

# **SAFEGUARDING AND CHILD PROTECTION POLICY**

## **Policy Document Purpose Statement**

This document sets out the policy supporting safeguarding and child protection for Cornwall College Group.

## **Application**

The objective of this document is to provide a framework to ensure young people and adults learn and work in a safe environment whether in college, at home or in the wider community.

## **Interpretation**

Further guidance on the use or interpretation of this policy may be obtained from the responsible post holder.

## **Legislator / Regulatory Compliance**

Compliance with relevant current Health and Safety legislation, Data Protection Act and other legislation / regulations named within the body of the document.

## **Publication Restrictions**

A version of this document is available to view on the Cornwall College Website.

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# SAFEGUARDING AND CHILD PROTECTION POLICY

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## 1. Purpose of the Policy

- 1.1. The aim of this policy is to keep children, young people and adults safe by providing a framework to ensure a safe environment for them to learn and work, whilst contributing to the prevention of harm or abuse and the protection of those individuals who are identified as suffering or likely to suffer harm from any such risk to their safety, health or well-being, whether in college, at home or in the wider community.

## 2. Applicability / Scope

- 2.1. The policy set out in this document (and associated procedures) apply to all sites and activities that form part of The Cornwall College Group (TCCG), including work-based learning, college-managed residential accommodation, all off site activity including college-led trips and off site events organised and/or led by staff employed by TCCG.

- 2.2. Our policy and procedures apply to all learners, staff/governors, visitors, contractors, volunteers, advisory board members, and staff from partner organisations working on our sites, including those organisations using or hiring college sites or facilities.
- 2.3. Everyone has the right to be protected against risk to their safety, health and well-being and everyone has the responsibility to safeguard others against such risks.

### 3. Statutory Obligations

- 3.1. TCCG has a statutory duty under Section 175 of the Education Act (2002) and must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated TCCG policies and procedures listed, the web links provided and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.
- 3.2. This policy considers, amongst others, the following publications, including recent / relevant guidance and legislation in this area:
  - 3.2.1. Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2020)  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
  - 3.2.2. Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (Her Majesties Government, July 2018)  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
  - 3.2.3. The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police and other partner organisations. (Department of Health and Social Care)  
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>
  - 3.2.4. The Prevent Duty: Departmental advice for schools and child care providers (Department for Education. June 2015).  
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>
- 3.3. CCG policy and procedures are in accordance with those set out on the South West Child Protection Procedures website <https://www.proceduresonline.com/swcpp/> and the guidance issued by the various local multi-agency safeguarding partnerships and boards.
- 3.4. Key staff role abbreviations:
  - 3.4.1. DSL – Designated Safeguarding Lead.
  - 3.4.2. DDSL – Deputy Designated Safeguarding Leads
  - 3.4.3. DGS – Designated Governor for Safeguarding
  - 3.4.4. DDGS – Deputy Designated Governor for Safeguarding
  - 3.4.5. SMG – Safeguarding Management Group
  - 3.4.6. SPOC – Single Point of Contact for Safeguarding in campus, site or specialist area
  - 3.4.7. DT – Designated Teacher for Looked After Children (LAC)
  - 3.4.8. SEM - Student Experience Manager

Contact details and designation for the above can be found in Appendix A.

## 4. Definitions

- 4.1. A child is defined as any young person under the age of 18 years.
- 4.2. Safeguarding and promoting the welfare of children is defined in KCSIE (2020) as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- 4.3. An adult who may have safeguarding needs is defined in The Care Act (2014) as an adult who:
  - 4.3.1. has needs for care and support (whether or not the local authority is meeting any of those needs) and;
  - 4.3.2. is experiencing or at risk of abuse or neglect and;
  - 4.3.3. as result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect;

