children and many adults get involved in. The college will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate.
- By supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode.
- By talking to parents about setting boundaries and time limits when games are played.
- By highlighting relevant resources.

Online Reputation

<http://www.childnet.com/resources/online-reputation-checklist>

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

Ada works with a number of external organisations who can offer learners a wide range of opportunities, including workshops, networking events and work experience. Learners at Ada are supported with developing their online presence through LinkedIn through careful discussion around online reputation. Learners' pages are monitored and where there may be concern, this will be discussed with the learner and appropriate steps will be put in place to protect the learner.

Grooming

<http://www.internetmatters.org/issues/online-grooming/>

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

The college will build awareness amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online

That parents should:

- Recognise the signs of grooming
- Have regular conversations with their children about online activity and how to stay safe online

The college will raise awareness by:

- Informing parents of safeguarding processes and support for learners
- Include awareness around grooming as part of their curriculum
- Identifying with both parents and children how they can be safeguarded against grooming

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one.

Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education.

Staff should take action on any mental health concerns that are also safeguarding concerns, following this policy and speaking to the DSL or Deputy DSL.

SAFEGUARDING ISSUES RELATING TO INDIVIDUAL LEARNERS' NEEDS

Learners with Medical Conditions (in college)

As a college we will make sure that sufficient staff are trained to support any learner with a medical condition. All relevant staff will be made aware of the condition to support the learner and be aware of medical needs and risks to the learner. An individual healthcare plan may be put in place to support the learner and their medical needs, particularly if there is a risk of an emergency directly related to an existing medical need.

learners with Medical Conditions (out of college)

There will be occasions when learners are temporarily unable to attend our college on a full-time basis because of their medical needs. These are likely to be those:

- suffering from long-term illnesses
- with long-term post-operative or post-injury recovery periods
- with long-term mental health problems (emotionally vulnerable)

Where it is clear that an absence will be for more than 15 continuous college days the college will work with the learner and parents/carers to agree on the most suitable next steps.

Fabricated or Induced Illness

There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms; this may include fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts and records, and

specimens of bodily fluids; this may also include falsification of letters and documents

- Induction of illness by a variety of means

If we are concerned that a child may be suffering from fabricated or induced illness we will follow the established procedures of the Local Safeguarding Children Board.

Mental Health

<http://www.voungminds.org.uk/>

<https://mhfaengland.org/>

<https://www.go11.uk/go11ernment/publications/the-mental-health-strategy-for-england>

Class teachers and other members of staff see their learners' day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of the learner. Alongside the Board, the college will work to continually ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

When concerns are identified, college staff will provide opportunities for the child to talk or receive support within the college environment. Parents will be informed of the concerns and a shared way to support the child will be discussed.

Where the needs require additional professional support, referrals will be made to the appropriate team or service with the parent's agreement.

Self- Harm

Definition of self-harm. We regard self-injury to be a coping mechanism for young people who are attempting to cope with high levels of distress and emotional pain. It is any deliberate, non-suicidal behaviour, which causes physical pain or injury and is aimed at reducing the emotional pain and distress of the individual concerned. These behaviours may include deliberate bone-breaking, cutting, bruising, banging and non-suicidal overdosing and the behaviours are usually chronic, repetitive and habitual.

Young people who self-injure will generally attempt to hide any scarring or injuries and can find it extremely difficult to discuss their behaviours, and the emotions behind them, with others. We understand these behaviours not to be about seeking attention but rather to be about seeking relief and release from emotional distress. We also understand that self-injury is not suicidal behaviour. However, the emotional distress that causes these behaviours can lead to suicidal thinking and actions. We will consequently take ALL incidents of self-injury seriously, investigate them and attempt to provide the most appropriate emotional support possible.

