



# Safeguarding Policy and Procedures 2023/24

## Safeguarding Policy and Procedures

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# 'Safeguarding is everyone's responsibility'

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# Safeguarding Policy and Procedures

## Safeguarding Statement

Nescot College recognises our moral and statutory responsibility to safeguard and promote the welfare of children, young people and adults at risk of harm in our care. We endeavour to provide a safe and welcoming environment where students are respected and valued. We are alert to the signs of abuse and neglect and the Safeguarding Policy and Procedures will incorporate a wide range of risks we need to safeguard against. This includes the prevention of radicalisation which is listed as a specific safeguarding issue and is addressed by the Government PREVENT strategy.

## Terminology

**Safeguarding** and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children are growing up in circumstances constant with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

**Abuse:** could mean neglect, physical, emotional, sexual, child on child or a combination of these. Further explanations can be found in Appendix 1

**A child:** is defined as under the age of 18 years

**An Adult at Risk** is defined as someone 18 years of age or over who is or may need to receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation

**Prevent:** The Prevent Strategy has three main objectives: responding to the ideological challenge of terrorism and the threat we face from those who promote it; preventing people being drawn into terrorism and ensure they are given appropriate advice and support; working with sectors and institutions where there are risks of radicalisation.

**Students:** For the purpose of this policy and in the context of a post 16 environment, children (including those aged under 16 enrolled at Nestots), young people and adults at risk will be referred to as students with appropriate adaptations applied to the procedures.

**Staff:** Applies to all those working for or on behalf of the College, full or part time in either a paid or voluntary capacity including, for example, members of the Governing Body, visitors, contractors, sub-contracting partners, supply and franchised staff.

**Child Protection Online Management System (CPOMS):** Online database where ALL staff record any student safeguarding concerns. All staff receive a CPOMS induction on commencement of employment and a yearly update on feature changes. CPOMS allows the Safeguarding and Wellbeing Team to monitor incidents, record interventions and create reports for Governors.

**The Safeguarding Policy and Procedures apply to all students and staff, in addition to any external individuals and external organisations using the site.**

## Introduction

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

**National** Legislation: Children Acts 1989/2004; Education Act 2002; Working Together to Safeguard Children 2018/2020/2023; Keeping Children Safe in Education 2023; What to do if a child is being abused 2015; Safeguarding Vulnerable Groups Act 2006; The Care Act 2014; Counter-Terrorism and Security Act 2015; Prevent Duty Guidance 2015;

**Local:** Surrey Safeguarding Children Partnership and SSCP Procedures Manual; Surrey safeguarding adults policy and procedures

Nescot College takes seriously its responsibility to safeguard and promote the welfare of students and to work together with other agencies to ensure that adequate arrangements are in place within our college to identify, assess, and support students who are suffering harm.

## Policy Aims

- To demonstrate the College's commitment with regard to safeguarding to students, parents and other partners.
- To provide an environment in which students feel safe, secure, valued, respected and feel confident to, and know how to, approach adults if they are experiencing difficulties, believing they will be effectively listened to.
- To raise the awareness of all staff, of the need to safeguard students and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a structured framework and procedure which will be followed by all staff in cases of suspected abuse ensuring consistent good practice across the College.
- To provide a systematic means of monitoring students known, or thought to be at risk of harm, and ensure we, the college, contribute to assessments of need and support packages for those students.
- To develop and promote effective working relationships with other agencies.
- To ensure that all staff working within the College, have been checked for their suitability, including, verification of their identity and qualifications, online checks and has a satisfactory DBS check and a single central record is kept for audit.

## Prevention/Protection

We recognise that the College plays a significant role in the prevention of harm to students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- Work to establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with students e.g. through student surveys and Learner Voice.
- Ensure that students know that there is an adult in the College whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, tutorials and opportunities which equip students with the skills they need to stay safe and know who to turn to for help.

## **Safe College, Safe Staff**

We will ensure that:

- All staff have information about the College's safeguarding arrangements, Safeguarding Policy and Procedures, the role and names of the Designated Safeguarding Lead and Deputies, and Keeping Children Safe in Education. This will apply to the Governing Body in relation to part 2 of the same guidance.
- All staff will receive Safeguarding, Prevent and Online Safety Training at induction, which is regularly updated and will receive updates on safeguarding, online safety, Prevent as required but at least annually.
- All staff and governors have regular safeguarding awareness training, updated by the Safeguarding Team as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding Policy and Procedures, which includes the names of the Safeguarding Team, will be made available via the College website and will be clearly advertised to students, staff and parents/carers.
- The College adopts safer recruitment, selection and pre-employment vetting procedures in line with Keeping Children Safe in Education guidance, legislation and best practice available.
- The College holds a single central register for all staff and volunteers which lists the checks that have been carried out and the date they were completed.

## **Roles and Responsibilities**

### **All College Staff:**

- Understand that it everyone's responsibility to safeguard and promote the welfare of children and that they have a statutory role to play in identifying concerns, sharing information and taking prompt action • Are aware of indicators of abuse (Appendix 1)
- Are aware of the Early Help process and understand their role of identifying emerging problems and preventing concerns from escalating
- Know how to respond to a student who discloses abuse and maintain appropriate confidentiality, only involving those who need to know such as the Safeguarding Team and Social Care
- Will never promise a student that they will not tell anyone about a report of abuse
- Will refer any safeguarding concern to the Safeguarding Team or if necessary, where there is immediate risk to the student, to the police or Social Services
- Should expect to support the Safeguarding Team, social workers and other agencies following a referral
- Consider at all times the best interest of the student
- Have a responsibility to provide a safe environment in which students can learn
- Will be aware of systems within the college which support safeguarding, which is explained as part of staff induction and attend update training offered during CPD
- Have read the current Keeping Children safe in Education part one, Nescot Safeguarding Policy and Procedures and the Behaviour Policy (Code of Conduct).

### **Student Safeguarding and Wellbeing Team:**

The Student Safeguarding and Wellbeing Team are responsible for ensuring:

- They are the first point of call for all staff and students reporting concerns
- They are available to listen to students during the college day
- They will offer ongoing support to students
- Will manage a caseload, including record keeping and case notes, ensuring that safeguarding records remain updated

- External agencies are supported with assessment and planning and provided with a report where required
- Students are supported in line their Child Protection Plans, Child in Need plans and Personal Education Plans
- Liaison and first point of call with other agencies that support students and provide early help
- Attendance at conferences and review meetings
- Appropriate referrals are made to external agencies
- Students' confidentiality is respected and information will only be disclosed to other members of staff on a need to know basis.

### **Designated staff with responsibility for Safeguarding:**

The Designated Safeguarding Lead (DSL) is a senior member of staff from the College Leadership Team (CLT) and takes lead responsibility for safeguarding. The College has eleven Deputy Designated Safeguarding Leads (DDSL's) who are trained to the same standard as the DSL. The DSL and DDSL's carries out those functions necessary to ensure the ongoing safety and protection of students by ensuring that:

- The Safeguarding Policy and Procedures are implemented and followed by all staff
- During term time they will be available (during college hours) for staff to discuss safeguarding concerns and will arrange adequate cover for out of hours'/term activities
- Where there is a safeguarding concern, the students' wishes and feelings will be taken into account, when determining what action to take and what services to provide
- Any disclosures or suspicion of abuse are reported to the appropriate agency, including the police where a crime may have been committed
- They liaise with Local Authorities and work with other agencies and professionals in line with Working Together to Safeguard Children
- They, or another staff member, will attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required
- Has an understanding of locally agreed processes for providing early help and interventions and will support members of staff where early help is appropriate.
- There are detailed accurate records, either written or using appropriate online software, of all concerns about a student, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from student records until a student's 25<sup>th</sup> birthday
- They organise Safeguarding and Prevent induction training, annual updates, keep a record of attendance and address any absences
- Undergo training for the role which will be updated every two years and will keep up with any developments relevant to the role
- An annual report is provided to the Governing Body setting out how the College has discharged its duties
- They have a working knowledge of the SSCP procedures and will annually submit the 'Audit of Statutory Duties and Associated Responsibilities' to the Education Safeguarding Team
- They will refer cases where a member of staff is dismissed or left due to risk/harm to a student to the Disclosure and Barring Service.

