



Safeguarding Vulnerable Groups

Essential Recruitment and Selection Practice Procedure

New College Durham is committed to safeguarding and promoting the welfare of children and young people, as well as vulnerable adults, and expects all staff and volunteers to share this commitment.

New College Durham
Safeguarding Vulnerable Groups-
Essential Recruitment and Selection Procedure
(Equality and Diversity Assessment)

We will consider any request for this procedure to be made available in an alternative format.

We review our policies and procedures regularly to update them and to ensure that they are accessible and fair to all. All policies and procedures are subject to equality impact assessments. Equality Impact Assessments are carried out to see whether the policy has, or is likely to have, a different impact on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or human rights.

We are always keen to hear from anyone who wants to contribute to these impact assessments and we welcome suggestions for improving the accessibility or fairness of the policy.

To make suggestions or to seek further information please contact:

Human Resources Department
human.resources@newdur.ac.uk
Tel: 0191 375 4025/4023

If any employee has difficulty understanding this policy or needs assistance completing any documentation associated with the policy, please contact either your trade union representative or the College's Human Resource Department.

Equality Impact Assessed: August 2021

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New College Durham

Safeguarding Vulnerable Groups- Essential Recruitment and Selection Practice Procedure

1. Introduction

- 1.1 New College Durham (the College) is committed to Safeguarding and promoting the welfare of all vulnerable groups (children and adults). As part of this commitment the College ensures that key Human Resource processes, notably recruitment decisions, are well informed through a consistent and thorough process of obtaining, collating, analysing and evaluating information from and about applicants and new members of staff or volunteers. The overall aim of this data collection is to provide greater protection for vulnerable members of society, staff and students. All staff and volunteers are required to share this commitment to support and engage in measures that afford greater protection to such vulnerable members.
- 1.2 This procedure should be read in conjunction with the following College Policies:
- Recruitment and Selection Procedure;
 - Safeguarding Children and Adults at Risk Procedure;
 - Safeguarding Low-Level Concerns Policy
 - Staff Code of Conduct

It is imperative that all staff understand their obligations under all relevant Safeguarding Procedures and are aware of the reporting processes and procedures to follow should a safeguarding concern arise regarding not only a student but also about another member of staff.

- 1.3 This procedure focuses on the recruitment of staff under the prevailing legislation and details explicitly employment checks that will be undertaken in relation to the recruitment of staff. This Procedure is based on guidance issued by the Department for Education (DfE) in their publication “Keeping Children Safe in Education” (latest version). A Glossary of Terms for this Procedure is provided at Annex A.

- 1.4 All staff, including those who do not work directly with children, are required to read Part One of Keeping Children Safe in Education (latest version). A copy can be located on the government website.
- 1.5 This Procedure is designed to inform staff of the College's legal responsibility to safeguard vulnerable groups and to ensure safe working practices apply.
- 1.6 As part of the recruitment process, the College will utilise the principles and services of the Disclosure and Barring Service (DBS), to identify candidates who may be unsuitable for certain work with certain groups. Further details on the College's DBS procedure can be found at Annex C of this procedure.

2. Prevailing Legislation and Check Levels

- 2.1 The level of checking procedures that must be undertaken for a potential College employee, is dependent on the level of responsibility associated with caring for, training, supervising, or being in sole charge of persons under 18 and/or adults at risk.
- 2.2 The Further Education (Providers of Education) (England) Regulations 2006 (supported by 'Keeping Children Safe in Education', requires institutions to check (for all new members of staff) their:

- Identity;
- Right to work in the UK;
- Possession of relevant qualification(s);
- Enhanced DBS clearance with appropriate barred list check. The nature of the College establishment means that for the purposes of this, all posts will be subject to an Enhanced DBS check with Children's Barred List as it falls under the definition of a role that is undertaken within a 'specified place'

"work for a limited range of establishments (known as 'specified places' which include school and colleges), with the opportunity for contact with children"

- additional checks on those who have lived outside the UK will take place (for example, via the embassy or police force of the relevant country/countries).

- 2.3 In relation to this procedure and our practices the College will comply with the relevant prevailing legislation.

3. The Recruitment Process

- 3.1 The College will ensure that all applicants are made aware of the College's commitment to safeguarding vulnerable groups, by including a detailed statement within the recruitment literature (ie. advert and post and person specification) detailing;
- The College's commitment to safeguarding and promoting the welfare of children and vulnerable groups
 - That safeguarding checks will be undertaken
 - The safeguarding responsibilities of the post (as detailed in the post and person specification)
 - Whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. This means that when applying for certain jobs and activities certain spent convictions and cautions are 'protected' so they do not need to be disclosed. If they are disclosed the College cannot take them into account.
 - That it is an offence to apply for a role at the College if the applicant believes they are barred from engaging in regulated activity relevant to children
- 3.2 All applicants will be provided with copies of the College's child protection / safeguarding policies (including the College's process/policy on the recruitment of ex-offenders) and are required to read them in full and make a declaration to say that they have read them.
- 3.3 Relevant job descriptions and person specifications will make reference to responsibilities towards children and safeguarding vulnerable groups (SVG) and the suitability of the post holder to work with these groups.

3.4 Applicants will be asked to provide the following:

- full identity details (including current and former names, current address, date of birth and NI number);
- statement of qualifications;
- full employment history since leaving Secondary Education or post compulsory education employment (and reasons for leaving), voluntary work and explanations of any gaps;
- qualifications, the awarding body and date of award
- declaration of any family, or close relationship to a member of the Corporation;
- details of referees, one of which should be the current or most recent employer;
- statement of personal qualities and experience that the applicant believes are relevant to the suitability for the post advertised and how they meet the person specification;
- declaration of suitability and/or subject to investigations regarding working with vulnerable groups;
- applicant's commitment to Safeguarding principles and affirmation of the commitment detailed in this Procedure.
- Applicant's commitment to upholding the College's commitment to the embedding of PREVENT and Fundamental British Values in all aspects of work and learning.

3.5 The College will not accept copies of curriculum vitae (CV) in place of an application form, and this is detailed on all adverts/application forms.

3.6 All applications will be scrutinised by those tasked with shortlisting potential employees. Any member of staff or governor who undertakes shortlisting activities must have completed specific training on Safer Recruitment. Additionally, the HR department will check all applications and any forms with missing information relating to declarations will not be accepted. Any forms which detail gaps in employment or education history will be highlighted to the relevant shortlisting individuals, so that further information can be obtained during any subsequent interview (if the individual has been short listed). Shortlisting will be undertaken by at least two members of staff which for consistency purposes will also form part of the interview panel. This will ensure that they are aware of and have considered any gaps in employment and the reasons for them, and to ensure that all potential concerns have been explored.

3.7 All shortlisted applicants will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children or vulnerable groups. This includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with law applicable in England and Wales, not the law in the country of origin or where they were convicted
- If they are known to the police and children's social care
- Any relevant overseas information

Applicants shortlisted for interview will be asked to make this self-declaration and provide the relevant information in advance of the interview taking place. Applicants will be asked to sign confirming that the information provided is true which will then be supported with a physical signature at the point of interview. Any information detailed as a result of this process will then be discussed and considered at interview.

The self-declaration will also inform shortlisted applicants that the college will undertake a search (via an online search engine) as part of our due diligence checks (see section 3.8 for more information)

A copy of the self-declaration form is available at Annex B of this policy.

3.8 In addition, as part of the shortlisting process the HR department will carry out a search (via an online search engine) as part of their due diligence on all shortlisted candidates. This will consist of inputting the full candidate's name (as provided on their application form) into a search engine. This may help identify any incidents or issues that have happened and are publicly available online and therefore may make the candidate unsuitable to work in a college setting. This information will then be explored further with the applicant at interview before any firm decisions about their suitability for appointment are made. The recruitment checklist will be updated to reflect that the check has been undertaken. Only where concerns are raised will copies of the relevant links and a summary of the subsequent discussions with the applicant be retained as evidence to support any decision making.

- 3.9 Applicants will be asked to bring with them to interview, proof of identity, proof of right to work in the UK and essential qualifications.
- 3.10 For appropriate posts, students will be used as part of the interview process. Interview panels will consist of a minimum of two, appropriately trained members of staff, with the necessary authority to make recruitment decisions.
- 3.11 All interview panels will consist of at least one member who has undertaken Safer Recruitment Training, which covers as a minimum, the guidance as outlined in Keeping Children Safe in Education (latest version).
- 3.12 All interview panels will agree structured questions which are asked of all candidates and will include:
- 3.12.1 Finding out what attracted the candidate to the post being applied for and their motivation to work with children or in the College;
- 3.12.2 Exploring their skills and asking for experience of working with children (or in an education setting);
- 3.12.3 Probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this
- 3.13 All information considered in the decision making will be clearly recorded along with decisions made.
- 3.14 Offers of employment will be conditional upon:
- receipt of at least two satisfactory references (one of which must be from current or last employer/school);
 - verification of identity – it is important to be sure that the person is who they claim to be. Where available, the successful candidate will be asked to provide a copy of their birth certificate to verify their name at birth, and then evidence to confirm where name changes have occurred;
 - verification of Right to Work in the UK, including EU nationals
 - appropriate DBS Disclosure with barred list information and relevant overseas checks;

- verification of mental and physical fitness for the role;
 - verification of qualifications as detailed on the person specification for the post;
 - a prohibition check using the Department for Education's 'Check a teacher's record' service (for applicable posts)
 - a criminal record check from the relevant country's embassy or police force if the candidate has lived abroad for a period of 12 months or more in the last 5 years;
 - Satisfactory completion of all mandatory training (including Safeguarding and Safer Recruitment (for applicable posts);
 - commitment to participate in the relevant probationary period.
- 3.15 All new staff will be appropriately inducted with training and information regarding the College's Policies and Procedures including those related to SVG.
- 3.16 Monitoring of this procedure and the College's policies and procedures on recruitment and selection and induction etc. will be monitored through staff turnover, reasons for leaving and Employment Reflection surveys and/or interviews.

4. Checking Procedures and Information

4.1 Identity Checks

- 4.1.1 The HR department will verify the identity of all new employees (and volunteers). The criterion includes checking a person's name (including any previous names used), date of birth and address verification.
- 4.1.2 The identification should be either a valid passport and/or birth certificate (where available) and proof of NI number, together with a document containing a photograph (eg driving licence). All documents must be originals. Photocopies are not accepted.

4.2 Right to Work in the UK

- 4.2.1 All staff will be asked to provide evidence that they are legally entitled to work in the UK, as part of the recruitment process (at interview) and upon appointment. The law on preventing illegal working is set out in sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (the 2006 Act), section 24B of the

Immigration Act 1971, and Schedule 6 of the Immigration Act 2016.

In accordance with the Act, guidance is provided to all applicants/employees as to acceptable documentation that can be used to verify their right to work in the UK.

4.3 Barred Lists

4.3.1 The DBS hold two barred lists – the Children’s Barred List and the Adults Barred List. The barred lists can only be checked when carrying out an Enhanced DBS check and where the applicant/employee role involves regulated activity. The full legal definition of regulated activity which is used to determine the appropriateness of and undertaking of the relevant DBS check is set out in Schedule 4 (Parts 1 and 2) of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

4.4 DBS Checks

4.4.1 The College ensures compliance with the DBS Code of Practice and ensures checks are undertaken in accordance with relevant legislation to determine ‘eligibility’ (ie. Rehabilitation of Offenders Act 1974 (ROA) 1974 (Exceptions Order / Police Act 1997).

4.4.2 There are three types of check that can be undertaken:

Type of Check	What it will check for
Standard	this provides information about convictions, cautions, reprimands, and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the ROA Act 1974. The law allows for certain old and minor matters to be filtered out.
Enhanced	As above – plus any approved information held by the police which a chief officer reasonably believes to be relevant and ought to be disclosed

Enhanced with list checks

As above – plus a check of the appropriate DBS barred lists

4.4.3 The College has established guidance based on government's statutory guidance on the supervision of children and the definition of 'Regulated Activity' and the appropriateness of the level of check.

4.4.4 Any offer of employment will be conditional until the individual receives a copy of their DBS certificate and presents this document to the HR department for verification. Failure to do this will either lead to a delay in employment commencing, or the conditional offer of employment being withdrawn.

Should any information be disclosed on the certificate, the decision to employ rests with the Principal and Chief Executive, with guidance from the Executive Director of HR & Corporate Services. A decision not to appoint an individual because of their conviction(s) will be clearly documented.

4.4.5 The College ensures that they adhere to the requirements of the Data Protection Act 2018 in terms of the storage and handling of DBS certificates. When a DBS certificate is presented to the HR department, a scanned copy is made, and this is stored electronically in line with the retention period (ie. for no longer than 6 months).

4.4.6 Individuals are eligible to join the DBS Update Service at the point a new DBS check is made. The DBS Update service allows for the portability of a certificate across employers. Where an individual details that they have joined the DBS Update Service, the HR department will:

- obtain written consent from the applicant to carry out an online check to view the status of an existing enhanced DBS check;
- see the original DBS certificate and confirm that it matches the individual's identity;
- ensure that the appropriate level of check e.g. Enhanced certificate including relevant barred list information

matches the requirements of the post that the individual has been appointed to

The College will then check the individuals online record to see if any changes to the record have been made since the initial certificate was issued.

The individual, via their own online record, will be able to see the full list of those organisations that have carried out a status check on their record.

Further information on this and the DBS service can be found in Annex C of this procedure.

4.5 Overseas Checks

- 4.5.1 Staff who have lived overseas will undergo the same checks as those who have lived solely in the UK including an enhanced DBS check, with barred list (as relevant) even if the individual has never been to the UK. Where the DBS check is deemed as not sufficient for making a recruitment decision, further criminal records information should be sought from countries where individuals have worked or lived. These checks could include, criminal records checks for overseas applicants (in line with Home Office guidance) and for teaching positions, by obtaining a letter from the professional regulating authority in the country (or countries) in which the applicant has worked, confirming that they have not imposed any sanctions or restrictions and /or that they are aware of any reason why they may be unsuitable to teach.
- 4.5.2 Where this information is not available alternative methods of seeking an applicant's suitability will be sought and/or a risk assessment undertaken that supports informed decision making on whether to proceed with the appointment.
- 4.5.3 Staff may commence employment prior to the College receiving an appropriate DBS check (and any overseas checks if applicable), provided **ALL** other checks (paragraph 3.8) have been carried out with satisfactory results, and the employee is continuously and appropriately supervised, and the criminal records checks have been requested and a standalone children's barred list check has been undertaken. Only the Executive

Director of HR and Corporate Services can give this authorisation once a written request and appropriate supervision measure have been arranged by the recruiting manager.

4.6 Qualification Checks

- 4.6.1 The College will verify that the candidate has obtained any professional qualifications required for the job including those detailed as 'essential' within the person specification and that they claimed for on their application form. Sight of original qualification certificates, or where not available, a letter from the awarding institution, will be required.
- 4.6.2 Where a newly appointed lecturer does not hold a recognised teaching qualification, it will be the College's expectation that they undertake the College's "Teaching, Learning and Assessment Toolkit" programme within their probationary period.