## 5. Policy Principles

- 5.1. The Cornwall College Group will ensure that:
  - 5.1.1. safeguarding and promoting the welfare of children, young people and adults at risk of harm or abuse is everyone's responsibility and is child-centred / person-centred, ensuring that everyone is acting in the best interests of the child, young person or adult at risk of harm or abuse.
  - 5.1.2. the safety and well-being of children, young people and adults are paramount in all areas of its operations, including safeguarding our staff / learners and raising their awareness, to safeguard themselves and others.
  - 5.1.3. all children and adults, regardless of age, culture, disability, gender, language, racial origin, religious belief and or sexual identity can exercise their right to protection from harm or abuse when engaged in college-related activity or settings and receive college support where they may disclose concerns about their broader lives in the community or at home.
  - 5.1.4. all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, with due regard to appropriate levels of privacy and the dignity of those concerned.
  - 5.1.5. all staff will be made aware of key safeguarding principles/practice through appropriate training and are required to report any disclosures, concerns or allegations in line with our procedures and the statutory guidance.
  - 5.1.6. best practice is used in safer recruitment when recruiting staff/volunteers to ensure their suitability to work with children, young people and adults who may be at risk of harm, abuse or neglect and appropriate levels of assurance are sought from others who visit/use our sites.
  - 5.1.7. all those involved with safeguarding adopt a multi-agency approach, working in partnership with other key statutory, non-statutory and voluntary sector organisations to support and protect children, young people and adults at risk of harm, abuse or neglect through information sharing and the sharing of best practice to improve safeguarding within our communities.
  - 5.1.8. all staff understand the benefits of early help and intervention and are particularly alert to the potential need for early help.

- 5.1.9. everybody adheres to all statutory responsibilities placed upon them and they maintain professional curiosity, appreciative enquiry and an attitude of it could happen here.

## 6. Responsibilities

### 6.1. The Governing Body of TCCG

6.1.1. The Governing Body of TCCG are responsible for the management of safeguarding in accordance with the statutory guidance set out in Part Two of KCSIE (2019) and related guidance or legislation. This includes that:

- A member of the Governing Body is nominated to take a lead on safeguarding matters and undertakes appropriate training in this, supported by another member of the Governing Body to act as their deputy.
- TCCG has a child protection and safeguarding policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance.
- The Board receives and considers regular safeguarding update reports.
- TCCG operates 'safer recruitment procedures' in accordance with statutory requirements and guidance.
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- A senior manager is appointed to the role of Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead will take responsibility across TCCG for child protection and safeguarding.
- TCCG contributes to multi-agency working in line with statutory guidance.
- Ensure that staff have the skills, knowledge and understanding to keep safe the vulnerable learners as defined in sections 13, 14 and 15.

### 6.2. The Designated Safeguarding Lead (DSL).

6.2.1. The DSL has ultimate lead responsibility for safeguarding and child protection with responsibilities set out in Annex B of KCSIE (2020). Activities may be delegated to appropriately trained DDSL or SPOC but lead responsibility remains that of the DSL. The DSL is responsible for ensuring:

- Publication and correct implementation of the policy and procedures and reviewing the effectiveness of them annually in a written report to the board of governors.
- Safeguarding training, appropriate to role, is in place for all staff and is delivered in line with national and local guidance.
- Completion of external and internal audits related to the effectiveness of safeguarding
- Oversight of the recording and passing on to external agencies, where appropriate, any disclosures received and liaising with the Local Authority Designated Officer (LADO) on any staff related matters, where required.
- The appointment of DDSL and SPOC are appropriately trained and supported.

- Documents relating to safeguarding are managed and secured in accordance with statutory guidance and legislation.
- That the Safeguarding Management Group (SMG) receives appropriate safeguarding information and advice in all cases where allegations of abuse have been made against a member of staff. (The Chair of the Board, if allegations concern the Principal).
- Effective liaison and working with the Local Authority Safeguarding Children's Partnership / Boards and the Safeguarding Adult Boards and other agencies in keeping with 'Working Together to Safeguard Children' (2018).
- That robust risk assessment processes are in place where individuals pose a risk to themselves or others.
- They attend Tier 3 Safeguarding training every two years and other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- Those who use TCCG premises or provide site based service to learners are aware of this safeguarding policy and associated procedures and agree to abide by these via a 'Letter of Assurance' or 'Letter of Understanding' that will be held with our Single Central Record.
- Providing senior management, information on safeguarding incidents and trend analysis for service development and reporting.
- Chair Safeguarding Team meetings which will occur regularly throughout the year.

### 6.3. Deputy Designated Safeguarding Leads (DDSL)

6.3.1. The DDSL is responsible for safeguarding and child protection as set out in Annex B of KCSIE (2020), including:

- Receiving, recording and passing on to external agencies, where appropriate, disclosures concerning harm, abuse or neglect in accordance with TCCG and local authority procedures.
- Liaising with the DSL, as appropriate.
- Carrying out risk assessments in line with our admissions and safeguarding policy and procedures, ensuring the implementation of risk control measures.
- Contributing to safeguarding training for all staff.
- Working with colleagues to raise the awareness of safeguarding amongst the student body and encouraging concerns to be reported.
- Attending Tier 3 Safeguarding training every two years and other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- Supporting and advising colleagues with potential safeguarding concerns about learners.
- Effective and secure record keeping.
- Liaising and working with the different local authorities and other agencies in accordance with statutory guidance.