### **Designated Teacher**

The designated teacher will work with local authorities to promote the educational achievement of looked after children, previously looked after and those who have left care through adoption, special guardianship or child arrangement orders.

### **The Governing Body**

All members of the Governing Body understand and fulfil their responsibilities, namely to ensure that:

- They comply with their duties under legislation and guidance as outlined in Keeping Children Safe in Education, to ensure that policies, procedures and training are effective and comply with the law at all times.
- There is a safeguarding policy, staff code of conduct, recruitment, and managing allegation policy and procedures. These are consistent with Surrey Safeguarding Children's Partnership Board and statutory requirements and are reviewed annually, the safeguarding policy is publicly available.
- The College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with students and disqualification by association regulations, by ensuring that there is at least one person on every recruitment panel that has completed safer recruitment training. A member of the Governing body will also complete safer recruitment training every five years.
- The College has procedures for dealing with allegations of abuse against staff (including the Principal) and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have if had they not resigned.
- They liaise with the LA on Child Protection issues in the event of an allegation of abuse made against the College Principal.
- A member of the senior management team has been appointed as the Designated Safeguarding Lead (DSL) to take the lead responsibility for safeguarding and on appointment the (D)DSL's will undertake interagency training (SSCP Modules 1&2) and DSL 'New to Role' including update training every two years.
- All staff are provided with the safeguarding and staff behaviour policy and have read Keeping Children Safe in Education part 1.
- All staff have safeguarding and PREVENT training updated as appropriate.
- Appropriate online filtering and monitoring systems are in place and students are taught about keeping safe online through tutorials.
- Enhanced DBS checks are in place for all Governors.
- Any weakness in Safeguarding are remedied immediately.
- The Governing Body should put into place appropriate responses to children missing from education.

The Principal will ensure that the above policies and procedures, adopted by Governing Body, particularly concerning referrals of suspected abuse and neglect, are followed by **all** staff.

### **Multi-agency working**

Nescot College works in line with statutory guidance Working Together to Safeguard Children by working with social care, police, health and other services to promote the welfare of students and protect them from harm. This includes providing a coordinated offer of early help, contributing to inter-agency plans and providing additional help to children subject to child protection plans.

The College will allow access to social care workers from the local authority, where appropriate, to conduct, or if considering conducting statutory assessments and will work with the police through Operation Encompass This system ensures that when the police are called to an incident of domestic abuse, where there are children in the household, the police will inform the D/DDSL's to enable support to be given.

### **Transferring of Safeguarding files**

#### **Students arriving at Nescot**

The college will collect safeguarding information on students attending Nescot in the following ways:

1. Send a request to schools requesting any information on applicants in the summer preceding enrolment

2. Invite Safeguarding Leads from local feeder schools in for a meeting in the week prior to the start of term to receive paper files or further information on students who have enrolled at Nescot
3. Via automatic transfer on CPOMs once a student is enrolled

When receiving paper files or files via email, the college will send confirmation that they have received the file within 48 hours.

### **Students leaving Nescot**

The college will notify other providers that Safeguarding information is held at Nescot for progressing students by:

1. Notifying the Local Authority SEN and NEET Teams of the names and dates of birth of students who do not have an active application for the next academic year. This is to enable the Local Authority to pass this information on to subsequent providers so they can contact the college to request the file.
2. Contact the subsequent providers where progression is known either in September or following progression data collection in January of the following year.
3. Via automatic transfer on CPOMs once a student has progressed

When transferring paper files or files via email, the college will request a receipt (either tracked mail or read receipt) and follow up within 48 hours.

### **Information sharing, GDPR and data protection**

GDPR/Data protection Act 2018 places duties on organisations and individuals to process information, fairly and lawfully, and to keep the information they hold safe and secure. However, this is not a barrier to sharing information, where to not do so, would result in a student being placed at risk of harm.

- Information sharing is vital in identifying and tackling all forms of abuse.
- All staff must be aware that they cannot promise to keep a student's secrets which might compromise their safety or well-being.
- Fears about sharing information cannot be allowed to stand in the way of promoting the welfare and protecting the safety of students.
- The College recognises that matters relating to safeguarding are personal and will respect confidentiality. The Safeguarding Team will only disclose information about a student to other members of staff on a need to know basis.
- We will always look to share our intention to refer a student to social care with their parents/carers unless to do so could put the student at greater risk of harm.
- There are detailed accurate records, either written or using appropriate online software, of all concerns about a student, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from student records until a student's 25<sup>th</sup> birthday.

### **Criminal Convictions:**

The (D)DSL's will carry out risk assessments of students who declare an unspent or pending criminal conviction as outlined in the Criminal Convictions Policy. Having a conviction will not bar someone from studying, as this would be dependent upon the background to their offence(s) and if they pose a risk to children and vulnerable adults that access the site. If this is not declared, then potentially the College could withdraw any offer of enrolment. Full details of the application process for those with criminal convictions or prosecutions pending can be found in the Nescot Criminal Disclosure Policy.

### **ID and Lanyards**

- All staff, contractors, visitors and guests are required to wear a lanyard when on site, identifying themselves as authorised personnel. Lanyards play a prominent role in keeping the college, staff, and students secure - making



it easier to identify unauthorised visitors and act quickly. Staff should remind students to wear their lanyards often and the reasons why.

- Members of the general public should follow guidance as set out in *Use of facilities by members of the general public* on page 16.

### **Related College Documents**

This policy should not be read in isolation, and should be read in conjunction with others. Policies may be under review; please check [www.nescot.ac.uk/policies](http://www.nescot.ac.uk/policies)

### **Who to contact?**

If staff are unsure about how to refer to this procedure, they should seek advice and discuss their concerns with the Safeguarding and Wellbeing Team:

- Email: [safeguarding@nescot.ac.uk](mailto:safeguarding@nescot.ac.uk)
- Tel: 0208 394 3025

## Safeguarding Procedures

The aim of this procedure is to provide a robust framework, to ensure that all staff take appropriate action when they are worried that a student is being abused. It is the responsibility of all staff working within the College, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, but they should not discuss this with anyone other than a member of the Safeguarding Team.

All staff must be alert to, and aware of, the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and staff need to take notice not only of major incidents but also other signs which may cause concerns. Further information about the four categories of abuse: physical, emotional, sexual and neglect can be found in appendix 1. Other signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is ill, or an accident has occurred. In these circumstances staff will try to give the student the opportunity to talk. It is fine for staff to ask the student if they are OK or if they can give help in any way.

### What should be referred to the Safeguarding Team?

Specific safeguarding issues include:

- Abuse and neglect
- Adults at risk
- Children missing education
- Child/Sexual Exploitation (CSE)
- Criminal Exploitation: county lines, criminal behaviour and gang involvement
- Domestic abuse
- Drugs and alcohol misuse, including legal highs
- Female Genital Mutilation (FGM)
- Forced marriage
- Homelessness/missing from home or care/private fostering
- Honour base violence (so called)
- Mental health/self-harm
- Online safety
- Parental substance abuse, mental health and domestic abuse
- Child on child abuse (sexual violence & harassment, relationship abuse, criminal behaviour)
- Preventing radicalisation and extremism
- Youth produced sexual imagery (sexting)
- Sexual violence/ harassment/ rape allegations

### Students who are particularly vulnerable

To ensure that all of our students receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked After Children and previously Looked After Children
- On Child Protection Plans
- Children in Need
- Asylum seekers
- Young Carers
- Living away from home/private fostering
- Children in the court systems/YOT/ pending police investigations.

