A picture containing icon

Description automatically generated

**Safeguarding and Child Protection Policy**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Reference** | SGP-01 | | |
| **Issue Date** | 31 August 2021 | **Review Date** | 31 August 2022 |

Document Control

|  |  |
| --- | --- |
| **Owner** | Senior Designated Safeguarding Lead |
| **Audience** | All Moulton College Stakeholders |
| **Confidentiality** | Low |

Version Control

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Description/Changes** | **By** | **Date** |
| 1.0 | Initial Version | DSL | June 2018 |
| 2.0 | Review and Update | DSL | June 2019 |
| 2.1 | Role updates | DSL | Oct. 2019 |
| 3.0 | Review and Update | DSL | Sept 2020 |
| 3.1 | Appendix 4 – Covid update | DSL | Jan 2021 |

Approval

|  |  |  |
| --- | --- | --- |
| **Approved By** | **Meeting Date** | **Next Review** |
| The Board of Governors | June 2019 | September |
| Senior Leadership Team | September 2020 | August 2021 |
| Corporation Board |  |  |

Related Policies

|  |  |
| --- | --- |
| **Ref.** | **Policy** |
| EDI-01 | Equality and Diversity Policy |
| HS-01 | Health and Safety Policy |
|  | Risk Assessment Procedure |
| FM-04 | Security Policy |
| DP-01 | Data Protection Policy |
| HR-01 | Staff Recruitment Policy |
| SS-01 | Admissions Policy |
| TLA-01 | Teaching, Learning and Assessment Policy |
| QD-06 | Complaints, Compliments and Suggestions Policy |
| HR-03 | Whistleblowing Policy |
| HR-24 | Staff Code of Conduct |
| SS-02 | Visitor Policy |
| SS-03 | Learner Behaviour, Support and Disciplinary Policy |
| SGP-04 | Peer on Peer Abuse Policy |
| SGP-02 | Prevent Policy |
| IS-02 | Firewall Policy |
| SLT-04 | Dynamic Lockdown Policy |
| SST-09 | Missing Student Policy |
| SST-07 | Residential Accommodation Allocation Policy |
| TLA-05 | Remote Learning Policy |

Equality Impact Assessment

|  |
| --- |
| **Equality Impact Assessment** |
| The policy is robust and there is no evidence of unlawful discrimination and all reasonable adjustment opportunities have been considered and will be subject to continuous monitoring and review. |

High Level Strategic Objectives this Policy feeds in to;

* To provide an outstanding and personalised student experience
* Provide a wide range of high-quality student support including information, advice and guidance.

Legislative Framework that this Policy relates to;

* + Children Act 1989 and 2004 amendment-section 11
  + Section 175 of the Education Act 2002
  + Counter-Terrorism and Security Act 2015
  + Protecting children from radicalisation: the prevent duty – August 2015
  + Working together to safeguard children – July 2018
  + Keeping children safe in education – September 2021
  + Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the SeriousCrimeAct2015
  + TheRehabilitationofOffendersAct1974
  + Schedule 4 of the SafeguardingVulnerableGroupsAct2006**,** which defines what ‘regulated activity’ is in relation to children
  + School Staffing (England) Regulations 2009
  + Sexual Offences Act (2003)

This policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the College.

**Northamptonshire Safeguarding Children Partnership**

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

* The local authority (LA)
* A clinical commissioning group for an area within the LA
* The chief officer of police for a police area in the LA area

Moulton College complies with this guidance and the procedures set out by Northamptonshire Safeguarding Children Partnership. The new 2019 Northamptonshire Safeguarding Partnership arrangements can be found here:

<http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/the-partnership/structure-of-the-partnership/>

Safeguarding and Child Protection Policy

Policy Statement

1. At Moulton College we are committed to safeguarding children and young people and we expect everyone who works in our college to share this commitment and ensure we create a culture of vigilance.

Adults in our college take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

The need for guidelines and procedures is important to ensure that this is done with understanding and clarity.

The college assesses the risks and issues in the wider community when considering the well-being and safety of its students.

1. Moulton College will aim to protect and safeguard children and young people through the application of the procedures linked to this policy. The College recognises that protecting and safeguarding children and young people is a shared responsibility and depends upon effective joint working between partners that have different roles and expertise.
2. This policy aims to inform staff, parents/carers, volunteers and governors about the college's statutory responsibilities for safeguarding children and young people. It aims to enable everyone to have a clear understanding of how these responsibilities should be carried out and that appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
3. At Moulton students are taught about safeguarding, including but not exhaustive of peer on peer abuse and online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they need it by;

* PHSE lessons
* Leaflets/posters around college
* Pop up screens on computer
* Wellbeing days
* Drop in sessions

**Policy Standards**

1. Moulton College will work with Northamptonshire Safeguarding Partnership (NSP), the Local Authority Designated Officer (DO), the police and social services whilst always placing the welfare of the child at the centre of actions taken.
2. Moulton College will work within the Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2021) statutory guidance to safeguard and promote the welfare of children.
3. Moulton College recognises that all members of staff and students have an important role to play in safeguarding the welfare of children and preventing their abuse. To this end all staff employed by or working with the college are required to adhere to the procedures linked to the Safeguarding and Child Protection policy and these procedures are clearly outlined to staff during induction undertaken by all new staff.
4. It is not the responsibility of the College or its staff to investigate abuse.
5. Any member of staff receiving a complaint or allegation or who has suspicions that child abuse is taking place will follow the procedures for reporting the incident via the Safeguarding team who are NSPCC trained in Safeguarding. Moulton College is a member of the Northamptonshire Safeguarding Partnership.
6. The safeguarding and child protection policy and procedures will be reviewed annually by the Vice Principal of Curriculum, who is the Designated Senior Person responsible for safeguarding, and the Director of Learning and Student Support, who is the Designated Safeguarding Lead and Single Point of Contact for Prevent, in line with the current statutory guidance and in consultation with the Northamptonshire Safeguarding Partnership as appropriate. Substantive changes will be approved by the Board of Governors.
7. Where a student who is not defined as a child under the Children Act (1989) is identified as being at risk, the same procedures will be followed up to informing the Designated Senior Person. This applies to all students but special consideration may be necessary in the case of students with learning difficulties and disabilities and/or who may be regarded as a vulnerable adult under the age of 25.

Definitions

1. Safeguarding and promoting the welfare of children is defined as:
   * + Protecting children from maltreatment
     + Preventing impairment of children’s mental and physical health or development
     + Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
     + Taking action to enable all children to have the best outcomes
2. The term ‘Child’ refers to anyone under the age of 18.
3. This policy also applies to vulnerable young people and adults who may be over the age of 18.
4. Child Protection is part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect specific children who are suffering, or who are likely to suffer, significant harm.
5. Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.
6. Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

**Roles and Responsibilities**

1. Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Northamptonshire Safeguarding Children Partnership
2. Our policy and procedures also apply to extended college and off-site activities.
3. We will include opportunities across the curriculum, including tutorials for young people to be taught about safeguarding and to develop the skills they need to recognise danger and know where to seek help.
4. We will maintain an attitude of “it could happen here” where safeguarding is concerned.

