Child Protection: Safeguarding Children & Vulnerable Adults Policy Guidelines for Staff 2023-24

Effective for employees, students, governors and volunteers September 2023

(Part B)

Overall responsibility: Principal

Implementation: Assistant Principal Student Services

Date issued: September 2023

Date for review: September 2024

Endorsed and approved by Policy & Strategy Group   Date: September 2023

Pat Brennan-Barrett   Principal

Contents

1. BACKGROUND

1.1   This guidance is designed to support staff with identifying appropriate reporting channels or actions when working with young people or vulnerable adults who may be at risk of harm. This document should be read alongside part A of the College's **Child Protection**: **Safeguarding Children & Vulnerable Adults Policy 2022-2023.**

1.2   This guidance applies to all groups and it is the duty of all employees, students, governors and volunteers to follow it.

1.3   This guidance has been produced with reference to the Ofsted publication, **Safeguarding in early years, education and skills settings.**

2. DEFINITIONS

- Children and young people – those aged under 18 years
- Vulnerable adults – those aged 18 and over who may be considered vulnerable to abuse.
- NSCP – Northamptonshire Safeguarding Children Partnership
- DO – Designated Officer (provided by Local Authority)
- Children in Care/ LAC – Child looked after by the local authority
- MASH – Multi Agency Safeguarding Hub
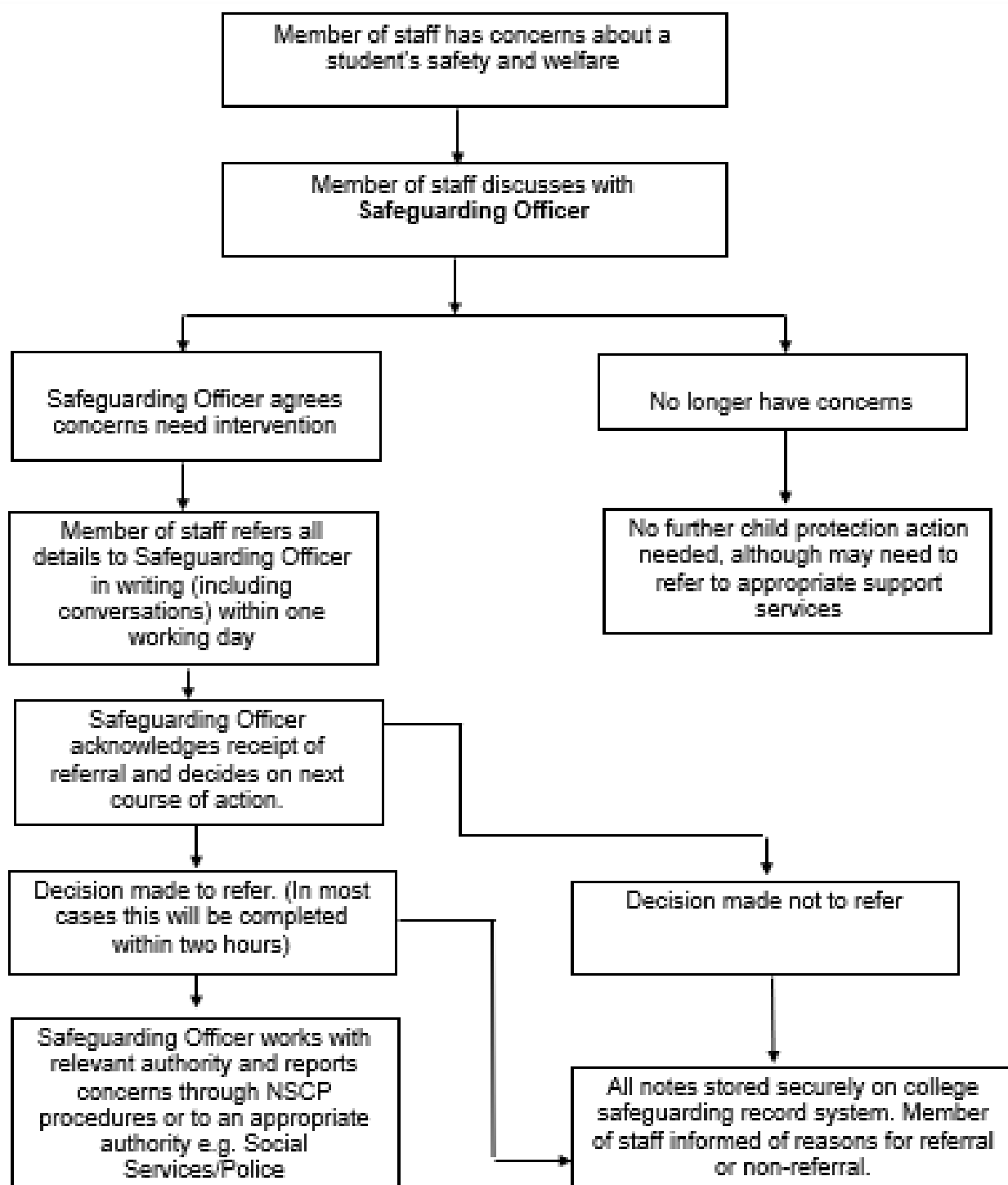- YOS – Youth Offending Service

3. KEY STAFF

3.1 Northampton College actively seeks to appoint and develop staff from within its workforce to work with young people and external services to ensure its student body is supported in keeping safe from harm.

3.2 All staff involved in safeguarding undergo development with the NSCP prior to their involvement and are supported in developing their knowledge in line with national and regional priorities.