### 6.4. The Safeguarding Management Group (SMG)

6.4.1. Where an allegation of abuse is reported that implicates a member of staff, governor or volunteer, the SMG will be convened and is responsible for responding quickly and

appropriately to allegations of abuse made against staff/volunteers in line with the statutory guidance set out in Part Four of KCSIE (2020) and Local Authority procedures, overseeing any investigation or external reporting related to this.

6.4.2. The SMG will comprise of:

- The Designated Safeguarding Lead
- The Principal / Chief Executive Officer
- The Human Resources Manager

## 6.5. All Staff Members / Volunteers

6.5.1. All staff members / volunteers are responsible for:

- Reading and understanding Keeping children safe in education: Statutory guidance for schools and colleges Part 1: Information for all school and college staff (Department for Education, September 2020)
- Providing a safe environment in which children, young people and adults at risk of harm, abuse or neglect can learn.
- Being prepared to identify children, young people and adults at risk of harm, abuse or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- Following the framework described in Appendix D, together with the correct referral process and procedure. Know where to go and what to do if they have any safeguarding concerns.
- Attending safeguarding and child protection training and updates as required, on induction and as a refresher at least once every 3 years.
- Reading and familiarising themselves with associated policies via the Insights Intranet Document Finder or TCCG website.
- Reading safeguarding newsletters and associated guidance when published.
- Being aware of how to make referrals to children's social care and adult's social care for statutory assessments via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments.
- Promoting awareness of safeguarding issues/support amongst learners, colleagues and other stakeholders.
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct, safer working practice and other key safeguarding standards.
- Wearing their staff ID badge always when working on or off college sites.
- Reporting to a DSL, DDSL, SPOC, Engagement & Progression Officers or Learning Coaches any learner welfare concerns that they may have or may need support with.
- Reporting to the Human Resource Manager/Advisers any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with children, young people and adults at risk of harm, abuse or neglect.
- Reporting to the Principal, DSL, or Director of Human Resources any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or Professional Staff Code of Conduct.
- Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.

## 6.6. Learners

6.6.1. Learners are responsible for:

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers and others on site.
- Reporting any concerns to any trusted member of staff with whom they feel comfortable discussing these concerns.
- Abiding by TCCG learner code of conduct which is designed to safeguard all those on college sites or using college facilities, including the IT network.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

## 7. Other Individuals Working on TCCG Sites / Provision

- 7.1. Visitors to college sites must be directed to sign in and collect a visitor's badge/lanyard that must be visible always while on site. They must be collected from the reception area, accompanied always by a member of staff and returned to reception to sign out and hand in their badge/lanyard.
- 7.2. Contractors and tenants operating on Group premises are to contractually agree and abide by safeguarding conditions set out by TCCG.
- 7.3. Other organisations working with learners on TCCG premises are required to sign a Letter of Assurance to confirm that they have complied with statutory requirements of safer recruitment and agree to comply with TCCG Safeguarding Policy and Procedures. This also applies to any organisations renting or using space on TCCG premises. If the organisation is not engaged in regulated activity they may complete a Letter of Understanding but will be more strictly monitored.
- 7.4. In the case of learners directly employing their own support worker, TCCG reserves the right to require that safer recruitment processes are adhered to and that the details will be recorded on the single record.

## 8. Multi-agency Working

- 8.1. As a relevant agency, TCCG will work with the three safeguarding partners and other statutory and non-statutory agencies in accordance with the statutory guidance<sup>1</sup> and published arrangements<sup>2</sup>

## 9. College Managed Accommodation

- 9.1. The Residential Support Team will be responsible for the out-of-hours administration of safeguarding and child protection in college managed accommodation in accordance with TCCG Safeguarding and Child Protection policy and procedures, together with the National Minimum Standards<sup>3</sup>. During curriculum hours the overall lead responsibility for safeguarding and child protection will be undertaken by the Locality/Campus/Site SPOC.
- 9.2. The Residential Services Manager will be responsible for leading the Residential Support Team in the management and administration of safeguarding and child protection in college managed

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<sup>1</sup> Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (Her Majesty's Government, July 2018)

<sup>2</sup> <https://www.cornwall.gov.uk/media/38441387/2019-05-14-osc-partnership-agreement-v-67-with-complaints-policy.pdf>

<sup>3</sup> Further education residential accommodation: national minimum standards (2018)



accommodation but this must be in collaboration with the DSL, DDSL or site SPOC, who has overall lead responsibility for safeguarding and child protection, being able to take a holistic and universal view of all learners in college managed accommodation.