4.7 References

- 4.7.1 At least two references will be sought for all new employees, one of which should be from the current or most recent employer and must be completed by a senior person with appropriate authority for completing the reference. The College will not accept references that are provided by candidates, or that are open, for example, references that are addressed "*To Whom it May Concern*". If a candidate for a teaching post (unless this is their first teaching post) is not currently employed as a teacher the College will check with the school, college or local authority at which they were most recently employed and previously undertook teaching, to confirm details of their employment and their reasons for leaving. If the applicant has never worked with children then the College will ensure that a reference is provided by their most recent employer. If the referee is school or college based the reference should be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations. References will be scrutinised and any concerns resolved before the appointment is confirmed. Where the candidate allows (as stated on the application form) references will be requested prior to interview) to enable any concerns

raised to be explored further with the referee and taken up with the candidate at interview.

However, where a candidate expressly states that they do not wish for the referees to be contacted prior to interview, the HR department will ensure that this is adhered to, and the offer of employment will be subject to satisfactory references.

- 4.7.2 Reference requests will include a copy of the job description and person specification and will ask for the referee's opinion in relation to the suitability of the candidate to the role, and where appropriate, their suitability to work with children and adults. They will also ask about the relationship between the candidate and the referee.
- 4.7.3 Where information that has been requested is missing from the reference or is vague/insufficient, clarification will be sought by contacting the referee and requesting the information be returned in writing. The HR department will ensure that we always verify information with the person who provided the reference,
- 4.7.4 Where references are received electronically, the HR department will ensure that that they originate from a legitimate source/email address.
- 4.7.5 References will wherever possible be obtained before interview so that any issues raised can be explored with the referee prior to the interview and with the candidate during the interview.
- 4.7.6 The HR department will compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
- 4.7.7 Other information that will be sought via reference requests includes:
 - reason for leaving their current or most recent post;
 - confirmation of current/most recent post and salary;
 - comments about the applicant's performance history and conduct;

- details of any disciplinary procedures the applicant has been subject to (including any related to the safety and welfare of children or adults).

No appointment will be confirmed until all concerns (where there are any) are satisfactorily resolved.

4.8 Occupational Health Check

- 4.8.1 All appointees new to the College must undergo an occupational health check. This is to ensure that they are both mentally and physically fit for work in their appointed role and to enable the College to provide for any adaptations/adjustments for the appointee to do the role, for example a special chair, keyboard etc as necessary.
- 4.8.2 The individual will be asked to complete a health questionnaire which should be returned to the Occupational Health Department, via the online Cohort system, for assessment. A report will then be issued to the HR department declaring whether or not the individual is fit to work, including any recommended adjustments (if applicable). Where further specialist occupational health advice or assessment is required, this may be obtained through an appropriately qualified external occupational health provider (this may be provided through a third party provider).

4.9 Prohibition Check

- 4.9.1 A prohibition check using the Department for Education's 'Check a teacher's record' service is undertaken for all staff that undertake “teaching work” and ensures that no sanction or restriction has been imposed on the individual by the Secretary of State following consideration by a professional conduct panel convened by the Teaching Regulation Agency.
- 4.9.2 In accordance with the Department for Education's requirements and the College's funding conditions, the College must not appoint or engage any person who is prohibited from carrying out teaching work. For all posts that involve teaching work, a prohibition check will be completed using the

Department for Education's 'Check a teacher's record' service before employment is confirmed.

- 4.9.3 For the purposes of carrying out a prohibition check using the Department for Education's 'Check a teacher's record' service., “teaching work” is defined as “*planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting the development progress and attainment of pupils*”.

5. The Single Central Record

- 5.1 The College's Single Central Record (SCR) will be maintained in accordance with the statutory requirements set out in the latest version of Keeping Children Safe in Education and will contain all information required by the Department for Education. The SCR will be kept up to date and retained securely as part of the College's safeguarding arrangements.
- 5.2 The College will maintain a record of all staff/volunteers who are employed/engaged at the College, and also any that are employed as supply staff, whether employed directly via the College Supply Pool; through an external agency, or through a contracted service. The record will indicate whether or not the following are required, have been completed and when, and by whom:
- Identity checks;
 - Qualification checks;
 - Checks of right to work in the UK;
 - Standalone children's barred list check
 - DBS checks;
 - Further overseas records checks.
 - A prohibition check using the Department for Education's 'Check a teacher's record' service (where applicable)
- 5.3 In addition to the above checks, the College will record:
- whether the person's position involves 'relevant activity' ie. Regularly caring for, training, supervising, or being solely in charge of persons under the age of 18;

- all mandatory training, including Safeguarding Training which is undertaken prior to commencement at the College, and then refreshed on a three-yearly basis, in addition to Safer Recruitment training (where relevant to the post).

5.4 Where a member of staff or individual ceases work at the College, their details will be removed from the single central record.

6. Agency and Third-Party Staff

At times there may be a requirement to engage the services of staff from an external agency/third party to provide cover on a short-term basis. Where such occurrences are approved, the HR department will ensure that written confirmation is obtained from the agency/third party that declares that they have carried out all appropriate recruitment checks (as detailed above in section 4, and the same checks had the College undertaken to recruit that individual themselves).

In respect of the DBS check the College will ensure that written notification is received confirming that the certificate has been obtained by either the agency/third party themselves or by another such business.

Where the agency/third party has obtained an enhanced DBS certificate that has disclosed any matter or information, the College will request to see a copy of the certificate from the agency.

At the point all checks are in place, the HR department will agree a start date. On the first day of the assignment, and prior to undertaking any work at the College the individual must present themselves to HR with appropriate photo identification to confirm that they are who they say they are. This information is recorded on a SCR for External Agency staff.

7. Trainee Teachers

7.1 The College may host trainee teachers undertaking initial teacher training, teacher training or other teaching placements as part of an accredited training programme.

7.2 Before a trainee teacher commences their placement, the College will obtain written confirmation from the training provider or employing organisation that all required pre-placement safeguarding and pre-employment checks have been completed in accordance with statutory guidance, including:

- identity;
- enhanced DBS check (including children's barred list information where required);
- right to work (where applicable);
- prohibition check (where applicable); and
- any overseas checks where required.

7.3 Where the trainee teacher is employed directly by the College, all safer recruitment checks detailed within this Procedure will be completed by the College before the individual commences their duties.

7.4 All trainee teachers will receive an appropriate safeguarding induction and be provided with relevant College safeguarding policies, including the Staff Code of Conduct, before undertaking teaching activities.

8. Contractors

Where the College utilises contractors to provide services, any contractual arrangements will specifically reference their safeguarding requirements/obligations under the contract of service.

All contractors working on College premises are subject to the appropriate level DBS check prior to the commencement of any work on-site. Any contractor engaged in regulated activity will undertake a DBS check including the relevant barred list check.

Where work is needed to be undertaken in advance of a DBS check being received, approval must be sought from the Deputy Chief Executive and permission will only be given if the activity/attendance on-site is fully supervised by an individual that has all appropriate checks in place.

The identity of all contractors to site is checked upon arrival to site.

Where an individual working at the College is self-employed, the College may consider obtaining a DBS certificate for them as self-employed staff are unable to make an application directly to the DBS themselves.

9. Governors

All governors will be subject to checks deemed appropriate to the role they are undertaking, including that of a DBS check, and mandatory training (including Safeguarding). Such information will be retained centrally as part of the College's Single Central Record, by the HR department.

10. Visitors

10.1 All visitors to the College must comply with the College's Visitor Management Procedures. Visitors will be required to report to Reception on arrival, provide appropriate identification where required, sign in and out, and wear the appropriate visitor identification badge whilst on College premises.

10.2 The College will determine the safeguarding arrangements for visitors according to the nature of their visit, the activities they will undertake, and the level of contact they will have with children and young people. Appropriate supervision arrangements will be determined through a safeguarding risk assessment.

10.3 This approach applies to, but is not limited to:

- contractors working on College premises;
- professionals visiting students as part of their role (for example social workers, health professionals, careers advisers etc)
- guest speakers and employers;
- one-off visitors;
- any visitor who is escorted by a member of College staff.

10.4 Where visitors attend the College in a professional capacity to work with or meet students, the College will verify their identity and obtain confirmation from their employer that the appropriate pre-employment and safeguarding checks, including DBS checks where applicable, have been completed before unsupervised access is permitted.

11. Work Experience Placements

11.1 Individuals undertaking work experience or placement opportunities within the College will be subject to appropriate safeguarding arrangements. Before a placement commences, the College will undertake a risk assessment to

determine the level of supervision required, taking account of the individual's age, the nature of the work to be undertaken and the level of contact they may have with children and young people.

- 11.2 Where a work experience placement is likely to involve regulated activity with children, the College will ensure that the appropriate pre-placement safeguarding checks, including a Disclosure and Barring Service (DBS) check where legally required, are completed before the placement begins. Where a DBS check is not required, appropriate supervision arrangements will be implemented throughout the placement.

12. Existing Staff

Although limited, there are circumstances where the college will be required to carry out new checks on existing staff. These are when:

- there has been a break in service of 12 weeks or more;
- there are concerns about an individual's suitability to work with children
- an individual moves from a position that did not involve the provision of education to one that does, and will therefore be treated as if they were a new member of staff.

13. Staff Code of Conduct

The College's Staff Code of Conduct applies to all College employees and is published separately on the College's HR and Safeguarding intranet pages.

Section 3 of the Staff Code of Conduct details behaviour /conduct that is expected of all staff specifically in relation to Safeguarding.

Employees should be aware that failure to comply with the Code of Conduct could result in disciplinary action including dismissal. The Code of Conduct is designed to give clear guidance on the standards of behaviour all staff are expected to observe.

14. Procedure Review

- 14.1 The effectiveness of this Procedure will be monitored and reviewed annually in light of legislative changes, best practice and experience.

Where changed to legislation prompt an earlier review then this will be undertaken accordingly.

- 14.2 In considering the effectiveness of this Procedure, consultation will be undertaken with Trade Unions, staff and managers to assist in the review and monitoring of this Procedure.

Implementation	June 2009
First Review (completed)	June 2013
Second Review (completed)	December 2015
Third Review (completed)	August 2021
Fourth Review (completed)	31 August 2022
Fifth Review (completed)	July 2024
Sixth Review (completed)	July 2025
Seventh Review (completed)	September 2026
Eighth Review (due)	September 2027

Glossary of Terms

Safeguarding Vulnerable Groups Essential Recruitment and Selection Practice Procedure

Applicant: An individual that applies for a job.

Adult: People aged 18 years or over who are not defined at risk

Adults at Risk (formerly known as Vulnerable Adults): An ‘adult at risk’ is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) the following definitions for the purpose of this policy have been used:

An individual:

- a. is or may be in need of community care services by reason of mental or other disability, age or illness;
- b. is or may be unable to take care of himself or herself;
- c. is unable to protect himself or herself against significant harm or serious exploitation

Whilst not definitive, the main categories of people covered by the definition of “adult at risk” for the purpose of this policy include those who;

- d. have a learning disability
- e. have a physical or sensory impairment
- f. have a mental illness
- g. are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seekers).

Barred Lists: There are two types of lists – the Children’s Barred List and Adults Barred List which are held by the Disclosure and Barring Service (see DBS below). These are checked to ensure that an applicant is suitable for working with children and/or adults.

Child: A person under the age of 18 years. A child becomes an adult on the date of their 18th birthday

DBS: Disclosure and Barring Service. A Government agency that helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups and children. They are responsible for processing requests for criminal records checks.

Employment Checks: Robust recruitment checks that are carried out on all individuals working with children and vulnerable groups in educational establishments.

Enhanced Disclosure: This shows details of all spent and unspent convictions, cautions reprimands and final warnings and includes a check on all local police records.

Overseas Check: The practice of obtaining further criminal records checks from the embassies or High Commission of a country where a prospective employee has lived and worked.

References: A statement from a previous employer or teacher that can attest to an applicant's skills, qualities and abilities and suitability for the role applied for.

Right to Work in the UK: A check of an employee's eligibility to ensure that they are legally entitled to work in the UK in accordance with the Immigration, Asylum and Nationality Act.

Safeguarding: Protecting children, young people and vulnerable adults from physical, emotional or sexual abuse and neglect.

Single Central Record: A register that is kept and maintained by the College detailing all employment checks that have been carried out on all individuals employed by the College.



Self-Declaration and Disclosure Form

(to be completed only by shortlisted applicants)

Self-Declaration and Disclosure Form

New College Durham is committed to Safeguarding and promoting the welfare of all vulnerable groups (children and adults). As part of this commitment the College ensures that key Human Resource processes, notably recruitment decisions, are well informed through a consistent and thorough process of obtaining, collating, analysing and evaluating information from and about applicants and new members of staff or volunteers. The overall aim of this data collection is to provide greater protection for vulnerable members of society, staff and students. All staff and volunteers are required to share this commitment to support and engage in measures that afford greater protection to such vulnerable members.

Staff working at the College who have the opportunity for access to young persons are exempt from the provisions of the Rehabilitation of Offenders Act 1974. If you have received any convictions, which for other purposes are 'spent' under the provisions of the Act, you are not entitled to withhold information and, in the event of employment, any failure to disclose such convictions could result in dismissal or disciplinary action by the Corporation. The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the [Ministry of Justice website](#).

Any information given will be completely confidential and will be considered only in relation to your application for a position to which the order applies.

This form is only to be completed by shortlisted applicants and must be returned to the HR department in advance of the interview taking place. Failure to provide such information in advance of the interview will mean that your application will be void and will not progress.

Please send your completed form to human.resources@newdur.ac.uk

Privacy Notice

The personal data that this form collects about you will be used for the purposes of processing your application. If your application is successful this data will be retained on your personal file together with your application form for the position in which you have been successfully appointed to.

Where you are unsuccessful in the selection process, manual records will be kept for 6 months and then destroyed.

The completion of this document should only be done so after having read and understood the College's policies on (copies enclosed):

- Safeguarding Children and Adults at Risk
- Safeguarding Vulnerable Groups – Essential Recruitment and Selection Practice
- Recruitment of Ex-Offenders (policy statement)

Should you have any queries regarding the completion of this form please email human.resources@newdur.ac.uk

Applicant Information	
Full Name:	
Post shortlisted for:	

Keeping Children Safe in Education (KCSIE) – a search (via an online search engine)

Part 3 Safer Recruitment (Section 226)

In addition, as part of the shortlisting process schools and colleges should consider carrying out a search (via an online search engine) as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that a search (via an online search engine) may be done as part of due diligence checks.

In accordance with the above guidance, New College Durham will be carrying out a 'google' search on all shortlisted candidates as follows:

- Your first name plus surname plus county you live in
- Your first name plus surname plus county you have worked in (if different)
- If the application form indicates that you have worked overseas, an additional search which includes the overseas location will be undertaken.

If you have had previous names i.e., a maiden name, New College Durham may well search this name too.

If you have moved around, there will be additional searches on the locations you have lived and worked in.

If you have a more common surname there are likely to be many results and it could take considerable time to search. In this situation the College may include your date of birth into the search criteria to narrow the search.