3.3 Situations involving children, young people or vulnerable adults that **do not require an immediate or urgent response** should be referred to one of the **Safeguarding Officers** below:

Name	Job Title	Extension Number
Mark Owen	Assistant Principal Student Services	4015
Julie Kennedy	Welfare Officer	4244
Jo Cox	Children in Care (Looked After Children) Officer	6320
Carrie Newton	Student Advisor	4247
Jo Davies	Daventry Co-ordinator	6320
Jade Care	Family Support Officer	4046
Jan Hutt	Vice Principal -People and Organisation Development	4395
Amy Owers	Family Support Officer	4075

4.   REFERRAL PROCESS

4.1   Individual staff should never deal with or investigate **a disclosure of abuse or concerns around potential radicalisation alone and should always refer to a Safeguarding Officer**. The procedure below should be

followed in all circumstances for referrals to appropriate external agencies, **apart from life threatening incidents including the threat of immediate suicide where staff should call 999 and inform the Principal's Office. If a child is at immediate risk you should call MASH on 0300 126 1000 and make a telephone referral. You will be subsequently be required to put this in writing. Known incidents of FGM MUST be referred directly to the Police by the individual staff member using phone number 101. A safeguarding officer should then be informed.**

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            ┌─────────────────────────────────────┐
            │  Member of staff has concerns about a │
            │     student's safety and welfare      │
            └─────────────────────────────────────┘
                           │
                           ▼
            ┌─────────────────────────────────────┐
            │    Member of staff discusses with     │
            │         Safeguarding Officer          │
            └─────────────────────────────────────┘
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Safeguarding Officer agrees concerns need intervention	No longer have concerns
Member of staff refers all details to Safeguarding Officer in writing (including conversations) within one working day	No further child protection action needed, although may need to refer to appropriate support services
Safeguarding Officer acknowledges receipt of referral and decides on next course of action.	
Decision made to refer. (In most cases this will be completed within two hours)	Decision made not to refer
Safeguarding Officer works with relevant authority and reports concerns through NSCP procedures or to an appropriate authority e.g. Social Services/Police	All notes stored securely on college safeguarding record system. Member of staff informed of reasons for referral or non-referral.

4.2   All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child

suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
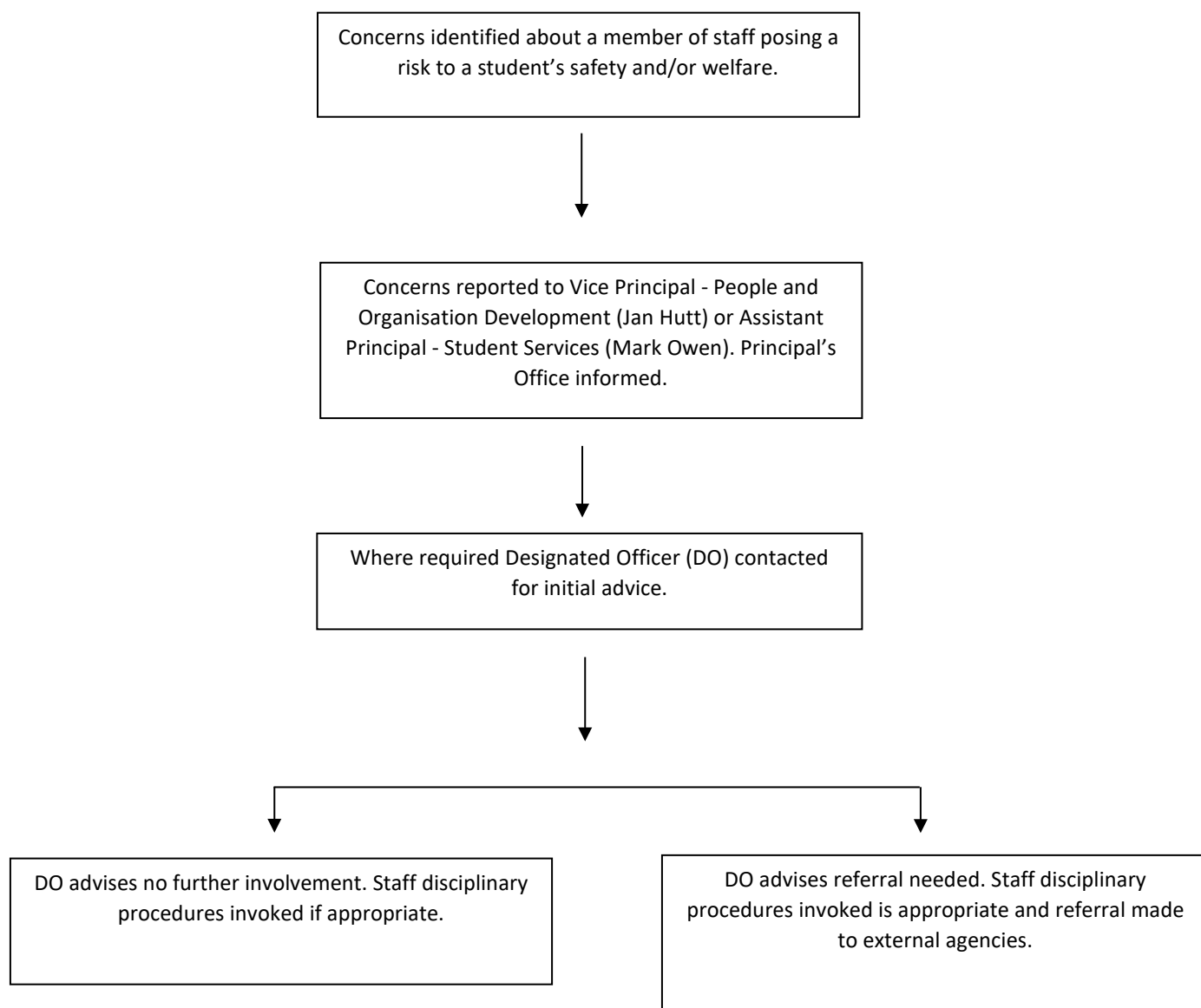
5.   OUT OF HOURS & EMERGENCY SUPPORT

5.1   Occasionally emergency referrals for safeguarding support that cannot wait until normal office hours (Monday to Friday 8am – 5.00 pm) need to be made.

5.2   If you think a child, young person or vulnerable adult is being abused or mistreated or you have concerns about a child, young person or vulnerable adult's well-being that **cannot be dealt with the next working day** you should call and speak to someone on the following emergency out of hours service:

Northamptonshire Children's Trust 'Out of Hours' Support: 01604 626938.

5.3   If you contact the number above with an out of hours concern:

- You will be passed to an experienced 'Duty Social Worker'.
- You will be asked some questions about your reason for calling and the details will be recorded.
- Your referral will be prioritised. Emergency Child Protection, Mental Health Act and vulnerable people at risk of imminent harm are given the highest priority.
- You will be informed of any actions that will be or must be taken.

5.4   If you believe that a child, young person or vulnerable adult is at immediate risk of harm and that action is required urgently you should call:

Northamptonshire Police: 999

5.5   Any member of staff accessing the out of hours service/Police should also contact a Safeguarding Officer the **next working day** ensuring that all records/details are provided.

