



Suffolk  
New  
College

### Safeguarding & Child Protection Policy

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Related Policies & Procedures:	<ul style="list-style-type: none"> <li>• Attendance &amp; Punctuality Strategy</li> <li>• E-Safety Policy</li> <li>• Learner Anti-Bullying / Harassment Policy</li> <li>• Learner Disciplinary Policy</li> <li>• Lettings Policy</li> <li>• Managing Challenging Behaviour Policy</li> <li>• Positive Behaviour and Attitude to Learning Policy</li> <li>• Preventing Extremism and Radicalisation Safeguarding (PREVENT) Policy</li> <li>• Recruitment &amp; Selection Policy</li> <li>• Student Placement Policy</li> </ul>



**Equality Impact Assessment Tool Name of Policy: Safeguarding and Child Protection Policy**

		Yes/No	Comments
1	<b>Does the policy / guidance affect one group less or more favourably than another on the basis of:</b>		
	Race or ethnicity	No	
	Disability	Yes	This policy is designed to safeguard children and vulnerable adults and so there are differences regarding the approach to them and other adults in some situations.
	Gender	No	
	Religion or belief	No	
	Sexual orientation	No	
	Age	Yes	This policy is designed to safeguard children and vulnerable adults and so there are differences regarding the approach to them and other adults in some situations.
	Marriage and Civil Partnership	No	
	Maternity and Pregnancy	No	
	Gender Reassignment	No	
2	<b>Is there any evidence that some groups are affected differently?</b>	No	Within children and vulnerable adults all treated the same.
3	<b>If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?</b>	Yes	This policy is covered by legislation.
4	<b>Is the impact of the policy/guidance likely to be negative?</b>	No	
5	<b>If so, can the impact be avoided?</b>		
6	<b>What alternatives are there to achieving the policy/guidance without the impact?</b>	None	
7	<b>Can we reduce the impact by taking different action?</b>	No	

# **SUFFOLK NEW COLLEGE SAFEGUARDING AND CHILD PROTECTION POLICY**

## **1. CONTEXT**

Suffolk New College has a statutory and moral duty to ensure that the College safeguards and promotes the welfare of learners receiving education and training at the College. This Policy has been developed in accordance with the principles established by and within:

- The Human Rights Act 1998
- The Children Act 2004
- The Equality Act 2010
- The Education Act 2011
- The PREVENT Duty 2015
- The Data Protection Act 2018 and the UK GDPR (General Data Protection Regulation)
- The Domestic Abuse Act 2021
- Suffolk's Safeguarding Partnership

and in line with Government publications, notably:

- What to do if You Are Worried a Child is Being Abused – Advice for Practitioners 2015
- Information Sharing – Advice for Practitioners 2018
- Working Together to Safeguard Children 2018 (2022 update)
- Keeping Children Safe in Education (KCSIE) September 2023.

The College takes very seriously its responsibility to safeguard and promote the welfare of our learners and to work together with other agencies to ensure adequate arrangements within our college to identify, assess and support those learners who are, or may be, suffering harm.

The College is committed to responding to safeguarding concerns from the basis of a learner being 'at risk', rather than 'the risk'. We consider that such an approach helps strengthen our responses, holding the learner's vulnerability and safety at the centre of decision making.

Throughout this Policy and procedures, reference is made to learners and 'young people'. This term is used to mean 'those under the age of 18'. It is recognised that some adults are vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse / harm and for the protection of vulnerable adults.

It is important that child protection and safeguarding issues are handled with sensitivity and respect. Young people have the right to make important decisions about their lives. The College recognises this but also recognises its duty and responsibility to protect where there is a cause for concern.

It is the responsibility of the Designated Safeguarding Lead (DSL) to ensure that all safeguarding issues at the College are effectively responded to, recorded and referred externally to the appropriate agency.

The DSL is also responsible for ensuring introductory safeguarding training is accessed by all new staff, to familiarise them with safeguarding and child protection issues. Safeguarding and

Prevent training for new staff is a mandatory component of their Induction, facilitated through the completion of TES training modules online. Alongside this, safeguarding briefings are delivered and updates shared to all staff as appropriate throughout the year.

The College's safeguarding policies, procedures and reporting mechanism (MyConcern) are included as part of on-boarding for new staff prior to and at Induction.

## 2. SAFEGUARDING TEAM MEMBERS

Arrangements for safeguarding at the College are defined through the following senior roles:

- Safeguarding Link Governor: Suzanne Davis
- Executive Lead for Safeguarding: Mary Gleave, Deputy CEO (**LADO point of contact**)
- Strategic Lead for Safeguarding: Greer Hill, Director of Student Services Safeguarding and Support (Designated Safeguarding Lead – senior member of staff with lead responsibility for safeguarding, Prevent Lead)
- Lead for Safeguarding (staff): Sumita Kundu, Head of Human Resources

The nominated members of staff with responsibility for the management of Safeguarding & Child Protection are:

- Greer Hill, Director of Student Services, Safeguarding & Support, ext 2230
- Victoria Howard, Safeguarding Manager, ext 2777
- Sherry Storer, Head of Centre, Suffolk New College On The Coast, ext 2778 or 2875 (Leiston) and 01986 875749 (Halesworth)
- Nell Burnett, Student Support & Safeguarding Officer, ext 2715
- Ryan Crisp, Student Support & Safeguarding Officer, ext 2595
- Elaine Green, Student Support & Safeguarding Officer, ext 2238
- Samuel Mason, Student Support & Safeguarding Officer, ext 2237
- Philippa Ditcham, Student Support & Safeguarding Officer, ext 2849
- Laura Manley, Student Support & Safeguarding Officer, ext 2790
- Sumita Kundu, Head of Human Resources, ext 2409 (for safeguarding matters in respect of allegations made / concerns raised against staff, supply (agency) staff, volunteers and contractors, including for the reporting of low level concerns).

