South Thames Colleges Group

Carshalton College | Kingston College | Merton College | South Thames College

# SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY 2025- 26

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## 1 Introduction

1.1. South Thames Colleges Group is committed to a whole Group approach to safeguarding, creating a culture of vigilance, promoting the welfare of children, young people and adults at risk, ready to provide support as soon as the problem emerges. The Group will ensure that action is taken to support all those at risk of significant harm. Safeguarding and promoting the welfare of children and adults at risk is **everyone's** responsibility. All welfare concerns are taken seriously, and students are encouraged to talk to us about anything that worries them. The Group requires that all staff, governors, volunteers and those contracted to provide services should always consider what is in the best interests of the child or adult at risk.

1.2 The Group recognises that 'Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures and consequentially enshrined in its ethos.' Keeping Children in Education 2025

1.3 The Group requires all staff to demonstrate high standards in the early identification and protection of children and adults at risk from discrimination and avoidable harm. **All** staff should maintain the attitude "it could happen here".

1.4 Staff are required to understand and fulfil their duties to children (young people under 18) and adults at risk in accordance with all relevant legislation, statutory guidance and departmental advice including:

- Children Acts 1989 and 2004
- Children and Social Work Act 2017
- Section 5B of the FGM Act 2003 as inserted by section 74 of the Serious Crime Act 2015
- Sexual Offences Act 2003
- Counter Terrorism and Security Act 2015
- Vulnerable Groups Act 2006
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Keeping Children Safe in Education September 2023
- Working Together to Safeguard Children 2023
- The Prevent Duty Guidance 2023: for England and Wales
- Terrorism (protection of premises) Act 2025
- What to do if you are Worried a Child is Being Abused
- Information Sharing: advice for practitioners providing safeguarding services' DfE July 2018

1.5 The Group recognises that the welfare of the student is paramount and that, in accordance with the Equality Act 2010, all students regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation have the right to protection from all types of harm or abuse. Working in partnership with children, adults at risk, their parents, carers and other agencies is essential in promoting the welfare of individuals.

1.6 This policy should be read in conjunction with individual College's safeguarding procedures and relevant policies / guidance – notably:

- STCG Values, Our Code of Conduct and the Attendance, Behaviour and Commitment to Study (ABC) Guidance
- Child-on-child abuse Procedures (see Appendix 4)
- Complaints, Compliments and Feedback Policy
- E-Safety Policy
- Fitness to Study Policy
- Freedom of Speech & Visiting Speaker Policy
- Inclusion and Learning Support Policy
- Children Looked After and Care Leavers Policy
- Applicant and Student Criminal Conviction Policy & Procedure
- Mental Health and Wellbeing Policy
- Student Code of Conduct
- Student Disciplinary Policy and Procedure
- Policy for Low Level Safeguarding Concerns
- Prevent Action Plan
- Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors
- Safer Recruitment Policy
- Safeguarding and External Contractor's Procedures
- Transgender Policy
- Whistleblowing Policy

STCG Policies and Procedures:

- View on Website: Link
- View on STCG (staff) online: Link

## 2 Purpose

2.1 The purpose of this policy is to provide a framework that informs procedures relating to the Groups legal obligations to safeguard and protect children (and adults at risk) who are at risk of harm, have been suffering forms of abuse or are at risk of radicalisation.

2.1.2 This policy provides clear direction to all members of the college community to ensure child protection and adult at risk concerns, referrals and monitoring of actions are handled sensitively, professionally and in ways that promote the welfare of students and support their needs e.g., students are encouraged to talk and are listened to. The policy also makes a commitment to the development of good practice and sound procedures.

2.1.3 All staff receive a copy of this policy and are required to be familiar with the statutory guidance 'Keeping Children Safe in Education' 2025 Part One/Annex B, read and record that Part 1 has been understood and undertake regular refresher training to fulfil their safeguarding duties.