## **10. Safer Recruitment and Selection**

- 10.1. TCCG will select and recruit in accordance with the statutory guidance set out in Chapter 3 of KCSIE (2020), which details Safer Recruitment.
- 10.2. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in TCCG, including staff, volunteers and staff employed by external partners / contractors.
- 10.3. The Director of Human Resources will ensure that a single central record is maintained of all pre-appointment checks.

## **11. Safeguarding Types, Themes and Specific Safeguarding Issues**

- 11.1. In accordance with 6.5.1, all staff must read and familiarise themselves with the different types of harm and abuse, together with various safeguarding themes and specific safeguarding issues outlined in Part One and Annex A of KCSIE (2020). A summary of these types and themes are at Appendix B of this policy, together with possible signs and indicators at Appendix C.
- 11.2. Guidance for dealing with an incident of Peer on Peer abuse, including Sexual Harassment / Violence, is published separately to this document but should be read with this document and the Anti-bullying and Harassment Policy. Abuse is abuse and this type of abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.
- 11.3. The Governments Counter Terrorist Strategy (CONTEST) places a specific duty<sup>4</sup> on the college to prevent radicalisation and extremism. TCCG’s PREVENT (Extremism & Radicalisation) policy and procedures, which focusses on the Prevent referral process and Channel, and must be read alongside this policy.

## **12. Safeguarding and Child Protection Procedure**

- 12.1. The procedure for reporting a safeguarding or child protection concern is outlined in a separate document following the intervention framework provided at Annex D although a direct referral should be made to the local authority safeguarding unit or the police when:
  - 12.1.1. it may not always be appropriate to go through all stages sequentially because there is immediate danger or risk of harm. Before doing so, basic facts should try to be established. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation.
  - 12.1.2. a member of staff has concerns about the safety or welfare of a child and feel they are not being acted upon by their manager or named DSL, DDSL or SPOC.
  - 12.1.3. there is a specific legal duty on teachers to report to the police if they discover that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18.
- 12.2. Record, in writing, all concerns and discussions, the decisions made and the reasons for those decisions, which should be passed to the DSL, DDSL or SPOC at the earliest opportunity.

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<sup>4</sup> The Prevent Duty: Departmental advice for schools and child care providers (Department for Education. June 2015)  
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- 12.3. Allegations of abuse, or other safeguarding concerns, raised against a teacher or other member of staff, including supply teachers and volunteers, should be dealt with in accordance with part four of KCSIE and the procedure outlined in the Safeguarding and Child Protection Procedure.

### **13. Early Help**

- 13.1. Early help means providing support as soon as a problem emerges at any point in a child's or adult's life. Staff should be particularly alert to a learner who:
- 13.1.1. is disabled and has specific additional needs;
  - 13.1.2. has special educational needs (whether they have a statutory Education, Health and Care Plan or not);
  - 13.1.3. is a young carer;
  - 13.1.4. is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - 13.1.5. is frequently missing / goes missing from care or from home;
  - 13.1.6. is at risk of being radicalised or exploited;
  - 13.1.7. is in family circumstances presenting challenges, such as drug and alcohol misuse, mental ill health and domestic abuse;
  - 13.1.8. is misusing drugs or alcohol themselves;
  - 13.1.9. Has returned home to their family from care; and
  - 13.1.10. Is a privately fostered child.
- 13.2. It is important that staff try to identify early help and support needs during the recruitment, interview and enrolment process, carrying out risk assessments and creating support plans where required.
- 13.3. If there is no pre-existing local authority partner agency involvement or it is felt that the individual case does not require a social worker, then an early help referral can be made directly to the local authority early help teams or by contacting the local authority safeguarding units as detailed in Appendix B although it is important to do this with the support and assistance of the DSL, DDSL or SPOC.
- 13.4. The role of staff in a statutory assessment is detailed in Chapter 1 of Working Together to Safeguard Children (2018). Staff may be required to act as the lead professional for an early help assessment or be asked to participate in such an assessment. Whatever the case they will need to work closely with other practitioners to decide whether the individual would benefit from coordinated support from more than one agency.