*Note, first point of contact for LADO as above.*

## 3. SCOPE OF THE POLICY

**'CHILDREN'** - The Children Act defines a child as person under the age of 18. For the purposes of this Policy, this includes children in the care of learners on placement. Learners with special educational needs and / or disabilities (SEND) over the age of 18 are also covered by this Policy and need to be safeguarded by staff.

**'LEARNER'** - means any person currently enrolled on a course at the College.

**'STAFF'** - means any person employed by the College, apprentices, contractors, agency staff (on supply) volunteers, contractors, sabbatical officers and staff of the Student Union.

The Policy aims to provide a framework for protecting learners under 18 years of age, vulnerable adults and children in the care of learners.

The Policy should be followed if there is a concern that a young person or vulnerable adult is in need of protection. It should also be followed if a member of staff or a learner suspects that a staff member, a learner or another person may be abusing a learner under 18 or a child in the care of a learner.

Child protection issues concerning any child attending the College on a school taster event must be referred to the College's DSL who will make any necessary referrals. The respective school's senior designated person for safeguarding will be notified of any safeguarding concerns and referrals made.

The Policy does not include persons who are outside the College community for whom there are other means of raising concerns. However, it does apply in situations where actions take place externally to the College but involve children or young people who are part of the College and the College becomes aware of these.

#### **4. COVID-19**

The impact of the COVID-19 pandemic and subsequent closure of schools and colleges brought with it unprecedented challenges for the safeguarding of children, young people and vulnerable adults. The impact of periods of Lockdown as a direct result of COVID-19 is known to have exacerbated levels of vulnerability in many ways, including (but not limited to):

- Mental health and wellbeing
- Isolation from trusted adults
- Isolation from peers and social networks
- Chaotic household
- Abusive household
- Breakdown in family relationships
- Family history of poor mental health, substance misuse, neglect, abuse, violence
- Domestic abuse
- Lack of adult supervision / guidance
- More time spent online than ever before
- Financial circumstances; with many children and young people described as being "impoverished by lockdown"
- Furloughed from employment.

At Suffolk New College, we recognise that children, young people and vulnerable adults are potentially more vulnerable than ever before to those who might seek to harm, exploit, abuse or traffick them.

#### **5. PREVENTING RADICALISATION ("PREVENT")**

Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015 places a duty on schools and colleges as well as other public bodies, to have "due regard to the need to prevent people from being drawn into terrorism". To meet this duty, the College has implemented a Preventing Extremism and Radicalisation Safeguarding Policy, which should be read as a supplement to this Safeguarding and Child Protection Policy.

The Policy explains actions that may be taken by the College where we have concerns that a learner may be vulnerable to extremism, radicalisation and / or terrorism, including when we might make a referral to the “Channel Panel”. *At the time of publishing this amended version of our Safeguarding & Child Protection Policy, the College is aware that updated Prevent Duty guidance is due to come into force on 31<sup>st</sup> December 2023. Any necessary amendments to policy, procedures and / or practice, will be made accordingly.*

## 6. DEFINITIONS

Safeguarding and promoting the welfare of children is defined within Keeping Children Safe in Education 2023 as:

- Protecting children from maltreatment
- Preventing the impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

**Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

**Sexual abuse:** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or

in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a young person from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- Be responsiveness to a young person's basic emotional needs.

### **Safeguarding Issues:**

Behaviours linked to issues such as drug-taking and / or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and / or videos can also be signs that a child / young person is at risk.

Other safeguarding issues all staff should be aware of include:

### **Child-on-Child Abuse (previously referred to as peer-on-peer abuse)**

*Where the terms 'victim' and perpetrator' are used within this section, they are done so in accordance with Keeping Children Safe In Education, 2023*

Suffolk New College staff recognise that children and young people are capable of abusing other children and other young people, both inside and outside of the College, as well as online. We also recognise that this is not something that children and young people find it easy to talk about. A prominent college campaign called 'Its Never Ok' focusses on sexual harassment, violence and abuse.

Sexual violence and sexual harassment can occur between young people and children of any age and gender. It can also occur through a group of young people and children sexually assaulting or sexually harassing a single person or group of people. Young people and children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, which could affect their educational attainment.

College staff recognise that although child-on-child abuse can, and does, affect anyone, some groups are potentially more at risk than others:

- Girls
- LGBTQ
- Learners with SEND

It is more likely that girls will be the victims of sexual violence and harassment, with boys the more likely perpetrators.

**College commitment:**

Staff recognise it is our duty to ensure that we do all we can to eradicate child-on-child abuse or any form of sexual violence, abuse or harassment from the College. We want our college to continue to be a safe place for people to come and learn, free from judgement, abuse and discrimination. On occasions where incidents do occur, we want our learners to feel empowered to step forward, stand up and talk about their experiences. As such, we are absolutely committed to ensuring that when learners witness or encounter anything that causes them concern, or makes them feel uncomfortable, that they can come forward safe in the knowledge that staff will deal with concerns and issues appropriately and sensitively. We will not tolerate child-on-child abuse and so will fully support learners, taking appropriate action(s) as required, for any breaches to our policies and offence caused to others.