Any issues or concerns flagged as a result of a search (via an online search engine) will be discussed at interview, giving you an opportunity to give further information to the appointment panel for consideration.

Declarations

Declaration of individual		
1. Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974?	No ☐	Yes – please provide further information ☐
2. Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020?	No ☐	Yes – please provide further information ☐
3. Have you been formally charged with any other offence in any country which has not yet been disposed of?	No ☐	Yes – please provide further information ☐
4. Are you currently subject to any criminal investigations or pending prosecutions by the police in any country which may have a bearing on your suitability for this position?	No ☐	Yes – please provide further information ☐
5. Have you ever been known to any Children’s Services department or the police as being a risk or potential risk to children?	No ☐	Yes – please provide further information ☐
6. Have you ever been barred from working with children or disqualified from working in Childcare?	No ☐	Yes – please provide further information ☐

7. Have you been the subject of any formal action, disciplinary investigation and/or sanction by any organisation due to concerns about your behaviour towards children or vulnerable groups?	No ☐	Yes – please provide further information ☐
8. Are you or have you ever been prohibited from teaching?	No ☐	Yes – please provide further information ☐
9. Have you ever been refused employment or been dismissed for misconduct from any employment, volunteering, or other position previously held by you, in circumstances which may have bearing on your suitability for this position?	No ☐	Yes – please provide further information ☐
10. Are you currently subject to any fitness to practise investigations or proceedings by a regulatory, governing, or licensing body in any country, which may have bearing on your suitability for this position?	No ☐	Yes – please provide further information ☐
11. Is there any reason that you cannot work with children/young people (under 18 years of age) or with vulnerable groups?		
12. Are there any other reasons that may be relevant to your suitability to work at the College?		
Please tick the boxes below and then sign this form.		
☐ I declare that all the information I have provided in this disclosure is full and correct at the time of application and that I have not omitted anything that could be relevant to the appointment of the post that I have applied for. I understand that the recruitment panel may be made aware of any relevant information that I have disclosed in order to discuss the matter(s) with me as part of the recruitment process and that, if my application is successful, a risk assessment of the disclosed information will be held securely on my personnel file. Any failure to disclose such convictions could result in dismissal or disciplinary action by the College.		
☐ I am aware that I will be required to apply for an Enhanced DBS certificate should I be successful at interview.		

☐ I agree to inform the College within 24 hours if I am subsequently investigated by any agency or organisation in relation to concerns about my behaviour towards children/young people or vulnerable groups.	
☐ I confirm that I have read, understood and agree with the following College Policies • Safeguarding Children and Adults at Risk Policy • Safeguarding Vulnerable Groups – Essential Recruitment and Selection Practice • Recruitment of Ex-Offenders (policy statement)	
Signature	 <i>The above has been signed as an electronic signature. I am aware that I will be asked to physically sign a hard copy of this declaration when I attend for interview.</i>
Print name	
Date	

Please do not complete this section until interview, you are required to sign a hard copy as part of the interview process. This is a declaration that all of the information provided electronically both on the Self Declaration and Disclosure Form and on your Application for Employment is true and accurate.

Signature	
Print name	
Date	

Guidance issued by Disclosure and Barring Service (DBS)

1. Background

- 1.1 The Disclosure and Barring Service (DBS) is designed to identify candidates who may be unsuitable for certain work.
- 1.2 The DBS further maintains the registers which indicate where an individual is barred from working with children or adults. The College is able to undertake checks against these lists (relevant to the role) through our Umbrella Body service: the children's barred list and the adult's barred list, via an Enhanced DBS check.
- 1.3 DBS checks have to be requested by or through a Registered Body (RB). The College utilises a DBS registered Umbrella Body to undertake such checks. to obtain these checks on our behalf.
- 1.4 The College can only apply for a DBS check if the position is exempt from the Rehabilitation of Offenders Act and falls under the occupations that are known as the exceptions.

2. Guidance

- 2.1 There are three types of checks that can be undertaken:
 - Standard Check;
 - Enhanced Check ;
 - Enhanced Check with barred lists.
- 2.2 The College follows established guidance based on the government's statutory guidance on the supervision of children/vulnerable adults and the definition of Regulated Activity to determine the appropriate level of check to be undertaken.
- 2.3 The College ensures that all DBS applicants are made aware of the DBS Code of Practice.

- 2.4 The College recognises that any individual can refuse to apply for a DBS check; however, some posts require disclosure by law. In this instance, if an individual refuses to apply for a DBS check, the College will not progress the job application (where such a check is required for the post). If an individual is currently working for the College and changes role and/or type/age of student, which prompts the need for a DBS check, this requirement would be regarded as a “*Reasonable Management Instruction*” and failure to comply fully result in more formal action.
- 2.5 Individuals registered with New College Durham Supply Pool, are required to apply for a DBS check upon registration. If the individual refuses to apply for such a check, then their application will not be progressed.

3. Responsibilities

- 3.1 DBS checks for staff can only be processed by the College’s HR department through our nominated DBS registered Umbrella Body.
- 3.2 Recruiting Managers must not agree on a start date until the HR Department has provided the authority to do so. Only in exceptional circumstances, and with the agreement of the Executive Director of HR & Corporate Services will staff be allowed to commence work prior to receiving the appropriate clearance and only subject to a standalone children’s barred list check being undertaken and all other checks completed.

4. Disclosure Processes and Charges

- 4.1 The DBS charge a fee for checking applications. The fee charged will be paid for by the staff member.
- 4.2 The process for applying for such a check will involve the completion of an electronic application form), The individual will also be required to provide identification, including proof of name, date of birth and current address. The College will not accept photocopies of any documentation required to verify identity. The College will issue guidance to offer assistance on suitable forms of identification.

5. Posts eligible for DBS checks within the College

- 5.1 The process used by the HR department to identify if a post is eligible for a DBS check is in line with the statutory guidance.
- 5.2 Where an individual is appointed to a new role and has not previously been subject to the required level of DBS check then the relevant check will be undertaken prior to their commencement in the new post

6. Secure Storage, Handling, Use, Retention and Disposal of Disclosure Information

- 6.1 The College will comply with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure information. It also complies fully with its obligations under the General Data Protection Regulation and other relevant legislation pertaining to the safe handling, use storage, retention and disposal of Disclosure information and with the consent of the individual to retain such information.
- 6.2 In accordance with the relevant prevailing legislation, certificate information is only passed to those who are authorised to receive it in the course of their duties. The College maintains a record of all those to whom certificate information has been revealed and recognises that it is a **criminal offence** to pass this information to anyone who is not entitled to receive it. Hence, the College will use certificate information only for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- 6.3 Once a recruitment decision has been made, the College does not keep certificate information for longer than six months. This is to allow for the consideration and resolution of any disputes or complaints. If the College considers it necessary to keep certificate information for longer than this period, consultation with the appropriate body or bodies will take place, giving full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.
- 6.4 Once the retention period has elapsed, the College will ensure that any certificate information is destroyed by secure means, ie file deletion. The College will not keep any photocopy or other image of the

certificate or any copy or representation of the contents of a certificate. The College keeps a record of the name of the individual; the date a copy of the certificate was taken; the date of the certificate; the certificate type; the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision made.

The Recruitment of Ex-Offenders – see separate policy statement published on the College website / HR intranet page

7. DBS Code of Practice

- 7.1 The DBS Code of Practice exists to ensure that information made available through DBS Certificates is used fairly and is intended to provide assurance to applicants that this is the case.
- 7.2 The Code of Practice is an important document that sets out the obligations that must be met by Registered Persons and other recipients of DBS certificate information.
- 7.3 The College seeks to ensure that all individuals subject to DBS checks through the College are aware of the existence of the Code of Practice. A copy of this document is available from the HR department.
- 7.4 If it is perceived by an individual that the practices explained in this Procedure are not applied fairly, they should in the first instance write to the Executive Director of HR, outlining their concerns and outcome sought from their enquiry

8. Referrals to the DBS

- 8.1 Where a member of staff or volunteer has been removed from the College or leaves the College (but would have been removed from the College had they not chose to leave) and there is reasonable belief that the individual has:
 - Engaged in relevant conduct in relation to children and/or adults
 - Satisfied the harm test in relation to children and/or vulnerable adults; or
 - Been cautioned or convicted of a relevant (automatic barring either with our without the right to make representations(offence.

The Executive Director of HR and Corporate Services will formally write to inform the DBS in line with the guidance published in the DBS referral guidance document (on GOV.UK). The employee concerned will further receive written confirmation that such actions will occur.



Safeguarding Children and Adults at Risk Policy and Procedure 2026/27

The College recognises that effective safeguarding is underpinned by a culture of openness, vigilance and shared responsibility. All staff must act promptly on safeguarding concerns and must never assume that another person has taken action.

All safeguarding concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL (DDSL). If they are unavailable, staff must contact a senior manager without delay and, where there is an immediate risk of serious harm, contact Children's Social Care, Adult Social Care (where appropriate), or the Police.

New College Durham is committed to safeguarding and promoting the welfare of children and young people, as well as adults at risk, and expects all staff and volunteers to share this commitment.

Policy Title	Safeguarding Children and Adults at Risk Policy and Procedure
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Document Owner	Deputy Principal (HR & Corporate Services)
Owning Directorate	Corporate Services
Owning Department	ASC

Directorates and Departments affected by this Policy	All staff
Policy Effective From	1 September 2026
Next Review Date	31 August 2027

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New College Durham

Safeguarding Children and Adults at Risk Policy and Procedure

(Equality and Diversity Assessment)

We will consider any request for this policy to be made available in an alternative format.

We review our policies regularly to update them and to ensure that they are accessible and fair to all. All policies are subject to equality impact assessments. Equality Impact Assessments are carried out to see whether the policy has, or is likely to have, a different impact on grounds of race, gender, disability, age, religion, sexual orientation or human rights.

We are always keen to hear from anyone who wants to contribute to these impact assessments and we welcome suggestions for improving the accessibility or fairness of the policy.

To make suggestions or to seek further information please contact:

Emma Crosskey
Head of ASC and School Engagement
Tel: 0191 375 4907

New College Durham

Safeguarding Children and Adults at Risk Policy and Procedure

1. Introduction

- 1.1 New College Durham is committed to protecting and promoting the welfare of all children, young people and adults at risk who study at, work at or engage with the College. The College recognises that safeguarding is everyone's responsibility and is committed to maintaining a culture where students feel safe, are listened to and know that concerns will be taken seriously.

This policy has been developed in accordance with:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children (2023)
- Education Act 2002 (as amended)
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Children Act 1989 and Children Act 2004
- Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025
- Relevant statutory guidance issued by the Department for Education, Disclosure and Barring Service and local safeguarding partners.

- 1.2 The College wants to ensure that children, young people and adults at risk are protected from abuse. All complaints, allegations or suspicions will be taken seriously and in accordance with this policy and procedure, and the student or adult at risk WILL be supported and kept safe. What is paramount for the College is that any student who feels unsafe is able to report any concerns at the earliest opportunity to the College. An overriding principle of this document is that every victim will be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- 1.3 The College recognises that abuse, neglect and exploitation may occur both inside and outside of the home, within the College, in the wider community and online. Safeguarding concerns are often interconnected and may involve multiple forms of abuse occurring simultaneously. The College will therefore adopt a child-centred approach, exercising professional curiosity and working collaboratively with safeguarding partners through the local multi-agency safeguarding arrangements, and with other relevant agencies, to ensure students receive the right support at the right time, including Family Help where appropriate.
- 1.4 The College recognises that some students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, the learner may feel embarrassed, humiliated, or be threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Indeed, making such a disclosure takes courage and is difficult, but the College staff are keen to listen and support such disclosures. We have highly trained staff who will carefully allow the student to make the disclosure at a pace they feel comfortable, and it will be their welfare which is our central focus and will remain so.
- 1.5 The College will take active steps not only to support the student during and after the disclosure, but we will work with others to ensure that they are kept safe. Often victims of safeguarding concerns just want the abuse to stop, we will work with the victim and others to ensure that we achieve this goal together. By reporting such concerns, the students can help us to stop these inappropriate actions of others. The College staff will determine how best to build trusted relationships with the learner which facilitate communication and disclosure.

The College further recognises that abuse may be facilitated through the use of technology, including online grooming, coercive or controlling behaviour, the sharing of nude or semi-nude images, AI-generated or digitally manipulated images (including so-called "deepfakes"), online exploitation, cyberbullying and other forms of technology-assisted abuse. Such concerns will be treated with the same level of seriousness as abuse occurring in person.

1.6 Through this policy and procedure the College aims to:

- Ensure the promotion of a culture of safeguarding throughout the College.
- Listen to the concerns of the learner at risk with an open and supportive approach.
- Minimise the risks to health and wellbeing of learner at risk.
- Promote safe practices and challenge poor and unsafe practice.
- Identify instances in which there are grounds for concern about the welfare of children, young people and adults at risk and take action to keep them safe.
- Enable children, young people and adults at risk to raise concerns relating to safety and for those concerns to be actioned and appropriate support, including Family Help where required, to be provided at the earliest opportunity.
- Take appropriate action to prevent unsuitable people working with children, young people and adults at risk.
- Ensure staff receive adequate training and supervision in relation to Child Protection, Safeguarding, online safety and Prevent.
- Ensure that all recruitment complies with safer recruitment practices.
- Set and communicate clear expectations of staff about personal conduct and responsibility to promote the wellbeing of young people and adults at risk at all times.
- Ensure that the Designated Safeguarding Lead (DSL) and three Deputy DSLs are trained to provide access to specialist advice on child protection and the protection of adults at risk.
- Clearly define the procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the College including independent advice and referral to the police as necessary.
- Define a process to consider 'low-level' concerns and analysis of such concerns.
- Ensure effective reporting/monitoring of safeguarding practices and processes via both the Senior Leadership Team and College Governors.
- Ensure effective online safety mechanisms which are underpinned by appropriate filtering and monitoring.
- Define an accessible procedure/process to allow concerns to both be raised and effectively addressed.
- Recognise and respond effectively to safeguarding concerns arising from extra-familial harm, serious violence, criminal and sexual exploitation, online harms and technology-assisted abuse.
- Promote effective multi-agency working and timely information sharing in accordance with prevailing safeguarding legislation and statutory guidance.
- Ensure that safeguarding arrangements remain responsive to emerging risk and evolving technology.

1.7 Safeguarding and promoting the welfare of learner at risk is defined for the purpose of this guidance as:

- Providing help and support to meet the needs of children, young people and adults at risk as soon as problems emerge;
- Protecting children/young people/adults at risk from maltreatment;

- Protecting children and young people from abuse, neglect and exploitation, whether occurring within or outside the home, including online;
- Preventing the impairment of children's/young person's/adult's at risk mental and physical health or development;
- Ensuring that children/young person/adults at risk develop in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children/young people/adults at risk to have the best outcomes

1.8 This policy relies on utilising a number of key definitions to underpin this policy and procedure – clarity on these are provided at:

- Appendix A – Safeguarding Glossary of Terms
- Appendix B – Definitions of abuse, neglect, exploitation and specific safeguarding issues.