If staff become aware of students within these specific group, this information should be referred to the safeguarding team.

### What to do if a student makes a disclosure?

A student who makes a disclosure may have provide information on a number of occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with a student staff will:

- Listen to what the student has to say and allow them to speak freely
- Remain calm and not overact or act shocked. The student may stop talking if they feel they are upsetting the listener
- Reassure the student that it is not their fault and they have done the right thing in telling someone
- Not be afraid of silences. Staff must remember how difficult it is for the student and allow them to talk
- Take what the student is disclosing seriously
- Ask open questions and avoid leading questions
- Avoid jumping to conclusions, speculation or make accusations
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a student who is being abused
- Avoid admonishing the student for not disclosing sooner
- Tell the student what will happen next.

If the student talks to any member of staff about any risks to their safety or wellbeing the staff member will let the student know that they will have to pass the information on - staff are not allowed to keep secrets.

### How to make a referral to the Safeguarding Team?

<b>CPOMS:</b>	Place a brief comment into CPOMS, which will <b>automatically be sent to the Safeguarding Team</b> , outlining that a safeguarding concern has been raised.
<b>Email:</b>	Use the dedicated email service: <a href="mailto:safeguarding@nescot.ac.uk">safeguarding@nescot.ac.uk</a>
<b>Telephone:</b>	Duty Number: <b>0208 394 3025</b>
<b>In Person:</b>	Student Wellbeing centre: <b>N20: Ground floor of the North Wing.</b>  This is dedicated area and has an open-door policy with access to the Student Wellbeing Team in a confidential setting. During office hours (Monday to Friday) the Student Safeguarding and Wellbeing Team will ensure that all safeguarding referrals are responded to and will be available to speak to students. They will highlight students requiring immediate protection to senior members of the team.  <b>Normal working hours: Mon to Fri, 9am to 5 pm</b>

<b>After 5pm (Mon-Thu):</b>	On weekdays (Mon-Thu), safeguarding responsibility passes to the Duty Manager <b>Duty Manager: 07973 882981</b> <b>Out of hours managers have the contact details for DSL to contact for any Safeguarding support</b>
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**Safeguarding Team**

Designated Safeguard Lead	<ul style="list-style-type: none"> <li>• Deputy DSLs</li> </ul>
Deputy Designated Safeguarding Lead (trained to DSL level)	<ul style="list-style-type: none"> <li>• Assistant Principal HR and OD</li> <li>• Assistant Principals (4)</li> <li>• Head of Student Safeguarding and Wellbeing</li> <li>• Student Safeguarding and Wellbeing Coaches (3)</li> <li>• Head of SEN, EHCP &amp; ALS</li> <li>• Schools Link Liaison</li> </ul>

**Safeguarding and Wellbeing Team**

- |  |
|--|
| <ul style="list-style-type: none"> <li>• Deputy Principal</li> <li>• Assistant Principal</li> <li>• Head of Student Safeguarding and Wellbeing</li> <li>• Student Safeguarding and Wellbeing Officers</li> <li>• EHCP Student Mentors</li> </ul> |
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## Safeguarding issues relating to individual student needs & wider safeguarding concerns

Staff should note that wider safeguarding concerns follow a **different referral pathway** and ensure they have read the related policies and procedures (where applicable).

<b>Individual need/related policy</b> <u>Nescot's current policies and documents for reference   Nescot</u>	<b>Procedure/Who to contact</b>
<b>Bullying &amp; Harassment</b> <ul style="list-style-type: none"> <li>• Anti-Bullying Policy</li> <li>• Student Charter, “Positive Behaviour” and Intervention Procedure</li> </ul>	Head of Curriculum <ul style="list-style-type: none"> <li>• Refer to HoC, who will ensure that incidents are dealt with in a consistent manner</li> <li>• HoC will take a statement and evoke disciplinary action</li> <li>• If behaviour is extreme HoC will report to safeguarding team for advice about whether external agencies need to be involved</li> </ul>
<b>Behaviour – negatively affecting the learning and wellbeing of others</b> <ul style="list-style-type: none"> <li>• Student Charter, “Positive Behaviour” and Intervention Procedure</li> <li>• Fit to Study Policy</li> </ul>	Head of Curriculum <ul style="list-style-type: none"> <li>• Will be dealt with by HoC under the college disciplinary policy</li> <li>• Fit to study policy will be considered</li> <li>• If behaviour is extreme HoC will report to safeguarding team for advice about whether external agencies need to be involved</li> </ul>
<b>First Aid</b>	Additional Learning Support and Learner Services <ul style="list-style-type: none"> <li>• College nurse</li> <li>• First Aider</li> </ul>
<b>Intimate Care</b> <ul style="list-style-type: none"> <li>• Intimate Care Policy</li> </ul>	Additional Learning Support and Learner Services <ul style="list-style-type: none"> <li>• College nurse</li> </ul>
<b>Medical Needs</b>	Additional Learning Support and Learner Services <ul style="list-style-type: none"> <li>• College nurse</li> </ul>
<b>Physical Intervention (use of reasonable force)</b> <ul style="list-style-type: none"> <li>• Managing Challenging Behaviour Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Complete use of force or restraint form</li> <li>• Form returned to Health &amp; Safety Officer, Chris Futtit</li> </ul>
<b>Pregnancy</b> <ul style="list-style-type: none"> <li>• Procedures and Guidance for Supporting Pregnant Learners to Success</li> </ul>	Additional Learning Support and Learner Services <ul style="list-style-type: none"> <li>• HoC to complete risk assessment with learner and submit to College Nurse</li> <li>• College Nurse will review RA with Learner</li> <li>• If adjustments needed send to Chris Futtit - Health &amp; Safety Officer</li> <li>• Completed plans sent to Lisa Moynihan – Assistant Principal Learning Support &amp; Learner Experience and <a href="mailto:safeguarding@nescot.ac.uk">safeguarding@nescot.ac.uk</a></li> </ul>

<p><b>(SEN) Students with Special Education Needs and disabilities</b></p> <ul style="list-style-type: none"> <li>• Learning Support Policy</li> </ul>	<p>Additional Learning Support and Learner Services</p> <ul style="list-style-type: none"> <li>• Assistant Principal Learning Support &amp; Learner Services</li> <li>• Head of SEN</li> </ul> <p>Students with SEN and disabilities can face additional safeguarding challenges. The expectation would be that Learning Support would act as their first line of contact. This is particularly important for those students with communication barriers. Learning Support will monitor and support these students in order to ensure appropriate identification.</p> <p>Assessing Risk - where risk is identified a risk assessment must be completed by Learning Support prior to enrolling students on a programme of study. The assessment must be in the form of a support plan and clearly outline the actions and measures in place to measure the risk. Risks might include, MEDICAL, PHYSICAL, SEMH (social, Emotional and Mental Health</p>
<p><b>Violence/Aggressive Behaviour</b> - Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (E.g. knife).</p> <ul style="list-style-type: none"> <li>• Student Charter, "Positive Behaviour" and Intervention Procedure</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Security</li> <li>• HoC to invoke disciplinary and suspend student if necessary</li> </ul> <p>The power to search will be used where there are reasonable grounds for suspicion that a student has an illegal or dangerous item in their possession. The searcher can use a hand held metal detector, search of their bag and pat down a person's clothing.</p> <p>If any drugs or dangerous items are found, they will be confiscated immediately, and the police will be called if appropriate. If the student is under 18 years their parents/carers will be contacted. The duty manager will record the details on the incident form</p>