All staff have an important role to play in preventing it and responding where they believe a child / young person may be at risk. This section of the Policy therefore reflects the College’s expectations and procedures in respect of child-on-child abuse.

Staff recognise that downplaying or dismissing responses can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalises abuse. College staff understand the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.

**Responding to and ‘modelling the challenge’:**

Staff have a duty to model acceptable behaviours and challenge those that are unacceptable; adopting a ‘Call it in : Call it out’ approach should they see / hear behaviour and / or language that concerns them, because addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and / or violent behaviour in the future. Staff are aware that through consistently adopting such an approach as part of a whole-college commitment to eradicating this kind of harm from our setting, we can all help minimise the risk of child-on-child abuse between our learners.

<b>Call it in</b>	<b>Call it out</b>
Gender stereotypes	Gendered slurs – directed towards someone and used with knowledge of harm caused
Gendered language	Attitudes directed against a person
Gendered slurs – not directed towards someone and used without knowledge of the harm	Sexualised bullying – including sexual innuendo intended to make someone feel uncomfortable or humiliated
Key attitudes – victim blaming	Comments about someone’s body, appearance or clothing – scrolling through Instagram, in person
Beliefs that aren’t based on fact	Sexual harassment – unwanted sexual comments, unwanted sexual touching, upskirting, sexual jokes

(credit source: Bold Voices)



Staff understand that even if there are no reports / a low number of reports it does not mean it is not happening / not happening often at the College; that it may actually be the case that it is happening often but is just not being reported. Barriers to children and young people reporting incidents of child-on-child abuse may include:

- Worry that what happened next would be out of their control
- Worry they would be branded a “snitch” by their peers
- Worry they would be ostracised from friendship groups
- Worry there would be damage to their reputation. E.g., sexual rumours circulation
- Feeling they might be blamed
- Feeling that nothing would be done
- Feeling there was “no point” in raising
- Feeling embarrassment and shame.

With barriers such as these above preventing learners from reporting incidents of child-on-child abuse, staff at the College will consistently challenge inappropriate behaviours between peers, many of which are actually abusive in nature, and can include:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and / or encourages physical abuse)
- Harmful sexual behaviour and sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and / or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and / or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Technology-assisted harmful sexual behaviour; using mobile devices or other smart technology to engage in sexual activity that may be harmful to themselves and others.

### Harmful Sexual Behaviour

Defined as: Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person, or adult (Professor Simon Hackett, 2014).

The progression of Harmful Sexual Behaviour can be understood within a continuum model which demonstrates the escalation from normal to highly deviant, violent behaviour. Recognising that behaviour exists within a continuum model such as this will further support college staff in helping minimise the risk of child-on-child abuse, as well as supporting our ability to ensure learners are able

to identify harmful sexual behaviour, by ensuring that learners can more easily recognise and understand what constitutes harmful sexual behaviour:

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviours</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure victim compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking, or not able to be freely given by victim</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</li> <li>• Sadism</li> </ul>

(credit source: Professor Simon Hackett, 2010)

### Reporting systems for learners to report abuse

There are various ways that learners can confidentially report abuse, these are:

#### (a) Internal-

- Reporting directly to a member of staff
- Reporting via the Student Support email address; [support@suffolk.ac.uk](mailto:support@suffolk.ac.uk)
- Reporting to one of the Safeguarding Team either in person or by calling 01473 382738
- Reporting via the dedicated 'Its Never Ok' email address; [itsneverok@suffolk.ac.uk](mailto:itsneverok@suffolk.ac.uk)
- Reporting via the dedicated 'Its Never Ok' telephone line; 01473 382205
- Reporting via their MySNC account by clicking on the 'Keep Me Safe' tab, which takes learners to a 'Stop It' Bullying report form, sent directly once completed to Student Support

#### (b) External-

- Local SARCs – Sexual Assault Referral Centres
- Police on 101, or by dialling 999 if urgent police assistance is required
- NSPCC's dedicated Report Abuse in Education helpline 0800 136 663 or via email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Directly via the relevant social media platform (Facebook, Instagram, TikTok, Snapchat, Twitter).

Learners will be listened to, supported and their concerns will be taken seriously.

### Receiving the initial report

The initial response from a member of staff is crucial, as referenced within Keeping Children Safe in Education 2023; 'How the college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward':

- The staff member to whom the child / young person discloses must recognise that they have been placed by the child in a position of trust. They should therefore be supportive and respectful of the child

- Essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe
- Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously
- A victim should never be given the impression that they are creating a problem in reporting sexual harassment or violence
- Nor should a victim ever be made to feel ashamed for making a report
- Being told “it happened ages ago” makes it no less important
- Where the concern includes an online element, staff must not view or forward illegal images of a child.

#### Reporting the concern (all staff)

Staff must follow the College’s safeguarding reporting procedures by submitting the information on MyConcern in the usual way (refer section 7 of this Policy).

#### Responding to the concern (the Safeguarding Team)

Each behaviour will be considered within the context of what is normal behaviour developmentally (refer p10 of this Policy), whilst also considering the needs of the child or young person displaying the harmful sexual behaviour.