Further detailed guidance can also be obtained on the College Safeguarding portal. Students are encouraged to download the College safeguarding app as it gives access to a wealth of information, guidance and support.

2. Scope and Purpose

- 2.1 This policy and procedure applies to all students and is in place to ensure children, young people and adults at risk are protected from all forms of abuse, definitions which are contained in Appendix B – Indicators of abuse and neglect. The purpose of this policy and procedure is to safeguard and protect the welfare of all our students and help to encourage all staff to achieve and maintain the highest standards of Safeguarding Children and Adults at Risk.
- 2.2 The College recognises that safeguarding concerns may arise both within and outside of the College environment, including within families, peer groups, the wider community and online. The College therefore adopts a whole-college approach to safeguarding which promotes prevention, early identification, timely intervention and effective multi-agency working.
- 2.3 Safeguarding and promoting the welfare of children, young people and adults at risk is everyone's responsibility. Everyone who comes into contact with children, young people and adults at risk and their families has a role to play in safeguarding. In order to fulfil this responsibility effectively, all staff should make sure their approach is centred on the student, taking seriously any concerns, and ensuring that the child/ adult at risk is kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual

harassment. The central focus of staff will always be what is in the best interests of the child/adult at risk, and reflective of the practice in key guidance/legislation e.g. Keeping Children Safe in Education (KCSIE) 2026.

No single practitioner can have a complete picture of a student's circumstances. Effective safeguarding therefore depends upon staff exercising professional curiosity, sharing concerns promptly, working collaboratively with the Designated Safeguarding Lead and external agencies where appropriate, and ensuring that children and young people receive the right support at the right time, including Family Help where this is identified as the most appropriate intervention.

All staff should recognise that safeguarding concerns are rarely standalone events and that abuse, neglect, exploitation and other safeguarding issues frequently overlap.

The policy and procedure should be read in conjunction with the following:

- Staff Code of Conduct
- Recruitment and Selection Procedures
- Procedure for Prevention of Bullying and Harassment
- Prevention of Bullying Policy
- Health, Safety and Welfare Policy
- Mental Health and Wellbeing Strategy (Staff)
- Mental Health and Wellbeing Strategy for Effective Learning (Students)
- Prevention of Harassment, Bullying and Victimisation in the Workplace Policy
- Work Placement Health & Safety Policy
- First Aid Policy
- Prevention and Management of Substance Misuse Policy
- Young Persons Health and Safety Policy
- Disciplinary Procedure
- Tutorial Policy
- PREVENT Strategy
- Engagement in learning policy
- Data Protection Policy
- Acceptable Use, Electronic Communications, Cyber Security and Social Media policies
- Staff Acceptable Use of IT Policy
- Student Behaviour Policy
- Low-Level Concerns Procedure
- Whistleblowing Policy
- Attendance and Student Absence Procedures
- Procedure for supporting Transgender (staff)

- Procedure for supporting Transgender (student)

- 2.4 The College recognises that safeguarding is underpinned by a culture of openness, vigilance and shared responsibility. All members of the College community are expected to contribute to creating a safe, inclusive and respectful environment where students feel confident to report concerns, knowing they will be listened to, taken seriously and supported appropriately.

3. Key Responsibilities

Safeguarding is the responsibility of everyone; however, it is recognised that some individuals have some specific roles/responsibilities to enable effective discharging of the key safeguarding obligations:

3.1 The Role and Responsibilities of the Governing Body

The Governing Body is committed to ensuring that the College:

- Raises awareness of issues relating to safeguarding and promotes the welfare of all learners in the College.
- Has an effective Safeguarding Children and Adults at Risk Policy and Procedure which complies with KCSIE.
- Provides a safe environment for children, young people and adults at risk.
- Identifies those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe.
- Has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers.
- Operates safe recruitment procedures.
- Designates a member of staff with sufficient authority to take the lead on protection for safeguarding.
- Ensure that the College has appropriate online filters and monitoring systems in place and regularly review their effectiveness
- Remedies any weaknesses and areas for improvement relating to safeguarding that are brought to the attention of the Corporation.
- Ensure all staff members receive appropriate safeguarding protection training which is regularly updated.
- Ensures safeguarding arrangements promote a whole-College approach in which safeguarding underpins all relevant policies,

procedures and operational practice.

- Seeks assurance that effective systems are in place to identify emerging safeguarding risks, including technology-assisted abuse, AI-enabled harms, serious violence, child criminal exploitation and child sexual exploitation.
- Ensures the College has appropriate arrangements for timely information sharing, effective record keeping and secure transfer of safeguarding information where required.
- Monitors the effectiveness of safeguarding arrangements through regular reporting, challenge and scrutiny, ensuring lessons learned are incorporated into College practice.

Any new addition to the Governing Body will receive a comprehensive induction which will include appropriate safeguarding and child protection. This training will equip new Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in College are effective and support the delivery of a robust College approach to safeguarding.

Safeguarding Training for Governors will be updated, and Governors will annually read and understand their obligations under Part 1 and Part 2 of KCSIE.

3.2 Designated Link Governor Responsibilities

The role of the Safeguarding Link Governor is to ensure that the wider Corporation is in a position to satisfy itself that the duties of safeguarding are being met by the College. The Safeguarding Link Governor liaises with the DSL, designated senior members of staff with responsibility for safeguarding and the Head of Governance & Corporation Secretary, and reports back to the Corporation. The role of the Safeguarding Link Governor is a strategic one, and not operational. The Safeguarding Link Governor will:

- Ensure, with the assistance of the Head of Governance and Corporation Secretary, that the Corporation receives an annual safeguarding report and sufficient information throughout the year to enable it to discharge its strategic safeguarding responsibilities.
- attend meetings once a term with the designated senior members of staff with responsibility for safeguarding. The purpose of such meetings is for the Safeguarding Member to be updated regarding safeguarding and prevent practice in College, any actions being taken and the most prevalent issues. The Safeguarding Member will then report to the board at the next meeting; maintain an understanding of the College's safeguarding policy and

associated procedures and practices;

- keep up to date with developments in legislation, policy and best practice by undertaking recommended training;
- promote safeguarding knowledge and understanding amongst Corporation Members;
- raise safeguarding issues as and when they apply to the business of the Corporation;
- Limit the learners (children, young people, and adults) exposure to the online risks from the college's IT system by ensuring the College has appropriate web/IT filters and monitoring systems in place and regularly review their effectiveness
- ensure, with the assistance of the Head of Governance & Corporation Secretary, that the board receives an annual report in respect of safeguarding issues and to contribute to that report if responsibility to safeguard and promote the welfare of learners and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to appropriate to do so.
- Provide strategic assurance to the Corporation that safeguarding arrangements remain compliant with statutory guidance and reflect emerging safeguarding risks.
- Receive assurance that appropriate arrangements are in place for safeguarding oversight of online safety, filtering and monitoring systems, information sharing, safer recruitment and safeguarding training.
- Ensure that the College's safer recruitment, volunteer, work-experience and vetting arrangements remain compliant with Part Three of KCSIE and current regulated-activity and DBS requirements.

3.3 Staff Responsibilities

All staff (including supply/external agency staff) will always have the best interest of the student in mind. Staff will be able to deal effectively with any safeguarding issues and to this end will:

- Maintain the currency of their knowledge on safeguarding issues. Exercise professional curiosity where safeguarding concerns arise and recognise that abuse, neglect and exploitation frequently overlap. Engage with the regular training provided by the College to support this obligation, however, if any additional training is required staff are obliged to either raise this with their line manager or undertake independent research (e.g. College Safeguarding Portal).
- Be aware of and comply with their obligations under the Staff Code of Conduct.

- Work together to continue to create an environment in which recognise that abuse may occur within or outside of the College, including online, and understand that technology is increasingly used to facilitate abuse, exploitation and harmful behaviour, and ensure that students feel able to make such life changing disclosures in a safe and supportive environment.
- Maintain accurate record of any disclosure which provides:
 - a clear and comprehensive summary of the concern.
 - details of how the concern was followed up i.e. referral to DSL/DDSL
- Comply with the obligations in this policy and key external documents notably KCSIE.
- Share safeguarding concerns promptly and never assume another colleague has taken action where there is concern that a child or young person may be at risk.
- Understand the College's arrangements for Family Help and referral pathways and contribute to multi-agency safeguarding activity where appropriate.
- Promote both safeguarding and the College as an environment for learning and being a safe and caring place.

3.4 Designated Safeguarding Lead and Deputies Responsibilities

- Promote and maintain a whole-College safeguarding culture which places the welfare of children and young people at the centre of all safeguarding decision making.
- Promote positive safeguarding procedures and practices so that all students feel safe.
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to Safeguarding Practice and procedures, notably the obligations of KCSIE 2026, online safety and Prevent.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral). Ensure safeguarding records are accurate, proportionate, securely maintained and transferred promptly where students move to another educational provider.
- Liaising with the local authority, Local safeguarding

partners/Local multi-agency arrangements and LADO. Indeed, lead on information sharing with safeguarding partners and external agencies in accordance with statutory guidance and data protection legislation.

- Liaising with employers and training organisations who receive students on long-term placements to ensure appropriate safeguards are put in place.
- Ensuring staff receive basic training in safeguarding issues (including Prevent) appropriate to their roles and at least annually, to reflect changes in legislation, emerging safeguarding risks and local safeguarding priorities and to ensure that they are aware of the College's safeguarding procedures.
- Ensuring there is liaison with employers and training organisations providing student placements to ensure proper safeguarding arrangements are in place.
- Ensuring that all staff receive relevant training about safeguarding matters and the College procedures.
- Providing an annual report to the Corporation.
- Reporting any refinement or enhancement to the safeguarding procedure to the Corporation as soon as possible.
- Ensure effective business continuity arrangements exist to enable safeguarding concerns to be received, reviewed and acted upon whenever the Designated Safeguarding Lead is unavailable
- Liaising with secondary schools to ensure that appropriate arrangements are made for pupils who may be at risk or who are subject to a CP or CIN plan.
- To receive training in safeguarding issues and inter-agency working, as required by local safeguarding partners/Local multi-agency arrangements, and to undergo refresher training at least every 2 years.
- To ensure safeguarding information is processed, stored and shared securely in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025 and prevailing safeguarding legislation.
- To ensure the College is represented at case conferences and review meetings as appropriate.
- To ensure maintenance of accurate records and record all concerns, discussions and decisions made and the reasons for these decisions, ensuring:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome.
- Ensure safeguarding practice reflects current national guidance regarding online safety, filtering and monitoring, AI-enabled abuse, serious violence and contextual safeguarding.

In the absence of the DSL, a nominated Deputy DSL will carry out the responsibilities of the DSL.

3.5 Student Responsibilities

It is an expectation of the College that students comply with this policy and procedure and its central aims. The College will not accept behaviour from any student that falls below these expectations, so in cases where the action/behaviour of a student falls below this (e.g. child to child abuse) the College will take appropriate internal action under prevailing procedures as well as following the external avenue detailed in this procedure. To aid students to understand College expectations a safeguarding app has been developed which gives access to a library of information to aid and support students in these issues. This app allows for students to report safeguarding concerns from any location directly to a DSL or DDSL. Students are encouraged to report concerns relating to themselves or others at the earliest opportunity, recognising that safeguarding concerns may arise both within and outside of College, including online.

The College will teach students about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE) and/or through sex and relationship education.

Students will be supported to develop an understanding of online safety, healthy relationships, consent, exploitation, misinformation, technology-assisted abuse and other emerging safeguarding risks through the College's tutorial and enrichment programmes.

3.6 Contractors/Visitors

All contractors and visitors to New College Durham will be required to adhere to our safeguarding practices/process and to understand their responsibilities for safeguarding children and adults at risk whilst undertaking activities on behalf of the College.

4. Responding to a disclosure of abuse, neglect, exploitation and specific safeguarding issues

- 4.1 All staff should be aware of the indicators of abuse, neglect, exploitation and specific safeguarding issues, definitions which are contained in Appendix B – Indicators of abuse, neglect, exploitation and specific safeguarding issues (further guidance is available on the College safeguarding portal). Knowing what to look for is vital for the early

identification of abuse and neglect and specific safeguarding issues, such as children/young people/ adults at risk criminal exploitation, modern slavery, trafficking, county lines and serious violence, and sexual exploitation, so staff are able to identify cases of children, young people and adults at risk who may be in need of help and protection.

4.2 Staff should recognise that safeguarding concerns are rarely standalone events and that abuse, neglect, exploitation and other safeguarding issues frequently overlap. Staff should remain alert to indicators of child criminal exploitation, child sexual exploitation, county lines, modern slavery, trafficking, serious violence and other forms of contextual safeguarding, recognising that these safeguarding issues frequently overlap.

4.3 Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children/students /adults in these external environments. This includes extra-familial harm, whereby abuse may occur in peer groups, intimate relationships, the wider community, online environments, social media, organised criminal groups or other settings beyond the family home. The College will consider safeguarding risks within these wider contexts when assessing concerns and determining appropriate intervention. Technology is a significant component in many safeguarding and wellbeing issues. Children/young people/adults at risk are at risk of abuse/bullying online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

4.4 Technology may also facilitate grooming, coercion, exploitation, child criminal exploitation, sexual exploitation, serious bullying, sexual harassment, making, creating or sharing of nude or semi-nude images, including images that have been digitally altered or wholly generated using artificial intelligence. Such incidents will be managed through the College's safeguarding procedures in the same way as abuse occurring face to face.

The College has a separate policy to set out the key protection for students to maximise online protection and further guidance is provided on the College's Safeguarding Portal.

4.5 Whilst College staff are not responsible for investigating abuse, exploitation or neglect, it is essential that any suspicions of significant harm or allegations of abuse are promptly recorded and acted upon and treated seriously. Staff should never assume that another colleague has taken appropriate action and should ensure that concerns are reported immediately to a Designated Safeguarding Lead or Deputy Designated

Safeguarding Lead. Timely information sharing is essential to safeguarding children and young people effectively. The following procedure provides guidance for staff who receive a disclosure or who have concerns about allegations or abuse against a child/young person (under 18) or Adult at Risk (18 or over). Where a member of staff suspects that a child, young person or adult at risk is being abused, they must:

- ✓ Take all allegations or suspicions of abuse seriously.
- ✓ Show acceptance of what they are told – even if it seems unlikely or too awful to be true. Reassure the person that they have done the right thing in raising the matter and that you are taking the information seriously.
- ✓ Respond with tact and sensitivity to anyone who confides in them and clarify that they are not creating an issue or problem.
- ✓ Reassure the learner and let them know they were right to report the matter and that their concerns will be taken seriously.
- ✓ Always ask enough questions to clarify understanding but not probe or interrogate.
- ✓ Be honest – explain that you may have to share what they say with the College specialist staff (e.g. the DSL/DDSL) but this information will be shared on a ‘need to know’ basis only and why (i.e. the appropriate person in College who will seek further advice and help). Don’t delay in making this notification.
- ✓ Ensure tact and diplomacy and discretion (only the people who need to know will be told).
- ✓ Allow the learner to speak freely in her/his own way and time and at her/his own pace. Avoid interrupting when the learner is recalling significant events.
- ✓ Only clarify what the learner is trying to say and ascertain whether there are any immediate issues of safety for the learner or any other learner(s).
- ✓ Recognise that the learner may not identify their experiences as abuse, exploitation or neglect and may disclose information gradually over time.
- ✓ Avoid making assumptions or seeking to investigate the matter. Listen carefully, record accurately and report promptly.
- ✓ Share information only with those who need to know in order to safeguard the learner.
- ✓ Consider whether there are immediate safeguarding concerns affecting other learners or members of the College community which should also be brought to the attention of the DSL/DDSL.