### **14. Special Educational Needs and Disabilities**

- 14.1. Learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:
- 14.1.1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without exploration;
  - 14.1.2. being more prone to peer group isolation than other children;
  - 14.1.3. the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
  - 14.1.4. communication barriers and difficulties in overcoming barriers.
- 14.2. Consideration must be given to extra pastoral support for learners with SEN and disabilities.

## 15. Learners Potentially at Greater Risk of Harm

- 15.1. There are groups of learners who may be at greater risk of harm, abuse or exploitation. TCCG will seek to identify early, those learners who may be at greater risk for one or more of the following reasons:
  - 15.1.1. Learner has a social worker and are on a Child in Need or Child Protection Plan.
  - 15.1.2. Learner is a looked after child, who is subject to a care order or a previously looked after child.
  - 15.1.3. Learner is a care leaver, who is no longer subject to a care order.
  - 15.1.4. Learner is a young carer or young parent.
  - 15.1.5. Learner requires mental health support.
- 15.2. Consideration must be given to the assessment and implementation of extra pastoral support and protection in collaboration with relevant social workers, virtual school, care leaver teams and other professionals / agencies as required and based on the needs and wishes of the learner.

## 16. Work Placements

- 16.1. Employers and training organisations will be required to co-operate with TCCG in putting appropriate safeguards in place. Failure to do this will result in TCCG not using them as a work experience placement provider.
- 16.2. Where a placement is long term or meets certain criteria following a risk assessment that increases the safeguarding risks to children or adults at risk of harm, abuse or neglect, then TCCG will ensure that additional safeguards are in place or decline the placement based on the lack of suitability. DBS checks will be carried out on learners who will be working in regulated activity, which must be completed prior to the placement starting.

## 17. On-line Safety and E-Safety

- 17.1. TCCG will endeavour to both filter and monitor all computer and on-line usage within the college or on college systems in a responsible and transparent way to ensure and maintain the safety of staff and learners.
- 17.2. All learners and staff must accept, agree and adhere to the acceptable use policy and any other related on-line and e-safety policies.
- 17.3. Training and education will be given to all staff and learners on how to stay safe on-line and the three areas of risk:
  - 17.3.1. **content:** being exposed to illegal, inappropriate or harmful material;
  - 17.3.2. **contact:** being subjected to harmful online interaction with other users; and
  - 17.3.3. **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

## 18. Whistleblowing

- 18.1. All concerns raised about poor or unsafe practice and potential failures in relation to the college's safeguarding regime will be taken seriously and acted upon through the college's whistleblowing policy.

- 18.2. Where a staff member feels unable to raise the issue or concern with the college leadership team or feels that a genuine concern is not being addressed, it is suggested that they get free, confidential advice from the independent whistleblowing charity Public Concern at Work, who can help with the decision whether and/or how to raise the concern. This can be done by contacting the charity by telephone on 020 7404 6609 or email [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). Further information can be found on the Public Concern at Work website [www.pcaw.co.uk](http://www.pcaw.co.uk) which includes guidance on whistleblowing legislation.
- 18.3. Staff may also use other whistleblowing channels such as the NSPCC or OFSTED whistleblowing helplines:
- 18.3.1. Telephone: NSPCC on 0800 028 0285 or OFSTED on 0300 123 3155
- 18.3.2. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

## 19. Supervision

- 19.1. Supervision for safeguarding staff will be provided through regular pre-arranged meetings. Additional supervision for individuals or groups can be provided on request or as needed.
- 19.2. Supervision will be provided by the direct line manager or delegated to another manager if required. Access to more specialised counselling or supervision is available through human resources.

## 20. Safeguarding and Child Protection Policy and Procedure Updates

- 20.1. The Safeguarding and Child Protection Policy will be reviewed, updated and approved by Governors via the Curriculum and Quality Committee on a biennial basis or more frequently if there are changes to national or local guidance.
- 20.2. Safeguarding procedures and supporting guidance will be reviewed on a regular basis, at least annually and as part of national/local case reviews and “learning lessons” data and in the light of feedback from staff or learners.