The Safeguarding Team will make an assessment of ‘Risk and Needs’ when responding to a report of child-on-child abuse. This framework will provide the Safeguarding Team with the foundation for a calm, considered and appropriate response to any reports. This ‘Risk and Needs’ assessment will consider:

- The victim, especially their protection and support
- Whether there have been any other victims
- The alleged perpetrator(s)
- All the other children and young people (and if appropriate adult learners and staff), especially any actions that are appropriate to protect them from the alleged perpetrator(s) (including whether they share the same classroom or transport) or from future harms.

The Safeguarding Team will liaise with children’s social care services and specialist services as required, receiving professional risk assessments from social workers and / or sexual violence specialists where appropriate.

Important, initial considerations by the Safeguarding Team will include:

- The wishes of the victim in terms of how they want to proceed. This will however need to be balanced with the College’s duty and responsibilities to protect other children
- The nature of the alleged incident(s), including whether a crime may have been committed and / or whether harmful sexual behaviour has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Are there ongoing risks to the victim, other children, adult students or staff?

- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Decisions made, and actions taken by the Safeguarding Team will be made on a case-by-case basis, using their professional judgement, supported by other agencies, such as children's social care and the police as required, acting in the best interests of the child / young person.

Where a report is going to be made to children's social care and / or the police, the Safeguarding Team shall, wherever possible, consider with the relevant agency how the alleged perpetrator(s) will be informed of the allegations. HOWEVER, this will not stop the College taking immediate action to safeguard a learner.

There are four likely scenarios:

1. Manage internally
2. Early help – considered to be particularly helpful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence
3. Referrals to children's social care – where a child has been harmed, or is at risk of harm, or is in immediate danger
4. Reporting to the police – where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police (the Safeguarding Team will utilise the NPCC's When to call the Police Guidance for Schools and Colleges).

Keeping Children Safe in Education 2023 identifies the same two crucial key principles within each of the above scenarios, these are:

1. Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated
2. All concerns, discussions, decisions and reasons for decisions should be recorded [via MyConcern].

The College shall ensure that both the victim and the perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Supporting the victim: In addition to the principles already outlined within this section, support will be tailored on a case-by-case basis. For example, the support required regarding a one-off incident of sexist name-calling will be vastly different from that for a rape. Sexual assault can result in a range of health needs; physical, mental and sexual health problems and unwanted pregnancy. Specialist NHS support can be accessed via a Sexual Assault Referrals Centre (SARC).

The College will allocate a trusted adult to talk to about their needs, with the choice of adult being as far as reasonably possible, the victim's. The College will do everything we reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour: Considering and taking action in line with the relevant college policies (Learner Disciplinary Policy and Positive Behaviour and Attitude to Learning Policy) and providing appropriate support are not mutually exclusive actions, and so can, and will, be taken by the College at the same time if necessary.

In addition to the principles already outlined within this section, support will be tailored on a case-by-case basis. Any child / young person will likely experience stress as a result of being the subject of allegations and / or negative reactions by their peers to the allegations made against them.

The College will consider the *proportionality* of the response. The alleged perpetrator(s) may potentially have unmet needs, which in some cases may be considerable. Heads of Department and Directors of Curriculum will ensure proportionality when considering disciplinary procedures.

The College recognises the importance of ensuring that the perpetrator(s) are given the right support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Advice should be taken as appropriate from children's social care, specialist sexual violence specialists and the police. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and / or violent behaviour in the future.

In supporting the alleged perpetrator(s), the Safeguarding Team will remember to:

- Consider any risks to the child / young person's safety and what multi-agency responses are needed
- Avoid using language that may make them feel judged or criminalised
- Work with the child / young person and their support network to put measures in place that will help them change their behaviour
- Consider whether the child / young person might need any targeted therapeutic work.

#### Victim and alleged perpetrator(s) sharing classes

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim and the College shall take suitable, proportionate action (if we have not already done so), in accordance with the relevant college policy. The nature of the investigation, any subsequent conviction or caution and the wishes of the victim will be especially important in determining how we will proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. In so doing, the College will have opportunity to review and consider any areas for staff development / training.

If a report is determined to be unsubstantiated, unfounded, false or malicious, staff should consider whether the child and / or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the College shall consider whether any disciplinary action is appropriate against the individual who made the allegation, in line with college policy.

#### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal

activity, in exchange for something the victim needs or wants and / or for the financial advantage or increased status of the perpetrator or facilitator and / or through the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the sole purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through County Lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening / committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

### **County Lines**

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. Key to identifying potential involvement in County Lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. 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

- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. 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.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Female Genital Mutilation (FGM)**

There is a specific legal duty on teachers - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

As with the existing forced marriage legislation, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Mental Health**

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken.

### **Serious Violence**

Indicators which may signal children are at risk from, or are involved with serious violent crime may include:

- Increased absence from college
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Risk factors that might increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

### Online Safety

E-Safety is an essential part of safeguarding at the College. The College recognises its duty to ensure that all learners and staff are protected from potential harm when using mobile or smart technology and social media.

Computers, tablets, mobile phones, smart watches, games consoles, Apps and social media, are an important part of everyday life which present positive and exciting opportunities, as well as challenges and risks. Suffolk New College will empower learners to acquire the knowledge needed to use mobile technology and social media in a safe, considered and respectful way, develop high levels of digital skills and develop their resilience so that they can manage and respond to online risks, as well as prepare for future learning opportunities and employment.