- ✓ Take notes as accurately as possible of what was said, use the learner's own words; what you said in response, and an explanation of how the conversation took place. Include the date, time and your signature. Keep the notes, even if not typed up, as they could be used as material evidence in court.
- ✓ Seek immediate guidance from a DSL/DDSL but make sure the student remains safe.

If the concern is about what has been observed, for example bruises, marks, suspicions of neglect or sexually explicit/abusive behaviour, then it is important to write a full account of what was seen. Include:

- ✓ Size, shape, colour, position on the body of any bruises or marks, consider taking a picture unless location of that picture is inappropriate.
- ✓ Person's appearance e.g. ragged or dirty clothing, smell, emaciated body, pain or difficulty in moving.
- ✓ Description of sexually explicit or abusive behaviour.
- ✓ The date and time of your report and your signature.

Where concerns relate to online activity or technology-assisted abuse, staff should preserve relevant evidence where appropriate (for example screenshots or electronic communications), taking care not to further circulate harmful material, and seek immediate advice from the DSL/DDSL

In any instance, as a result of dealing with safeguarding and supporting students, both the student and, if required, the member of staff to whom the disclosure was made can access support from the College's Counselling and Support Services. The service can be accessed by emailing asc@newdur.ac.uk, contacting 0191 3754400 or booking an appointment in ASC.

- 4.6 The College recognises that a learner who is questioning their gender is not, in itself, a safeguarding concern. However, some learners may have additional safeguarding, wellbeing or vulnerability needs and may be at increased risk of bullying, harassment, discrimination, exploitation or mental ill-health. Any request relating to social transition, including (but not limited to) changes to a learner's name, pronouns, records, facilities, changing arrangements, accommodation, participation in activities or any other aspect of College life, must be referred immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL. Individual members of staff must not agree to or implement such requests independently.

4.7 The DSL/DDSL will ensure that each request is considered on an individual basis through an appropriate safeguarding risk assessment, taking account of:

- the learner's wishes and feelings;
- the learner's age, understanding and capacity;
- any safeguarding or welfare concerns;
- the rights, safety, privacy and dignity of all learners;
- relevant legislation and statutory guidance; and
- where appropriate, discussion with parents/carers, relevant professionals and senior leaders.
- Decisions will be evidence-based, proportionate and centred on safeguarding and the welfare of all those affected.

4.8 Actions following a Disclosure

After making sure that the student is safe. immediately contact one of the College's DDSLs:-

- Kay Wilson (Deputy Designated Safeguarding Lead)
Safeguarding Support Officer
T: 0191 375 4089
E: kay.wilson@newdur.ac.uk Room:
B0.17
- Emma Crosskey (Deputy Designated Safeguarding Lead) Head of
ASC and School Engagement Team
T: 0191 375 4907
E: emma.crosskey@newdur.ac.uk Room: B0.10
- Andy Stephenson (Deputy Designated Safeguarding Lead) Vice
Principal for Curriculum and Quality
T: 0191 375 4286
E: andrew.stephenson@newdur.ac.uk Room:
G3.07
- Karl Fairley (Designated Safeguarding Lead) Deputy
Chief Executive
T: 0191 375 4022
E: karl.fairley@newdur.ac.uk Room:
G3.22

If none of the above are available, action must not be delayed. Staff must immediately contact a senior manager and, where appropriate, Children's Social

Care, Adult Social Care or the police. If, at any point, there is a risk of immediate serious harm, staff must call 999

For out of hours referrals contact – First Contact 03000 267 979.

- 4.9 Following assessment of the concern, the DSL/DDSL will determine the most appropriate course of action based on the needs and level of risk identified. This may include:

- internal pastoral or wellbeing support;
- community-based early help or targeted Family Help where additional support is required but statutory intervention is not appropriate;
- referral to Children's Social Care;
- referral to Adult Social Care (where appropriate);
- referral to the Police; or
- referral to other safeguarding partners or specialist agencies.

The College recognises that providing support at the earliest opportunity can prevent concerns from escalating. Where appropriate, the DSL/DDSL will work collaboratively with learners, families and partner agencies to secure the right support at the right time through Family Help arrangements. A written record of the date and time of the report must be made, and the department should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate Local Authority form within 24 hours.

The DSL should note down the detail of the discussion, including the action to be taken, to inform the parents/carers, depending on the circumstances. The process for keeping the College informed of further action should also be discussed. Within one working day of a referral being made, the College should expect the local authority to acknowledge receipt and advise on the next steps and type of response required. The DSL/DDSL will follow up the referral if this information is not received.

Where appropriate, the DSL will continue to review safeguarding concerns following referral to ensure that learners receive appropriate support and that concerns do not diminish where circumstances fail to improve.

Where there is a safeguarding incident the Department of Education must be made aware, when an institution is itself the subject of an investigation by the local authority or the police

- 4.10 Where concerns do not meet the threshold for statutory intervention but indicate that a learner would benefit from additional coordinated support, the College will work with learners, families and partner agencies to facilitate Family Help where

appropriate.

The College recognises that providing support at the earliest opportunity can significantly reduce safeguarding risks and improve outcomes for children and young people. Decisions regarding Family Help will be coordinated by the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead in partnership with relevant agencies.

- 4.11 All staff are responsible for complying with this policy, reporting incidents and co-operating with any investigations or incidents in line with procedures.

5. Responding to Child-on-child Abuse (including Harassment and Violence)

- 5.1 It is recognised that on occasions the abuse may be from children and young people, in this respect the College has developed a specific response to this abuse (often referred to as child-on-child abuse). Such abuse can happen anywhere both inside and outside of College and face to face or virtually online. The College recognises that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Both may require safeguarding support, risk assessment and appropriate intervention.

- 5.2 Child-on-child abuse is most likely to include, but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children/young people/students;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the images are consensually or non-consensually created or shared. The nature and proportionality of the response

will be determined on a case-by-case basis, having regard to the circumstances, ages, understanding and safeguarding needs of those involved. For further guidance please see the UKCIS guidance on the College Safeguarding Portal. This includes images that have been digitally altered or wholly generated using artificial intelligence, including AI-generated or manipulated intimate images ("deepfakes");

- stalking;
- discriminatory or prejudicial behaviour;
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element);
- misogynistic, misandrist, discriminatory or prejudicial behaviour, whether occurring online or offline; and
- Behaviour associated with serious violence, intimidation, coercion or the carrying, use or threat of weapons.

- 5.3 New College Durham adopts a zero-tolerance approach to all kinds of child-on-child abuse. The College recognises that the absence of reported incidents does not necessarily indicate that child-on-child abuse is not occurring. Students may be reluctant to report concerns because of fear, embarrassment, peer pressure, coercion or not recognising that their experiences constitute abuse. Staff must challenge inappropriate behaviour between children/young people/students and ensure that unacceptable behaviours are not downplayed or dismissed as 'just banter', 'part of growing up', 'just having a laugh' or 'boys being boys'.
- 5.4 The College recognises that sexual behaviour exists on a continuum and that consent must be freely given and may be withdrawn at any time. Consent must not be assumed because of previous sexual activity, friendship or an existing relationship. In assessing concerns, the DSL/DDSL will consider the age and developmental stage of those involved, the nature and frequency of the behaviour, any imbalance of power, coercion, consent, vulnerability and the potential for the behaviour to cause harm. Specialist advice will be sought where appropriate.
- 5.5 New College Durham maintains an attitude that 'it could happen here' and has a whole-college approach to developing a culture to recognise and address child-on-child abuse. Although girls are more likely to be victims and boys perpetrators, the College does not tolerate any child-on-child abuse, and it will be taken seriously. Staff and students must report all concerns of child-on-child abuse, both online and offline, including those that have happened outside of

the College.

5.6 The following procedure provides guidance for staff who receive a disclosure of child-on-child abuse and/or recognise signs of abuse.

- If staff have any concerns about the welfare of a child or adult at risk they should act on these immediately.
- Reassure the victim that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.
- Don't promise confidentiality as it is very likely a concern will have to be shared further.
- Listen carefully, reflecting back, not asking leading questions and only prompting with open questions.
- Take notes as accurately as possible what was said, use the learner's own words; do not interpret.
- Consider whether there is an immediate risk to the safety of the victim or any other learner and take appropriate action without delay.
- Avoid asking leading questions or seeking to investigate the incident beyond establishing sufficient information to enable an appropriate safeguarding response.
- Preserve any available electronic evidence where appropriate without further distributing harmful material.

5.7 Actions following a Disclosure:

You must make sure the student is safe and then contact one of the College's Designated Safeguarding Leads immediately and log the report through the College's MyConcern system.

The College will consider every report of child-on-child abuse on a case-by-case basis and the DSL and/or DDSL will make an immediate risk and needs assessment to respond to the concern and support all students affected. This assessment will consider:

- the immediate safety of the victim;
- the welfare and safeguarding needs of both the victim and alleged perpetrator;
- whether there is a wider safeguarding risk to other learners;
- whether external agencies should be involved;
- whether ongoing support or safety planning is required.

The College will ensure that support provided to victims is proportionate to their needs and continues for as long as reasonable. Decisions regarding sanctions or disciplinary action will not replace or diminish the College's safeguarding responsibilities.

The potential actions following a report of child-on-child abuse include:

- management internally using the appropriate College procedures;
- community-based early help or targeted Family Help where additional coordinated support is required;
- referral to Children's Social Care;
- referral to the Police;
- ongoing safeguarding support and risk management for both the victim and the alleged perpetrator where appropriate.

These actions are explored in more detail at Appendix C.

The designated member of staff must notify the DSL or Deputy DSL as soon as possible of a serious disclosure or suspicion being raised.

5.8 Preventing Child-on-child Abuse

The College is committed to preventing child-on-child abuse through a whole-college approach to safeguarding. This includes promoting positive behaviour, respectful relationships, equality, diversity and inclusion, online safety, healthy relationships, consent and appropriate challenge to discriminatory, abusive or harmful behaviours.

Safeguarding themes will be reinforced through the tutorial programme, student induction, awareness campaigns, enrichment activities and the wider College environment. Staff are expected to challenge inappropriate behaviour whenever it occurs and promote a culture where students feel confident to report concerns.

6 Key Safeguarding Information for Students

- 6.1 Students can report safeguarding concerns to any member of staff or directly to one of the College's Designated Safeguarding Leads (DSL), each of whom has the responsibility to act as a source of support and have expertise within the College to support students to address these concerns. Students are encouraged to report concerns relating to themselves or others as early as possible. The College recognises that students may disclose safeguarding concerns gradually and that they may choose to speak to a trusted member of staff before approaching a Designated Safeguarding Lead. All members of staff have a responsibility to respond appropriately and refer concerns in accordance with this policy.
- 6.2 Students can also report safeguarding concerns via the College's dedicated safeguarding app or via the report a concern form which can be accessed on New College Durham's Safeguarding Portal. The College will ensure that

safeguarding reporting mechanisms remain accessible, well-publicised and easy for students to use, including for those with additional learning needs, disabilities or communication difficulties.

- 6.3 The College's tutorial programme strongly promotes key messages relating to all aspects of safeguarding, including online safety, highlighting the monitoring and filtering arrangements in place across the College. These key safeguarding messages will be raised during induction and throughout the academic year. The tutorial programme will also promote healthy relationships, consent, respectful behaviour, equality, diversity and inclusion, mental wellbeing, exploitation, serious violence, online safety, critical evaluation of online content, artificial intelligence (AI), technology-assisted abuse, and the risks associated with sharing images or personal information online.
- 6.4 The College provides for information on safeguarding to be displayed around the College, but the key source of information is the safeguarding portal and/or tutorial programme. Safeguarding information will be reviewed regularly to ensure it reflects current legislation, emerging safeguarding risks and local safeguarding priorities. The College will actively seek and consider student feedback regarding the accessibility and effectiveness of safeguarding information, reporting mechanisms and support services.
- 6.5 The College recognises the importance of listening to the views, wishes and experiences of students when developing and reviewing safeguarding arrangements. Student feedback will be used, where appropriate, to improve safeguarding practice, communication, reporting mechanisms and support services, helping to ensure that students feel safe, respected and confident that their concerns will be taken seriously.

7 Radicalisation and Acts of Terrorism

7.1 The Counter Terrorism & Security Act (2015) & The Prevent Duty

Prevent is 1 of the 4 elements of CONTEST, the government's counter- terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of

radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country.
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers.
- funding a specialist police unit which works to remove online content that breaches terrorist legislation.
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations.
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

The College is committed to supporting students at risk (or may be vulnerable) through its safeguarding policies and procedures and recognises that this can support the College's contribution to the Prevent duty.

The College adopts a proportionate, risk-based approach to Prevent which complements its wider safeguarding responsibilities and seeks to safeguard vulnerable individuals whilst promoting freedom of expression, critical thinking, mutual respect and the values of democracy, individual liberty, the rule of law, and mutual respect and tolerance of those with different faiths and beliefs.

The College recognises that radicalisation is a safeguarding issue and that vulnerability to radicalisation may arise from a complex interaction of personal, social and environmental factors. Radicalisation can affect any individual regardless of age, gender, ethnicity, faith, disability or background.

The College further recognises that individuals may be exposed to extremist ideologies through both online and offline environments, including social media, online forums, gaming platforms and encrypted messaging services.

7.2 Contact with external services

Where a member of staff has any concerns about the risk of possible or actual radicalisation of an individual, then she/he is required to report that immediately to a Designated Safeguarding Lead (DSL). Staff should not wait until they are certain that an individual is being radicalised before seeking advice. Where concerns exist, staff should exercise professional curiosity, discuss these promptly with a Designated Safeguarding Lead and record the concern in accordance with college procedures.

The Designated Safeguarding Lead will consider all available information, undertake an appropriate safeguarding risk assessment and determine whether the concern should be managed internally, referred to Channel or discussed with other safeguarding partners.

Where appropriate, Prevent concerns will be managed alongside other safeguarding concerns, recognising that vulnerability to radicalisation may coexist with other forms of abuse, exploitation, mental ill-health, criminal exploitation or social vulnerability.

7.3 Online Radicalisation

The College recognises that online platforms may be used to promote extremist narratives, recruit vulnerable individuals and encourage harmful or illegal activity. Through its filtering and monitoring arrangements, tutorial programme, digital literacy education and safeguarding processes, the College seeks to reduce the risk of students being exposed to extremist material whilst promoting safe, responsible and critical use of online technologies.