Our college team is dedicated to ensuring the emotional, physical and mental well-being of all the learners in our community. We consequently aim to:

- Recognise any warning signs that one of our learners may be engaging in self-harming behaviour
- Understand the risk factors associated with these behaviours including low self-esteem

perfectionism, mental health issues such as anxiety or depression, home or college problems, social isolation, and emotional, physical or sexual abuse

- Be proactive in discussing this topic with learners we might feel are deliberately harming themselves
- Know how to respond to learners who wish to discuss these behaviours with us and take them seriously at all times
- Be able to produce short and long-term care and management plans for such learners in conjunction with external agencies if necessary
- Provide the appropriate level of practical and emotional support for staff dealing with learners who self-harm and ensure appropriate training and education is available to all staff regarding this issue

Children who need a social worker

Children may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances.

These experiences can leave children vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour and mental health. The college will actively work alongside the local authority in order to remain informed of any children who have a social worker. The DSL will hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

OTHER SAFEGUARDING ISSUES IMPACTING LEARNERS

Bullying

<https://www.go11.uk/go11ernment/publications/pre11enting-and-tackling-bullying>

The college works to an Anti-Bullying Policy, please refer to this policy for full details of how we approach bullying at Ada.

Prejudice based abuse

Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation
- Political views
- Physical ability
- Socio-economic background
- Or other protected characteristic

Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on college furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against learners who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to cooperate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- Attempts to recruit other learners to organisations and groups that sanction violence, terrorism or hatred.

As a college we will respond by:

- clearly identifying prejudice-based incidents and hate crimes and monitor the frequency and nature of them within the college

- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the college and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice-based incidents and hate crimes
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again

Drugs and Substance Misuse

The college works to a Substance Abuse Policy, please refer to this policy for full information on Ada's approach.

Faith Abuse

<https://www.go11.uk/go11ernment/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

The number of known cases of child abuse linked to accusations of "possession" or "witchcraft" is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem. Such abuse generally occurs when a parent/carer views a child as being "different", attributes this difference to the child being "possessed" or involved in "witchcraft" and attempts to exorcise him or her. A child could be viewed as "different" for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the parent/carer and the child. There are various social reasons that make a child more vulnerable to an accusation of "possession" or "witchcraft". These include family stress and/or a change in the family structure. The attempt to "exorcise" may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the college becomes aware of a learner who is being abused in this context, the DSL will follow the normal referral route to children's social care.

Gangs and Youth Violence

https://www.go11.uk/go11ernment/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_113_March2015.pdf

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact. As a college based within a borough of London where we know that gangs do exist, staff at Ada should be vigilant within this area. All staff should be aware of indicators, which may signal that 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. Advice for colleges 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.

As a college we have a duty and a responsibility to protect our learners. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While learners generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education. Crucial preventative work can be done within college to prevent negative behaviour from escalating and becoming entrenched.

As a college we will:

- develop skills and knowledge to resolve conflict as part of the curriculum;
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
- understand risks for specific groups, including those that are gender-based, and target interventions;
- safeguard, and specifically organise child protection, when needed;
- make referrals to appropriate external agencies;
- carefully manage individual transitions between educational establishments, especially into learner Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime

Private Fostering

<https://www.go11.uk/go11ernment/publications/children-act-1989-private-fostering>

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more.

It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the children's services department of any private fostering arrangement.

If the college becomes aware that a learner is being privately fostered we will inform the children's services department and inform both the parents and carers that we have done so.

Parenting

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs such as autism or ADHD, which can have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place. As a college we will support parents in understanding the parenting role and provide them with strategies to make a difference by:

- Discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence-based parenting programmes)
- Considering appropriate early help services, such as: <https://www.haringey.gov.uk/children-and-families/early-help/p>
- Support the parent with accessing additional services, as required

SAFEGUARDING PROCESSES

Safer Recruitment

www.gov.uk/government/publications/keeping-children-safe-in-education--2

The college operates a separate safer recruitment process. We will endeavour to have at least one member of staff who has undertaken safer recruitment training involved in the shortlisting and interview process. The process checks the identity, criminal record (enhanced DBS for all those working within the Sixth Form and appropriate checks for those working with apprentices), right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.