**Other useful contacts:**

Head of SEND		Ext: 3083
College Nurse		Ext: 3131
Student Finance	<a href="mailto:studentfinance@nescot.ac.uk">studentfinance@nescot.ac.uk</a>	Ext: 3033
Security	<a href="mailto:security@nescot.ac.uk">security@nescot.ac.uk</a>	07973 882922
Duty Manager (Mon–Thu, 5pm to 9pm)		07973 882981

**Allegations against staff**

If you have a safeguarding concern about a member of staff working with students which indicates that they have:

- behaved in a way that has harmed or may harm a student
- behaved towards a student in a way that indicates they would pose a risk of harm
- possibly committed a criminal offence against or related to a student
- behaved or may behave in a way that indicates they may not be suitable to work with students.
- This must be reported immediately to:

Assistant Principal HR Organisation Development.	Tel: 0208 394 3318	Email: <a href="mailto:humanresources@nescot.ac.uk">humanresources@nescot.ac.uk</a>
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### **Low-level concerns and College response arrangements**

If staff have a safeguarding concern or an allegation about another member of staff (including agency staff, volunteers or contractors) that **does not** meet the harm threshold then this must still be reported immediately to the Assistant Principal HR & Organisation Development no matter how small or insignificant it may seem.

### **What is a low-level concern?**

Low-level concerns may include but are not limited to, allegations against staff and whistleblowing, acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the college to refer to the local authority.
- Low-level concerns are part of a spectrum of behaviour. This includes:
  - inadvertent or thoughtless behaviour
  - behaviour that might be considered inappropriate depending on the circumstances
  - behaviour which is intended to enable abuse.

The College Staff Code of Conduct details how the organisation responds to issues raised around low-level concerns and supports staff to help them understand:

- what constitutes appropriate and inappropriate behaviour
- what a low-level concern is
- the importance of sharing low-level concerns
- how to report any concerns
- the process for recording, reviewing and responding to concerns.

### **Allegations against a member of the Safeguarding Team or another senior member of staff**

Allegations against a member of the Safeguarding Team should be reported to the Head of Safeguarding and allegations against the Head of Safeguarding should be made to the Assistant Principal for Student experience and Learning Support. Allegations against members of the Senior Management team should be made directly to the Assistant Principal for Human Resources and Organisational Development

- Head of Safeguarding and Wellbeing: Hayley Bevan, (020 8394 3393, [hbevan@nescot.ac.uk](mailto:hbevan@nescot.ac.uk))
- Assistant Principal for Student Experience and Learning Support: Lisa Moynihan (020 8394 8598 [lmoynihn@nescot.ac.uk](mailto:lmoynihn@nescot.ac.uk) )
- Assistant Principal for Human Resources and Organisational Development: Donna Patterson, (020 8394 3318 [dpatterson@nescot.ac.uk](mailto:dpatterson@nescot.ac.uk))

### **Allegations of abuse against the Principal**

The College has an appointed Governor with special responsibility for Safeguarding, any concerns about the CEO/Principal should be reported immediately to him and to the college Safeguarding Lead for staff.

- Chair of the Corporation and Safeguarding Lead for Governance: Chris Muller (020 8394 3004 [cmuller@nescot.ac.uk](mailto:cmuller@nescot.ac.uk) )
- Assistant Principal for Human Resources and Organisational Development: Donna Patterson, (020 8394 3318 [dpatterson@nescot.ac.uk](mailto:dpatterson@nescot.ac.uk))

The Chair of the Corporation will act as the case officer. If it is felt an investigation is necessary, the Chair will discuss the case with the LADO and appoint an investigating officer; either another Governor or an external investigating officer depending on the seriousness of the allegation.

The Chair will keep the LADO informed of the investigation and follow advice.

### **Whistleblowing**

The College operates in an ethical and committed way and has a Whistleblowing Policy and Procedure to provide employees with a means for raising genuine concerns. The Whistleblowing Policy can be found on the Nescot [website](#). Staff can also use the NSPCC helpline number 0800 028 0285.

### **Safeguarding Students aged 14-16**

Particular care should be taken as these learners are more vulnerable than other students because of their young age:

- Where young people are on the role of another education establishment there should be protocols in place between the College Designated Safeguarding Lead and the Designated Officers at these establishments for communication regarding unexplained absence or other concerns.
- 14 -16-year olds will be appropriately supervised and registered by qualified staff in all areas.
- All 14-16-year-old students will wear a specific lanyard that will highlight their safeguarding risk.
- The College will provide a dedicated space where 14-16-year-old students will attend for their break and lunch periods.

Nescot College has a dedicated person on call who will be informed if a 14-16-year-old:

- Does not return to lesson after break or lunch
- Is seen outside of the designated area at any time
- Is seen leaving the campus.

The designated person for 14 to 16-year olds is: Leanne Cassidy [lcassidy@nescot.ac.uk](mailto:lcassidy@nescot.ac.uk)  
Telephone: 020 8394 3268



## Use of facilities by members of the general public

**Nescot Sports Centre** is open as a commercial centre as well as being used by students of Nescot College. It is open to the public between 7am and 8.30am each morning and from 3pm to 10pm in the evenings. We take our responsibility for safeguarding seriously and the following procedures have been put in to place:

- Members of the gym are provided a membership card once enrolled onto the Club Manager system.
- The sports centre team is responsible for ensuring that the correct contact information and verification of ID is performed.
- The sports centre team, in liaising with security, are responsible for updating these cards.
- Access to the sports centre is via the Pedestrian gate ONLY. If a member does not have a card, or is not working, and intercom system is in place to verify the member, giving full name and address details, prior to entry. This can be accessed through the sports centre office.
- Members of the gym receive a copy of our club rules and terms and conditions which states that their membership will only provide access to the sports centre and not the whole college site.
- Members who wish to bring a guest will need to access the site through main reception. Visitors will be provided with a visitor's badge and will be escorted onsite by the member.
- **All staff will challenge anyone found on campus without an ID badge.**
- Changing room facilities will be checked every 30 minutes by centre staff
- Centre staff will be present in areas that members are using, students participating in lessons will be supervised by tutors
- Posters will be displayed throughout the centre to inform members/students of who to approach if they have a concern
- The centre has CCTV and is regularly monitored by staff in the reception area
- The Centre Manager will notify the Safeguarding and Wellbeing Team of any safeguarding concerns as they arise
- All members will sign terms and conditions prior to joining, these will also be displayed in the reception area of the centre.

### **Innovations & Osteopathy Clinic**

- Customers for Innovations will not receive an identification card as these facilities can be accessed directly via reception.
- All staff will receive safeguarding training and will know how to contact the Safeguarding Team if they have a concern.
- Visitors to the Osteopathy Clinic will be provided with a visitor's badge; reception will let the relevant person know that a visitor is on their way over to the Clinic. Any visitor that had not arrived within 10 minutes will be reported to Security and escorted off site.

### **Organisations using College Premises**

Any organisations renting or hiring any part of the college premises for activities involving children should have appropriate safeguarding and child protection policies in place which should be included in any lease or hire agreement. These organisations should adhere to the keeping children safe in out of school settings guidance April 2022. Any allegations received by the college regarding any of these activities should follow this safeguarding policy including informing the LADO.