8 Dealing with allegations made against/concerns raised in relation to College staff/Governor/Contractor

- 8.1 Any member of staff who receives an allegation or concern about another member of staff should follow the guidelines for dealing with disclosures (see para 3.3). The primary concern of the College is to ensure the safety of the students. It is essential that in all cases of suspected abuse by a member of staff, action is taken quickly and professionally. All concerns relating to the conduct of adults working with children and young people will be treated seriously regardless of whether the concern arises within or outside of the College. The

College recognises that safeguarding concerns may relate to behaviour occurring in an individual's personal life where that behaviour may indicate they are unsuitable to work with children or adults at risk (sometimes referred to as transferable risk).

8.2 The allegation or concern should be reported immediately to the DSL or DDSLs (see Section 4.7) . Where there is any doubt regarding the appropriate response, advice should be sought from the Local Authority Designated Officer (LADO) before commencing any internal investigation.

8.3 If the Principal is the person against whom the allegation/concern is made, the DSL/Executive Director of Human Resources and Corporate Services will notify the Chairperson of the Corporation. The DSL or the Chairperson of the Corporation, if the allegation/concern is against the Principal, should:

- Obtain written details of the allegation/concern from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL/Chairperson of the Corporation.
- Record information about times, dates, locations and names of potential witnesses.

8.4 Initial Assessment by the designated person

The Executive Director of Human Resources and Corporate Services should make an initial assessment of the allegation/concern consulting with the DSL or Chairperson of the Corporation and the relevant Local Authority's Services Safeguarding Team as appropriate. The initial assessment is not an investigation into the allegation/concern but is intended to determine whether the reported behaviour appears to meet the harm threshold requiring referral to the LADO and/or other external agencies.

An allegation is information which indicates that a person who works with a child, young person or adults at risk has:

- Behaved in a way that has harmed or may have harmed a child/ young person or an adult at risk; and/or
- Possibly committed a criminal offence against or related to a child/young person or an adult at risk; and/or
- Behaved towards a child/young person or an adult at risk in a way that indicates he or she may pose a risk of harm to children/young people/adults and/or
- Behaved towards a child, young person or adults at risk in a way that indicates s/he or she is unsuitable to work with children, young people or adults at risks (this includes behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children,

young people or adults at risk. (This is known as transferrable risk).

Where behaviour does not meet the harm threshold, the concern should nevertheless be considered under the College's Low-Level Concerns Procedure where appropriate.

It is important that the Executive Director of Human Resources and Corporate Services does not investigate the allegation/concern. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation/concern warrants further investigation.

In the case of concerns which relate to a Governor these concern(s) will be shared by the DSL (or deputies) with the Head of Governance & Corporation Secretary and the Chair of the Corporation.

If the assessment of the allegation/concern is that it requires to be investigated, then an investigation will take place in accordance with the College's disciplinary policy. The Local Authority Designated Officer (LADO) will be advised and advice sought. No internal investigation should commence before discussion with the LADO where the allegation may meet the statutory harm threshold unless specifically advised otherwise. They will further be kept fully informed of progress and outcome.

8.5 Initial Response to an allegation/concern

Where the College identify a child/young person or an adult at risk has been harmed, that there may be an immediate risk or of the situation is an emergency, the DSL (or in his/her absence a Deputy DSL) will contact children's/ adult social care and as appropriate the police immediately.

The College will seek to ensure that appropriate support is made available throughout the investigation process to:

- the child or young person;
- the member of staff concerned;
- any other individuals affected by the allegation/concern

Confidentiality will be maintained as far as reasonably possible throughout the process, recognising that information should only be shared where necessary to safeguard children, comply with legal obligations or enable appropriate investigation.

8.6 Enquiries and Investigations

Enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child/adult protection agencies, including the police, have no power to direct the College to act in a particular way however, the College should assist the agencies with their enquiries.

The College will instigate its own internal enquiries regardless of any formal police or social services investigations but will ensure that this will not prejudice the investigation. Any internal investigation shall conform to the existing College staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the DSL and/or Executive Director of Human Resources and Corporate Services should normally be involved in, and contribute to, the inter- agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance with the agency's enquiries.

He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation/concern is made. The DSL (or Executive Director of Human Resources & Corporate Services) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

The Executive Director of Human Resources and Corporate Services will consult with Social Services, the police or the relevant Integrated Services Safeguarding Team, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the learner or parent/carer making the allegation/concern that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the learner making the allegation/concern have been informed verbally and in writing that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation/concern was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the member of staff making the allegation/concern that the

investigation is taking place and what the likely process will involve.

- Inform the Chair of the Corporation and/or the Designated Governor

of the allegation and the investigation.

The Executive Director of Human Resources and Corporate Services shall keep a written record of the action taken in connection with the allegation/concern

8.7 Suspension

Suspension should not be automatic. In respect of staff, other than the Principal or Senior Post Holders, suspension can only be carried out by the nominated member of the senior management team. In respect of Senior Post Holders, suspension can only be carried out by the Principal or Chairperson (or Vice Chairperson). In respect of the Principal, suspension can only be carried out by the Chairperson (or Vice Chairperson).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay.

Suspension should only occur for a good reason. For example:

- An allegation/concern or likelihood, of a risk to students, staff or members of the public;
- An allegation/concern or likelihood of damage or loss of property belonging to students, members of staff, public or the College;
- An allegation/concern of an offence which might amount to gross misconduct;
- A perception that evidence regarding the allegation/concern may be destroyed

If suspension is being considered, this will be conducted in accordance with the existing College disciplinary procedures.

8.8 External Agency/Third Party / Contracted Services Staff

Where allegations/concerns are made against individuals that are not college staff and therefore, we are not the employer, the College will ensure that allegations/concerns are dealt with properly; establishing the facts; liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome and ensuring that the agency/third party is involved and cooperates fully.

8.9 Governors

Where an allegation/concern is made against a Governor, the above-mentioned process will apply. Where an allegation against a governor is substantiated,

the governor will be removed from office in accordance with internal procedures.

8.10 Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the relevant Integrated Services Safeguarding Team in order that other agencies may act upon the information. In consultation with the DSL and/or the Chairperson of the Corporation, the Principal shall:

- Inform the member of staff against whom the allegation/concern is made orally and in writing that no further disciplinary or protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence.
- Inform the parents/carers of those involved that the allegation/concern has been made and of the outcome.
- Where the allegation/concern was made by a learner/learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.
- Prepare a report outlining the allegation/concern and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- In some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

8.11 Record Keeping

This section sets out the college's obligations in terms of record keeping following investigations where the concern/allegation was initially considered under the category of "*may meet the harm threshold*".

For information on details of record keeping where the concern/allegation is considered under the category of "*does not meet the harm threshold*" and is considered a low-level concern, please refer to the College's Safeguarding – Low Level Concerns Policy.

Details of allegation/concern following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information.

However, for all other allegation/concern , i.e. substantiated, unfounded and unsubstantiated the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation/concern that did not result in a criminal conviction, and it will help to prevent unnecessary reinvestigation if an allegation/concern re-surfaces after a period of time.

All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation/concern is that is longer.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to notify the Disclosure and Barring Service.

8.12 Low Level Concerns

The College promotes a culture of openness and transparency where staff feel confident to report concerns about the conduct of colleagues, including concerns that do not meet the harm threshold. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the College may have acted in a manner that is inconsistent with the Staff Code of Conduct, including behaviour which may not meet the threshold for referral to the Local Authority Designated Officer (LADO).

All low-level concerns will be recorded, reviewed and managed appropriately in accordance with the College's Low-Level Concerns Procedure. Where patterns of behaviour emerge, these will be considered alongside any previous concerns when determining appropriate action. The College recognises that identifying, recording and reviewing patterns of low-level concerns contributes to a strong safeguarding culture.

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegation/concern threshold or is not considered serious enough to refer to the LADO.

Examples of low-level concerns could include:

- Being overly friendly with learners
- Having favourites
- Taking photographs of learners on their mobile phone (or other devices)
- Using inappropriate sexualised, intimidating or offensive language.

Low-level concerns must be reported to the DSL or a deputy. If there are concerns about a DSL, these should be reported to the Principal. The College seeks to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted, or they have behaved in a way that falls below professional standards.

The DSL or DDSL will record all low-level concerns. Records should include the details of the concern, how the concern arose, and the actions taken. Records will be reviewed by the DSL/DSLs so that patterns of concerning “low-level” behaviour can be recognised and appropriate action can be taken. The College has a detailed policy on addressing low level concerns, which provides for sharing confidentially such concerns, which is clear, easy to understand and implement.

Low-level concerns which are shared about external supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

If the College is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the DCC LADO.

The College recognises that identifying, recording and reviewing patterns of low-level concerns contributes to a strong safeguarding culture.

8.13 Learning Lessons

Following the conclusion of any safeguarding concern or allegation, the College will consider whether there are any lessons to be learned or improvements that should be made to policies, procedures, safeguarding practice, supervision or staff training in order to strengthen safeguarding arrangements.

9 Training

9.1 The Designated Safeguarding Lead and Deputy Safeguarding Leads, as indicated in this policy, will undertake Designated Safeguarding Lead training provided by the local authority (or other approved safeguarding provider) and maintain their knowledge and skills through regular updates in accordance with Keeping Children Safe in Education and local safeguarding partnership requirements.

9.2 All College staff, including supply staff and volunteers who work with students and/or adults at risk, must undertake appropriate safeguarding training to equip them to carry out their responsibilities effectively. Staff will receive safeguarding and child protection training (including online safety, filtering and monitoring responsibilities where appropriate) at induction, regular safeguarding updates at least annually, and mandatory refresher training in accordance with the College's training programme. Staff will annually read and understand Part One of Keeping Children Safe in Education. Governors will annually read and understand Parts One and Two of KCSIE.

9.3 Safeguarding, including online safety training, is covered at both staff and student induction. Safeguarding, including online safety, filtering and monitoring, forms part of both staff and student induction and will continue to be reinforced through regular communications, updates, briefings and continuing professional development throughout the year.

10 GDPR

10.1 This guidance has been updated to reflect the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, Keeping Children Safe in Education 2026 and HM Government's *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers*. The data protection laws place duties on

organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- 10.2 The College recognises that effective safeguarding depends upon the timely, lawful and proportionate sharing of information. Data protection legislation is not a barrier to sharing information where this is necessary to safeguard children, young people or adults at risk. Information will be shared appropriately, securely and only where it is necessary to protect an individual or comply with statutory safeguarding duties.

1. Remember that the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and human rights legislation are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
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.

Where seeking consent would place a learner at increased risk of harm or prejudice a safeguarding enquiry, information should be shared without consent where there is an appropriate lawful safeguarding basis to do so.

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.

Where safeguarding concerns arise, staff should consult the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead wherever practicable before making complex information-sharing decisions.

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 data protection laws you may share information without consent if, in your judgement, there is a lawful basis to do so, including where doing so is necessary to safeguard a child, young person or adult at risk, prevent serious harm or fulfil statutory safeguarding responsibilities. 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.

5. Consider safety and wellbeing: base your information sharing decisions on considerations of the safety, welfare and wellbeing of the individual and others who may be affected by their actions.
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 (see principles).

Information should be shared without unnecessary delay where timely information sharing will better safeguard a learner or support effective multi-agency working.

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, including, where appropriate, the lawful basis for sharing or withholding information.

10.3 Further guidance is available within HM Government's *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* and the Information Commissioner's Office (ICO) guidance on sharing information to safeguard children and young people in the education sector.

11 Safeguarding in Partner Organisations

11.1 New College Durham expects all partner organisations to have the following in place:

- A safeguarding policy including PREVENT or two separate policies which fully complies with the relevant guidance.
- A member of staff who has completed the respective Local Authority Safeguarding Training who can act as named Designated Safeguarding Lead for their organisation.
- A robust procedure for dealing with and recording allegations.
- Appropriate arrangements for online safety, including filtering and monitoring where applicable to the organisation.
- A Staff Code of Conduct which includes arrangements for managing allegations against staff, whistleblowing and low-level concerns.
- Appropriate arrangements for sharing safeguarding information securely and promptly with New College Durham where learners are supported jointly or undertake activities on behalf of the College.

- 11.2 The College will seek appropriate assurance that partner organisations maintain effective safeguarding arrangements throughout the duration of any partnership agreement. This may include due diligence processes, contractual requirements, safeguarding audits, review meetings or other proportionate monitoring arrangements.
- 11.3 Where safeguarding concerns arise involving a learner participating in activities delivered by a partner organisation, both organisations will work collaboratively to ensure that concerns are managed promptly, information is shared appropriately and statutory safeguarding responsibilities are fulfilled. Responsibility for safeguarding cannot be delegated through partnership arrangements.

12 Communication

- 12.1 As part of New College Durham's commitment to safeguarding, we have developed an online safeguarding portal. The portal will allow staff, students and partner organisations to view key information and documents relating to Safeguarding and Prevent. The safeguarding portal will also provide access to current safeguarding guidance, reporting mechanisms, contact details for the Designated Safeguarding Leads, external support services and resources relating to online safety, mental wellbeing, child-on-child abuse, exploitation, Prevent and other emerging safeguarding risks.
- 12.2 The College will develop and issue a termly safeguarding newsletter to keep all staff informed of key developments. In addition, safeguarding updates will be communicated throughout the year, where appropriate, through staff briefings, digital communications, training events and other internal communication channels to ensure staff remain aware of changes to legislation, emerging safeguarding risks and local safeguarding priorities
- 12.3 The DSL/DDSLs will ensure that:
- The policy is reviewed annually.
 - The procedures and implementation will be updated and reviewed regularly.
 - The policy is publicised and parents will be made aware of the fact that referrals about suspected abuse or neglect may be made to external parties by the College.
 - Staff are aware of safeguarding training opportunities and the latest local policies on safeguarding.

- Should learners leave the College, and the College is aware of the learners new educational designation, the safeguarding or child protection file will be transferred securely and separately from the main learner file as soon as possible to the new educational establishment, and within five days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be obtained and retained. The DSL/DDSL will also consider whether relevant safeguarding information should be shared with the receiving provider in advance of the learner's transfer where this is necessary to support the learner, assess risk to the learner or others, or ensure that appropriate arrangements are in place before arrival.
- Safeguarding information remains accessible, accurate and up to date across all College communication channels.
- Students are regularly reminded of the safeguarding support available to them, including how to report concerns, access the safeguarding portal and obtain support from the Designated Safeguarding Leads or other trusted members of staff.
- Lessons learned from safeguarding incidents, audits, reviews or changes in statutory guidance are reflected in College communications, safeguarding practice and staff development activities, where appropriate.

13 Review

13.1 The effectiveness of this Policy will be reviewed annually, or earlier where required, in light of:

- changes to legislation or statutory guidance (including Keeping Children Safe in Education);
- changes to local safeguarding partnership arrangements;
- lessons learned from safeguarding incidents, audits, reviews or inspections;
- changes to College procedures or organisational structure;
- emerging safeguarding risks and national best practice.

13.2 The Designated Safeguarding Lead will undertake an annual review of the effectiveness of the College's safeguarding arrangements, with the findings and any recommended amendments reported to the Senior Leadership Team and Corporation for consideration and approval.