2.1.4 The Group's policy and procedures for safeguarding mirror Local Safeguarding Children partnerships and are based upon the London Safeguarding Children Procedures and Practice Guidance

(https://www.londoncp.co.uk) and the London Multi Agency Adult Protection Policy and Procedures (https://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures).

## 3 Scope

3.1 The policy applies to all students, governors, staff and volunteers working for the Group in all locations where education and training is delivered to children and adults at risk. It applies also to those situations where students are in a workplace setting undertaking vocational training or studying for vocational qualifications. The policy also covers collaborative provision and staff employed directly by contractors supplying services on behalf of the Group. Subcontractors of educational provision are required to have and adhere to their own safeguarding policies and procedures which are in line with relevant legislation and statutory guidance; these will be quality assured by the Group.

3.1.2 Safeguarding and promoting the welfare of children is defined in KCSIE 2025 as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

3.1.3 Within the Group, safeguarding involves acting to prevent harm and to protect students from maltreatment by physical abuse, sexual abuse, emotional abuse and neglect which may take place inside or outside the home, including online. It also covers safeguarding young people and adults from being drawn into committing terrorist-related activities and the importance of early intervention, recognising that a person's susceptibility to radicalisation may be linked to their vulnerability. Section 26 of the Counter Terrorism and Security Act, 2015 places a duty on colleges to have "due regard to the need to prevent people from being drawn into terrorism".

When operating this policy, the Group uses the following accepted governmental definitions of extremism and radicalisation which are:

*Extremism: 'Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.*

*Radicalisation: 'the process by which a person comes to support terrorism and forms of extremism leading to terrorism'.*

3.1.4 Safeguarding and promoting the welfare of young people is a broader term than child protection. It includes protecting young people from maltreatment, whether within or outside the home, preventing impairment of mental and physical health or development to ensure young people can grow up in safe circumstances. It also encompasses specific issues such as student health and safety; serious violence; child-on-child abuse; (including bullying sexual violence; sexual harassment; harmful sexual behaviour), arrangements to meet medical need; provision of first aid; college security; access to and use of information technology.

3.1.5 **A 'child'** is defined as a person aged up to 18. 'Keeping Children Safe in Education' 2024 recognises the additional vulnerabilities of 'looked after children' and care leavers. The Children Act 2004 also covers adults with a disability up to the age of 25.

3.1.6 An adult at risk is defined as "a person aged 18 or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation" (Safeguarding Vulnerable Groups Act 2006). An 'Adult at Risk' may therefore be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment has learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to make a decision and is in need of care and support

Please note this is not an exhaustive list.

## 4. Main Elements

The three main elements of the Policy are Prevention, Protection and Monitoring and Recording.

### 4.1 Prevention

The Group will put in place measures which are intended to prevent harm to children and adults at risk. The Group will:

4.1.2 Raise awareness of issues relating to the welfare of young people and adults who are or may become vulnerable and promote a safe environment for these students including apprentices.

Aid the early identification of young people and adults who are, or may become, vulnerable, who are at risk of significant harm.

4.1.3 Adopt a zero-tolerance approach to bullying, discrimination, sexual harassment and sexual violence and recognise that even if there are no reported cases, staff must not take the view that it does not happen. All staff should challenge inappropriate behaviours between students that are abusive in nature.

4.1.4 Provide safeguarding and child protection training (including on-line safety) as part of the Group safeguarding approach and wider staff training and curriculum planning. Ensure training is regularly updated including in-year updates to provide staff with the relevant skills and knowledge to safeguard children and vulnerable adults effectively. See section 10.

4.1.5 Ensure the Designated Safeguarding Lead and Centre Safeguarding Leads and Safeguarding Officers undergo appropriate training every two years and in addition to this training, their knowledge and skills will be refreshed at least annually.