**Responsibilities of all staff**

1. All staff will read and understand Part I and Annex A of the Department for Education’s statutory safeguarding guidance,Keeping Children Safe in Education 2021 and review this guidance at least annually.
2. All staff stand in a position of trust in relation to young people. As a result they have a responsibility to conduct themselves in line with the professional standards expected of those standing in such a role.
3. All staff will be aware of:

* Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, peer on peer abuse policy and the safeguarding response to children who go missing from education (CME)
* The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
* The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
* What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
* The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child criminal exploitation, child sexual exploitation (CSE), FGM, peer on peer abuse and radicalisation.
* Serious Violence - All staff should be aware of indicators, which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

Board of Governors Responsibilities

1. The Board of Directors/Governors at Moulton College stand by their responsibilities as stated in Keeping Children Safe in Education, 2021. Governors also have a specific responsibility for ensuring that the College monitors the impact of its work and learns lessons from Serious Case Reviews.
2. The Board of Governors recognise that the Local Authority and the Local Safeguarding Partnership has a statutory responsibility to monitor schools’ and colleges’ compliance with statutory guidance.
3. The link governor for Safeguarding and Prevent is Barry Hansford. As part of his duties he will take lead responsibility for overseeing any allegations made against the Principal and other Directors/ Governors in relation to safeguarding matters.
4. Where an allegation is made against the link Governor the Chair of Governors will then take the lead. He is responsible for overseeing the liaison between the Designated Officer, Social Services and/or the police, in connection with such allegations. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provision of information to assist enquiries.
5. The Board of Governors instructs the College to:

* Provide a safe environment for children, young people and adults to learn in.
* Identify those who are suffering, or are likely to suffer significant harm or who are at risk of radicalisation
* Take appropriate action to see that learners are kept safe at College, and that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
* Refer concerns that a young person or adult is at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.
* Work effectively with others as required by ‘Working Together to Safeguard Children, July 2018’.
* Listen to the voice of the child/young person/adult and always act in the interest of the child/ young person/adult.
* Ensure appropriate safeguarding response for learners who go missing from College.
* Ensure there is an effective Safeguarding Policy in place together with a Staff Code of Conduct which includes staff/learner relationships and communications including social media.

1. The Board of Governors will approve and review annually the Safeguarding Policy and Procedure, and receive regular information on safeguarding with the aim of:

* Maintaining awareness of progress across the College and/or issues relating to the welfare of children, young people and adults at risk of harm.
* Being reassured by the Principal and Vice Principal of Curriculum that systems are in place and effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known.
* Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with learners through College activity are in place including referral to the Designated Officer.
* Ensuring safe recruitment of staff and volunteers
* Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding.
* Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.

1. In developing policies and procedures, the Board of Governors will take account of guidance issued by Northamptonshire County Council and the Counter-Terrorism and Security Act, 2015.
2. The Principal, Governors and all staff working with children, young people and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive annual updates. A member of the College Management Team will be the Designated Safeguarding Lead who will be assisted by the Safeguarding Team who share responsibility for safeguarding learners.
3. The Board of Governors will receive from the Designated Safeguarding Lead, regular update reports which includes how the duties have been discharged.

**The Senior Person with responsibility for Safeguarding and Prevent Responsibilities**

1. The Senior Person with responsibility for safeguarding, John O’Shea, Vice Principal of Curriculum can be contacted on 01604 491121 extension 2029 and is responsible for ensuring that:

* Staff are aware of issues relating to the welfare of children, young people and adults at risk of harm. On instruction from the Principal, the Vice Principal of Curriculum will contact the Designated Officer for children and young people under 18 or the Adult Safeguarding Unit for adults at risk of harm to discuss referral and action when in relation to an allegation against a staff member. He will report to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.
* Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
* Communicating this policy to parents when their child joins the school and via the school website
* Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
* Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
* Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

**The Designated Safeguarding Lead and Single Point of Contact for Prevent Responsibilities**

1. The Designated Safeguarding Lead (DSL), Carla Hayes the Director of Learning and Student Support can be contacted on 01604 491121 extension 2010 and is responsible for ensuring that:

* Cases of suspected abuse or allegations are appropriately referred to relevant agencies (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police).
* Advice and support is provided to staff on issues relating to safeguarding.
* A record of any safeguarding referral, complaint or concern is kept, even where that concern does not lead to a referral.
* Parents/carers/employers of children, young people or adults within the College have access to the College’s Safeguarding Policy.
* Moulton College works with appropriate partners to safeguard children, young people and adults at risk of harm.
* A member of the Safeguarding Team or tutor attends case conferences and review meetings, contributes to assessments and provides reports when requested.
* Where staff discover that an act of FGM has been carried out it is reported to the police as our mandatory duty.
* Prepare a fortnightly safeguarding report for SLT and a bi-annual report for the Board of Directors/Governors
* The Vice Principal of Curriculum and Principal are informed of any issues, and liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.
* Refresher training is attended at least every two years. The DSL should also undertake Prevent awareness training and their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.

1. The DSL will be given the time, funding, training, resources and support to meet the above responsibilities
2. When the DSL is absent, the Deputy Designated Safeguarding Leads, Vicki Hickman and Sara Hewertson (Safeguarding and Wellbeing Coordinators) will act as cover.
3. If the DSL and deputies are not available, the Safeguarding Assistant, Dan Noone (Residential Coordinator) will act as cover.
4. The Deputy DSL’s and the Safeguarding Assistant are trained to the same level as the DSL.
5. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated. (*Annex B; Paragraph 2 Keeping Children Safe in Education 2021*.)
6. The full responsibilities of the DSL are set out in their job description.
7. The Designated Safeguarding Lead should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.
8. The Safeguarding Assistants will:

* Liaise with the Designated Safeguarding Lead regarding referrals.
* Appropriately refer cases of suspected abuse or allegations to relevant agencies.
* Provide advice and support to other staff on issues relating to safeguarding.
* Attend case conferences and review meetings as appropriate, contributing to assessments and providing reports when requested.
* Attend refresher training at least every two years and keep up-to-date.

1. The Executive Director of Human Resources will be responsible for ensuring compliance with safeguarding requirements in relation to the recruitment and induction of staff and for the implementation of safer recruitment practices.
2. Safer recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

**Raising a Concern**

1. Where any member of staff has a concern the following procedure will apply:

* Safeguarding concern is reported onto the electronic system My Concern. Emergencies are phoned through to the duty safeguarding officer before logged on the My Concern system.
* This triggers an alert to the safeguarding team who monitor My Concern, and will triage the urgency of the safeguarding situation within the hour.
* Safeguarding team will follow up - usually by making face-to-face contact with the student, who the concern is about.
* Parents/carers called and notified if young person is under 18, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence.
* GP, Police, emergency services, Prevent, MASH referral or Mental Health Crisis team alerted if required.
* All actions and referrals are logged on the system and followed up as relevant.