## 21. Confidentiality

- 21.1. The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk of harm, abuse or neglect.
- 21.2. Staff should never promise that they will not tell anyone about an allegation or disclosure, as this may ultimately not be in the best interests of the child, young person or adult at risk of harm or abuse.
- 21.3. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance<sup>5</sup>, using the 7 golden rules:
- 21.3.1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

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<sup>5</sup> Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (Her Majesty's Government July 2018) <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>  
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- 21.3.2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 21.3.3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- 21.3.4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- 21.3.5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- 21.3.6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- 21.3.7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## **22. Equality and Diversity**

- 22.1. In accordance with TCCG procedures, an equality impact assessment will be undertaken for this policy.

## **23. Related Documents**

- Safeguarding and Child Protection Procedure
- Prevent (radicalisation & extremism) Policy and Procedures
- The Learner Disciplinary Policy and Procedure
- Code of Conduct-Learner
- Safer Recruitment Policy and Procedure
- Risk Assessment Guidance
- Risk Assessment Procedure
- Code of Conduct-Staff
- Disciplinary Procedure-Staff
- Anti-bullying and Harassment Policy
- Drugs and Substance Misuse Policy
- Sexual Health and Relationships Policy
- Missing Learner Procedure
- Whistleblowing Policy and Procedure

## APPENDIX A – DESIGNATION AND CONTACTS – INTERNAL AND EXTERNAL

### 1. Key Internal Contacts

CONTACT POINT	LOCATION RESPONSIBILITIES	CONTACT NUMBER
Central Contact Number and Central Safeguarding email	All sites	01209 617888 Email: <a href="mailto:safe@cornwall.ac.uk">safe@cornwall.ac.uk</a>
<b>DESIGNATED POSITIONS</b>		
Designated Governor for Safeguarding (DGS)	All sites	Contact through Clerk to the Corporation 01726 226528
Deputy Designated Governor for Safeguarding (DDGS)	All sites	Contact through Clerk to the Corporation 01726 226528
Safeguarding Management Group Members (inc. CEO & Director of HR)	All sites	Contact through Clerk to the Corporation 01726 226528
Director of Student Experience	All sites	01209 617956 / 07920 805852
Designated Safeguarding Lead SPOC, DT & SMG	All sites	01579 372325 / 07928 048485
West Cornwall DDSL, SPOC & DT	All sites	01209 616377 / 07776 284930
SPOC & SEM	Cornwall College St Austell	01726 226441
SPOC & SEM	Cornwall College Camborne	01209 616162 / 07468 710245
SPOC & SEM	Duchy College Stoke Climsland	01579 372308 / 07976 412525
SPOC & SEM	Duchy College Rosewarne	01209 721312 / 07468 710249
SPOC & SEM	Falmouth Marine School	01326 310305 / 07557 759685
SPOC & SEM	Cornwall College Newquay	01637 857960 / 07468 710232
SPOC, SEM & Residential Manager	Bicton College <a href="mailto:safe@bicton.ac.uk">safe@bicton.ac.uk</a>	01395 562386 / 07778 603953
Residential Team Lead	Bicton College Accommodation	01395 562320 / 07977 148270
Residential Team Lead	Duchy College Accommodation	01579 372314 / 07773 367483
dBs Music, Bristol SPOC & DT	dBs Music, Bristol	0333 3442235 / 07970 419 629 / 07746314348
dBs Music, Plymouth SPOC, DT & Head of Centre	dBs Music, Plymouth	0333 3442237
SPOC, DT & Head of Golf College	Linfield Golf Course	07971 186403 / 01444 484467
SPOC & CAM DDSL	Sisna	07929 756209 01579 372391 / 07928048485

### 2. Other Safeguarding staff include Engagement and Progression Officers together with Residential Support Team.

### 3. Key External Contacts

- 3.1. Local Authority arrangements may vary when referring allegations of abuse or general safeguarding concerns about young people under the age of 18 years or in the case of adults at risk of harm under the definition of the Care Act 2014. You should refer to the Local Authority Multi-Agency Safeguarding Unit, Local Safeguarding Children Partnerships (SCP) or Boards (SCB) or Safeguarding Adults Board (SAB) for contact details, advice and the referral process.
- 3.2. Allegations against professionals (teachers, social workers, care/childcare workers etc.) working with children or adults should be made to the relevant LADO (Local Authority Designated Officer) in accordance with the Safeguarding and Child Protection Procedure.