The College recognises that many learners have unlimited / unrestricted access to the internet via mobile phone networks. It is further recognised that as a result, some learners will use their mobile and / or smart technology to:

- Sexually harass their peers whilst at college
- Share nudes, either consensually or non-consensually (often via large social media chat groups)
- View and share pornography and other harmful content.

Where such occurrences become known to staff, they must report this via MyConcern (refer section 7), such that appropriate actions and support can be identified, liaising with Heads of Department as appropriate in accordance with college policy.

The approach to online safety taken by the College is outlined in full within the College's E-Safety Policy, which takes account of the breadth of online safety issues as classified within Keeping Children Safe in Education 2023; broadly categorised within four main areas of risk:

- **CONTENT** - being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **CONTACT** - being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **CONDUCT** - personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying



- **COMMERCE** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College has appropriate monitoring and filtering procedures in place to limit a learner's exposure to online risks, taking account of the Department for Education's newly published 'Filtering & Monitoring Standards'.

The College recognises the importance of regularly testing and reviewing the effectiveness of our filtering and monitoring systems.

The College's E-Safety Policy is updated and reviewed at least annually, alongside published guidance and updates, including from the UK Centre for Internet Safety (UKCIS).

### **Children at potentially greater risk of harm**

In line with Keeping Children Safe in Education September 2023, the College recognises that some learners may be at potentially greater risk of harm:

#### Children who need a Social Worker (Child in Need and Child Protection Plans)

A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. Where children need a social worker, this should inform decisions about safeguarding.

#### Children who are absent from education

Children being absent from education for prolonged periods and / or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It may also indicate need for support in respect of their mental health, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. The College's response to persistently absent children missing education supports identifying such risk of abuse and helps prevent the risk of children missing education in the future.

This includes when problems are first emerging but also where children are already known to Local Authority children's social care and need a social worker (such as a child who is a Child in Need or who has a Child Protection Plan, or is a Looked After Child), where being absent from education may increase known safeguarding risks within the family or in the community.

#### Children requiring mental health support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

#### Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and / or neglect. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When

dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

### Care leavers

Local Authorities have ongoing responsibilities to the children who cease to be looked after and become care leavers, this includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training.

Children with special educational needs and disabilities (SEND) or physical health issues. Additional barriers can exist when recognising abuse and neglect for this group of children and young people, these can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges.

The College offers a range of additional and specialist support to young people with SEND. Information can be sought from the Learning Support and SEND team in the first instance.

### Children who are lesbian, gay, bi or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. The College recognises that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

## **7. REPORTING A CONCERN**

All safeguarding concerns need to be acted upon immediately. If a staff member is concerned that a child or young person is at risk or is actually suffering abuse / harm, they should immediately report their concern via 'MyConcern'. This is the online safeguarding platform purchased by the College to enable efficient management of all safeguarding concerns, excluding where a concern might relate to a member of staff, as such instances are managed away from MyConcern (refer section 10 of this Policy).

If the concern is urgent, the staff member must inform a member of the Safeguarding Team verbally, prior to recording on MyConcern.

It is important that learners and other children are protected from abuse. All complaints, allegations or suspicions of abuse / harm must be taken seriously.

Individual members of staff should never deal with disclosures in isolation and should always refer via MyConcern and in the first instance verbally to the Safeguarding Team where the concern is urgent. The only exception to this is where a member of staff discovers that an act of Female Genital Mutilation (FGM) has / may have been carried out on a girl under the age of 18.

In any such situation, the member of staff must report this directly to the Police by calling 101, before reporting as urgent to a member of the Safeguarding Team.

Staff should, where possible, make it clear to a person that they cannot guarantee confidentiality. If possible, they should warn the individual about this before they are given an opportunity to disclose.

The learner should be made aware that information may have to be shared with a nominated person for safeguarding and child protection and that social care services may have to be contacted in order to discuss appropriate action.

If the learner wishes to continue, staff should:

- Listen carefully to what is said
- Keep questions to a minimum, just clarify what has been said
- Avoid leading questions or comments as these can cause problems for any subsequent investigation or proceeding
- Tell the learner what is going to happen next following the conversation and assure them that they will be kept informed of all developments
- Reassure the learner that in telling a member of staff they have done the right thing.

Staff should report, via MyConcern, a factual and comprehensive record of the disclosure and any other relevant information including:

- Campus location (drop-down list provides all campus options)
- The date, time and place where the disclosure of information took place
- The date, the time and the place (if known) where the alleged abuse occurred
- The learner's name and the names of any other learner(s) involved
- The nature of the alleged abuse / harm
- The account which has been given by the learner, using their own words
- A description of any injuries observed
- There is also an option to indicate whether the referrer considers the concern to be 'urgent'. If the staff member considers the concern to be urgent, they must tick the relevant box AND also report the concern verbally to a member of the Safeguarding Team BEFORE submitting the concern.

Every member of staff has a log-in to MyConcern. MyConcern is a web-based platform although the link can also be accessed via the staff intranet. Guidance is made available to staff on how to report a concern.

Any safeguarding concerns must be reported via MyConcern as soon as possible on the same day, ideally within two hours. If reporting via MyConcern is not possible on the day, then a member of the Safeguarding Team must be informed verbally of the concern, so as not to delay any anticipated action(s) required to appropriately safeguard the learner.