**Thresholds for Intervention**

1. The DSL/Deputy DSL’s will decide on the most appropriate course of action and whether the concerns should be referred to Children's Social Care, referring to the [Northamptonshire Thresholds Guidance](https://www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Documents/NSCB%20Thresholds%20Guidance%202018.pdf) or guidance from the relevant local authority. If it is decided to make a referral to Children's Social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. All concerns, discussions and decisions will be recorded on My Concern. NB: Informing parents does not require seeking their consent to share the information with professionals who need to know.
2. The DSL/Deputy DSL’s will provide guidance on the appropriate action. Options will include:

* Managing any support for the child internally via the college’s own pastoral support processes
* An Early Help Assessment or
* A referral for statutory services e.g. the child is or might be in need or suffering or likely to suffer significant harm

1. **Early Help** - If early help is appropriate, the DSL/Deputy DSL’s will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children’s Social Care for assessment for statutory services if the young person’s situation does not appear to be improving or is getting worse.
2. **Children in Need** – A child in need is defined under the *Children Act 1989* as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.
3. **Children suffering or likely to suffer significant harm** - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and criminal/sexual exploitation.
4. The DSL/Deputy DSL’s should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

* By telephone contact to the Multi-Agency Safeguarding Hub (MASH): 0300 126 1000 (Option 1)
* By e-mail to: [MASH@northamptonshire.gcsx.gov.uk](mailto:MASH@northamptonshire.gcsx.gov.uk)
* By using the online referral form found at:

[**http://www.northamptonshirescb.org.uk/more/borough-and-district-councils/how-to-make-an-online-referral/**](http://www.northamptonshirescb.org.uk/more/borough-and-district-councils/how-to-make-an-online-referral/)

* In an emergency outside office hours, contact children's social care out of hours team on 01604 626938 or the Police
* If a child is in immediate danger at any time, left alone or missing, the police should be contacted directly and/or an ambulance using 999

Safeguarding and Prevent Board

1. Moulton College’s Safeguarding and Prevent Board will meet a minimum of three times a year to:

* Oversee the review and development of Moulton College’s Safeguarding and Prevent Policies and Procedures, including any linked policies.
* Raise awareness of developments and good practice in relation to safeguarding and prevent
* Monitor the single central record.
* Review College security arrangements including IT.
* Receive and review the College’s Safeguarding Reports prior to its presentation to SLT and the Board of Governors

Prevent

1. The Prevent Strategy is part of the Government’s overall counter terrorism strategy known as CONTEST.  The aim of Prevent is to stop people being drawn into terrorism: terrorist groups who pose a threat to the UK, seek to radicalise and recruit people to their cause.  Early intervention is at the core of Prevent, aiming to divert people away from being drawn into terrorist activity.
2. The College has a statutory duty under Section 26 of the Counter Terrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”.
3. The Government has defined extremism in the Prevent Strategy as: “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.  British values are defined as: “democracy, the rule of the law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”.
4. The College recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern.  We also recognise that if we fail to challenge extremist views we are failing to protect our learners.  Therefore, the Prevent agenda will be addressed as a safeguarding concern.
5. As part of the Colleges’ wider safeguarding responsibilities staff will be alert to:

* Disclosures by learners of their exposure to extremist actions, views or materials by others, both inside or outside of the College, including in their homes, community groups, especially where learners have not actively sought these out
* Learners expressing opinions that indicate a support for terrorism or violence/ or for the leaders of terrorist organisations
* Attempts to impose extremist views or practices on others
* Possession of violent or extremist material in digital or hard format including possession of material relating to weapons and explosives
* Graffiti symbols, writing or art work promoting extremist messages or images
* Learners accessing extremist material online, including through social networking sites
* Parental reports of changes in behaviour, friendships or actions and request for assistance
* Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race or culture

1. The above is not exhaustive and it should be noted that those behaviours listed above are not themselves indicators or criminality or criminal intent.  Prevent is about looking for signs that an individual may be at risk and benefit from some supportive intervention.
2. Prejudice, discrimination or extremist views, including derogatory language will be challenged and where necessary dealt with in line with our Learner Behaviour, Support and Disciplinary Policy for Learners and Code of Conduct for staff.
3. Where there is a concern, the DSL/Deputy DSL’s will consider the level of risk and decide which agency to make a referral to. This could include [**Channel**](https://www.gov.uk/government/publications/channel-guidance), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.
4. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which college staff and governors can call to raise concerns about extremism with respect to a learner. You can also email **counter.extremism@education.gov.uk**. Note that this is not for use in emergency situations.
5. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

* Think someone is in immediate danger
* Think someone may be planning to travel to join an extremist group
* See or hear something that may be terrorist-related

British Values

1. Moulton consider British Values to underpin what it is to be a citizen in our modern and diverse society and as such are of significant importance to everyone involved in any College activity.  These values are promoted through the College’s themed event programme and embedded into curriculum.
2. The five part definition of British Values is:

* Democracy
* The Rule of Law
* Individual Liberty
* Mutual Respect
* Tolerance of Different Faiths and Beliefs

Use of External Agencies and Speakers

1. The College is committed to enriching our learners’ experience at Moulton and to the health and wellbeing of our learners via themed events.  We proactively vet those organisations that we invite into our College to ensure their suitability, effectiveness and benefit to our learners.  Staff complete Visiting Speaker check list prior to them coming on site as per the Visiting Speaker Policy.
2. This process is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in opposition to the College’s values and ethos.

**Female Genital Mutilation (FGM)**

1. The Department for Education’s Keeping Children Safe in Education (2021) explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
2. Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 1
3. Any tutor who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a learner under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
4. Unless they have good reason not to, they should also discuss the case with the DSL/Deputy DSL’s and involve children’s social care as appropriate.
5. Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL/Deputy DSL’s and follow our local safeguarding procedures.
6. The duty for tutors mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.
7. Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a pupil age 18 or over appears to have been a victim of FGM must speak to the DSL/Deputy DSL’s and follow our local safeguarding procedures.

**Dealing with a Disclosure**

1. If a young person discloses that he or she has been abused in some way, the member of staff/volunteer should:

* Listen to what is being said without displaying shock or disbelief
* Accept what is being said
* Allow the child to talk freely
* Reassure the child, but not make promises which it might not be possible to keep
* Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
* Reassure him or her that what has happened is not his or her fault
* Stress that it was the right thing to tell
* Listen, only asking questions when necessary to clarify
* Not criticise the alleged perpetrator
* Explain what has to be done next and who has to be told
* Make a written record (see Record Keeping)
* Pass the information to the Safeguarding Team without delay.
* Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL/Deputy DSL’s as soon as possible that you have done so.