A Disclosure and Barring Service (DBS) Check is carried out on all staff, including supply staff, governors, associate members and regular volunteers employed or working at the college. All teaching staff are subject to additional barring checks via the Teaching Regulation Authority with relevant management positions subject to s138 prohibition checks and the DBS barring list. These processes will be led by Human Resources as part of the recruitment process.

In exceptional circumstances, a staff member may be authorised to start in post without a fully processed DBS check provided we have:

- received appropriate references
- the staff member has satisfied the required identity checks to enable a DBS check to commence
- a risk assessment has been completed by the DSL which identifies minimal risk to learners and others in appointing the staff member
- appropriate monitoring and supervision of the staff member is agreed and in place
- appropriate members of the senior leadership team approve the appointment subject to these conditions being satisfied

Information regarding the appointment of staff member's prior receipt of a fully processed DBS check will be monitored annually by the Extended Leadership Team (ELT).

Staff Induction

The DSL or their deputy will provide all new staff with training to enable them to both fulfil their role and also to understand the safeguarding policy, the staff behaviour policy/code of conduct, other relevant policies and part one of Keeping Children Safe in Education. This will also include how to manage a disclosure (see appendix four). This induction may be covered within the annual training if this falls at the same time, otherwise it will be carried out separately during the initial starting period.

Health and Safety

The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act

All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. The college has a Health and Safety policy which details the actions that we take in more detail. In addition, the college maintains a separate Health

and Safety Policy, which should be referred to.

Following the recent outbreak of coronavirus and the long-term impact this could have on Health and Safety, the college has introduced a number of additional safeguarding procedures in the event of a full college closure. Staff are aware of this and have been signposted to the measures outlined in appendix five.

Site Security

We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. These are:

- All doors within the college that are locked will remain locked at all times, only to be opened by appropriate members of staff and will not remain propped open
- Visitors and volunteers enter at the reception and must sign in.
- Visitors and volunteers are identified by wearing visitor lanyards and badges
- All children leaving or returning during the college day have to tap in and out of the barriers

Off site visits

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the college and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. The college has an educational visits coordinator (EVC) who liaises with the local authority's outdoor education adviser and helps colleagues to manage risks and support with off site visits and provides training in the management of groups during off site visits, as well as First Aid in an outdoor context.

First Aid

This is provided for in the Health and Safety Policy.

Physical Intervention (Restraint and Use of Reasonable Force)

This is provided for in the Behaviour Policy and complies with The Education and Inspections Act 2006, section 93, and guidance from the Department of Education (August 2011).

Taking and the use and storage of images

As a college we will seek consent from the parent/carer of a learner and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in college publications, printed media or on electronic publications. We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for these images to be used until such a time that consent is withdrawn.

Photographs will only be taken on college owned equipment and stored on the college network. No

images of learners will be taken or stored on privately owned equipment by staff members.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT

This section of the policy should be read in conjunction with the college's ***Sexual Harassment & Misconduct Policy***. The Sexual Harassment & Misconduct Policy further details staffs and learners' responsibilities in ensuring allegations of sexual misconduct are responded to appropriately and effectively if / when they occur. The policy also highlights Ada's commitment in ensuring the college has appropriate procedures in place to create an inclusive and safe culture for all learners and staff; Where victims of sexual misconduct are empowered to disclose and appropriate safeguards are put in place to ensure victims feel, safe, listened to and supported throughout.

Sexual violence and sexual harassment can occur between two learners of any age and sex, within the college. It can occur through a group of learners sexually assaulting or sexually harassing a single learner or group of learners. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with learners are advised to maintain an attitude of 'it could happen here' and will be vigilante to any forms of sexual harassment, violence or peer on peer abuse.

All Staff have been trained to identify sexual harassment and violence within the college and will address inappropriate behaviour (even if it appears to be relatively innocuous).

Reporting sexual violence and harassment

Staff who observe any form of sexual harassment or violence will refer all concerns to the DSL who will investigate further. Learners who either disclose or fall victim to sexual harassment or violence will be reassured that they will be taken seriously and that they will be supported and kept safe within the college.