## **8. RESPONDING TO A CONCERN**

When a concern is raised the Safeguarding Team will take appropriate action which may include making a referral in line with the relevant Local Authority Safeguarding Partnership guidelines. Any referral made will contain as much information as possible to help social care assessments

consider context outside the home and enable a contextual approach to assessing harm / risk of harm.

Action may also include making contact with the police, which will be done in line with the National Police Chiefs' Council (NPCC) published guidance for schools and colleges.

The Safeguarding Team will record all actions taken, decisions reached, referrals made and outcome(s) on MyConcern.

In keeping with the commitment made in the Children Act, children and young people's wishes and feelings will be taken into account when determining what action to take and what services to provide. Where a learner is emotionally and intellectually able, the College will only make a referral with their knowledge and, if possible, their full consent, ensuring that learners are given opportunity to safely express their views. Depending on the nature of the concern, it may be appropriate for a member of the Safeguarding Team to notify the learner's NoK. *Such contact will not be made, however, if it is considered that doing so could potentially put the learner at greater risk of harm.*

Learners with SEND may be less likely to appreciate the seriousness of the situation and be unable to decide on the safest outcomes. Therefore, there is a greater possibility of external referral in such instances without the learner's full knowledge and consent.

The Safeguarding Team shall discuss with the relevant external agency what action should be taken to inform the parent / carer of a learner or a child / young person, unless to do so would put the child or young person at risk.

Where, in exceptional circumstances, a staff member deems there to be an immediate risk to a learner and it is not possible to contact a member of the Safeguarding Team or a member of Executive within the same day, they should report the matter – normally by telephone – directly to local social care services or to the police as appropriate (refer Section 20 for contact details). The staff member shall notify a member of the Safeguarding Team or a member of Executive as soon as possible and normally within one working day of the action taken and submit via MyConcern details of any action(s) taken and the circumstances leading to it.

## **9. MANAGING SAFEGUARDING WITHIN PERIODS OF COLLEGE CLOSURE**

*From March 2020 through to August 2021, the College had in place a 'COVID-19 Annex' as an addendum to this Safeguarding & Child Protection Policy, expressly outlining how learners were to be safeguarded by the College during that period. During academic year 2021 – 2022, the College's arrangements for safeguarding learners during closure periods was embedded within this policy. As it is no longer a requirement for the College to include such information within this safeguarding policy document, it has therefore been removed. In any future event necessitating a period of college closure, the necessary safeguarding procedures would be immediately re-enabled.*

## **10. SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS**

This part of the Policy relates to all members of staff, those on supply (from an agency) and volunteers and contractors currently working in the College, regardless of whether the College is the location where the alleged abuse / harm took place. The College recognises its statutory

duty to safeguard learners from abuse and harm encompasses our response to allegations made against members of staff. This includes staff employed directly by the College, staff on assignment with us from an agency (supply), volunteers and contractors.

**The College's first point of contact for the LADO ('Local Authority Designated Officer') is Mary Gleave, Deputy CEO.**

### **Allegations that may meet the harms threshold**

This part of the Policy is about managing allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity at the College. We have specific procedures that we must follow, where it is alleged that someone working for the College, or on supply or with us on a voluntary / contractor basis has:

- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person
- Possibly committed a criminal offence against or related to a child or young person
- Behaved towards a child or young person in a way that indicates he or she may pose a risk of harm to children or young people
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of college, that might make an individual unsuitable to work with children, or young people, this is known as 'transferable risk'. Where appropriate, an assessment of 'transferable risk' to any learners with whom the individual works at the College will be undertaken. The College recognises that an allegation made against a member of staff (including supply, volunteers and contractors) may be made for a variety of reasons and that such an allegation may or may not be true. It is imperative therefore, that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

All staff (including supply, volunteers and contractors) should take care not to place themselves in a vulnerable position with a learner. The College's Induction process for new starters places a responsibility on managers on day one of employment to go through the staff Code of Conduct which outlines the College's expectations of all its employees.

The College recognises that the welfare of the child is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff (including those on supply, voluntary or contractor basis) can irreparably damage an individual's reputation, career and confidence. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured and timely way, providing effective protection for the child or young person whilst at the same time supporting the person who is subject to the allegation.

The College will follow the Suffolk Safeguarding Partnership procedures for managing allegations of abuse against staff which are set out in 'Working Together to Safeguard Children 2018' (2022 update).

**A member of staff who receives an allegation about another member of staff, that may meet the "harms threshold", must report the incident immediately to the Head of Human Resources (safeguarding lead for staff / supply / volunteer / contractor related matters) or the College's Deputy CEO. The incident must not be logged on MyConcern.**

The allegation should not be investigated by the College at this stage. The Head of Human Resources or the Deputy CEO must contact the Local Authority Designated Officer (LADO) as soon as an allegation or concern is raised on lado@suffolk.gov.uk or 0300 123 2044.

Whilst not the employer of a supply teacher, the College recognises its responsibility to ensure any allegations against supply staff are dealt with properly. The Head of Human Resources or Deputy CEO will contact the relevant employment agency to discuss whether it is appropriate to suspend the supply teacher, or re-deploy them to another part of the College. The Head of Human Resources or Deputy CEO will usually take the lead, recognising that the respective agency will not have access to the information that may be requested by the LADO as part of the referral process.

The LADO will discuss whether the allegation(s) meets the threshold of the Suffolk Safeguarding Partnership procedures and will consult with police and social care as appropriate.