**Allegations or Low-level concerns about an adult working in the college whether as a tutor, agency staff, support staff, other staff, volunteers or contractors**

At Moulton College we recognise the possibility that adults working in the college may harm children and young people, including governors, volunteers, temp staff and contractors.

Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young person, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Senior Person with Responsibility for Safeguarding has to decide whether the concern is an allegation or low-level concern. 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 criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Example low-level concern behaviours include, but are not limited to:

* Taking photographs of young people on their mobile phone;
* Using inappropriate, intimidating or offensive language
* Meeting young person outside of the college setting for non-college reasons
* Being friends with students on social media

1. If any staff has concerns about a member of staff or a volunteer, they should speak to the Senior Person with Responsibility for Safeguarding. If the concern has been raised via a third party, the safeguarding team should collect as much evidence 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.

1. If you have concerns about the Senior Person with Responsibility for Safeguarding they should speak to the chair of governors.
2. Staff can also discuss any concerns about any staff member or volunteer with the DSL/Deputy DSL’s.
3. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
4. The DSL/Deputy DSL’s (or chair of governors, in the case of a concern about the Senior Designated Person with Responsibility for Safeguarding) will also inform the Designated Officer (formerly LADO) for the local authority.
5. Low-level concerns should be recorded in writing. Records must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified. If any patterns are identified and then meet the criteria for an allegation, then it will be referred to the LADO. The policies and processes will be revised and if necessary extra training delivered to minimise the risk of it happening again.
6. Before contacting the LADO, college will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation; being careful not to jeopardise any future police investigation.
7. For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) follow the link below:

<http://www.northamptonshirescb.org.uk/health-professionals/taking-action/designated-officer/>

1. Where an allegation is made against a supply teacher or volunteer, the Senior Person with Responsibility of Safeguarding/Executive Director of HR will immediately contact both the agency concerned and the Designated Officer (formerly LADO). The College will continue to support any investigation that is required
2. In no circumstances will the College decide to cease to use a supply teacher/volunteer due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (formerly LADO) to determine a suitable outcome.
3. An allegation is any information which indicates that a member of staff/volunteer may have:

* Behaved in a way that has, or may have harmed a child/young person
* Possibly committed a criminal offence against/related to a child/young person
* Behaved towards a child or children/young person or people in a way which indicates she/he would pose a risk of harm to children; and/or
* Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college)

**What college staff should do if they have concerns about safeguarding practices within the college:**

1. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college’s safeguarding arrangements.
2. Appropriate whistle blowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the college’s senior leadership team. A whistleblowing disclosure must be about something that affects the general public such as :

* A criminal offence has been committed, is being committed or is likely to be committed
* An legal obligation has been breached
* There has been a miscarriage of justice
* The health or safety of any individual has been endangered
* The environment has been damaged
* Information about any of the above has been concealed.

The NSPCC run a whistleblowing helpline on behalf of the government, the number is

0808 800 5000

1. If staff members have concerns about another staff member then this should be referred to the Senior Person with Responsibility for Safeguarding or Principal. Where there are concerns about the Senior Person with Responsibility for Safeguarding or Principal, this should be referred to the Chair of Governors.
2. The Chair of Governors in the college is:

NAME: David McVean CONTACT: 01604 491131 Ext 2403

1. In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair in the college is:

NAME: Charles Matts CONTACT: 01604 491131 Ext 2403

1. In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.
2. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. She/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a ‘need to know’ basis only.
3. Actions to be taken include making an immediate written record of the allegation using the informant’s words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Senior Person with Responsibility for Safeguarding. The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.
4. The Senior Person with Responsibility for Safeguarding/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Designated Officer (formerly LADO):

Multi-Agency Safeguarding Hub: 0300 126 1000 (Option 1)

For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) follow the link below:

<http://www.northamptonshirescb.org.uk/health-professionals/taking-action/designated-officer/>

1. If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Designated Officer (formerly LADO) without delay.
2. If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the college’s internal procedures.
3. The Senior Person with Responsibility for Safeguarding should, as soon as possible, **following briefing** from the Designated Officer inform the subject of the allegation.
4. Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

Multi-Agency Safeguarding Hub: **0300 126 1000 (Option 1)**

NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: **help@nspcc.org.uk**

**Safer Working Practice**

1. To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (September 2019).*
2. The document seeks to ensure that the responsibilities of college leaders towards young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour.This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment **(**School Standards and Framework Act 1998**).** Please see the Staff Code of Conduct policy for more information.

**Record Keeping**

1. All concerns, discussions and decisions made and the reasons for those decisions should be recorded on My Concern. If in doubt about recording requirements, staff should discuss with the DSL/Deputy DSL’s.
2. When a child has made a disclosure, the member of staff/volunteer should:

* Record the information on My Concern as soon as possible after the conversation.
* Do not destroy the original notes in case they are needed by a court. Handwritten notes should be uploaded to My Concern.
* Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
* Draw a diagram to indicate the position of any injuries
* Record statements and observations rather than interpretations or assumptions

1. All records need to be uploaded to My Concern promptly. No copies should be retained by the member of staff or volunteer.
2. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
3. We will hold records in line with our records retention schedule.
4. If a young person for whom the school has, or has had, safeguarding concerns moves to another education establishment, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.
5. The DSL will contact the previous education establishment of new starters in October each year, requesting child protection files which may have not been received.

**Confidentiality and Information Sharing**

1. Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.
2. **The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2,18; Schedule 8, 4)
3. When the safeguarding team is considering whether, or not, to share safeguarding information (especially with other agencies) Moulton College will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within My Concern
4. All relevant information can be shared without consent if to gain consent would place a child at risk.
5. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.
6. The Working Together to Safeguarding Children (2018) statutory guidance states the following:

1. Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe.

2. All professionals responsible for children should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children’s social care (e.g. they are being supported as a child in need or have a child protection plan). You should be alert to sharing important information about any adults with whom that child has contact, which may affect the child’s safety or welfare.

3. Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child’s care.

4. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

1. To ensure effective safeguarding arrangements:

* you should have arrangements in place that set out clearly the processes and the principles for sharing information. The arrangement should cover how information will be shared within your own organisation/agency; and with others who may be involved in a child’s life
* all professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe. If a member of staff has concerns about a child’s welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with local authority children’s social care and/or the police. Staff should be particularly alert to the importance of sharing information when a child moves from one school to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.
* you should aim to gain consent to share information, but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if you have good reasons to do so, and believe that the sharing the information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, you should record who has been given the information and why.