The college will also ensure that the wishes of the victim in terms of how they want to proceed are listened to. Decisions regarding how any investigation will be progressed and any support that they will be offered will be discussed with the victim. This will however need to be balanced with the college's duty and responsibilities to protect other learners and learners.

All learners will be made aware that they are able to disclose all concerns of sexual harassment and violence to any member of staff, who have all been trained to handle such disclosures. Victims of sexual harassment or violence may find it difficult to initially discuss and disclose SH and SV to members of staff; therefore learners will also have the option to self-disclose their concerns through the learners self-disclosure forms (Appendix 2 of this policy). All disclosures will be dealt with in a timely manner to ensure the safety of all learners involved.

Risk Assessments

When there has been a report of sexual violence, the designated safeguarding lead (or deputy) will decide if a risk and needs assessment is required. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment will consider:

- the victims, protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other learners/ learners, at the college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

The college will also refer all cases of sexual violence to external agencies as required. If it is suspected a crime has been committed such cases will be reported to the police.

After an initial investigation by the DSL, if concluded that the sexual harassment or violence is of such a serious nature that it would be unsafe for the perpetrator to remain in the college setting; the college will be required to refer to its exclusion policy.

Responding to Sexual harassment and sexual violence

The college is committed to creating a safe space for all our learners. Therefore, all learners will receive age appropriate guidance around the colleges zero tolerance policy on sexual harassment or violence. Learners will be made aware of the colleges policy during their induction, and may also receive additional relationship and sex education (RSE) sessions throughout the year.

APPENDIX ONE: CATEGORIES OF ABUSE OR HARM

Physical Abuse

A form of abuse which may involve 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 (or Psychological) Abuse

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 a child 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 a 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 including child on child (and vulnerable adults) abuse

Any suspicion of sexual abuse or actual disclosure by a child that he or she has been sexually abused must be referred immediately to the MASH team, who will contact the appropriate investigative agencies. Parents/carers should not normally be informed at this stage as this may jeopardise the investigation and the safety of the child. Where there is an allegation of, or concern about, sexual abuse a strategy meeting will be held in order to decide on the most appropriate way to proceed. The referrer will normally be invited to the strategy meeting. Further guidance is held in the document: [Keeping children safe in education 2022 - Gov.uk](#). Child Sexual Exploitation refers to someone taking advantage of a child sexually, for their own benefit. Through threats, bribes, violence, humiliation, or by telling them that they love them, they will have the power to get them to do sexual things for their own, or other people's benefit or enjoyment (including: touching or kissing private parts, sex, taking sexual photos). Upskirting is now defined as a form of child on child abuse.

Neglect

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), ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