## Safeguarding Briefing Sheet

Whilst working in or on behalf of Nescot College, you have a statutory duty of care towards our learners. This means that at all times you should act in a way that promotes their safety and welfare. If at any time you have a concern about a Nescot learner, particularly if you think that they are at risk of abuse or neglect, it is your responsibility to share your concerns with the College Safeguarding Team. This document is for:

- Temporary and franchise staff
- Work Experience/ Placements
- Commercial Services
- Third party hire
- Apprentices
- Distance Learning

Everyone has a responsibility to: **Recognise – Respond – Report – Record – Refer & PREVENT**

<b><u>RECOGNISE</u></b> What kind of abuse is there?	
<p><b><u>Categories of Abuse (As defined by the Children Act 2004)</u></b></p> <ul style="list-style-type: none"> <li>• Physical</li> <li>• Emotional</li> <li>• Sexual</li> <li>• Neglect</li> </ul>	<p><b><u>Other causes of concern</u></b></p> <ul style="list-style-type: none"> <li>• Bullying &amp; Harassment (Child-on-Child Abuse)</li> <li>• Honour Based Abuse</li> <li>• Criminal Exploitation</li> <li>• Substance Abuse</li> <li>• Sexual Exploitation</li> <li>• Domestic Abuse</li> <li>• Radicalisation* (<b>PREVENT</b>)</li> </ul>

<b><u>RESPOND</u></b> How to talk to a learner who is disclosing abuse	
<p><b><u>What you should do</u></b></p> <ul style="list-style-type: none"> <li>• Listen non-judgmentally and stay calm</li> <li>• Ask open-ended questions to clarify and re-assure, but do not investigate</li> <li>• Do not put words in the learner’s mouth</li> <li>• Inform the learner that you must pass on the information but only to those who need to know</li> </ul>	<p><b><u>What you should NOT do</u></b></p> <ul style="list-style-type: none"> <li>• Do not promise confidentiality, explain that you may need to discuss with someone else</li> <li>• Do not investigate the matter yourself</li> <li>• Do not convey a sense of judgement or shock</li> <li>• Do not discuss with anyone other than Nescot’s Safeguarding Team</li> <li>• Do not take matters into your own hands</li> </ul>

<b><u>REPORT</u></b> If you suspect abuse	Contact Nescot Safeguarding Team: <ul style="list-style-type: none"> <li>• <a href="mailto:safeguarding@nescot.ac.uk">safeguarding@nescot.ac.uk</a></li> <li>• <b>Safeguarding Line: 0208 394 3025</b></li> <li>• <b>Duty Manager (Mon-Thu, 5pm to 9pm) 07973 882981</b></li> </ul>
<b><u>RECORD</u></b>	Complete a written report for the Safeguarding Officer, recording the date, time, place and what was said
<b><u>REFER</u></b>	The Safeguarding Officer will contact the relevant agencies to ensure that support is given to the Learner. Support from the College’s Welfare Team may be sufficient

## PREVENT

**PREVENT** is a strand of the Government counter terrorism strategy – CONTEST. Everyone has a role to play in supporting the aim of CONTEST. You can do this by remaining vigilant and reporting any suspicious activity which can include someone who:

- Is behaving differently for no obvious reason
- Travels for long periods of time but is vague about where they are going
- Buying or storing large amounts of chemicals for no obvious reason
- Visits or sends out links to extremist internet sites
- Is recording and documenting information in a crowded location
- And includes activity at a property that doesn't fit day to day life

**Apprenticeships** - All learners receive a safeguarding induction, details of support services offered, and the Safeguarding Team's contact details. Assessors will check the apprentices understanding of all aspects of safeguarding and safe working practice at each review. The College has arrangements in place to ensure that, prior to work related activity there are:

- Pre-placement health and safety checks, including insurance checks
- Employers are made aware of relevant college policies.

**Distance Learning** - All Learners will receive a telephone induction and handbook with details of how to contact the Safeguarding Team.

**Work Experience and Placements.** The Work Placement Officer will:

- Give all work placement providers safeguarding information
- Ensure all employers sign a work place agreement form to say that they have read and understand their duty to safeguard Nescot's learners
- Some settings, e.g. early years, will require site visits and risk assessments.

The Safeguarding Policy and Procedures apply to all learners on or offsite. Where employer related concerns are raised the Safeguarding Team will liaise with the Head of Apprenticeships to decide on the appropriate course of action.

**Further Information:**

- Nescot College Safeguarding Policy and Procedures can be found at [www.nescot.ac.uk](http://www.nescot.ac.uk)
- Health & Safety related to Work Experience  
[Young workers – Advice for work experience organisers \(hse.gov.uk\)](http://www.hse.gov.uk/youngworkers/)
- Insurance matters related to Work Experience:  
[Work experience students | ABI](#)

# Appendix 1:

## **Abuse and neglect**

Abuse and neglect are forms of maltreatment – a person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family, an institutional or community setting, by those known to them or by a stranger including via the internet. They may be abused by an adult or adults, or by another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Child abuse and neglect can have a major long-term impact on all aspects of a child's health, development and well-being.

**Neglect:** Is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often suffer from other types of abuse. Neglect is not always easy to identify, and it is important that staff remain alert and not miss opportunities to take timely action. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol use.

Indicators of neglect can include:

- Living in a home that is indisputably dirty or unsafe
- Being left hungry or dirty
- Left without adequate clothing, e.g. not having a winter coat
- Living in dangerous conditions, i.e. around drugs, alcohol or violence
- Students who are often angry, aggressive or self-harm
- Students who fail to receive basic health care
- Parents who fail to seek medical treatment when their child is ill or injured.

**Physical abuse:** Is deliberately physically hurting a child. It might take a variety of forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical abuse can happen in any family and occur outside of the family environment. Children may be more at risk if their parents have problems with drugs, alcohol and mental health, or if they live in a home where domestic abuse happens. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Some of the following signs may be indicators of physical abuse:

- Frequent injuries
- Unexplained or unusual fractures or broken bones
- Unexplained, bruises, cuts, burns, scalds, bite marks.

**Emotional abuse:** Is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have 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 and not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse may involve serious bullying - including online

bullying through social networks, online games or mobile phones, by a child's peers. The following signs may be indicators of emotional abuse:

- Withdrawn, fearful, anxious about doing something wrong
- Parents or carers who withdraw attention from their child, giving the 'cold shoulder'
- Parents or carers blaming their problems on their child
- Parents or carers who humiliate their child, for example, name calling or making negative comparisons.

**Sexual abuse:** Is any sexual activity with a child. Many victims of sexual abuse do not recognise themselves as such and may not understand what is happening or understand it is wrong. Sexual abuse can have a long-term impact on mental health. Sexual abuse may include physical contact including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing or touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images, being forced to look at or watch sexual images and activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The following signs may be indicators of sexual abuse:

- Knowledge or interest in sexual acts inappropriate to their age
- Use of sexual language or sexual knowledge that you wouldn't expect them to have
- Asking others to behave sexually or play sexual games
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

### **Adults at risk**

An 'adult at risk' is defined by the Department of Health as a person aged 18 years or older who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Characteristics/factors that might make someone more at risk of harm include:

- Not having the mental capacity to make decisions about their own safety – including having fluctuating mental capacity associated with mental illness
- Communication difficulties
- Physical dependency – being dependent on others for personal care and activities of daily life
- Low self-esteem
- Experience of abuse
- Childhood experience of abuse
- Being cared for in a care setting where they are more or less dependent on others
- Not getting the right amount or the right kind of care that they need
- Living in a family with multiple problems
- Isolation and social exclusion
- Stigma and discrimination
- Lack of access to information and support

- Being the focus of anti-social behaviour.