1. Safeguarding young people raises issues of **confidentiality** that must be clearly understood by all staff/volunteers in colleges.
2. Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person’s best interests
3. Staff/volunteers who receive information about young people and their families in the course of their work should share that information only within appropriate professional contexts.
4. Timely information sharing is essential to effective safeguarding.
5. Information must only be shared on a ‘need-to-know’ basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

**Communication with Parents/Carers**

1. *Moulton College* will ensure the Safeguarding Policy is available publicly via the college website.
2. Where appropriate, we will discuss any concerns about a child/young person with their parents. The DSL/Deputy DSL’s will normally do this in the event of a suspicion or disclosure.
3. Other staff will only talk to parents about any such concerns following consultation with the DSL/Deputy DSL’s
4. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children’s social care before doing so.
5. In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

**Online Safety**

1. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.
2. When children use the college’s network to access the internet, they are protected from inappropriate content by our filtering and monitoring system Smooth wall. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use students receive tutorials on online safety and phones are encouraged to be away during lessons.
3. All staff are made aware of the college policy on Online Safety which sets our expectations relating to:

* Creating a safer online environment – including training requirements, filters and monitoring;
* Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
* Inspiring safe and responsible use and behaviour;
* Safe use of mobile phones both within school and on school trips/outings;
* Safe use of camera equipment, including camera phones; and
* What steps to take if you have concerns and where to go for further help.

1. Staff must read the Staff Code of Conduct in relation to personal online behaviour.

**Implementation, Monitoring and Review of the Safeguarding Policy**

1. The policy will be reviewed annually by the governing body. It will be implemented through the college’s induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

The Safeguarding Team

**Board of Governors**

**Annual Report & Termly Updates**

**John O’Shea - Vice principal Curriculum**

Senior Designated Person with responsibility for safeguarding

**Barry Handsford – Link Governor for Safeguarding**

Safeguarding Board member and link Director/Governor for Safeguarding

**Principal – Corrie Harris**

Overall responsibility to ensure statutory duties and responsibilities are met

**Carla Hayes Director of Learning and Student Support**

Designated Safeguarding Lead (DSL) & Single Point of Contact (SPoC)

**Safeguarding Board**

**David Aldridge – Executive Director of HR**

Responsible for recruitment and selection and management of the single record and Safeguarding Board member

**Deputy Designated Safeguarding Leads**

Vicki Hickman and

Sara Hewertson (Safeguarding and Wellbeing Coordinator )

**Safeguarding Assistant**

Dan Noone (Residential Coordinator)

Angela Johnson (Safeguarding & Wellbeing Officer - Vulnerable Learners)

Emma Quinton Safeguarding and Wellbeing officer

**Additional Safeguarding Board Members**

Barry Hansford - LInk Governor

Giles Batchelor - Network Development & Services Manager

Andrew Bailey – Director of Student Services

Mike Putman – Director of Facilities

Heads of School

**Appendix 1**

**Indicators of Abuse and Neglect**

**Types of abuse**

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
* Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate
* Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
* Seeing or hearing the ill-treatment of another
* Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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
* 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

* Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
* Protect a child from physical and emotional harm or danger
* Ensure adequate supervision (including the use of inadequate care-givers)
* Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

**The framework for understanding children’s needs:**

Diagram

Description automatically generated

In addition to the above, from Working Together to Safeguard Children (DfE 2018), refertothe latest Thresholds and Pathways document: [**Northamptonshire Thresholds and Pathways**](http://www.northamptonshirescb.org.uk/schools/toolkits-docs-schools/thresholds-and-pathways/)

**Appendix 2**

**Annex A - Specific Safeguarding Issues - Further Information**

**Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds [Guide 5-11 years](https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds) and 12-17 year olds [Guide 12-17 years](https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds). They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

**Children missing from education (CME)**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school or college’s unauthorised absence and children missing from education procedures.

College will monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at college. This means we will ensure we have two up to date contact numbers.

**Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**Children with a Social Worker**

The safeguarding team retain details of which young people have a Social Worker. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). 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.

**Child Sexual Exploitation (CSE)**

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child’s or young person’s limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009).

Key Facts about CSE

* Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
* It affects both girls and boys and can happen in all communities.
* Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities.
* Victims of CSE may also be trafficked (locally, nationally and internationally).
* Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

**Good practice – Individuals**

Recognise the symptoms and distinguish them from other forms of abuse

Treat the child/young person as a victim of abuse

Understand the perspective/behaviour of the child/young person and be patient with them

Help the child/young person to recognise that they are being exploited

Collate as much information as possible

Share information with other agencies and seek advice/refer to Social Care

**Good practice – Organisations**

Ensure robust safeguarding policies and procedures are in place which cover CSE

Promote and engage in effective multi-agency working to prevent abuse

Work to help victims move out of exploitation

Cooperate to enable successful investigations and prosecutions of perpetrators

**Child Criminal Exploitation: County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban 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; and
* 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**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are ‘personally connected’ to each other:

1. physical or sexual abuse;
2. violet or threatening behaviour;
3. controlling or coercive behaviour;
4. economic abuse(adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
5. Psychological, emotional or other abuse.

People are ‘personally connected’ when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives. The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

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

**Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children’s services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child’s circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for

16 and 17 year olds who may be homeless and/ or require accommodation.

**Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their safeguarding policy and speaking to the designated safeguarding lead or a deputy. The safeguarding team will work closely with mental health professionals. The safeguarding team can be contacted on [safeguarding@moulton.ac.uk](mailto:safeguarding@moulton.ac.uk) or on the safeguarding mobile 07827929695 or by coming to the student support office in the Social centre at main site.

The college has commissioned Health Assured Wellbeing Service – A FREE 24-hour, 365 day a year confidential helpline for all students, which is run by a team of qualified counsellors. Services also feature a downloadable ‘My Health’ app offering a variety of bespoke wellbeing features and a whole library of learning materials. This service is particularly useful in providing out of hours support for those learners in crisis. Students can call this number any time. The number is 0800 028 3766.

**So-called ‘honour-based’ abuse (including FGM and Forced Marriage)**

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

**Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

**Female Genital Mutilation FGM**

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for any person (regardless of their nationality or residence status) to:

* perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
* assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
* Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident (section 3 of the Act).

**Forced Marriage (FM)**

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they’re bringing shame on their family). This is very different to an arranged marriage where

both parties give consent.

FM is illegal in England and Wales. This includes:

* taking someone overseas to force them to marry (whether or not the forced marriage takes place)
* marrying someone who lacks the mental capacity to consent to the marriage (whether they’re pressured to or not)

**Preventing Radicalisation**

The Counter Terrorism & Security Act 2015

The Act places a Prevent duty on specified schools to have “due regard to the need to prevent people from being drawn into terrorism”. The education and childcare specified authorities in Schedule 6 to the Act are as follows:

* The proprietors of maintained schools, non-maintained special schools, maintained nursery schools, independent schools (including academies and free schools) and alternative provision academies, PRUs, registered early year’s providers, registered late years providers and some holiday schemes.

College/settings subject to the Prevent Duty will be expected to demonstrate activity in the following areas –

* Assessing the risk of children being drawn into terrorism
* Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
* Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
* Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
* Expected to ensure children are safe from terrorist and extremist material when accessing the internet in school

**Peer on Peer / Child on Child Abuse**

We recognise that children are capable of abusing their peers. This is generally referred to as peer on peer abuse. Even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

It should be recognised that it is more likely that girls will be victims and boys’ perpetrators, however all peer-on-peer abuse is unacceptable and will be taken seriously.