6. TRIPS / WORK PLACEMENT

6.1   If a disclosure is made on a trip, residential or by a student on work placement/ work based learning a member of the safeguarding team should be contacted during the day and the emergency number provided in these guidelines should be used out of hours.

6.2   Managers and staff responsible for placements and work based learning students/apprentices need to obtain a copy of the relevant company's safeguarding policy to check that it follows similar principles and guidelines to Northampton College.

6.3   All concerns related to the welfare of a child will be dealt with in line with the procedure already outlined regardless of their place of study.

7. PROCEDURE FOR ALLEGATIONS INVOLVING STAFF

7.1 The statutory guidance in Keeping Children Safe in Education will be followed in relation to allegations against staff. The procedure below for reporting staff concerns should be followed in all circumstances:

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┌─────────────────────────────────────────────┐
│ Concerns identified about a member of staff  │
│ posing a risk to a student's safety and/or   │
│ welfare.                                      │
└─────────────────────────────────────────────┘
                      │
                      ▼
┌─────────────────────────────────────────────┐
│ Concerns reported to Vice Principal - People │
│ and Organisation Development (Jan Hutt) or   │
│ Assistant Principal - Student Services        │
│ (Mark Owen). Principal's Office informed.     │
└─────────────────────────────────────────────┘
                      │
                      ▼
┌─────────────────────────────────────────────┐
│ Where required Designated Officer (DO)       │
│ contacted for initial advice.                │
└─────────────────────────────────────────────┘
                      │
          ┌───────────┴───────────┐
          ▼                       ▼
┌──────────────────────┐  ┌──────────────────────┐
│ DO advises no further │  │ DO advises referral   │
│ involvement. Staff    │  │ needed. Staff         │
│ disciplinary          │  │ disciplinary          │
│ procedures invoked if │  │ procedures invoked is │
│ appropriate.          │  │ appropriate and       │
│                       │  │ referral made to      │
│                       │  │ external agencies.    │
└──────────────────────┘  └──────────────────────┘
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7.2 All matters will be considered in accordance with guidance provided by the DO and where required a referral to external services will be made.

7.3 Where it is judged that a member of staff may pose a risk to children or young people, or that by being in College they may be placed in a vulnerable position whilst concerns are investigated, they will be suspended on full pay.

7.4 Depending on the outcome of any investigation, an appropriate referral to the Disclosure and Barring Service may be made.

7.5 Referrals to the Disclosure and Barring Service may also be made should a resignation take place during the investigatory phase or prior to a formal disciplinary hearing. 'Settlement Agreements' will not be appropriate in these circumstances.

7.6 Members of staff involved in allegations will have a designated contact at the College who will normally be a member of the HR team.

8. DEALING WITH DISCLOSURE

8.1 It is important that the member of staff to whom a disclosure is made reacts in a supportive and reassuring way. It is important to remember that we all have statutory responsibilities in this area and that the initial disclosure could end up with a criminal prosecution. The following points will help you deal effectively with disclosures:

- Listen to what is being reported. If you are shocked by what you are told, try not to show it. Take what is said seriously. Those involved rarely lie about abuse and to be disbelieved adds to the traumatic nature of disclosing.
- Stay calm and reassure them that they have done the right thing in talking to you. It's essential to be honest with the student, so don't make promises you may not be able to keep.
- Do <u>NOT</u> promise confidentiality: **you have a legal duty to refer a child who is at risk.**
- Try to alleviate any feelings of guilt that the child displays. For example, you could say: 'You're not to blame' or 'you're not alone, you're not the only one this sort of thing has happened to'.
- Do <u>NOT</u> ask 'leading' questions such as 'What did he/she do next?' (This assumes that he/she did!). Such questions may invalidate your evidence in any later prosecution in court. Instead ask open questions like: 'Anything else to tell me?'
- Explain what you have to do next and whom you have to talk to.
- Make notes as soon as possible after the disclosure. Make them as objective and factual as possible. Remember they may be needed by the Police. Send all notes to a designated Safeguarding Officer.
- Make it clear that, whatever happens, College staff will be there to offer support.

8.2 After the disclosure, you may well need to talk to someone else to unburden yourself and come to terms with the emotions and feelings you have been experiencing. Staff should seek support from either an appropriate manager or Human Resources if they feel they need further help.

9. RECOGNISING ABUSE

9.1 Even for those experienced at working with abuse cases it is not always easy to recognise a situation where abuse may occur or has already occurred.

9.2 Staff should be aware that children and vulnerable adults with disabilities are at an increased risk of abuse because of additional barriers to disclosure. When working with a disabled child or vulnerable adults, impairment related factors such as being more prone to peer group isolation, dependency on carers for personal assistance, impaired capacity to resist/avoid abuse, communication impairments and an inability to understand what is happening or to seek help should be considered by staff and should not become a barrier for a referral being made.

9.3 Below are listed the five main types of abuse along with some of their common characteristics. These are by no means exhaustive and are only indicators of potential abuse, not confirmation.

Physical Abuse - defined as the use of physical force that may result in bodily injury, physical pain, or impairment	
Physical Indicators	**Behavioural Indicators**
Unexplained bruises or burns particularly if they are recurrent. Bite marks, welts or bald spots. Unexplained lacerations, fractures or abrasions.	Self-destructive tendencies. Improbable excuses given to explain injuries. Chronic runaway. Aggressive or withdrawn.

Untreated injuries.	Fear of returning home.
	Reluctant to have physical contact.
	Clothing inappropriate to weather, worn to hide part of the body.

Neglect - the ongoing failure to meet a child's basic needs	
Physical Indicators	**Behavioural Indicators**
Constant hunger	Tiredness, listlessness
Poor state of clothing and/or personal hygiene	Lack of social relationships
Untreated medical problems	Compulsive stealing, begging or scavenging
Emaciation/distended stomach	Frequently absent or late
Constant tiredness	Low self-esteem

Emotional Abuse - subjecting or exposing another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder	
Physical Indicators	**Behavioural Indicators**
Sudden speech disorder.	Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
Signs of mutilation.	Reluctant for parent liaison.
Signs of solvent abuse (e.g. mouth sores, smell of glue, drowsiness)	Fear of new situations.
Wetting and/or soiling.	Chronic runaway.
Attention seeking behaviour.	Inappropriate emotional response to painful situations.
Poor peer relationships.	