An adult at risk is someone who is unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. One way to evaluate whether or not someone can take care of themselves is to assess their mental capacity to make decisions about their own safety. In the safeguarding context, mental capacity is the ability of a person to:

- Understand the implications of their situation and the risks to themselves
- Take action themselves to prevent abuse
- Participate to the fullest extent possible in decision making about interventions involving them, be they life-changing events or everyday matters.

**There are also a number of specific safeguarding concerns that we recognise our students may experience, these include:**

#### **Children Absent from Education**

All staff should be aware that students having a pattern of being absent from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. They may include abuse and neglect, sexual or criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage. The College has an attendance policy and procedure. Performances Coaches and Tutors will intervene early, and the College will feedback data on withdrawn students to the local authority.

#### **Child Sexual Exploitation (CSE)**

Is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where the child may believe they are voluntarily engaging with sexual activity with the person who is exploiting them. Child Sexual Exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Older boyfriends or girlfriends
- Sexually transmitted infections or pregnancy
- Changes in emotional well-being
- Misusing drugs and alcohol
- Missing for periods of time or regularly returning home late
- Regularly missing education or don't take part in education.

#### **Criminal exploitation, County lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs, groom and exploit children and young people to carry drugs and money from urban areas to suburban areas and rural areas, market and seaside towns. Key to identifying potential involvement in county lines is missing episodes when the victim may have

been trafficked for the purpose of transporting drugs. Like other forms of abuse county lines exploitation can:

- Affect young people (male or female) under and over the age of 18
- Still be exploitation even if the activity appears to be consensual
- Involve force, enticement-based methods of compliance and if often accompanied by violence or threats of violence
- Be perpetrated by individuals, groups, males, females, young people and adults
- Be typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, power imbalance can be due to other factors such as gender, cognitive ability, physical strengths, status and access to economic or other resources.

Guidance for frontline professionals on dealing with county lines:  
[County lines exploitation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/county-lines-exploitation)

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by abuse is available at:  
<https://www.nspcc.org.uk/what-is-child-abuse/spotting-signs-child-abuse/>

### **Drugs and alcohol misuse, including legal highs**

It is not uncommon for teenagers to try drugs or drink alcohol in their teenage years. For some they may experiment and make the positive choice not to participate but, there are also those who become dependent on drugs or alcohol. It's important to know the difference between drug abuse and addiction. If you become concerned that a student is harming themselves or at risk of harm through alcohol or substance misuse. This can include being parented or being cared for by an adult that abuses drugs or alcohol then refer to the Safeguarding Team.

**Do NOT refer to safeguarding if the student:**

- Is under the influence of drugs or alcohol (follow disciplinary procedure). **HoC should be informed and the student asked to leave site.**
- Requires medical attention - **contact the college nurse.**
- Is in possession of drugs or alcohol - contact **security.**

**Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female organs. It is illegal in the UK and a form of child abuse with long-lasting consequences

FGM mandatory reporting duties for teachers

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out by calling 101. Unless the teacher has good not reason not to, they should discuss such cases with the safeguarding team. The duty does not apply in relation to at risk or suspected cases.

Information on when and how to make a report can be found at:

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information)

**Forced Marriage**

A forced marriage is a marriage in which one entered into without full and free consent, of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Threats can be physical or emotional and psychological. A lack of full consent can be where a person does not consent or where they cannot consent (if they have learning difficulties for example). Some communities use religion and culture as way to coerce a person into marriage. College staff should never attempt to intervene directly.

Refer to the safeguarding team who will contact the Forced Marriage Unit 200 7008 0151. Further information can be found at: <https://www.gov.uk/guidance/forced-marriage#forced-marriage-unit>

**So called 'Honour-based' Abuse (HBA)**

Honour based violence (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and staff should refer their concerns to the safeguarding team who will activate the local safeguarding procedures, using national and local protocols for multi-agency liaison.

**Homelessness/Children missing from home**

Students may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought



that approximately 25 per cent of children or young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, violent crime, gang exploitation, or drug and alcohol misuse.

Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The homeless reduction Act 2017 places new duties on the LA to provide those who are homeless or at risk of homelessness to have an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. It should also be recognised that some 16 to 17-year olds could be living independently from their parents or carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency; the safeguarding team will ensure that appropriate referrals are made based on the student's circumstances.

Private fostering – occurs when a child under the age of 16 (18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff. The Safeguarding Team will need to be notified and will inform the local authority who will check if the arrangement is suitable and safe.

### **Online Safety**

Our students increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, Twitter, Instagram and Snapchat. Unfortunately, some adults and other children use these technologies to harm others. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing students to engage in sexual behaviour such as webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

The College uses a software to block material at source that the College does not wish students or staff to view. It also uses a reporting mechanism of key words, to enable the Safeguarding and Wellbeing Team to identify and discuss potential on-line abuse or misuse and any indicators of safeguarding and wellbeing concerns. The Head of Student Safeguarding and Wellbeing team will work alongside HoCs to provide students with a safe online environment to learn.

### **Parental substance abuse, mental health and domestic abuse**

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 young people has occurred. These issues are viewed as indicators of increased risk of harm.

### **Peer on Peer Abuse**

In most instances, the conduct of students towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Peer on peer abuse can take on many forms this can include:

- Domestic Abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships and situations by peers who are also under 18
- Harmful Sexual Behaviour – children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others
- Serious Youth Violence – Any offence of the most serious violence or weapon enabled crime, where the victim is aged 1-19, i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences
- Sexual violence can include rape, assault by penetration and sexual assault
- Sexual Harassment - unwanted conduct of a sexual nature
- Upskirting – where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing for sexual gratification or to cause victim humiliation, distress or alarm.

The term peer-on-peer abuse can refer to all of these definitions and a student may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the Safeguarding Team. Where there is a report of rape, assault by penetration or sexual assault made all investigation will be stopped and passed on to the police. Further guidance published by the NSPCC on when to call the police can be found via the link below:

[when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npsc.police.uk\)](https://www.nspcc.police.uk/when-to-call-the-police--guidance-for-schools-and-colleges.pdf)

If a student’s behaviour negatively impacts on the safety and welfare of other students, then safeguards will be put in place to promote the well-being of the students affected. Further actions could include a disciplinary hearing, robust risk assessments and targeted work for students identified as being a potential risk to other students and those identified as being at risk.

### **Youth produced sexual imagery (sexting)**

The practice of children (under the age of 18) sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult

- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery but refer to the Safeguarding Team.

A member of the Safeguarding and Wellbeing Team will hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if;

- The incident involves a child
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent
- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the Safeguarding and Wellbeing Coach will use their professional judgement to assess the risk to students involved and may decide, with input from the DSL, to respond to the incident without escalation to Children's Social Care or the police.

**Students with Social Workers: Looked After Children (LAC), previously looked after children, care leavers and unaccompanied asylum seekers, Children in Need and those on Child Protection Plans**

The most common reason for children becoming looked after is a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable. The Safeguarding Team will record information in relation to a child's looked after status (whether they are looked after under voluntary arrangements or with consent from parents or on an interim or full care order). When dealing with looked after children and previously looked after, it is important that all agencies work together, and prompt action is taken to safeguard these children. If staff become aware that a child becomes looked after it is important that they highlight this to the safeguarding team.

- **Designated Teacher and Heads of Curriculum** - The DSL is the designated teacher and is responsible alongside the Heads of Curriculum for promoting their educational achievement,

- **The Student Safeguarding and Wellbeing Coaches** - will provide ongoing support to learners, acting as a first point of contact for external agencies and will co-ordinate meetings on behalf of the College.
- **All staff** are responsible for ensuring that they attend PEP/Review meetings when requested by the Safeguarding Team. The expectation would be that if staff are unable to attend the the HoC will attend in their place.