- 13.3 The Governing Body will receive regular safeguarding reports throughout the year to enable it to monitor the effectiveness of the College's safeguarding arrangements, challenge performance where appropriate and gain assurance that statutory safeguarding responsibilities continue to be met. The effectiveness of this Policy will be judged annually and reviewed every five years in light of experience and best practice. The appropriate Corporation Committee will undertake the review of the Policy.

Appendix A – Safeguarding Glossary

Child

A **child** is anyone who has not yet reached their 18th birthday, in accordance with the Children Act 1989.

Adult at Risk

An **Adult at Risk** is defined in accordance with the Care Act 2014 as a person aged 18 years or over who:

- has needs for care and support (whether or not the local authority is meeting those needs);
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from the abuse, neglect or the risk of it.

Designated Safeguarding Lead (DSL)

The senior member of staff with lead responsibility for safeguarding and child protection within the College.

The Designated Safeguarding Lead is supported by appropriately trained Deputy Designated Safeguarding Leads.

Safeguarding

Safeguarding and promoting the welfare of children means:

- providing help and support as soon as problems emerge;
- protecting children from maltreatment;
- protecting children from abuse, neglect and exploitation;
- preventing impairment of health or development;
- ensuring children grow up in safe and effective care; and
- enabling all children to achieve the best possible outcomes.

Family Help

Family Help provides coordinated early support where children, young people and families have additional needs but statutory intervention is not required.

Its purpose is to:

- identify concerns early;
- coordinate support;
- prevent escalation; and
- improve outcomes.

Contextual Safeguarding

Contextual safeguarding recognises that abuse can occur beyond the family home.

This includes harm occurring within:

- peer groups;
- schools and colleges;
- neighbourhoods;
- community settings;
- public spaces;
- transport networks; and
- online environments.

Children Looked After and Previously Looked After Children

Children Looked After, Previously Looked After Children and Care Experienced learners may have additional safeguarding vulnerabilities and may require enhanced pastoral and multi-agency support.

Prevent

Prevent is part of the Government's CONTEST Strategy and aims to safeguard individuals from becoming involved in terrorism or supporting extremism.

Radicalisation may occur both online and offline.

Children who are LGBT+ or Questioning their Gender

Being LGBT+ or questioning gender is **not** in itself a safeguarding issue.

However, these learners can experience increased vulnerability through bullying, discrimination, abuse or exploitation and should receive appropriate safeguarding support where required.

Gender-Questioning Learner

A learner who is exploring, questioning or experiencing uncertainty about their gender. The College recognises that such learners may, in some circumstances, require additional safeguarding support and individual risk assessment. The term does not imply any particular outcome or identity.

Professional Curiosity

Professional curiosity is the willingness to explore and understand what is happening within a learner's life rather than accepting information at face value.

It involves respectful questioning, critical thinking and professional challenge where safeguarding concerns arise.

Online Safety

Online safety is the College's approach to safeguarding learners when using technology.

It includes:

- filtering;
- monitoring;
- digital resilience;
- online behaviour;
- cyber security awareness; and
- education regarding online risks

Appendix B – Definitions of Abuse, Neglect, Exploitation and Specific Safeguarding Issues

Introduction

In respect of this Policy, the College recognises the following as definitions of abuse, neglect, exploitation and specific safeguarding issues.

These definitions are intended to support staff in recognising safeguarding concerns and understanding the terminology used throughout this Policy. They are not exhaustive and should be read alongside **Keeping Children Safe in Education 2026, Working Together to Safeguard Children (2023)** and the College's safeguarding procedures.

Where staff have any concern, however small, they should report it immediately to a Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) and should never assume that another colleague has taken appropriate action.

Physical Abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child, young person or an adult at risk.

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, young person or an adult at risk such as to cause severe and persistent adverse effects on emotional development or wellbeing.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Emotional abuse may include conveying to an individual that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.

It may also include:

- preventing a child or young person from expressing their views;
- deliberately silencing or ridiculing them;
- imposing age or developmentally inappropriate expectations;
- serious bullying (including cyberbullying);
- coercive or controlling behaviour;
- exploitation; or
- causing children or young people to frequently feel frightened or in danger.
- criticism
- humiliation
- belittling

- name-calling

Emotional abuse also includes the impact of seeing, hearing or experiencing the effects of domestic abuse.

Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person or an adult at risk to take part in sexual activities, whether or not the individual 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 or touching outside clothing.

Sexual abuse also includes non-contact activities such as:

- involving a child, young person or adult at risk in looking at sexual images;
- encouraging inappropriate sexual behaviour;
- grooming in preparation for abuse;
- sexual exploitation;
- online sexual abuse;
- image-based abuse; and
- the making, creating or sharing of indecent or sexually explicit images.

Sexual abuse may occur both online and offline and may be facilitated through the misuse of technology or artificial intelligence.

Child-to-parent or caregiver abuse

Abuse can also include violence or coercive behaviour by children towards parents or carers.

Such behaviour may include physical, emotional, coercive, controlling or financially abusive behaviour and should be considered within the wider safeguarding needs of all family members.

Neglect

Neglect is the persistent failure to meet a child, young person or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of health or development.

Neglect may occur during pregnancy through maternal substance misuse and may include a failure to:

- provide adequate food, clothing or shelter;
- protect from physical or emotional harm or danger;
- provide appropriate supervision;
- ensure access to appropriate medical care or treatment; or

- meet educational or emotional needs.

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

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into taking part in criminal or sexual activity.

This may be in exchange for something the victim needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

CCE and CSE affect both boys and girls and may also affect adults at risk.

Victims may have been moved or transported for the purpose of exploitation (commonly referred to as trafficking).

The College recognises that apparent consent does not remove the exploitative nature of the abuse.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation is a form of abuse in which children or young people are manipulated or coerced into criminal activity.

Specific forms of CCE may include:

- county lines activity;
- transporting drugs or money;
- working in cannabis cultivation;
- shoplifting;
- pickpocketing;
- vehicle crime;
- fraud;
- carrying weapons; or
- threatening or committing serious violence.

Children and young people may become trapped through violence, intimidation, debt bondage or threats against themselves or their families.

Victims may appear to be offending, but they should always be considered first as potential victims of exploitation.

The College recognises that girls may experience criminal exploitation differently from boys and that indicators may not always be immediately apparent.

Although the generally accepted terminology refers to "child" exploitation, the College will extend similar safeguarding consideration to adults at risk.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity.

Victims are frequently targeted because of their vulnerability.

Grooming may occur:

- face-to-face;
- through social media;
- online gaming;
- messaging applications;
- mobile devices; or
- other digital technologies.

Perpetrators frequently establish trust through friendship, relationships, gifts, money, accommodation, alcohol, drugs or emotional dependency before exploitation occurs.

Offenders may work individually or as part of organised groups.

Victims may be transported to different locations, isolated from family and friends and subjected to repeated sexual abuse.

Although the generally accepted terminology refers to "child" exploitation, the College will extend similar safeguarding consideration to adults at risk.

Consent

Consent is the voluntary and informed agreement by a person with the capacity to make that decision.

Consent must be freely given, can be withdrawn at any time and must never be assumed.

A child under the age of 13 cannot legally consent to sexual activity.

Where there is an imbalance of power, coercion, manipulation, exploitation or abuse, apparent consent does not negate the safeguarding concern.

Grooming

Grooming is the process by which an individual builds a relationship, trust or emotional connection with a child, young person or adult at risk in order to manipulate, exploit or abuse them.

Grooming may occur:

- in person;
- online;
- through social media;
- gaming platforms;
- messaging applications; or
- other digital technologies.

Victims often do not recognise that they are being groomed.

Children with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year.

These children are at increased risk of poor educational outcomes, emotional distress, poverty, stigma, social isolation and mental health difficulties.

The College will utilise guidance from the National Information Centre on Children of Offenders (NICCO) and work with appropriate agencies to mitigate these risks and provide appropriate support.

Children and the Court System

Children and young people are sometimes required to give evidence in criminal courts, either as victims of crime or as witnesses.

The College recognises that involvement in the court process can be distressing and will work with partner agencies to ensure that appropriate safeguarding, pastoral and emotional support is available throughout the process.

Children with Unexplained and/or Persistent Absence from Education

All staff should recognise that unexplained and/or persistent absence from education may be an indicator of abuse, neglect or exploitation.

Persistent absence may be associated with:

- child sexual exploitation;
- child criminal exploitation;
- county lines activity;

- serious violence;
- mental health concerns;
- substance misuse;
- domestic abuse;
- forced marriage;
- female genital mutilation;
- so-called honour-based abuse;
- radicalisation; or
- other safeguarding concerns.

Early intervention is essential to identify underlying safeguarding risks and reduce the likelihood of future harm.

Staff should follow the College's attendance and safeguarding procedures whenever unexplained or persistent absence gives rise to concern.

Children with Medical Conditions

Children with physical or mental health conditions may face additional safeguarding vulnerabilities or barriers to communicating concerns. Staff should consider whether changes in health, attendance, behaviour, treatment or support arrangements indicate an unmet safeguarding need and should share concerns promptly with the DSL/DDSL.

Children who are Pregnant or Young Parents

Children and young people who are pregnant or who are parents themselves may require additional support to safeguard both their own wellbeing and that of their child. Pregnancy or parenthood at a young age may increase vulnerability to abuse, neglect, exploitation, domestic abuse, poor mental health, interrupted education or financial hardship.

The College will work collaboratively with the learner, their family (where appropriate) and relevant partner agencies to ensure that appropriate safeguarding, pastoral and educational support is provided.

Mental Health

All staff should be aware that mental health concerns can, in some cases, be an indicator that a child, young person or an adult at risk has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Whilst only appropriately trained professionals should attempt to diagnose mental health conditions, staff should remain alert to behaviours or changes that may indicate a learner requires safeguarding support or referral.

Mental health concerns should always be considered within the wider safeguarding context and should not be viewed in isolation.

The College has separate Mental Health and Wellbeing Strategies for both staff and students, which complement this Policy and provide additional guidance and support.

Serious Violence

There are indicators which may signal that children, young people or adults at risk are at risk from, or involved in, serious violent crime.

These may include:

- increased absence from College;
- unexplained and/or persistent absence;
- changes in friendships or relationships with older individuals or groups;
- a significant decline in academic performance;
- signs of self-harm or deterioration in emotional wellbeing;
- unexplained injuries;
- possession of unexplained gifts or money;
- carrying weapons;
- involvement with gangs or organised criminal groups; or
- recruitment through social media, online gaming platforms or encrypted messaging services.

Research has identified several factors that may increase vulnerability to serious violence, including:

- previous abuse or neglect;
- social exclusion;
- involvement in offending behaviour;
- repeated absence from education;
- substance misuse; and
- association with individuals involved in criminal activity.

Staff should remain professionally curious and report any concerns immediately through the College's safeguarding procedures.

County Lines

County Lines is the term used to describe organised criminal networks involved in exporting and distributing illegal drugs using dedicated mobile phone lines or other forms of "deal lines".

This activity may occur locally or across the United Kingdom. Children, young people and adults at risk are often exploited to transport, store and sell drugs or money.

Perpetrators frequently use coercion, intimidation, violence (including sexual violence), debt bondage and weapons to maintain control over victims.

Children and young people may be recruited through schools, colleges, social media, gaming platforms, neighbourhoods, care settings or friendship groups.

Although victims may appear to be offending, they should always be regarded as potential victims of exploitation.

Further guidance is available through the Home Office and The Children's Society County Lines Toolkit, together with information available through the College Safeguarding Portal.

Domestic Abuse

The Domestic Abuse Act 2021 introduced the first statutory definition of domestic abuse and recognises that children, young people and adults at risk may themselves be victims where they see, hear or experience the effects of abuse.

Domestic abuse may consist of a single incident or a pattern of behaviour and may include:

- physical abuse;
- emotional abuse;
- psychological abuse;
- sexual abuse;
- financial exploitation or financial abuse;
- coercive or controlling behaviour;
- threatening behaviour; and
- technological abuse.

Domestic abuse can have a significant and long-term impact upon a learner's health, wellbeing, development and ability to learn.

The College will work closely with partner agencies to ensure appropriate safeguarding support is provided where domestic abuse is identified.

Coercive and Controlling Behaviour

Coercive and controlling behaviour is a pattern of behaviour designed to make another person dependent by isolating them from sources of support, exploiting them, regulating their everyday behaviour or depriving them of independence.

It may occur within intimate relationships, family relationships or between peers and may include intimidation, threats, humiliation, surveillance, financial control or technological abuse.

Coercive and controlling behaviour is recognised as a form of domestic abuse but may also arise independently as a safeguarding concern.

Modern Slavery

Modern Slavery encompasses slavery, servitude, forced or compulsory labour and human trafficking.

Victims may be exploited for:

- sexual exploitation;
- forced labour;
- domestic servitude;
- criminal exploitation;
- forced marriage;
- financial exploitation; or
- the removal of organs.

Children, young people and adults at risk may not recognise themselves as victims and may appear to consent to their circumstances due to coercion, intimidation or manipulation.

Cybercrime

Cybercrime is criminal activity committed using computers, networks or the internet.

Cybercrime may be categorised as:

- cyber-dependent offences, which can only be committed through technology; or
- cyber-enabled offences, where technology increases the scale or impact of traditional criminal behaviour.

Examples include:

- hacking;
- malware attacks;
- phishing;
- identity theft;
- online fraud;
- ransomware;
- unauthorised access to systems; and
- denial of service attacks.

Staff should remain alert to learners who may be victims of cybercrime or who may themselves become involved in criminal online activity.

Homelessness

Being homeless or at risk of becoming homeless presents a significant safeguarding risk for children, young people and adults at risk.

Homelessness may increase vulnerability to:

- exploitation;
- criminality;
- substance misuse;
- modern slavery;
- county lines;
- sexual exploitation;
- physical abuse; and
- poor mental health.

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) should be aware of local referral routes into housing services and work with partner agencies to ensure learners receive appropriate support at the earliest opportunity.

Forced Marriage and So-Called Honour-Based Abuse

So-called Honour-Based Abuse (HBA) encompasses incidents or crimes committed to protect or defend the perceived honour of a family or community.

This includes, but is not limited to:

- forced marriage;
- female genital mutilation (FGM);
- abuse linked to family or community expectations;
- practices such as breast ironing; and
- other forms of abuse committed in the name of preserving "honour".

All forms of Honour-Based Abuse are abuse, regardless of the motivation, and should be managed through the College's safeguarding procedures.

Such abuse often involves multiple perpetrators and may involve significant family or community pressure. Where staff have concerns that a learner may be at risk of Honour-Based Abuse, they should immediately refer the matter to the DSL or DDSL.

Where Female Genital Mutilation (FGM) is identified in a girl under the age of 18, staff must comply with the statutory mandatory reporting duty to the Police in accordance with current legislation and Department for Education guidance.

The College will work with Children's Social Care, the Police and other safeguarding partners to ensure that appropriate protection and support are provided to learners at risk.

Prevent, Extremism, Radicalisation and Terrorism

The College is committed to safeguarding learners from the risk of radicalisation and extremism and fulfilling its statutory duties under the Counter-Terrorism and Security Act 2015 and the Prevent Duty Guidance.