Moulton College has a zero tolerance approach to abuse, it should never be tolerated or passed off as “banter” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Peer on Peer abuse can take many forms.

This can include but is not limited to: peer on peer

* Bullying (including cyberbullying, prejudice-based and discriminatory bullying
* Sexual violence and sexual harassment
* Abuse in intimate personal relationships between peers
* Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise Most cases of pupils hurting other pupils will be dealt with under the schools behaviour policy and peer on peer policy but this child protection and safeguarding policy will apply to any allegation that raises safeguarding concerns. This might include where the alleged behaviour:
* Is serious and potentially a criminal offence
* Could put pupils in the school at risk
* Is violent
* Involves pupils being forced to use drugs or alcohol
* Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos/sharing of nudes or semi nudes. UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes(December 2020)

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

* Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
* Whether the perpetrator has repeatedly tried to harm one or more other children; or
* Whether there are concerns about the intention of the alleged perpetrator.

Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender based violence/sexual assaults, sharing of nudes/semi-nudes, domestic abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

Guidance on responding to and managing sexting incidents can be found at: [Sexual violence and sexual harassment between children in schools and colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)  [Sexting In Schools FINAL Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

In order to minimise the risk of peer on peer abuse the school:

* Provides a developmentally appropriate PSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
* Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.
* Develop robust risk assessments where appropriate.
* Have relevant policies in place (e.g. peer on peer abuse policy and behaviour policy).

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children

These can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury related 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
* Communication barriers and difficulties in managing or reporting these challenges.
* At Moulton College we provide pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place, for example learning support assistance and access to a specialist learning support assistant for ASD/ADHD/Emotional and behaviour. Daily pastoral drop ins.

**Sexual violence and sexual harassment between children in schools and colleges**

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur

Online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of 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”; and
* challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

**What is Sexual Violence and Sexual Harassment?**

**Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 200319 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

Whilst not intended to be an exhaustive list, sexual harassment can include:

* sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
* sexual “jokes” or taunting;
* physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

* non-consensual sharing of sexual images and videos;
* sexualised online bullying;
* unwanted sexual comments and messages, including, on social media; and
* sexual exploitation; coercion and threats
* Upskirting - Upskirting generally involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

**The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

**Appendix 3**

**Identification ID Card/Lanyard**

**1 Purpose**

The purpose of the Identification ID card/Lanyard Policy is:

* To provide standards and requirements for the display of identification
* To provide a consistent method of identification.
* To provide additional means of establishing a safe community for staff, visitors and students.

**2 Aim**

The Policy aims to ensure effective identification and safeguarding measures are in place.

This Policy should be read in conjunction with the following Policies:

* Learner Behaviour Support and Disciplinary Policy
* Staff Disciplinary Policy
* Admissions Policy

**3 Procedures/Responsibilities**

**3.1 Managers**

All Managers are required to sign a policy which confirms they have read and understood the content of the policy and will ensure that all staff/volunteers will enforce and adhere to the policy.

**3.2 Staff**

* All staff will be issued a photographic ID card and College lanyard upon employment.
* While in the workshops ID cards may be worn using a clip on accessory for those staff who would encounter health and safety issues while using a lanyard
* ID cards must be worn using a College breakaway lanyard (purple) to identify individuals as staff members.
* If a staff member refuses to wear their lanyard, or has to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances.
* The ID card and College lanyard must be visible at all times and not obstructed by clothing.
* All staff are responsible for challenging persons not displaying an ID card with a College lanyard.
* If a staff member finds a student displaying an out of date ID card, the staff member is responsible for retaining the ID card.
* Staff must return their identification ID cards and College lanyards to HR upon termination of employment.
* If staff are found not wearing their ID card and College lanyard, this will be referred to their line manager.
* Further incidents of non-compliance will be addressed via the staff disciplinary procedures. Staff who have lost their ID card and College lanyard must go to the HR Team to be issued with a replacement ID card and lanyard.
* Staff who have not lost their ID card and College lanyard but have forgotten to bring it to work must be issued with a temporary ID card and College lanyard.

**3.3 Applicants**

All potential students and their parent/guardian will be monitored whilst on campus. During their visit they will be issued with a visitor’s badge and lanyard (pink).

**3.4 Students**

* All students will be issued with a photographic ID card and a breakaway college lanyard (green) upon enrolment.
* All students should wear their lanyard at all times while on college property (this includes social areas and while moving between buildings).
* Lanyards are to be worn around the neck and not tied to bags/arms or hanging out of pockets.
* All staff have a responsibility to challenge any student or staff member not wearing a lanyard.
* If a student refuses to wear their lanyard, they should be asked to leave college property until such time that they are wearing a lanyard. If they continue to refuse or have to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances.
* In exceptional cases related to Special Education Needs or Disability (SEND) there may be a reason why a staff/student member cannot wear a lanyard around their neck. In this instance a formal request must be made to the Director of Student Services outlining reasons why and providing any supporting evidence.
* In workshops/high risk environments, students will be asked to remove their lanyard for certain tasks by their tutor. As an alternative clips will be provided so that identification is still displayed in these sessions.
* Students who have lost their ID card and/or College lanyard must go to the Learning Resource Centre to be issued with a replacement.
* Students who have not lost their ID card and college lanyard but have forgotten to bring it must report to the Student Services Team to be issued with a temporary lanyard which must be returned at the end of the day. Students who repeatedly forget their lanyard should be subject to a disciplinary sanction.
* When a student leaves or withdraws from a course, they should be requested to hand in their ID card, holder and lanyard on the last day of attendance to a member of staff.
* If a student is asked to leave by the College, they should be requested to hand in their ID card and college lanyard of the last day of attendance to a member of staff. Returned ID cards and college lanyards should be returned to the Student Services Team.

**3.5 Governors**

Governors will be issued with a Governor identification ID card and Governor lanyard (navy)

**3.6 Contractors**

All Contractors must report to reception to check-in, those who have registered a DBS with us will be issued an orange lanyard and do not need to be escorted by their host. Those without a DBS will be escorted by a staff member during their visit and will be issued a pink ID Card/lanyard/sticker. All contractors must wear their ID cards on the provided College lanyard (pink & orange), around the neck at all times while on campus. ID cards may be worn using a clip, unless issued on a sticker, provided by the College for those personnel who would encounter health and safety issues with the use of a lanyard. ID cards and College lanyards must be returned to the Facilities department upon completion of work each day. Contractors who have lost their ID card and College lanyard must report to the Facilities Department to be issued with a replacement ID card and College lanyard.

**3.7 Visitors**

Visitors must report to the Main Reception to be issued with an ID card/sticker and lanyard (pink). When visitors are issued with their ID card they must state what department or person they are on campus to visit. Visitors will be collected by their host from reception and will be escorted at all times. Visitors must return their ID card and College lanyard to the Main Reception at the end of their visit. Visitors who have lost their ID card and College lanyard must report to the Main Reception to be issued with a replacement ID card and College lanyard. This above applies to all businesses operating from a College property.