### Young Carers

A carer provides unpaid care for a family member or friend who has a long-term physical or mental health problem, disability, or a drug or alcohol dependency. Some are the main carers in the household; others supplement the caring undertaken by other members of the family. The caring tasks can include:

- **Domestic tasks** (e.g. cooking, cleaning, shopping)
- **Personal care** (e.g. helping with mobility, washing, dressing, giving medicine)
- **Emotional support & supervision** (e.g. watching over someone, providing company and a 'listening ear')
- **Sibling care:** Looking after an ill or disabled sibling or a non-disabled sibling where an ill or disabled parent is unable to provide care
- **Communication support** (e.g., interpreting, answering phone or door)
- **Financial management:** (e.g. budgeting, paying bills)

Many young carers do not realise that they are carers until they perceive the impact of their responsibilities upon their lives. Even if that impact causes significant discomfort or problems, many young people do not identify themselves as carers. For this reason, Young Carers are designated by OFSTED as a vulnerable group of students and they recommend their identification and support as best practice, making necessary adjustments where able. If you become aware of a student with a caring responsibility inform the Safeguarding Team who will offer ongoing mentoring and referral to external agencies if appropriate.

### Nescot Prevent Policy

This Prevent Policy applies to everyone working at or enrolled at Nescot College. It is designed to provide a clear framework for all staff to respond to safeguarding concerns for those students who may be vulnerable to the message of extremism.

The purpose of this policy is to:

- Ensure an awareness of Prevent within the College
- Provide a clear framework to structure and inform our response to radicalisation
- To provide a framework to embed British Values into the curriculum
- Recognise current practice which contributes to the Prevent agenda.

### Background Information

Prevent is one of four strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a risk to the UK seek to radicalise and recruit

people to their cause. Therefore, early intervention is the heart of Prevent, which aims to divert people away from being drawn into terrorist activity. Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. The Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges.

## **Definitions**

British Values of democracy, rule of law, liberty and respect and tolerance of different faiths and beliefs.

CONTEST is the government's counter-terrorism strategy and places a legal duty on certain bodies in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. The four elements are, Prevent, Pursue, Protect, and Prepare. It aims to stop people becoming terrorists or supporting terrorism.

Extremism is the vocal or active opposition to our fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes the call for the death of members of the armed forces, whether in this country or overseas.

Ideology is a set of beliefs.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism or criminal involvement.

CHANNEL is a key element of the Prevent strategy and is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners the police and the local community to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for those concerned.

Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. It about early intervention to protect and divert people away from the risk they face before illegality occurs.

## **Understanding and recognising risks and vulnerabilities of radicalisation**

Students may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that all college staff are able to recognise those vulnerabilities.

The ways in which students can be radicalised include:

- Via family members and friends
- Direct contact with extremist groups
- Contact via the internet.

Safeguarding our students from radicalisation is no different from safeguarding them from other forms of harm. Additional indicators for vulnerabilities to radicalisation include:

- Identity Crisis – distant from cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – experiencing family tensions a sense of isolation; low self-esteem; may have discounted from friendship group and become involved with a new and different group of friends; may be searching for answers to identity, faith and belonging.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis
- Direct contact with extremist groups
- Contact via the internet.

**Examples of extremist caused that have used violence to achieve their ends include:**

- Animal rights
- The far right
- Internal terrorism
- International terrorist organisations.

### **Roles and Responsibilities**

This policy is integral to our Safeguarding Policy and should be applied as an extension the College's current and established safeguarding procedures.

We have a filtering and monitoring process in place to ensure that our students are staying safe online.

### **College Leadership and Governance**

All board members have a legal responsibility under the Prevent Duty to make sure they have undertaken training in Prevent, additionally they should ensure that:

- All College staff have undertaken training in Prevent Duty
- All College staff are aware of how to make a referral to the Safeguarding Team
- All College staff exemplify British Values into their teaching • Policies and procedures are in place to implement the Prevent Duty.

### **Prevent Lead for the College, Supported by the Safeguarding Team**

The DSL responsible for ensuring:

- that our Prevent Policy is implemented across the College
- that any concerns are shared with the relevant organisation, in order to minimise the risk of our learners becoming involved with terrorism
- all new members of staff will receive Prevent training as part of their induction training

- referrals are made to CHANNEL if appropriate
- the Governors are presented with a termly report to discuss Safeguarding and Prevent concerns raised and changes to the Duty that affect the College.

### **All staff**

All staff at the College have a responsibility to:

- create an ethos that promotes British Values, to create an environment of respect, equality and diversity and inclusion
- attend Prevent training in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns
- report any concerns around extremism or radicalisation via the safeguarding procedures
- support the development of staff and learner understanding of the issues around extremism and radicalisation
- participate in engagement with external organisations as appropriate.

### **Teaching and Learning**

To provide a curriculum that promotes British Values, by undermining extremist ideology and supporting the learning voice. This will be achieved through:

- embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum
- promoting social and emotional aspects of learning
- a curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- encouraging active citizenship and learner voice.

### **Referral and intervention process:**

Any member of staff at Nescot who has any concerns regarding radicalisation should report these immediately to the Safeguarding Team:

<b>Via:</b> <a href="#">CPOMS</a>
<b>Email:</b> <a href="mailto:safeguarding@nescot.ac.uk">safeguarding@nescot.ac.uk</a>
<b>Tel:</b> 0208 394 3025

## Self-harm policy and procedure

### Purpose

In keeping with the College's values, vision and aims, this policy and procedure aims to guide staff in how best to support students who self-harm, ensuring consistency throughout the College.

### What is self-harm?

The term self-harm is often used as an all-encompassing term referring to suicidal thoughts, attempted suicide and self-injury. These can be sub-grouped into the following:

- Harming Behaviour: could result in long-term harm e.g. over/under eating, drug misuse, binge drinking.
- Self-injury: deliberately harming or injuring oneself e.g. cutting, burning, hair pulling and other acts of self-mutilation. Self-injury is seen as a coping mechanism with the aim of relieving emotional distress. Although self-harm is relied upon as an attempt to cope and manage and may not be intentionally suicidal, it must be recognised that the emotional distress that leads to self-harm can also lead to suicidal thoughts and actions.
- Suicide: is an intentional, self-inflicted, life-threatening act resulting in death from a number of means.
- Suicidal intent: is indicated by evidence of premeditation (such as saving up tablets), taking care to avoid discovery, failing to alert potential helpers, carrying out final acts (such as writing a suicide note) and choosing a violent or aggressive means of deliberate self-harm allowing little chance of survival.

Students with Special Educational Needs and Disabilities (SEND): can display what are perceived by others as self-harming behaviours, but there may be other functions of the behaviour to consider e.g. to achieve certain stimulation. By definition, young people with learning disabilities have impaired communication and it is not uncommon for a young person to hit or bite themselves, when feeling frustrated or not understood. Or it may be to enlist help, e.g. physical pain such as an ear infection, may be expressed by hitting their ear. It is therefore important to find out what is being communicated with this behaviour.