Sexual Abuse - defined as any behavior perceived to be of a sexual nature which is unwanted and takes place without consent or understanding.	
Physical Indicators	**Behavioural Indicators**
Soreness or bleeding in the genital or anal areas or in the throat.	Be chronically depressed/suicidal.
Torn, stained or bloodied underclothes.	Inappropriately seductive or precocious
Chronic ailments such as stomach pains or headaches.	Sexually explicit language.
Difficulty in walking or sitting.	Low self-esteem, self-devaluation, lack of confidence.
Frequent urinary or yeast infections.	Recurring nightmares/fears of the dark.
Unexplained/multiple pregnancies.	Outbursts of anger/hysteria.
	Overly protective to siblings.

Financial or Material Abuse – occurs when somebody forcibly controls another person's money or assets.	
Physical Indicators	**Behavioural Indicators**
Misuse or theft of money	Unexplained inability to pay for household shopping or bills etc.
Fraud and extortion of material assets	Withdrawal of large sums of money which cannot be explained.
Misuse or misappropriation of property, possessions or benefits	Missing personal possessions.
Exploitation or pressure in connection with wills, property or inheritance	Disparity between the person's living conditions and their financial resources.
	Unusual and extraordinary interest and involvement in the vulnerable adult's assets.

10. RELATED AND ADDITIONAL RISKS

As well as the main categories of abuse listed in section nine the College also seeks to protect its students from the additional risks listed below. Each of these additional areas is subject to the same referral process as listed in section four with the exception of known cases of **Female Genital Mutilation** which **MUST** be reported directly to the police by staff personally and reported to a college Safeguarding Officer.

Female Genital Mutilation - Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.	
Physical Indicators	**Behavioural Indicators**
Have difficulty walking, sitting or standing. Difficulties urinating or incontinence. Frequent or chronic vaginal, pelvic or urinary infections. Menstrual problems. Kidney damage and possible failure. Cysts and abscesses Pain when having sex Emotional and mental health problems.	Spend longer than normal in the bathroom or toilet. Have unusual behavior after an absence from College. Be particularly reluctant to undergo normal medical examinations. Ask for help, but may not be explicit about the problem due to embarrassment or fear.

Honour Based Violence -. Abuse committed in the context of preserving family "honour". It often involves a wider network of family or community pressure and can involve multiple perpetrators.
Indicators
It is likely that awareness that a student is the victim of an honour based crime will only come to light after the commission of an assault of some kind. There are inherent risks to the act of disclosure for the victim and possibly limited opportunities to ask for help for fear that their families will find out.   There may be evidence of domestic abuse, self-harming, family disputes, and unreasonable restrictions on the young person such as removal from education or virtual imprisonment within the home.   Some families go to considerable lengths to find their children who run away, and young people who leave home are at risk of significant harm if they are returned to their family. They may be reported as missing by their families, but no mention is made of the reason.

Radicalisation - a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations.	
Physical Indicators	**Behavioural Indicators**

Possesses unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person) Sudden or unexpectedly wearing religious attire/ Possession of materials or symbols associated with an extremist cause. Sudden or gradual change in physical appearance/ Changing their style of dress or personal appearance to accord with the group. Visits extremist websites, networks and Blogs.	Starts to become socially withdrawn/ refusal to co-operate. Starts to exhibit extreme religious intolerance/ derogatory name calling. Bullies or demonises other people freely/ attempts to recruit to prejudice-related organisation. Advocates violence or criminal behaviour/ physical or verbal assault/ damage to property/ condoning or supporting violence towards others.

Forced Marriage – a forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used**.**

Physical Indicators	Behavioural Indicators
Accompanied to doctors' appointments or clinics. Self -harm and/or attempted suicide Eating disorders, depression, declining mental health. Isolation from peer groups /community. Substance misuse Early/unwanted pregnancy Female genital mutilation	Absence and persistent absence. Request for extended leave of absence and failure to return from visits to country of origin. Fear about forthcoming college holidays Surveillance by siblings or cousins at college Decline in behaviour, engagement, performance or punctuality Being withdrawn from college by those with parental responsibility. Removal from a day centre of a person with a physical or learning disability.

Child Sexual Exploitation – illegal activity by people which have power over children and young people and use it to sexually abuse them.

Physical Indicators	Behavioural Indicators
Missing from home or care. Physical injuries. Drug or alcohol misuse. Involvement in offending. Repeat sexually-transmitted infections, pregnancy and terminations. Unexplained absence from college Change in physical appearance and dress. Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites. Estranged from their family. Receipt of gifts from unknown sources. Recruiting others into exploitative situations. Poor mental health. Self-harm and/ or thoughts of or attempts at suicide.	Living in a chaotic or dysfunctional household. History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse and neglect). Recent bereavement or loss. Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only). Unsure about their sexual orientation or unable to disclose sexual orientation to their families. Friends with young people who are sexually exploited. Homeless. Lacking friends from the same age group. Living in residential care. Low self-esteem or self-confidence. Young carer.
Institutional Abuse - the mistreatment of people brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.	
Indicators	

Often presents as being hungry or dehydrated. Talks about inadequate access to food and drink.
Presents a poor standard of care/Lack of personal clothing and possessions and reports communal use of personal items.
Few social, recreational and educational activities made available to the individual.
Public discussion of personal matters/ Lack of respect for dignity and privacy
Reports unnecessary exposure during bathing or using the toilet or bathing facilities
Absence of individual care plans. Lack of management overview and support
Reports organisation discouraging visits or the involvement of relatives or friends.
Lack of leadership and supervision/ Authoritarian management or rigid regimes
Abusive and disrespectful attitudes towards people using the service
Inappropriate use of restraints/ Misuse of medication
Not offering choice or promoting independence
Not taking account of individuals' cultural, religious or ethnic needs
Failure to respond to abuse appropriately/ Failure to respond to complaints
Interference with personal correspondence or communication

Domestic Abuse – An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality. Exposure to Domestic Abuse and/or violence can have a serious long lasting emotional and psychological impact on children.