**3.8 Special Events**

Visitors who are on campus as part of an authorised special event must sign in at designated check in points around the campus where they will receive a College ID and visitor lanyard (pink).

**3.9 Exceptions**

During pandemic periods, visitors and contractors will be issued with disposable stickers, in the same coloring as above. No lanyards will be issued. Students, staff and governors will continue to be issued with lanyards as they are for their own personal use

**Appendix 4 - Covid-19**

# 1 Context

1. This appendix has been added to the College safeguarding policy following the period of partial closure between January 5th 2021 and March 8th 2021. From the 8th March 2021 all learners, except those who are clinically extremely vulnerable and have been directed to shield at home, are expected to attend College.
2. This appendix has been added to provide all stakeholders with additional information about the College’s safeguarding and child protection arrangements from the 8th March 2021.

# 2 Guidance

1. The College continues to comply with all statutory safeguarding and child protection guidance during this time, including [Keeping Learners Safe in Education (2021)](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)[[1]](#footnote-1).
2. The College is currently operating under the latest Covid-19 guidance from the Department from Education, ‘[Colleges coronavirus (COVID-19) operational guidance (February 2021)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964351/Schools_coronavirus_operational_guidance.pdf)’

# 3 What to do if you have a concern about a child

1. A trained Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will be available at all times during College hours. Wherever possible, a trained DSL (or deputy DSL) will be available on site. Where this is not possible due to staff self-isolation, a trained DSL (or deputy DSL) will be available to be contacted via phone or Microsoft Teams.In this instance an appropriate senior leader will take responsibility for safeguarding on site.
2. Any changes in arrangements for contacting the DSL/DDSLs will be shared with staff before 9am each day, as well as any relevant safeguarding and child protection updates and training.
3. If the College becomes aware that a child is suffering, has suffered, or is at risk of suffering harm or abuse, this will be managed in line with procedures outlined in the main body of the college’s safeguarding and child protection policy.

# Attendance

1. In line with government guidance, we expect all learners to attend College unless they are self-isolating or shielding. The College is responsible for recording attendance, following up absence and reporting learners missing education to the local authority.
2. Parents or carers should contact the College on the first day of absence and inform the College of the reason why the child is not in attendance. Parents should inform the College of any COVID-19 tests that have been carried out and continue to keep the College informed of reasons for absence, as appropriate.
3. Where pupils are not able to attend College, as they are following clinical or public health advice related to coronavirus (COVID-19), the absence will not be penalised.
4. We understand that some parents, carers and learners may be anxious about learners returning to College. We will work closely with families who are finding the transition more challenging to ensure that learners are attending regularly.
5. We will work with other agencies (e.g. health and other education professionals) to support College attendance if this is required. We will continue to notify the learner’s social worker (if they have one) of any non-attendance.

# 5 Supporting learners who are learning at home

1. In the event that learners are required to shield or to self-isolate, the College will continue to provide education and pastoral support.
2. We will do this via the learner’s Course Manager
3. In the event that a member of our College community (a learner or a member of their family, for example) need to seek safeguarding or wellbeing support, they should call the Safeguarding team on 01604 491131 or the safeguarding mobile 07827929695 or email safeguarding@moulton.ac.uk
4. **Vulnerable Learners**

5.4.1 If learners who are self-isolating or shielding are within the government definition of ‘vulnerable’, we will keep in regular contact with them via their Course Manager

5.4.2 When a vulnerable learner is required to self-isolate, we will:

* notify their social worker (if they have one);
* agree with the social worker the best way to maintain contact and offer support;
* check if a vulnerable learner is able to access remote education support;
* support them to access it (as far as possible); and
* regularly check if they are accessing remote education.

5.4.3 The government considers learners to be vulnerable if they

* are assessed as being in need under section 17 of the Learners Act 1989, including learners and young people who have a child in need plan, a child protection plan or who are a looked-after child
* have an education, health and care (EHC) plan
* have been identified as otherwise vulnerable by educational providers or local authorities (including learners’ social care services), and who could therefore benefit from continued full-time attendance, this might include:
* learners and young people on the edge of receiving support from learners’ social care services or in the process of being referred to learners’ services
* adopted learners or learners on a special guardianship order
* those at risk of becoming NEET (‘not in employment, education or training’)
* those living in temporary accommodation
* those who are young carers
* those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
* care leavers
* others at the provider and local authority’s discretion including pupils and students who need to attend to receive support or manage risks to their mental health

5.5 We recognise that provision for learners who have SEND may have been disrupted during the period of restrictions on attendance. We will work with local services (such as health and the local authority) to ensure the services and support are in place for a smooth return to Colleges for learners.

**5.6 Clinically extremely vulnerable (CEV) learners**

5.6.1 Learners who have been confirmed as clinically extremely vulnerable and have received a shielding letter should not attend College until they have been removed from the shielding patient list. We will support these learners via their Course Manager.

5.6.2 The College may request to see a copy of the learner’s shielding letter.

# 6 Supporting learners on site

1. Moulton College will refer to the Government guidance for education settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.
2. Moulton Collegeunderstands that some learners will find the transition back into College challenging and will offer a range of support via Course Managers, Tutors, Pastoral Support Officer, Learning Support Assistants and the Student Support Team
3. Where there are concerns about a learner’s wellbeing, a My Concern log will be made, in accordance with the College safeguarding procedures.

# 7 Safer recruitment of staff and volunteers

1. The College continues to adhere to Keeping Learners Safe in Education (2021) and all relevant legislation relating to safer recruitment.
2. The College will adhere to all government guidance in relation to checking identification for the purposes of obtaining Disclosure and Barring Service checks and when conducting interviews.
3. Where Moulton College is utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 183 to 188 of Keeping Learners Safe in Education (2021). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.
4. Moulton College will continue to update the single central record and will log details of any risk assessment carried out on volunteers and any temporary staff from other educational institutions.

# 9 Online safety and remote learning

1. The College recognises that learners both on-site and off-site are vulnerable to abuse and radicalisation online. Learners who are at home because they are self-isolating or shielding may be spending more time online and this increases their vulnerability.
2. Moulton Collegerecognises that additional safeguarding arrangements are required to ensure that learners are safe online at this time.
3. All staff will continue to look out for any signs that indicate a child may be at risk online and will report and respond to concerns in line with this policy.

The College is legally required to provide suitable remote learning for learners whilst they are out of College. We are using technology to deliver learning to learners who are at home. In order to ensure that learners are safe when learning online, the College have;

* Trained staff involved on appropriate use of IT and provided learners with information on acceptable use. Learners have also had online safety tutorials.
* Online safety information for parents/carers on the College website.