### What to do if a student has disclosed that they have self-harmed?

It is essential that you assess the immediate risk the student may be in:

- **First resolve the physical issue and treat as a FIRST AID incident.** If the student requires medical attention, contact the College Nurse or a First Aider. They will assess any injuries and provide appropriate treatment if the injuries are minor. A referral to accident and emergency may be necessary, if the harm is considered a danger to an individual's health, either mentally or physically. The parents must be informed unless staff feel that informing the parents will put the student at risk.
- **If the student does not require medical treatment:** then staff should follow the safeguarding procedure. It is vital to make a written log of all incidents of self-harm on [CPOMS](#). This will be sent



directly to the Safeguarding and Safeguarding and Wellbeing Team. If you do not have access to [CPOMS](#) then email [safeguarding@nescot.ac.uk](mailto:safeguarding@nescot.ac.uk) or call: 0208 394 3025

### **Good practice guidelines**

#### Listen

- To what the student says in order to check whether they want help and if so, what help is required
- Respect their choices, do not impose your own agenda onto the student, unless they are a danger to themselves or others
- Remain calm and non-judgemental Consider
- Staff must not take the responsibility of resolving the underlying issues or stopping the self-harming behaviour
- Do not make promises of confidentiality, let the student know that the information will need to be shared with the Safeguarding and Wellbeing Team
- Try to contain your own anxiety, remember that self-harm is a coping strategy, if you insist, they stop, you may be removing the only coping mechanism they have
- Beware of escalating the issue out of proportion
- Remember the impact of self-harming behaviour on other students and provide support if necessary

#### Respond

- Make contact with the College Nurse or the nearest First Aider
- If there is risk of suicide or life-threatening self-harm, the student needs to be referred to A & E
- Make a record of the incident on [CPOMS](#) which will automatically be sent to the Safeguarding and Wellbeing Team Remember
- To look after yourself whilst supporting someone else
- Take care of your own emotional wellbeing and seek support if necessary
- Be self-aware; don't get burned out or take on anything you don't feel comfortable with
- Maintain boundaries, for example it is unrealistic for you to be on call for someone in need all the time

### **Role of the College Nurse**

The College Nurse provides a daily drop-in service and will support students with a range of health issues. Emotional problems and self-harm feature significantly in the Nurse's workload and, where appropriate, liaison will occur with the Safeguarding and Wellbeing Team. The Nurse plays an important role in helping to manage students who are at risk of self-harm or actually self-harming.

### **Role of the Safeguarding and Wellbeing Team**

When a disclosure of self-harm is made, it will be assessed by a member of the Safeguarding and Wellbeing Team, who will decide on the appropriate course of action. Decisions around threshold will be made, in line with the College's Safeguarding Policy, parents will be spoken to, unless doing so will place the student at risk.

The student will either be referred to the GP, A&E, MASH, CAMHS or an in-house member of the Safeguarding and Wellbeing Team. This will depend on an assessment of the current risk the student is

exposed to. All students, where a concern has been raised, will be monitored and reviewed and in some instances, the fitness to study procedure will be implemented.

### **Fitness to Study**

All staff should be aware that, after a crisis situation or absence from college for mental health recuperation, the student will need to attend a meeting to assess their fitness to return to study.

## **Local and National Help and Advice**

### **Help in a crisis:**

- Contact your own **GP** (Doctor)
- Visit the **Accident and Emergency** (A&E) department
- Contact the **NHS First Response** Team on 111, option 2, to speak directly with a mental health professional
- Call the **Samaritans** (24-hour helpline) on 116 123

### **Havens in Surrey offer a drop-in service for those experiencing crisis or distress**

- **Children and Young People's Haven:** [www.cyphaven.net](http://www.cyphaven.net)
- **Adult Safe Haven:** [www.sabp.nhs.uk](http://www.sabp.nhs.uk)

### **Local Services**

- **Kooth** – free online counselling for young people living or attending education in Surrey. Website: [www.kooth.com](http://www.kooth.com)
- **Off the Record (Sutton, Merton, Croydon)** – Free counselling for young people aged 11-25. Website: [www.talkofftherecord.org](http://www.talkofftherecord.org)

### **National Services**

- **Childline** – Free confidential support, 24 hours a day for anyone under 19, online or on the phone. Telephone: 0800 111, website: [www.childline.org.uk](http://www.childline.org.uk)
- **The Mix** – Confidential information and support for young people under 25 on a wide range of issues via online and free confidential helpline: Telephone: 0800 808 4994, website: [www.themix.org.uk](http://www.themix.org.uk)<http://www.themix.org.uk/>
- **Papyrus** – Help and advice around suicide prevention for young people and anyone worried about a young person. Telephone: 0800 068 4141, website: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- **Beat eating disorders** – Working to beat eating disorders. Telephone: 0808 801 0711, website: [www.beateatingdisorders.org.uk](http://www.beateatingdisorders.org.uk)
- **Mermaids** - Emotional support for transgender and gender diverse young people, their families and professionals working with them. Telephone: 0344 334 0550, website: [www.mermaidsuk.org.uk](http://www.mermaidsuk.org.uk)
- **Centrepoin**t – Support for ages 16-25 who are homeless, sofa surfing or at risk. Telephone: 0845 466 3400, website: [www.centrepoin.org.uk](http://www.centrepoin.org.uk)
- **Samaritans** – Free confidential support, 24 hours a day, call free from any phone, anytime: Telephone: 116 123, website: [www.samaritans.org](http://www.samaritans.org)
- **Young Minds** – Information for young people, parents, and professionals around the wellbeing and mental health of children and young people. Telephone 0808 802 5544, website [www.youngminds.org.uk](http://www.youngminds.org.uk)

- **HeadMeds** – Information for young people about mental health medication. Website: [www.headmeds.org.uk](http://www.headmeds.org.uk)

## Sexual Harassment

When referring to sexual harassment we mean unwanted conduct of a sexual nature that can occur online and offline. Whilst not intended to be an exhaustive list, sexual harassment can include: sexual comments, such as, telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual “jokes” or taunting.

Nescot recognises that sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. In most instances, the conduct of students towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. All reports of sexual harassment will be investigated and followed up with disciplinary action where necessary and if proven.

**Sexual Harassment MUST be reported on [CPOMS](#).**

## Sexual Violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent\* to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Consent:** is providing permission for something to happen or agreeing to do something with a full awareness and understanding of the facts and without coercion. In cases of sexual activity, consent cannot be presumed but must be explicitly given each time verbally or non-verbally. Consent cannot be deemed to have been given if it is provided under pressure, or in situations where someone is not capable of providing it such as when they are drunk, under the influence of drugs, asleep, unconscious, are physically or mentally unable to make a choice and understand the consequences. Consent can be withdrawn at any time.

### Reports of sexual violence

A student should never be given the impression that they are creating a problem by reporting sexual violence. It is essential that students reporting sexual violence are protected, offered appropriate support and every effort is made to ensure their education is not disrupted.

- The police will be important partners where a crime might have been committed. Where a report of sexual violence is made, the starting principle is that this should be referred on to the police.
- Where a student under 18 has been harmed, is at risk of harm, or is in immediate danger, a referral will be made to children's social care.
- Parents or carers will be informed unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a student under 18 at additional risk.
- Where a report is made to children's social care and/or the police, then, the College will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

### **Risk assessment**

The Safeguarding Team will make an immediate risk and needs assessment, this will consider:

- the victim, especially their protection and support
- the alleged perpetrator; and
- the expectations regarding their behaviour and any restrictions the College thinks are reasonable and proportionate with regard to the perpetrator's timetable
- how best to keep the victim and alleged perpetrator apart on college premises and on transport to and from College where appropriate
  - all the other students and staff at the College.

### **Responding to the report**

There may be reports where the students concerned attend two or more different schools or colleges. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important.

If a police investigation is commenced, the College will consider whether an internal investigation is required or if already underway, whether the internal investigation should be paused whilst the police investigation is undertaken.

In all but the most exceptional of circumstances, sexual violence is likely to constitute a serious breach of discipline (gross misconduct) and lead to the view that allowing the perpetrator to remain in the same college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where the perpetrator is going to remain at the College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.