Physical Indicators	Behavioural Indicators
Bruises or injuries that look like they came from choking, punching, or being thrown down. Black eyes, red or purple marks at the neck, and sprained wrists are common injuries in violent relationships. Hesitates or flinches at physical contact. Depression or anxiety or other personality changes. Frequent injuries and claiming of "accidents"	Become aggressive Display anti-social behaviour Suffer from depression or anxiety Not do as well at college - due to difficulties at home or disruption of moving to and from refuges. withdrawn

Risk to Self and Others – This may include but is not exclusive to severe self-harm, suicidal tendencies or potential risk of harming others which may or may not include children.

Physical Indicators	Behavioural Indicators
Scars, such as from burns or cuts Fresh cuts, scratches or other wounds Bruises Hair loss or bald spots Broken bones Keeping sharp objects on hand Spending a great deal of time alone Wearing long sleeves or long trousers even in hot weather Claiming to have frequent accidents or mishaps	Taking an overdose Swallowing hazardous substances Exercising excessively Scratching and hair pulling, Cutting Planned or deliberate over eating or under eating Burning own skin /body Inserting objects into own body. Hitting yourself or walls

11. E-SAFETY

11.1 The college recognises and embraces the opportunities offered by ICT in learning. To support this children and students of all ages need to develop digital literacy skills that help them to become safe

and responsible users of new technologies, and allow them to be discriminating users of both the content they discover and the contacts they make when online.

11.2   E-safety risks can be summarised under the three headings shown in the chart below.

Content	Exposure to age-inappropriate material, exposure to inaccurate or misleading information, exposure to socially unacceptable material, such as inciting violence, hate or intolerance including extremism and radicalisation, exposure to illegal material such as images of child abuse, illegal downloading of copyrighted materials e.g. music and films.
Contact	Grooming using communication technologies potentially leading to sexual assault and or child prostitution, bullying via websites, mobile phones or other forms of communication device.
Commerce	Exposure of minors to inappropriate commercial advertising, exposure to online gambling services, commercial and financial scams.

11.3   The creation, downloading, distribution and copying of pornographic images of children are criminal offences. If you become aware of any of the above contact a Safeguarding Officer immediately.

12.   YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

12.1   Youth produced sexual imagery (Sexting) generally refers to the sending of sexually explicit images via text, email, MSN or through social networking sites. For example, this could be a picture of a boy or young man exposing himself or a young woman in a state of undress.

12.2   'Sexting' has become commonplace amongst children and young people with the evolution of digital technology.

12.3   Young people (under 18) sending intimate pictures of themselves or other of the same age via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary/images are shared with permission.

12.4   Incidents of sexting should be reported to a safeguarding officer who will consider an appropriate course of action. This could include confiscation of devices and/or Police and parent notification and may invoke college disciplinary procedures.

13.   PEER ON PEER ABUSE (ALLEGATIONS OF ABUSE MADE AGAINST OTHER CHILDREN)

13.1   All staff should recognise that children are capable of abusing their peers. Peer on peer abuse is most likely to include, but may not be limited to, sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, bullying (including cyber bullying), initiation/hazing type violence and rituals and youth produced sexual imagery (sexting). **Peer on peer abuse should never be tolerated or passed off as "banter", "just having a laugh" or part of growing up.**

13.2   It is more likely that females will be victims of peer on peer abuse and that males will be the perpetrators. All peer on peer abuse is unacceptable and will be taken seriously.

13.3   The College will act to minimise the risk of peer on peer abuse by ensuring the establishment provides a safe environment, promotes positive standards of behaviour, and has effective systems in place where students can raise concerns and provides safeguarding through the curriculum via tutorial and other curriculum opportunities. This may include targeted work with students identified as vulnerable or being at risk and developing risk assessments and targeted work with those identified as being a potential risk to others.

13.4   Staff should follow the college's behaviour policy in cases where it is appropriate. For all other concerns, a safeguarding officer must be contacted immediately where advice on the appropriate course of action will be given dependent on the nature of the disclosure. In circumstances where it is deemed necessary a safeguarding officer may contact the Police especially if the alleged victim is vulnerable.

13.5   If the students are under 18 years their next of kin will be contacted unless it there is reason to believe it is unsafe to do so.

13.6   Serious consideration of immediate suspension of the student who is alleged to have abused the other student will be given whilst an investigation is undertaken. If the decision is taken not to suspend the student a risk assessment will be undertaken and a risk management plan put in place.

13.7   If an external body believe that an investigation is required it is likely that the College will need to wait for the outcome of this to undertake its own investigation (in some cases this takes several months).

13.8   The safety of other students must be considered in any disciplinary process. Support needs to be offered to the student alleging abuse and where appropriate the alleged abuser

14.   CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT

14.1   Sexual violence or sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

14.2   The college recognises that children who experience sexual violence and sexual harassment will likely find it stressful and distressing. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

14.3   Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable Sexual violence includes:

- rape
- assault by penetration
- sexual assault - intentionally touching another person in a way that is sexual.

14.4   Sexual harassment is defined as unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity, and/or
- make them feel intimidated, degraded or humiliated and/or
- create a hostile, offensive or sexualised environment.

14.5   Harmful sexual behaviors are:

Problematic, abusive and violent sexual behaviour that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if 1 of the children

is much older, particularly if there is more than 2 years' difference in age or if one of the children is pre-pubescent and the other is not.

14.6   Any safeguarding concerns regarding the above must be taken seriously and should be referred to a safeguarding officer using the College referral process set out in this document.

14.7   If the students are under 18 years their next of kin will be contacted unless it is considered unsafe to do so.

14.8   Serious consideration of immediate suspension of the student who is alleged to have abused the other student will be given whilst an investigation is undertaken. If the decision is taken not to suspend the student a risk assessment will be undertaken and a risk management plan put in place.

14.9   If an external body believe that an investigation is required it is likely that the College will need to wait for the outcome of this to undertake its own investigation (in some cases this takes several months).

14.10   The safety of other students must be considered in any disciplinary process. Support needs to be offered to the student alleging abuse and where appropriate the alleged abuser.

15.   CHILD CRIMINAL EXPLOITATION: COUNTY LINES

15.1   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 and rural areas, market and seaside towns.

15.2   Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

15.3   Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

15.4   Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

15.5   Any safeguarding concerns regarding the above must be taken seriously and should be referred to safeguarding officer using the College referral process set out in this document.