Extremism is the vocal or active opposition to the fundamental British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. It also includes calls for the death of members of the Armed Forces.

Radicalisation refers to the process by which an individual comes to support terrorism or extremist ideologies associated with terrorist groups.

Terrorism is defined in legislation as action or the threat of action designed to influence the Government or intimidate the public for the purpose of advancing a political, religious, racial or ideological cause. Such action may involve serious violence against a person, serious damage to property, endangering life or serious interference with electronic systems.

Radicalisation can occur both online and offline and may involve:

- social media;
- online forums;
- encrypted messaging platforms;
- gaming environments;
- peer groups;
- family members; or
- direct contact with extremist individuals or organisations.

Where staff have concerns that a learner may be vulnerable to radicalisation or extremism, they must report those concerns immediately to the DSL or DDSL, who will consider whether a referral to the Channel Programme or other appropriate agency is required.

Further information is available through the College Safeguarding Portal.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two or more individuals of any age and may occur both inside and outside the College, including online.

Sexual violence and sexual harassment exist on a continuum and may overlap. They may occur:

- face-to-face;
- online;
- through social media;
- via messaging applications;
- through image-based abuse;
- through the non-consensual sharing of intimate images; or
- through the misuse of emerging technologies, including artificial intelligence.

At New College Durham there is a zero-tolerance approach to sexual violence and sexual harassment.

Such behaviour will never be dismissed as:

- "banter";
- "just having a laugh";
- "part of growing up"; or
- "boys being boys".

The College recognises that any learner may become a victim of sexual violence or sexual harassment. Staff should also recognise that girls are statistically more likely to be victims of sexual violence and harassment and that children and young people with Special Educational Needs and Disabilities (SEND) are at greater risk of abuse than their peers.

All reports will be taken seriously.

The wishes, feelings and lived experience of the victim will remain central to all safeguarding decisions.

Victims will be reassured that they are being listened to, taken seriously and will receive appropriate safeguarding, pastoral and emotional support.

Child-on-child Abuse

The College recognises that children and young people can abuse other children and young people.

Child-on-child abuse can occur both inside and outside the College, including online.

It may include, but is not limited to:

- bullying, including cyberbullying;
- prejudice-based bullying;
- discriminatory behaviour;
- misogynistic behaviour;
- misandrist behaviour;
- prejudicial behaviour;
- physical abuse;
- emotional abuse;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- abuse within intimate personal relationships;
- coercive or controlling behaviour;
- initiation or hazing-type violence;
- image-based abuse;
- technology-assisted abuse;
- the making, creating or sharing of nude or semi-nude images and videos;

- upskirting; and
- any behaviour that causes physical, emotional or psychological harm.

The College recognises that inappropriate behaviour between learners must always be challenged.

Behaviour will never be dismissed as:

- "banter";
- "part of growing up";
- "just having a laugh"; or
- "boys being boys".

Failure to challenge such behaviour can create an environment in which abuse becomes normalised and tolerated.

All reports of child-on-child abuse will be managed in accordance with the College's safeguarding procedures and Appendix C of this Policy.

Discriminatory Behaviour

Discriminatory behaviour refers to unfair, prejudicial or abusive treatment of an individual or group based upon a protected characteristic or other personal characteristic.

This may include discrimination relating to:

- age;
- disability;
- race;
- ethnicity;
- religion or belief;
- sex;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity; or
- marriage and civil partnership.

Discriminatory behaviour may constitute a safeguarding concern where it results in bullying, harassment, intimidation, abuse or exploitation.

Misogynistic Behaviour

Misogynistic behaviour refers to attitudes, language or behaviours rooted in prejudice, contempt or hostility towards women and girls.

This may include:

- sexist language;
- harassment;

- intimidation;
- coercive or controlling behaviour;
- objectification;
- online abuse;
- image-based abuse;
- sexual harassment; or
- behaviours that normalise violence against women and girls.

Such behaviour will always be challenged and, where appropriate, managed as a safeguarding concern.

Misandrist Behaviour

Misandrist behaviour refers to attitudes, language or behaviours that demonstrate prejudice, contempt or hostility towards men or boys.

Although less frequently encountered within safeguarding practice, such behaviour may contribute to bullying, harassment, discrimination or emotional harm and should be addressed appropriately where it impacts upon the safety, wellbeing or dignity of learners.

Prejudicial Behaviour

Prejudicial behaviour refers to attitudes or behaviours based upon preconceived opinions, stereotypes or bias towards an individual or group.

It may include:

- discriminatory language;
- exclusion;
- intimidation;
- hate-related behaviour;
- stereotyping;
- online abuse; or
- other behaviour that undermines an individual's dignity, wellbeing or inclusion.

Where such behaviour places a learner at risk of harm it should be managed through the College's safeguarding and behaviour procedures.

Harmful Gender-Based Behaviour

Harmful gender-based behaviour refers to conduct motivated by attitudes, stereotypes or prejudice relating to gender.

It may include:

- misogyny;
- sexism;
- sexual harassment;

- coercive or controlling behaviour;
- intimidation;
- image-based abuse;
- sexual violence; or
- behaviours that normalise violence or abuse towards others.

Such behaviour may occur both online and offline and should be addressed promptly where it places a learner at risk of harm.

Online Safety

The College recognises that online safety is an essential component of safeguarding and promoting the welfare of children, young people and adults at risk.

Online safety refers to the safe, responsible and appropriate use of digital technologies and includes protecting learners from online harms that may jeopardise their safety, wellbeing, personal information or mental health.

The College recognises that technology plays a significant role in the lives of learners and that safeguarding risks continue to evolve. Online safety will therefore remain a running and interrelated theme throughout the College's safeguarding arrangements, curriculum, tutorial programme and wider student support services.

The breadth of issues classified within online safety is considerable and continually evolving but can be categorised into four broad areas of risk:

Content – being exposed to illegal, inappropriate or harmful content including:

- pornography;
- racism;
- misogyny;
- misandry;
- discrimination;
- self-harm;
- suicide;
- anti-Semitism;
- extremism;
- radicalisation;
- misinformation;
- disinformation (including fake news);
- conspiracy theories; and
- content generated through artificial intelligence.

Contact – being subjected to harmful online interaction including:

- grooming;
- child sexual exploitation;
- child criminal exploitation;

- peer pressure;
- online coercion;
- commercial exploitation;
- adults posing as children or young people;
- financial exploitation;
- online stalking;
- online fraud.

Conduct – online behaviour that increases the likelihood of harm including:

- cyberbullying;
- discriminatory behaviour;
- prejudice-based behaviour;
- making, creating or sharing nude or semi-nude images;
- image-based abuse;
- online harassment;
- sexual harassment;
- misuse of artificial intelligence; and
- the sharing of harmful or illegal content.

Commerce – risks associated with online gambling, inappropriate advertising, phishing, financial scams, identity theft and other forms of online financial exploitation.

The College will ensure that online safety remains an integral part of safeguarding through:

- learner education;
- the tutorial programme;
- staff training;
- appropriate filtering and monitoring systems;
- robust cyber security arrangements;
- acceptable use policies; and
- regular review of emerging online risks.

Where learners engage in remote or blended learning, the College will continue to promote safe online behaviour and work with parents, carers and learners to reinforce good online safety practices.

Further guidance is available through the College Safeguarding Portal.

Filtering and Monitoring

Filtering and monitoring form an important part of the College's online safeguarding arrangements.

Filtering reduces the likelihood of learners accessing harmful, illegal or inappropriate online material through College systems.

Monitoring assists the College in identifying safeguarding concerns arising from the use of College information systems and enables appropriate intervention where concerns are identified.

The College will ensure that filtering and monitoring arrangements remain proportionate, effective and subject to regular review.

All staff have a responsibility to understand their role in supporting the College's filtering and monitoring arrangements and should report any concerns regarding their effectiveness.

Artificial Intelligence (AI)-Enabled Abuse

Artificial Intelligence (AI)-enabled abuse refers to the use of artificial intelligence to create, manipulate or distribute images, audio or video to facilitate abuse, harassment, exploitation, coercion or blackmail.

Examples include:

- AI-generated intimate images ("deepfakes");
- manipulated videos;
- synthetic voice recordings;
- image manipulation;
- impersonation;
- digitally altered evidence; and
- other forms of synthetic media intended to exploit, deceive or humiliate.

The College recognises that AI-enabled abuse is an emerging safeguarding risk and that such behaviour may constitute sexual abuse, child-on-child abuse, bullying or criminal behaviour.

Any concerns relating to the misuse of artificial intelligence will be managed in accordance with the College's safeguarding procedures.

Technology-Assisted Abuse

Technology-assisted abuse refers to abuse facilitated through digital technologies.

Examples include:

- online grooming;
- cyberbullying;
- coercive or controlling behaviour;
- stalking;
- image-based abuse;
- online sexual exploitation;
- harassment;
- online blackmail;
- digitally manipulated intimate images;
- misuse of social media; and
- abuse facilitated through artificial intelligence.

Technology-assisted abuse should always be treated as seriously as abuse occurring face-to-face.

Professional Curiosity

Professional curiosity is the ability and willingness of staff to explore and understand what may be happening within a learner's life rather than accepting information at face value.

It requires respectful questioning, critical thinking and professional challenge where safeguarding concerns arise.

Professional curiosity supports early identification of abuse, neglect, exploitation and other safeguarding concerns and is an essential component of effective safeguarding practice.

Safeguarding Culture

The College is committed to maintaining a strong safeguarding culture in which:

- safeguarding is everyone's responsibility;
- learners feel safe, valued and listened to;
- concerns are recognised and reported promptly;
- staff exercise professional curiosity;
- information is shared appropriately;
- appropriate action is always taken; and
- safeguarding is embedded throughout College policies, procedures and day-to-day practice.

The College recognises that an effective safeguarding culture is fundamental to protecting children, young people and adults at risk.

Upskirting

The Voyeurism (Offences) Act 2019 created the specific criminal offence commonly known as

Upskirting.

Upskirting is where a person takes a photograph or records beneath another person's clothing (not necessarily a skirt), without their knowledge or consent, with the intention of viewing their genitals, buttocks or underwear to obtain sexual gratification or to cause humiliation, alarm or distress.

Anyone, regardless of age or gender, may become a victim of upskirting.

Where concerns arise, the College will treat such incidents as safeguarding concerns and, where appropriate, criminal offences.

Conclusion

The safeguarding issues described within this appendix are not exhaustive and new or emerging safeguarding risks may arise over time.

Staff should remain vigilant, maintain an attitude of **"it could happen here"**, exercise professional curiosity and promptly report any safeguarding concern, however small, to a Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

The College will review this appendix regularly to ensure it reflects current legislation, statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

Appendix C

Actions Following a Disclosure of Child-on-child Abuse

Following a report or disclosure of child-on-child abuse, the College will always ensure that the immediate safety and welfare of all learners is the primary consideration.

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) will undertake an immediate safeguarding risk and needs assessment to determine the most appropriate course of action. This assessment will be reviewed regularly as circumstances change.

The potential actions available to the College include:

Manage Internally

In some cases of child-on-child abuse, for example isolated or lower-level incidents, the College may determine that statutory intervention is not required and that the matter can be managed internally through the appropriate College procedures.

This may include:

- Pastoral support.
- Restorative approaches where appropriate.
- Behaviour management.
- Disciplinary procedures.
- Risk management measures.
- Safeguarding support for those involved.
- Ongoing monitoring and review.

Any internal response will be proportionate to the nature and seriousness of the concern and will always prioritise the safety, welfare and wellbeing of the victim.

Family Help

Where statutory intervention is not required, but additional coordinated support would benefit the learner and/or their family, the College may refer the matter for Family Help.

Family Help provides support at the earliest opportunity to improve outcomes, reduce safeguarding risks and prevent concerns from escalating.

The College recognises that providing coordinated support at an early stage is often more effective than responding after concerns have become more serious.

Referral to Children's Social Care or Adult Services

Where a learner has suffered harm, is at risk of harm, or is likely to suffer significant harm, the College will make an immediate referral to Children's Social Care or Adult Services, as appropriate.

The College will normally seek to inform parents or carers before making a referral unless doing so would:

- Place the learner or another person at increased risk.
- Prejudice a safeguarding investigation.
- Be contrary to the advice of Children's Social Care, Adult Services or the Police.

Where statutory assessment is appropriate, the College will work closely with the allocated Social Worker and all relevant safeguarding partners to support the learner and contribute to any safeguarding plans.

Police Referral

Where a criminal offence may have been committed, or where there is an immediate risk of harm, the College will refer the matter to the Police without delay.

The College recognises that its safeguarding responsibilities continue irrespective of any criminal investigation and appropriate support will continue to be provided to all affected learners.

Supporting the Victim

The College will ensure that victims receive appropriate safeguarding, pastoral and wellbeing support for as long as required.

The wishes, feelings and lived experience of the victim will be considered throughout the safeguarding process, recognising that every individual's circumstances and support needs are different.

The College will take all reasonable steps to ensure that victims are protected from further harm and are able to continue their education safely wherever possible.

Supporting the Alleged Perpetrator

The College recognises that the alleged perpetrator may also require safeguarding support.

Any support provided will not diminish the College's responsibility to safeguard and support the victim.

The College will consider whether any underlying safeguarding concerns, unmet needs or vulnerabilities have contributed to the behaviour and will make referrals where appropriate.

Risk Assessment and Safety Planning

Following any disclosure of child-on-child abuse, the DSL/DDSL will consider:

- The immediate safety of the victim.
- The safety and wellbeing of other learners.
- Any continuing contact between those involved.
- Whether reasonable adjustments to teaching, timetabling or College activities are required.
- Whether additional supervision or support is required.
- Whether wider safeguarding concerns exist.
- Whether additional agencies should be involved.
- Whether the safeguarding risk assessment requires regular review.

Appropriate safeguarding plans will be implemented, monitored and amended where necessary to ensure risks remain effectively managed.

Information Sharing

The College recognises that timely, lawful and proportionate information sharing is essential to effective safeguarding.

Information will be shared securely with those who need to know in order to safeguard children, young people and adults at risk, in accordance with data protection legislation and the College's Information Sharing procedures.

Recording

The DSL/DDSL will ensure that:

- All concerns are recorded accurately and without unnecessary delay.
- Safeguarding decisions are clearly documented.
- Actions taken and the reasons for those actions are recorded.
- Records are securely maintained within the College's safeguarding recording system.
- Safeguarding records are reviewed where further concerns arise or circumstances change.

Ongoing Review

The DSL/DDSL will regularly review the effectiveness of the safeguarding arrangements to ensure that support remains appropriate for all learners involved.

Risk assessments, safeguarding plans and support arrangements will be reviewed whenever new information becomes available or circumstances change.

The College will continue to work collaboratively with parents or carers (where appropriate), Children's Social Care, Adult Services, the Police and other relevant safeguarding partners to ensure that risks are effectively managed and learners receive appropriate support.

Safeguarding intervention will only be concluded when the College is satisfied that appropriate support has been provided, identified risks have been appropriately managed and all statutory safeguarding responsibilities have been fulfilled.