## APPENDIX B – FORMS OF ABUSE

Keeping Children Safe in Education (2020) and other government guidance identifies several categories of abuse. Safeguarding themes of concern that are specific to our age group include:

- Child & Adult Exploitation (Sexual, Criminal, Gangs etc)
- Sexting, Revenge pornography or other inappropriate use of social media.
- Emotional abuse
- Domestic abuse
- Controlling or coercive relationships/abuse
- Neglect or self-neglect.
- Mental Ill health, self – harm and / or suicidal ideation.
- Hate crime or Hate related incidents
- Peer on peer abuse, including bullying, initiation / hazing. This can be direct / indirect and off-line / on-line
- Sexual violence or harassment.
- Radicalisation
- Child Trafficking and Modern Slavery
- Grooming
- Female Genital Mutilation

All staff responsible for the management of safeguarding have undertaken various specialist training and learning lessons workshops on the above and can provide support, together with contacts in specialist support agencies.

These and other types of abuse can relate to either a child under the age 18 years or to an adult at risk of harm, abuse or neglect.

### **Physical Abuse**

This is anything that causes physical harm, injury or illness.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child / young person.

### **Emotional/Psychological Abuse**

This is the persistent emotional ill-treatment of a vulnerable person such as to cause severe and persistent effects on their emotional development.

### **Sexual Abuse**

This involves forcing or enticing a child/young person or adult who is vulnerable to take part in sexual activities. The activities may involve physical contact or non-contact, such as involving children/young people/adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

### **Neglect**

This is the persistent failure to meet the child/young person/ adult (who is vulnerable) basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development.

### **Self-Neglect/Harm**

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to remember that they may owe a duty of care to a child/young person or adult at risk of harm, abuse or neglect, who places themselves at risk in this way. A refusal to engage

with services does not override a duty of care to support individuals and they should continue to be encouraged to access support.

### **Domestic Abuse/Teenage Relationship Abuse**

Abuse can be either in the form of being personally abused within a relationship or for a child or young person to witness this within their home, perhaps involving parents/carers.

### **Financial or Material Abuse**

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

### **Discriminatory Abuse**

This includes racist, sexist, or other forms of abuse that are based on a person's protected characteristics and other forms of harassment, or similar treatment. This can be viewed by a victim as hate crime and the Police can prosecute on this basis.

### **Sexting and Revenge Porn**

New legislation came into force in April 2015 to prevent sexually explicit photographs or videos being shared or posted to cause harm or distress to the person subject of the material. The new law includes uploading to the internet, sending by text, email or messaging platforms, as well as simply showing someone a physical or electronic image.

### **Radicalisation**

This is a process by which a person comes to support terrorism and/or forms of extremism leading to them committing acts of violence or the support of violence by others in a group. Young people and adults who may be vulnerable are often targeted by groups. They may be drawn into association with these groups through internet chat rooms, possibly motivated by a wish to belong or to make a stand or a difference. Read PREVENT (Radicalisation & Extremism) Policy.

### **Exploitation**

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another person into sexual, criminal or gang related activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur using technology.

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

This is an unacceptable and illegal (in the UK) form of abuse and violence towards girls and women involving female circumcision or mutilation of the female genital. There have been incidences of FGM in the South West including Devon and Cornwall.

### **Peer on Peer abuse / Sexual Violence and Harassment**

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the perpetrator as well as the victim. Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however, it can also affect boys and young men. Specific attention should be given to individuals with learning difficulties or disabilities, LGBTQ and those who are from different communities.



## APPENDIX C – SIGNS AND INDICATORS OF POTENTIAL ABUSE

### 1. Overview

Signs of abuse can be many and varied but can also be innocent indications of a transition to adult life. However, they should always be considered as potential causes for concern and followed up / monitored in a sensitive way, with appropriate records dated and kept securely.

Welfare concerns may arise in many different contexts (Contextual Safeguarding) and can vary greatly in terms of their nature and seriousness. Abuse can occur in a family or in an institutional or community setting, by those known to victim or by a stranger, including, via the internet. Extra-familial harm takes a variety of different forms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a victim's health, development and well-being.

The DSL, DDSL, Student Experience Manager, Engagement & Progression Officers and Learning Coaches are trained and experienced in exploring such issues in a confidential and supportive way and can assist colleagues in this or provide guidance and support. They can also seek external, specialist advice and/or make referrals to statutory agencies.