16.   HOMELESSNESS

16.1   Homelessness is not only a housing problem. There are lots of reasons why a young person could become homeless, including family breakdown and mental health issues. Homelessness can have a detrimental impact on young people, with long-term implications for their education, employment prospects and health

16.2   Local authorities have a duty to house certain groups of homeless people under homelessness legislation. Homelessness legislation was amended in 2002 and extended the groups of homeless people for whom local authorities have a duty to rehouse. These now include young people aged 16 to 17, care leavers aged 18 to 20, and people considered vulnerable because they've been in care, the armed forces or prison, or because they've experienced violence, or the threat of violence.

16.3   Students who disclose or are suspected as being homeless should be referred to a safeguarding officer who will work with the appropriate agency to provide support/advice.

17.   CHILDREN IN CARE (LOOKED AFTER CHILDREN) / CHILDREN PREVIOUSLY IN CARE

17.1   Northampton College acknowledges that Children in Care /Children Previously in Care are a particularly vulnerable cohort and may need extra support to ensure they have equal access to education.

17.2   Sometimes specific contracts will be required to ensure appropriate adjustments are made in the curriculum and with support services to allow a student more flexibility if necessary.

17.3   The LAC Officer should be contacted if a student is found to belong to one of the above categories who have not yet been identified as such.

17.4   Any safeguarding concerns regarding the above should be referred using the College referral process set out in this document.

17.5   The LAC Officer will liaise with the local authority personal adviser where there are concerns.

18.   YOUNG CARERS / YOUNG PARENTS

18.1   Young carers are children and young people under 25 who help to look after a family member who is disabled, physically or mentally ill or has a substance misuse problem.

18.2   Young Parents are those young people under the age of 20 who are expecting a child or have an existing child.

18.3   Northampton College acknowledges that Young Carers and Young Parents are particularly vulnerable cohorts and may need extra support to ensure they have equal access to education.

18.4   Sometimes specific contracts will be required to ensure appropriate adjustments are made in the curriculum and with support services to allow a student more flexibility if necessary.

18.5   Students identifying as either young carers or young parents should be encouraged to utilise the wide range of support the college has to offer.

18.6   Student Services provide can provide advice and support in specialist areas such as counselling and wellbeing, disability, learning support, mental health and student funding.

18.7   A safeguarding officer should be contacted if a student is found to belong to one of the above categories who have not yet been identified as such.

18.8   Any safeguarding concerns regarding the above should be referred using the College referral process set out in this document.

19. EXTERNAL MEETINGS

19.1   Sometimes the College is contacted by external agencies with requests for attendance at external meetings e.g. case reviews, Early Help Meetings, LAC/CIC reviews, Child In Need Reviews

19.2   Arrangements should be made for the attendance at external meetings by safeguarding staff initially, with referral to other staff where necessary. Staff should always endeavour to attend meetings or provide College representation.

19.3   Where non-safeguarding staff do attend external meetings, staff in attendance should ensure that safeguarding staff are kept fully informed and notes from the meeting are provided for recording on the College's safeguarding database.

20. EARLY HELP

20.1   Early help is a simple way to help identify needs of children and families and make a plan to meet those needs.

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

- Is disabled and has specific additional needs
- has special educational needs (whether or not they has a statutory education and health care plan)
- is a young carer
- is frequently missing/goes missing from care or home
- is misusing drugs or alcohol
- is in a family circumstances presenting challenges for the child, such as substance abuse. adult mental health problems or domestic abuse
- has returned to their family home from care

20.3   Where a need for early help is identified either by the college or by a partner agency, a safeguarding officer initially who will either co-ordinate the Early Help process or work with another lead professional to co-ordinate support.

20.4   Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to referral to children's social care for assessment for statutory services if the student's situation does not seem to be improving or is getting worse.

20.5   All requests for the college to support a family under Early Help should **always** be referred to the safeguarding team in the first instance.

21. PRIVATE FOSTERING

21.1   Private fostering occurs when a child under the age of 16 (under 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.

21.2 Ideally, the parent or carer of the child should notify Northamptonshire County Council themselves however a Safeguarding Officer should always be informed where this arrangement is identified and they will discuss the situation with the family or contact the MASH team themselves.

22. ASSESSING RISK

22.1 Where a student's history indicates that they pose a risk to other students/staff, a risk assessment must be undertaken by appropriate professionals. This will establish whether College is an appropriate environment for that person, and if so, what arrangements can be put in place to support that person to ensure the safety of others and their own safety. This is usually undertaken by the Designated Manager for Safeguarding in collaboration with the Enrolment Team, curriculum staff, and Senior Managers where required.

22.2 There is a specific process for students declaring criminal convictions on application or at enrolment which must be followed. Documents in relation to this process are located on the College Document Library.

23. BEST PRACTICE / IDENTIFYING REFERRAL – GUIDANCE FOR STAFF

23.1 The following are examples of best practice that will help ensure professional boundaries and College policies are maintained.

- All staff should make sure they have read and understood the College's "**Child Protection: Safeguarding Children and Vulnerable Adults Policy 2023-24**, the College's **"Professional Boundaries"** document, and the guidance **'Keeping Children Safe in Education 2023.**
- If you are in doubt whether a proposed action is consistent with safe conduct then you should err on the side of caution and consult your line manager
- Do not have, or be perceived to have, favourites amongst students you work with.
- Do not give lifts to students in your own transport.
- Do not invite or take a student to your home.
- Do not visit students in their home without a specific purpose and express permission from the student and their family as well as your Assistant Principal.
- Do not befriend a student on personal social media accounts.
- Do not use your personal mobile phone to contact students or to allow students to contact you outside of College working hours.
- Do not under any circumstances use any physical punishments or actions towards students.
- Do not arrange meetings outside of working hours. Do not develop social relationships with students. If you come into contact with a student in a social setting maintain professional boundaries.
- Do not buy goods from or use the services of students unless in an educational setting for a specific purpose.
- Do not accept any money or gifts from students. Tell students of the College policy and ensure the student does not feel offended.
- Do not give money or gifts to students including cigarettes.
- Do not have or encourage physical contact with students.

- Do not lend or borrow money from students.
- Do not discuss your personal life /experiences with students or express overt distress/anger in front of them.
- Do not express thoughts or feelings towards a student which may be construed as embarrassing, humiliating intimidating or threatening.
- Avoid over sympathising with students who disclose e.g. that happened to me etc.
- Always refer on, do not get overly involved with safeguarding issues; this will help maintain the educational standards in the classroom and support the student in finding other safe spaces to talk through their troubles if they wish, away from the learning environment.