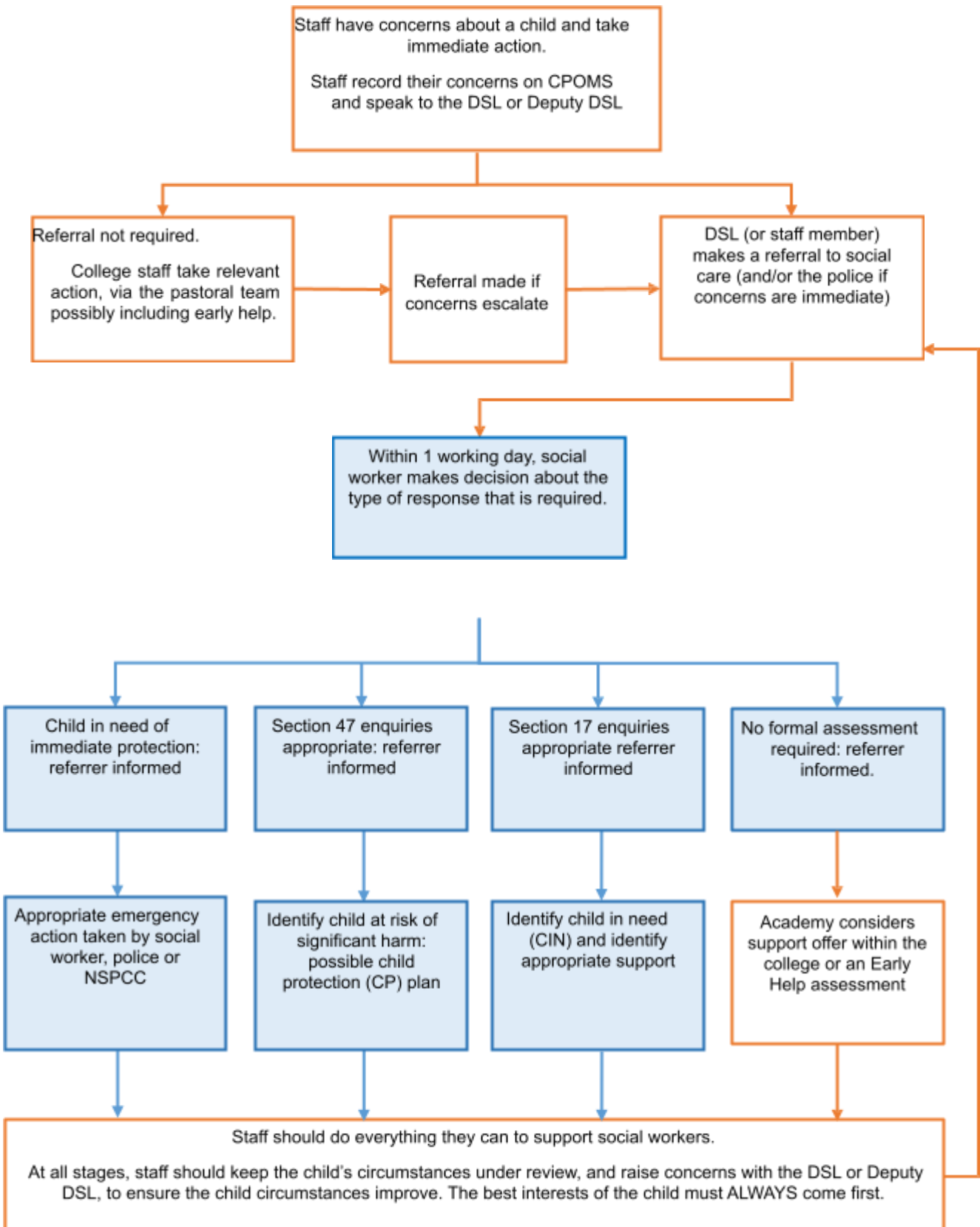
APPENDIX TWO: SAFEGUARDING REFERRALS

We encourage our learners to self - disclose concerns they have experienced or witnessed both within the college setting and/or the wider context. learners can disclose by reporting the concern to a member of staff.

CPOMS

- Staff will log any incidents on our CPOMS system as it allows for:
 - Audit Trails
 - Action Management and auto alerts
 - Data security
 - Ease of use for input and reporting
 - Monitoring and tracking of specific incidents
- All staff are trained on how to use the system as part of their induction. A user guide can also be found here:
 - <http://www.cpoms.eo.uk/restrictedsystemaccess/>
- Staff are asked to complete as many of the sections as possible when logging an incident, as noted previously.
- DSLs and DDSLs have access to incidents logged on the system and are able to track and monitor this. Each case is reviewed by the Designated Safeguarding Lead as the incident is logged and a decision made regarding actions to take.
- Actions can be assigned to individuals using the system and they are then alerted of this.