If the parents / carers of the child / young person are not already aware of the allegation, the LADO will discuss when, how and by whom they should be informed. Parents / carers will be notified of the requirement to maintain confidentiality (in line with the Education Act).

The Head of Human Resources or Deputy CEO should inform the member of staff about the allegation as soon as possible after consulting the LADO. However, where a Strategy Discussion is needed, or it is clear that police or social care may be involved, this should not be done until after those agencies have been consulted.

Should the Head of Human Resources or Deputy CEO be the subject of an allegation or complaint under this procedure, the matter should be notified to the Principal or Chair of Corporation.

In the event of a complaint being made under this procedure against the Principal, the Head of Human Resources or Deputy CEO shall inform the Chair of the Corporation or the Vice-Chair in their absence.

Allegations against members of staff may result in a social care services or police investigation. The Head of Human Resources and / or Deputy CEO will be advised of the allegation and the progress of any investigations conducted by external agencies. They will be advised whether college disciplinary processes can proceed in parallel with the criminal process or whether any disciplinary action needs to wait for the completion of police enquiries and / or prosecution.

If it is considered that the allegation does not involve a possible criminal offence, the College will normally deal with the matter under the College's Disciplinary Policy and procedures.

In circumstances of allegations against staff, suspension on full pay, pending the outcomes of investigation, may be appropriate. Suspension will not be an automatic response (refer the College's Disciplinary Policy for the arrangements for suspension).

In cases of allegations against staff there must be a clear and comprehensive summary of the allegations made, details of how and who followed the allegation up and any resolution and conclusion. The record should include details of any action taken and all decisions reached. These notes will be kept on the member of staff's file and will be retained until the person attains normal retirement age or for a period of 10 years from the date of the allegation if that is longer. (In addition, the College has a legal obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry Into Child Sexual Abuse).

The Head of Human Resources or Deputy CEO will inform the DSL of the learner making the allegation against a member of staff and will keep a record of the allegation made. However, the DSL will not record this information within MyConcern.

The College will refer to the Disclosure and Barring Service when appropriate and will take professional advice from other agencies as necessary.

The College is under an obligation to notify any future employers if an ex-member of staff is a danger to or concern for working with vulnerable children and young adults.

Where an allegation is determined to be unsubstantiated or malicious, the matter will in the first instance be referred to social care services to determine whether the child or young person is in need of services, or may have been abused by someone else.

If an allegation is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate.

### **Non-recent allegations**

In the event that an adult makes an allegation to the College that they were abused as a child, the individual shall be advised to report the allegation to the police. Non-recent allegations made by a child, shall be reported to the LADO in line with the Local Authority's procedures for dealing with non-recent allegations. The LADO will co-ordinate with children's social care and the police.

### **Low Level Concerns:**

#### **Concerns that do not meet the harm threshold 'low level' concerns**

This part of the Policy is about managing 'low level' concerns that do not meet the harm threshold (refer the 4 bullet points at beginning of section 10 of this Policy). Suffolk New College aims to create and embed a culture of openness, trust and transparency.

Any concerning, problematic or inappropriate behaviour is to be identified early, ensuring that adults working in or on behalf of the College are:

- Clear about professional boundaries
- Act within these professional boundaries, and do so
- In accordance with the College's ethos and values.

Suffolk New College will do this by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low level safeguarding concerns
- Addressing unprofessional behaviour, supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping identify any weakness in the College's safeguarding system.

**A low level concern is any concern that an adult working in or on behalf of the College has acted in a way that:**

- **Is inconsistent with the Staff Code of Conduct (including expectations made of supply staff, volunteers and contractors), including inappropriate conduct outside of work**
- **Does not meet the allegations threshold or is not considered serious enough to refer to the Local Authority Designated Officer (LADO).**

Low level concerns may arise in several ways and from a number of sources, such as through suspicion, complaint or disclosure made by a learner, parent / carer or other adult within or outside of the College or as a result of vetting checks undertaken.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse of the child / young person.

**The term 'low level' concern does not mean that it is insignificant.** It means that the behaviour towards a child / young person does not meet the harms threshold. Examples of such behaviour could include but are not limited to:

- Being over friendly or over familiar with a learner
- Having favourites
- Taking photographs of learners on personal mobile devices / smart technology
- Using inappropriate, sexualised, intimidating, humiliating or offensive language
- Engaging with a learner on a 1:1 basis within a secluded area or behind a closed door. \*

*\*Any activity required to take place behind a closed door without a vision panel shall be risk assessed by the respective curriculum area. Such an example might be in the case of Dark Room facilities used by staff and learners within Photography.*

Staff are encouraged to self-refer to the Head of Human Resources or Deputy CEO, where, for example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, and / or on reflection they believe they have behaved in such a way that they consider falls below expected standards.

Low level concerns should be reported to the Head of Human Resources or Deputy CEO who shall collect as much information as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses.

The concern shall be recorded by the Head of Human Resources or Deputy CEO in writing. The record should include details of the concern and the context in which the concern arose.

The Head of Human Resources or Deputy CEO should record the reason(s) for decisions made and any action(s) taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.



These records will be kept confidential, held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Reports shall be reviewed such that any potential patterns of inappropriate behaviour can be identified and action(s) taken – any reports about supply staff and contractors shall be notified to their employers to enable the same.

### **Organisations or Individuals using the College premises**

The College may receive an allegation relating to an incident that happened when an individual or organisation was using college premises for the purposes of running activities for children (for example community groups or sports associations).