23.2   The table below provides examples of typical safeguarding referrals and common misconceptions.

This list is not exhaustive.

Possible safeguarding issues	Issues which are NOT safeguarding (but may still require support)
Forced marriage	Falling out with friends
Genital mutilation	Falling down the stairs
Sexual activity under 16 yrs.	Accidents or accidental injury
Rape inc historical rape	Emotional reactions to everyday occurrences
Assault inc sexual assault	Illness
Violence and threats of violence	Taking medication (in line with medical advice)
Neglect inc parental issues (drugs, alcohol, violence)	Forgotten lunch money
E safety / on line bullying/ Facebook / twitter threats	Losing money
Missing people	Needing support for non-threatening issues
Grooming	Not getting on with teachers
Extreme self-harm	Arguing with parents
Suicidal tendencies	Managed self-harm out of college
Extreme financial hardship which puts the student at risk	Breaking up with boyfriend / girlfriend
Drug / alcohol abuse in college	Unkind comments with no implied threat
Homelessness	Theft with no risk to students
Bullying	Having counselling / therapy
Hate crimes (gender, sexuality, race, faith, disability, background)	Depressed / feeling down
Theft with assault	Hungry

Psychological abuse	Mental Health
Physical abuse	Being a 'Looked After' Child
Emotional abuse	Having friendship with Adults
Sexting	Living away from home
Forced prostitution	Choosing to live away from home

24. SUPPORTING STAFF

24.1   We recognise that staff working at Northampton College who have become involved with a child or vulnerable adult who has suffered harm or appears likely to suffer harm, may find the situation stressful and upsetting.

24.2   We will support all such staff by providing an opportunity to talk through their anxieties with either the Designated Senior Lead for Safeguarding, the Designated Manager for Safeguarding, their immediate line manager or appropriate external support provided by Human Resources.

25. DUTY TO REPORT

25.1   We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

25.2   All staff and students should be aware of their duty to raise concerns, where they exist, about the management of safeguarding of children and vulnerable adults, which may include the attitude or actions of colleagues, and should be encouraged to do so.

SPECIFIC GUIDANCE FOR STAFF WITH SAFEGAURDING RESPONSIBILITIES

26. RECORD KEEPING

26.1   All details provided by staff in relation to concerns about a student's wellbeing must be recorded on the College's safeguarding database/CPOMS including details of any conversation regarding the concern.

26.2   Copies of emails or notes provided to you in relation to the incident should be added to the secure student file located on the College V Drive/CPOMS

26.3   All records should contain:

- The nature of the incident
- A description of any visible injuries/marks
- The young person's account of what has happened
- Times, dates or other relevant information, e.g. details of siblings or others who may also be at risk
- A clear distinction between what is fact, hearsay or opinion

26.4   The designated manager will ensure that a student's child protection file is transferred to any new education provider when leaving the college. This process will be completed using data gathered by the college as part of its destination monitoring and by monitoring early withdrawal reports.

26.5   Copies of reports, notes etc. will be kept securely locked at all times and then retained until the 25th anniversary of the child's birth, or if the child dies before age 18, for 6 years from the date of death

26.6

Copies of reports regarding allegations made against staff shall be kept securely until at least the 25th birthday of any child or seven years in any other case

27. INFORMATION SHARING

27.1   The General Data Protection Regulation and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

27.2   When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the General Data Protection Regulation and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

27.3   Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

27.4   Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

27.5   Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

27.6   Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a student. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a student or young person at increased risk of harm.

27.7   Wherever possible, information should be shared in an appropriate, secure way.

27.8   Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester.

28. REFERRAL

28.1   If you believe the nature of the concern warrants a referral to Social Services/MASH (refer to Thresholds and Pathways Document) this should be completed in line with the NSCP guidelines using the digital referral form provided on the NSCP website.
http://www.northamptonshirescb.org.uk/schools/referrals-eha/how-to-make-an-online-referral/

28.2   Referrals for concerns around a young person who may be at risk of radicalisation should also be referred to the MASH /Northamptonshire Police

28.3   Copies of any referrals made should be retained in the student file on the college V: Drive

28.4   If you believe the nature of the concern warrants a referral to the Police then this should be reported to Northamptonshire Police using the 101 contact number for non-emergencies or 999 for life emergency situations.

28.5   Typical referral paths are outlined in the table below:

Typical external referrals	Referral path
Abuse under 18/Vulnerable Adults	Social Services/MASH
Domestic Abuse over 18	Domestic abuse services
Serious sexual offence	Police / Probation / YOS
Suicide / serious self-harm issue	GP / A&E via ambulance/
Assault or threats of assault	Police
Possession of Weapons	Police
Other criminal activity	Police, Probation/YOS
Concerns re: drugs/alcohol	Drug / alcohol services / Police
Forced marriage	Forced Marriage Prevention team / Police
Radicalisation / Extremism	MASH

29. FURTHER ACTIONS

29.1   Once the decision to make a referral is made the Safeguarding Officer making the referral will undertake the following:

- Ensure the young person is not in any immediate danger and seek medical attention if they are suffering from an injury.

- Where doing so will not place the young person at risk, concerns will be discussed with the parent or guardian of the young person.

- The young person will be informed of the decision to refer, the reason for the decision, and the actions that will now follow.

- All concerns, discussions, decisions and the reasons for those decisions will be recorded on the College's safeguarding database.

298.2   There may be instances where more than one Safeguarding Officer will be involved in a particular case and the student should be informed of the need to work collaboratively.

30. ALLEGATIONS AGAINST MEMBERS OF STAFF

30.1   The Designated Officer should be informed of all cases in which it is alleged that a person who works with children has:

1) Behaved in a way that has harmed, or may have harmed, a child;

2) Possibly committed a criminal offence against children, or related to a child; or

3) Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, for example if their conduct falls within any of these categories of abuse:

- Physical
- Emotional
- Sexual
- Neglect

30.2   Allegations made against workers who are paid, unpaid, volunteer, agency, casual and self-employed as well as foster carers, and adoptive parents of children on Placement Orders should all be reported to the Designated Officer. This should be done within 24 hours of the incident.

30.3   If you believe the nature of a concern warrants a referral to the Designated Officer this should be completed in line with the NSCP guidelines using the digital referral form provided on the NSCP website. Designated Officer (formerly LADO) - Northamptonshire Safeguarding Children Board (northamptonshirescb.org.uk)

30. 4   Referrals to the Designated Officer must be made within 24 hours of the incident.