### 2. Possible indicators of abuse

- Behaviour changes, extreme behaviours both introvert as well as extrovert.
- Excessively withdrawn, fearful, or anxious about doing something wrong
- Don't want to change clothes in front of others or participate in physical activities.
- Regularly missing from education, poor attendance and poor punctuality.
- Concerned for younger siblings without explaining why.
- Shy away from being touched or flinch at sudden movements.
- Physical injuries, including bruises, particularly if reasons for these do not appear plausible or if injuries are repeated or self-harm is suspected
- Emotional distress, fear, unwillingness to go home
- Expressed fear of, or strong effort to avoid individuals without an obvious reason
- Sudden changes in behaviour, e.g. becoming very withdrawn or aggressive
- Significant loss/increase of weight or poor hygiene or appearance
- Hungry at college with no money to buy food or borrowing money to buy food
- Poorly dressed or equipped for college
- Sudden changes of living circumstances, e.g. moving out of home to live elsewhere
- Sudden acquisition of jewellery, gifts from older girl/boyfriends
- Alcohol abuse or substance misuse.
- Displaying knowledge or interest in sexual acts inappropriate to their age
- Asking others to behave sexually or play sexual games out of context
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy
- Expression of radicalised views to others – racism, extreme political views, animal rights, religious ideology etc.
- Expression of Interest in weapons, explosives etc.
- Talking about travelling abroad to conflict zones such as Syria

- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons or blaming their problems on their child.
- Parents who are dismissive and non-responsive to practitioners' concerns.

Further signs / indicators specific to children can be found at:

[What to do if you're worried a child is being abused: Advice for practitioners \(March 2015\)](#)

## Appendix D – Intervention Framework

- 1. The following framework should be used when determining levels of responsibility for safeguarding intervention. The framework is adapted from the local authority threshold tool and continuum of needs model that can be found at:**

<https://www.cornwall.gov.uk/media/34382614/multi-agency-threshold-guidance.pdf>

### **2. Levels of Vulnerability and Need**

- 2.1.1. Level 1
- 2.1.2. Learners with no additional needs, who make good overall progress in all areas of universal development and receive appropriate universal services.
- 2.1.3. Study Programme Manager provides normal pastoral and welfare support, signposting to services as required and log on Pro-monitor as required.
- 2.2. Level 2
  - 2.2.1. Additional needs of the learner are being met or could be met through universal services. There is no risk of maltreatment and a low risk of harm.
  - 2.2.2. Study Programme Manager (SPM) to facilitate pastoral and welfare support through support plan in consultation with, and assistance from, Engagement & Progression Officers (EPO) and Additional Learning Support Team, as required. SPM to support / assist a referral to external service in consultation with parents / guardians. SPM to log in Pro-monitor 'Confidential / Sensitive' copying EPO, Student Experience Manager (SEM) and Designated Safeguarding Lead (East locality) or Deputy Designated Safeguarding Lead (West locality)
- 2.3. Level 3
  - 2.3.1. Learners experiencing a situation or circumstance where there is a perceived risk of maltreatment or harm to themselves.
  - 2.3.2. Any member of staff who has concerns about the treatment or risk of harm to a learner must complete a 'Safeguarding Concern / Disclosure' form and refer to the Designated or Deputy Designated Safeguarding Lead (DSL/DDSL), copying in the Student Experience Manager (SEM). The DSL / DDSL / SEM will assess the concern / disclosure to determine if this is a level 4 concern / disclosure or level 3. The DSL / DDSL / SEM to delegate and advice the Engagement & Progression Officer (EPO) or Study Programme Manager (SPM) on the best course of action and referral as required, in accordance with local authority processes.
  - 2.3.3. Administering member of staff to log on Pro-monitor 'Confidential / Sensitive' copying in the DSL / DDSL / SEM and create a Safeguarding Log as access permits showing concern, chronology and outcome.
- 2.4. Level 4
  - 2.4.1. Learners experiencing maltreatment or significant harm, or where there is a high likelihood of significant harm where protection or prevention measures are needed immediately.
  - 2.4.2. Any member of staff who has concerns about the maltreatment, abuse or significant risk of harm to a learner must complete a 'Safeguarding Concern / Disclosure' form immediately and refer to the Designated or Deputy Designated Safeguarding Lead, copying in the Student Experience Manager. The Designated Safeguarding Lead or

Deputy, or the Student Experience Manager will assess the concern / disclosure and then administer the referral in accordance with local authority processes.

- 2.4.3. The DSL / DDSL / SEM will create a Safeguarding Log with concern, chronology and outcomes.