APPENDIX THREE: PROCESS FOR RAISING A CONCERN



APPENDIX FOUR: HOW TO MANAGE A DISCLOSURE

If you see something that concerns you:

- Don't ignore it and don't feel silly – if it worries you, someone else needs to know
- If it is related to a child being at risk – see the DSL, or DDSL immediately and definitely before the child goes home that day
- Upload all information to CPOMS (or the agreed system for recording) and seek advice immediately from your DSL
- If it is something related to safeguarding, but not a child whose safety is immediately at risk – inform the appropriate Pastoral Leader via CPOMS, or the agreed system for monitoring
- All staff may raise concerns directly with Children's Services. If they feel an incident is not being dealt with appropriately, or they are unable to locate relevant staff
- Concerns about adults in the college should be made directly to the Principal or the Dean

At this point, take the following steps:

- Do not promise to keep the allegation secret or that 'everything will be alright'
- Reassure by telling the student that they have done the right thing in telling you, do not offer physical reassurance
- Do not admonish in any way e.g., 'I wish you had told me sooner'
- Inform the DSL initially verbally under no circumstances, discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed defamatory.

Dealing with disclosures of abuse

- Explain to the learner that the disclosure must be reported – emphasise your trust in them.
- Always listen carefully and quietly – do not press for any evidence at all
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern
- Do not refute or try to belittle the allegation
- Show that you care through open and reassuring facial and body language
- Do not interrogate or ask leading questions

With the DSL, prepare a detailed report itemising:

- The information revealed by the student with absolutely no opinion
- Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported and follow-up action taken within the academy
- Date and sign any written record of events and action taken and keep confidential and secure
- You must keep, in absolute confidence, a copy of the report, as will the DSL

APPENDIX FIVE: PROTOCOL DURING COVID-19 COLLEGE-WIDE CLOSURE

In light of the recent outbreak of COVID-19 and the physical closure of the college building across both sites, the following reflects updates to safeguarding processes that all staff should adhere to:

Vulnerable learners

Advice from central government and local authorities reflects the need to ensure appropriate support is in place for learners classified as vulnerable. Government guidelines define 'vulnerable' during this situation as children:

- with education, health and care (EHC) plans
- supported by a social worker
- receiving free college meals

Ada includes within this group those learners who are currently known as at risk in terms of safeguarding, thus making them vulnerable in the current change in circumstances.

Those learners either on an EHC plan, supported by a social worker or are deemed at risk due to a safeguarding issue have been risk assessed by the Designated Safeguarding Lead (DSL) in terms of the impact the college closure has on their ability to be able to learn and their wellbeing. Learners on this risk register will be monitored closely, receiving frequent calls, emails, or one-to-one support on their academic work to meet their needs. The support team, led by the DSL and including the Deputy DSL, will have daily round-up calls to ensure that all vulnerable learners are discussed regularly, in order that appropriate interventions are put in place as required, which may include communication to teaching staff or operational staff to support the learner in different ways.

Ada is able to continue to support all learners receiving free college meals by continuing monthly payments directly to the learner. All learners in this category have been contacted and offered additional support at any stage if the family is struggling financially.

All staff responsibility

All staff must ensure that safeguarding remains as their number one priority and continue to maintain a learner-centred approach to their work. This includes:

- if anyone has a safeguarding concern about **any** learner they should continue to act and act immediately
- be clear that, as under usual circumstances, **any** learner could be at risk; this guidance does **not** refer only to 'vulnerable' learners as laid out above, but to all learners regardless of their known circumstances
- ensure that any online activities are safe and appropriate for the learners that they are working with
- be vigilant in their interactions with the learners who they continue to work with, being mindful of the abuse that learners could still be subject to in the current circumstances, as laid out in Keeping Children Safe in Education (2022)
- be aware that a lack of engagement with online activity could be indicative of a safeguarding concern and should be raised as a concern as laid out below
- be aware that peer on peer abuse remains a possibility, particularly with the move to online learning, and that shared documents or other online platforms should be monitored closely to ensure learners continue to act appropriately towards each other

Raising a concern about a learner

All staff should continue to follow processes as laid out in the Safeguarding Policy when it comes to reporting a concern about a learner:

- If a staff member has a concern about a learner, but the learner is not immediately at risk, the staff member should record this in CPOMS, providing as much objective information as possible about the situation, ensuring that they alert the appropriate safeguarding team (either Sixth Form or Apprenticeship team). The appropriate safeguarding team will then follow up with the concern as per current procedures, using online tools to support discussions or further investigations that need to take place.
- If a staff member has a concern about a learner and believes the learner could be immediately at risk, a phone call **must** be made to the appropriate safeguarding team immediately, by calling the college phone number. Whoever answers the phone call will have relevant phone numbers for safeguarding personnel and will be able to redirect the call to the appropriate team.