As with any safeguarding allegation, the College will follow policy and will inform the LADO if appropriate to do so.

## **11. SAFEGUARDING RECORD KEEPING AND INFORMATION SHARING**

MyConcern is the secure online system for reporting all safeguarding concerns and is used for all records, for example: notes, photo images, reports, referrals and any other information relating to the safeguarding concern.

All members of staff are issued with notification to activate their MyConcern account at the start of their employment with the College.

All safeguarding records are to be treated confidentially and stored securely with due regard for Data Protection 2018, incorporating GDPR 2018.

Staff have due regard to relevant data protection principles which allow personal information to be shared, as provided for within the Data Protection Act 2018 and the UK GDPR:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

## **12. RECRUITMENT AND SELECTION PROCEDURES**

The College's safer recruitment procedures are detailed within the Recruitment & Selection Policy.

The College adheres to Keeping Children Safe in Education (2023), by recruiting all staff within safer recruitment procedures to protect children and vulnerable adults. Appropriate checks are carried out on all new staff and volunteers and include identity checks, references, Disclosure and Barring Service and Children's' Barred List checks. Internet and social media screening checks will be undertaken of all candidates successful at interview, in accordance with safer recruitment good practice.

### **13. SAFEGUARDING & CHILD PROTECTION TRAINING**

The DSL is responsible for ensuring introductory safeguarding training is accessed by all new staff, to familiarise them with safeguarding and child protection issues. Safeguarding and Prevent training for new staff is a mandatory component of their Induction, facilitated through the completion of TES training modules online. Completion of this training is monitored by the College's Safeguarding & Prevent Operational Group, through the submission and scrutiny of training summary reports.

The College's safeguarding policies, procedures and reporting mechanism (MyConcern) are included as part of on-boarding for new staff prior to and at Induction.

Alongside this, safeguarding briefings are delivered by the DSL to all staff with updates shared as appropriate throughout the year.

The Executive Lead and every member of the Safeguarding Team will attend Designated Safeguarding Lead training every two years.

Governors receive safeguarding training at Induction (through TES training modules) in addition to safeguarding updates at least once annually facilitated by the DSL. This ensures that in addition to them understanding safeguarding and the College's response, it also ensures they are appropriately prepared for their role of scrutiny and challenge.

### **14. WHISTLEBLOWING**

Learners cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the College, they should follow the College's Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally within the College. Staff can call 0800 028 0285 (8.00am to 8.00pm Monday to Friday) email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **15. USE OF 'REASONABLE FORCE'**

The College's Managing Challenging Behaviour Policy sets out the circumstances when physical intervention or reasonable force is permissible. It acknowledges that staff must only ever use physical intervention or reasonable force as a last resort, when a learner is endangering him / her / themselves or others and that at all times it must be the minimal force necessary to prevent injury to another person.

Where reasonable force is used in response to risks presented by young people with SEND or with medical conditions, the additional vulnerability of these groups should be recognised.

Individual behaviour plans and risk assessments can help reduce and manage challenging behaviours.

Such events must be reported to the individual's line manager and written records kept.

Physical intervention or reasonable force of a nature which causes injury or distress to a learner may be considered under safeguarding and child protection or staff disciplinary procedures.

## **16. BULLYING**

The College's policy on bullying is set out in the Learner Anti-Bullying / Harassment Policy and acknowledges that to allow or condone bullying (both on and off line, and including sexual harassment) may lead to consideration and action(s) taken under safeguarding, child protection and vulnerable adult procedures.

## **17. SECURITY**

On college premises, college visits and trips, the College's Visible ID Policy must be adhered to and ID cards with lanyards must be worn at all times. All visitors report to reception and are required to sign in and wear a visitor's lanyard and will be accompanied by a member of staff at all times. Staff are required to address individuals who do not comply with the Visible ID Policy.

## **18. INDUSTRY PLACEMENTS**

Staff organising any industry placements should take safeguarding and child protection into account when assessing the suitability of the placement, to ensure learners are placed in appropriate and safe environments.

The College's Student Placement Policy outlines the steps taken by the College to safeguard learners on placement.

## **19. OPPORTUNITIES TO TEACH SAFEGUARDING**

Suffolk New College recognises the crucial role we play in preventative education. This is underpinned by a whole college commitment to preparing our learners for life in modern Britain, creating a culture of zero tolerance for sexism, misogyny / misandry, homophobia, biphobic and sexual violence / harassment. We have a clear set of values that we expect learners, staff and visitors to adhere to, to uphold and demonstrate these values throughout all aspects of their programme of study.

This approach to teaching safeguarding is underpinned by the delivery of well planned, high quality sessions, fully inclusive and appropriate to the needs of all learners.

## **20. USEFUL EXTERNAL CONTACT NUMBERS**

ChildLine	0800 1111	
NSPCC	0808 800 5000	
Samaritans	116 123 (24 hours)	
SHELTER	0808 800 4444 for urgent housing advice (homelessness) (Monday - Friday 8am to 8pm // weekends 9am to 5pm)	
NHS 111	111 for urgent medical help or advice that is not life threatening	
Social Services (dependent upon area where the learner resides)	Suffolk County Council	0808 800 4005
	Essex County Council	0345 603 7627
	Norfolk County Council	0344 800 8021
Police	999 for emergencies 101 for non-urgent issues	