30.5   Should you need to discuss a case with a Designated Officer, please complete consultation form here. Completed forms should be send securely to **LADOConsultations@nctrust.co.uk** and a Designated Officer will get back to you as soon as they are able to.

30.6   The Designated Officer has 3-5 working days and where a Designated Officer strategy meeting is appropriate, the Designated Officer will arrange the initial meeting to include the employer and relevant multi-agency partners.

30.7   Allegations should be resolved within three months.

31. CONTACT DETAILS

Agency	Contact Number
Multi Agency Safeguarding Hub	0300 126 7000
Out of hours service	01604 626938
Youth Offending Team	01604 364118
Designated Officer	Sheila Kempster: 07831 123193 (North) Andy Smith: 07850 854309. (West)
Northamptonshire Safeguarding Children Partnership	07872 148334
Police (Emergency)	999
Police (Non-Emergency)	101
CAMHS (Mental Health)	01604 656 060
Serenity (Rape Victim Support)	01604 601713
Rape Crisis	01604 250721
Prevent Regional Co-Ordinator (Sam Slack)	07812 301215
Prevent (Police)	101 Ext 346112
Forced Marriage Unit	020 7008 0151
NHS School Nursing Team	0800 170 7055 (option 4).

NHS Helpline	111
OFSTED	0300 123 1231

32. Appendices:

- Appendix A: EQUALITY AND DIVERSITY IMPACT STATEMENT
- Appendix B: DATA PROTECTION IMPACT STATEMENT
- Appendix C: COMMUNICATIONS PLAN

Appendix A: EQUALITY IMPACT ASSESSMENT

This template has been designed to help you take action to improve services and practices which affect staff, students and other service users at Northampton College. By completing this template, you would have considered the impact that your policy, practice or service might have on particular social groups within the college community. The exercise will also provide you with the opportunity to demonstrate, where possible, that the College promotes equity, diversity and inclusion.

Once this Equality Impact Assessment has been created, please include on the last page of your policy document.

Policy Details	
What is the policy?	Child Protection, Safeguarding Children and Vulnerable Adults Policy
Is it new or existing?	Existing
Department	Student Services
Policy Author (postholder title, name)	Mark Owen – Assistant Principal Student Services
Author of Equality Analysis	Mark Owen
Date of completion	01/09/2023

Aim and Objectives
Briefly describe the aims and objectives of the policy
Sets out the colleges approach to safeguarding children and vulnerable adults in its care whilst providing information and support to staff.   Provides additional details of safeguarding arrangements in the college Nursery.

Policy Assessment
Consider whether your policy might have an impact on various groups identified within the categories listed below and explain why you have reached this conclusion.   Please tick (v) the identified level of impact (positive, negative, or no impact) and provide details of your findings.

	Positive Impact	Negative Impact	No Impact	Findings
Race			x	
Religion and/or belief			x	
Sex (Gender)			x	
Gender Identity			x	

Disability			x	
Age			x	
Sexual orientation			x	
Marriage and/or civil partnership			x	
Pregnancy and/or maternity (including surrogacy and adoption)			x	
Other identified group (e.g. carers)			x	

Action Planning			
How do you intend to mitigate or eliminate any negative impact identified?	If a positive impact is identified, how do you intend to promote or develop this opportunity?	Where negative impact has been identified, can it be justified? If so, explain how.	How do you intend to mitigate or eliminate any negative impact identified?

Monitor and Review

How will you monitor the impact of your project once it has been put into effect?

The policy will be monitored through feedback from services users gathered via:

- College Complaints Procedure
- Feedback from Students
- Northamptonshire Safeguarding Children Partnership Guidance

Names and position of Impact Assessment Team (min of 3 preferably from areas across the College):

Name	Position
Mark Owen	Assistant Principal – Student Services
Jan Hutt	Vice Principal – People and Organisational Development
Patrick Leavey	Deputy Principal & Chief Operating Officer
Equality Analysis Sign-Off Signature and Date: 01/09/2023	
Review Date: 01/09/2024	

Appendix B: DATA PROTECTION IMPACT ASSESSMENT

Data Protection Impact Assessment

Does this Policy
- require the collection and use of data in addition that normally collected by the College?

Yes / No (if Yes complete Assessment point number 1)
- require the sharing of data with partners?

Yes / No (if Yes complete Assessment point number 2)

1. Is additional data being collected? If so please detail:

> Yes. Information on student welfare/concern about young people is collected.

   Is data collected personal and/or sensitive?

> Information can be both personal and sensitive.

   How will you collect, use, store and delete data?

> The information is collected and stored on a secure area of the college network. Information is retained in accordance with safeguarding record keeping protocols.

2. Will you be sharing data with anyone? Please detail what data, with who and confirm a **Data Sharing Agreement** is in place.

> Information may be shared with agencies such as social care and the police where it is required to keep the subject safe. A data sharing agreement is not required for this.

   Describe the purposes of the processing / sharing: What are the benefits of the processing/sharing – for you, and more broadly?

> Information under this policy is shared for the purpose of keeping young people, who may be at risk of harm or abuse, safe.

   Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

> Students are made aware of the colleges approach to safeguarding through induction, tutorial and when working with safeguarding staff.

   Describe compliance and proportionality measures, in particular:
   What is your lawful basis for processing?

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe. Timely information sharing is supported under all key safeguarding legislation including Keeping Children Safe in Education 2022

How will you ensure data quality and data minimisation?

All safeguarding staff are qualified to level 3 and are aware of the need for appropriate record keeping.

What information will you give individuals?

Any information that will be shared will be necessary, proportionate, relevant, adequate, accurate to ensuring an individuals safety.. Additionally it will only be shared with those individuals who need to have it.

Please attach a Risk Assessment if there are significant risks to data protection

Signed by Data Protection Officer

Name:

Date:

Appendix C: COMMUNICATIONS PLAN

Version	Final
Ratified by	Policy & Strategy Group
Date Ratified	01/09/2023
Date Issued	01/09/2023
Expiry Date	01/09/2024
Lead Manager	Mark Owen/Jan Hutt
Name of Author	Mark Owen
Audience	College Staff, Students, Parents & Carers.
Communication Plan	Document Library, College Website