The staff member reporting the concern will be asked to follow this phone call by logging an incident in CPOMS so that a written record is made, but the phone call must take precedence so that action can be quickly taken.

All staff must respect that these are the personal mobile numbers of the safeguarding team and should only be used for the strict purposes as laid out above.

- If for whatever reason, a member of the safeguarding team is unavailable, any staff member should call:
 - Sixth Form: Haringey Local Safeguarding Children's Board - 020 8489 3145
 - Apprenticeship: Tower Hamlets Local Safeguarding Children's Board - 020 8489 1472
 - Manchester safeguarding partnership : 0161 234 5001

DSL or DDSL sickness

In the event that these members of staff become unwell and are unable to work, an appropriate DSL will be assigned from the Extended Leadership Team (ELT) or by sharing a DSL or Deputy from another college or college. Should a DSL from an alternative college or college be required, The Local Area Designated Officer (LADO) should be contacted for support and guidance.

In this instance, an appropriate member of the ELT will coordinate the replacement of this role and communicate new roles and/or procedures to the rest of the staff body. The members of the ELT will decide who is best suited to meet the requirements of this responsibility depending on staff available.

All staff will receive updated contact details and/or new procedures to be followed.

Supporting victims

The DSL will lead on supporting any victim of abuse during this time, as is usual. The DSL may contact other members of staff to be involved in this support, depending on the nature of the abuse. This could include operational support as well as pastoral support and may consist of, but not be limited to: regular contact with a member of the support team, involvement of external agencies, contact with parents/carers, reduced or restricted learning activities if this is deemed beneficial to the learner concerned and signposting to online support services.

Where there has been peer on peer abuse facilitated through the use of technology, the DSL will work with the victim to support them with their return to online learning, ensuring teaching members of staff (as appropriate) are aware of the circumstances and can be supportive of that learner, continuing to report any incidents that may be of concern.

Both the perpetrator and the parents/carers of the perpetrator will be contacted to notify them that the

college is aware that abuse has taken place. The perpetrator will be asked to write a formal letter of apology to be submitted to the DSL and shared with the victim, as well as compulsory engagement with an appropriate online programme aimed to address the behaviour demonstrated. In extreme circumstances, the perpetrator may have their ICT privileges restricted, such as restricted access and/or engagements being monitored on virtual learning platforms, emails or any other platform that the college deems to be a professional learning space. The parents/carers will be asked to monitor online activity of the perpetrator closely to ensure that professional behaviours are being demonstrated.

The college reserves the right to use the full extent of the consequences as laid out in the Behaviour Policy to deal with perpetrators and to support victims of abuse, even during the current situation.

Working with external agencies

Throughout this period, there remains a continued importance for college staff to work with and support children's social workers and the local authority virtual college head (VSH) for looked-after and previously looked-after children. In the first instance, the DSL or SENCO will coordinate this approach, but the delivery of identified support for any learner may be shared with teaching staff, support staff or other members of staff across the college.

Raising a concern about a staff member or volunteer

Staff and/or volunteers must maintain their responsibility with raising a concern about a staff member or volunteer, as with guidance in the Safeguarding Policy and staff training, as well as Part 4 of Keeping Children Safe in Education (2022). If staff and/or volunteers have a concern about another staff member and/or volunteer, in the first instance they should contact the Principal, Tina Götschi or Mark Smith by sending an email to tina@ada.ac.uk (Sixth form) / mark@ada.ac.uk (Apprenticeship)

If the concern is regarding the Principal, the Chair of the Board, Tiffany Hall, should be contacted. Her contact details are available from any member of the Executive Leadership Team.