1. All communication with learners and parents/carers will take place using Moulton College provided or approved communication channels; for example, Moulton College provided email accounts, Microsoft Teams, Google Classroom and our Virtual Learning Environment (VLE), Moodle.
2. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
3. Moulton College will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
4. Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our Learner Behaviour Support and Disciplinary Policy.
5. When delivering remote learning, staff at Moulton College will:
   * Only use online tools that have been evaluated and agreed by leadership.
   * Ensure remote learning activities are planned in accordance with our curriculum policies, taking learner needs and technology access into account.
   * Where possible, pre-record content.
6. If remote learning is taking place ‘live’ using webcams or chat facilities, staff and learners will ensure a professional environment is maintained. This means:

* Staff will record the length, time, date and attendance of any online lessons/contact held or made.
* Live sessions will involve at least two members of staff where possible.
* Sessions will not be delivered in any 1:1 situation, unless pre-approval has been given by the DSL and/or Principal and the session is auditable.
* Staff will record any online lessons so they can be audited or accessed later if required; learners and staff should be made aware that lessons are being recorded.
* Staff will agree online behaviour expectations with learners at the start of lessons.
* Staff will revisit our Acceptable use of Technology Policy with learners as necessary.
* All participants will wear suitable dress, use professional language, and ensure backgrounds of videos (live or pre-recorded) are neutral and appropriate.
* Staff and learners should ensure personal information and/or, inappropriate or unsuitable personal items are not visible.
* Where possible, other household members should not be in the background or in shot; if this unavoidable, they should follow appropriate language and behaviour expectations.
* If live streaming, staff will mute and/or disable learners’ videos and microphones, as required.

1. Learners are encouraged to report concerns to a member of staff or a trusted adult at home. Where this is not possible, additional support can be accessed online via:
   * Childline: [**www.childline.org.uk**](http://www.childline.org.uk/)
   * UK Safer Internet Centre’s ‘Report Harmful Content’: [**https://reportharmfulcontent.com**](https://reportharmfulcontent.com/)
   * National Crime Agency Child Exploitation and Online Protection Command (NCA-CEOP)**:** [**www.ceop.police.uk/safety-centre**](https://www.ceop.police.uk/safety-centre/)
2. Staff have received updated safeguarding training to ensure that they are equipped with the skills to keep learners safe when using technology for remote learning.
3. Use of staff and learner personal devices, including mobile phones, will be managed in line with our existing mobile technology policy.

# 10 Contingency Planning

1. In the event that restrictions in Colleges are needed to help contain the spread of the virus, we will refer to the contingency framework[[2]](#footnote-2), which has been updated and outlines how Colleges should operate in the event of any restrictions. We will always ensure that safeguarding learners is our priority and work within restrictions to keep learners safe.

# 11 Review

1. This appendix will be reviewed, updated and re-issued as necessary, to reflect government guidance. All staff will be made aware of any changes.

A picture containing icon

Description automatically generatedEquality Impact Assessment (EIA)

Please complete both sides of this Equality Impact Assessment and ensure that the latest copy of this is recorded as part of the appendices of the specific policy.

|  |  |
| --- | --- |
| **Policy Reference and Name** | SGP – 01 Safeguarding and Child Protection Policy |
| **Assessment date** | 8 September 2021 |
| **Completed by** | Director of Student and Learning Support |
| **What are the aims of the policy?** | This policy aims to inform staff, parents/carers, volunteers and governors about the college's statutory responsibilities for safeguarding children and young people. It aims to enable everyone to have a clear understanding of how these responsibilities should be carried out and that appropriate action is taken in a timely manner to safeguard and promote children’s welfare. |
| **Who does the policy affect?** | All members of staff, governors, students, prospective students, visitors, volunteers |
| **Who is involved in implementing the policy?** | Governors, CEO, SLT, VP Curriculum, ,DoS&LS, DSLs |
| **What information is currently available about the impact of this policy and its associated procedures?** | In responding to and managing situations around safeguarding, the college remains mindful of its duty of care and of its statutory obligations and will work within the guidance of Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2021) which ensures statutory guidance to safeguard and promote the welfare of children.  There is also various other legislative framework in which this policy relates and is compliant with. In dealing with cases the college remains mindful of its duties under the Data Protection Act 2018 and the college’s Data Protection Policy. |
| **Do you need more information to help you make an assessment about the impact of this policy and its associated procedures?** | No |
| **Do you have any examples that show how this policy will have a positive impact on any of the equality characteristics listed in the table below?** | When responding to individual issues, protected characteristics and other Equality factors will be clearly observed. |
| **Which other policies does this policy link with?** | Equality and Diversity Policy  Health and Safety Policy  Risk Assessment Procedure  Security Policy  Data Protection Policy  Staff Recruitment Policy  Admissions Policy  Teaching, Learning and Assessment Policy  Complaints, Compliments and Suggestions Policy  Whistleblowing Policy  Staff Code of Conduct  Visitor Policy  Learner Behaviour, Support and Disciplinary Policy  Peer on Peer Abuse Policy  Prevent Policy  Firewall Policy  Dynamic Lockdown Policy  Missing Student Policy  Residential Accommodation Allocation Policy  Remote Learning Policy |
| **What consultation has taken place in the development of this policy?** | Student Support team, Residential Team, Quality Team, External safeguarding network |

**Use the table below to assess the impact of this policy on each of the listed characteristics. Your decision must be evidence based.** Sources of evidence might include success rates, achievement gaps, application and enrolment data, student voice, consultation outcomes, recruitment and employment data, customer feedback or complaints, meeting minutes.

| **Characteristic**  (These characteristics are protected  under the Equality Act 2010) | **Negative impact?**  **Y / N** | **Evidence to support your impact assessment decision** | **Requires further action? Y/N** |
| --- | --- | --- | --- |
| **Age** | **N** |  | **N** |
| **Disability** | **N** |  | **N** |
| **Race** | **N** |  | **N** |
| **Gender, inc. re-assignment** | **N** |  | **N** |
| **Sexual orientation** | **N** |  | **N** |
| **Religion / belief** | **N** |  | **N** |
| **Pregnancy / maternity** | **N** |  | **N** |
| **Marriage / civil partnership** | **N** |  | **N** |
| **Socio-economic** | **N** |  | **N** |

**Overall EIA judgement**

|  |  |
| --- | --- |
| **Select** |  |
| ✓ | ***No change required*** - The assessment is that the policy is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review |
|  | ***Adjust the policy or practice -*** This involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the policy that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact |
|  | ***Continue the policy -*** This means adopting/continuing with the policy despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded |
|  | ***Stop the policy -*** If there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated |

1. This document was last updated in January 2021, to reflect arrangements following the UK’s departure from the European Union. However, it is still referred to as ‘Keeping Learners Safe in Education (2021)’. [↑](#footnote-ref-1)
2. <https://www.gov.uk/government/publications/coronavirus-covid-19-contingency-framework-for-education-and-childcare-settings/contingency-framework-education-and-childcare-settings-excluding-universities> [↑](#footnote-ref-2)