4.1.6 Ensure the Designated Safeguarding Lead and Deputy Safeguarding Leads undertake Prevent awareness training to provide a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

4.1.7 Preventing extremism and radicalisation. As part of wider safeguarding responsibilities, college staff are alert to:

- Student groups who may be vulnerable to being drawn into committing terrorist-related activity.
- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parent/carer reports of changes in behaviour, friendship or actions and requests for assistance.
- Local authority services, and police reports of issues affecting students in other colleges or settings.
- Students voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths and cultures.
- Use of extremist or ''hate" terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Making remarks about being at extremist events or rallies outside college.

4.1.8 Establish and maintain a safe environment in which staff and students feel secure and are encouraged to talk freely about anything that concerns them.

4.1.9 Include opportunities in the Tutorial Programme and curriculum to promote British Values, reflect on appropriate behaviour e.g. consent and develop and equip students with the knowledge and skills needed to recognise risks and stay safe from abuse (including online).

4.1.10 Ensure that all adults within the College who have access to children, young people and vulnerable adults have been subject to appropriate checks using safer recruitment practices.

4.1.11 Maintain and review a single central record of Safer Recruitment and DBS checks and training and comply with the duty of employers to inform the DBS of any individual (paid employee, volunteer or other) who poses a threat to children or adults at risk.

4.1.12 Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection/ adult at risk matters including attendance at strategy meetings, case conferences, core group meetings and other relevant child or vulnerable adult protection meetings.

**4.2 Protect**

The Group will act and work in conjunction with other agencies, as appropriate, to protect children and adults at risk who may be at risk of harm or who have been harmed. This includes:

4.2.1 Providing early intervention and support as soon as a problem emerges at any point in the young person or adult at risk's life. Work with other agencies to undertake Early Help Assessments, as required.

4.2.2 Always acting in the best interest of the child/adult at risk and providing opportunities for students to be heard and understood in the implementation of any measures to protect them.

4.2.3 Always considering whether children are at risk of abuse or exploitation in situations outside their families. Extras familial harms can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation). domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

4.2.4 Being aware that harm can include ill treatment of others and that this can be particularly relevant, for example in relation to the impact on children on all forms of domestic abuse, including where they see, hear or experience its effects.

4.2.5 Always alerting the Centre Safeguarding Lead, Deputy Safeguarding Lead and or Group DSL urgently of concerns about female genital mutilation (FGM) and or where staff are concerned that a child may be at risk of Honour Based Abuse (HBA). (*There is a legal duty to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18*.).

4.2.6 Responding immediately to concerns about and disclosures made by children and adults at risk which indicate that they may be at risk of harm or have been harmed.

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

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the student to talk freely
- reassure the student, but not make promises which might not be possible to keep
- never promise a student that they will not tell anyone
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify what is being said
- not criticise the alleged perpetrator
- explain what must be done next and who must be told
- make a written record
- pass the information to the relevant Safeguarding Officer /DSL or Deputy without delay (if a Safeguarding Officer /DSL or Deputy is not available, staff must inform a senior member of staff or complete a child protection referral if this disclosure indicates that the student may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

Reporting Form: Link

**Contact:**

- Kingston College: mailto:Referral.team@stcg.ac.uk 0208 268 2969/2949
- Carshalton / Merton: ccstudent.support@stcg.ac.uk
- South Thames College: safeguarding.whs@stcg.ac.uk

4.2.7 Ensuring students know that they can approach their tutor or other members of staff if they are worried about anything, including issues related to sexual abuse, sexual harassment, radicalisation, extremism, domestic abuse, including exposure to domestic abuse and serious violence. The Group recognises that sometimes children / young people / Adults at Risk do 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 but that this should not prevent staff from having a professional curiosity and reporting any concern.

4.2.8 Ensuring all staff can reassure victims that they are being taken seriously and that they will be supported and kept safe.

4.2.9 Ensuring that child-on-child abuse is not tolerated, and action is taken if it occurs. Further information Group's procedures in relation to child-on-child abuse is included at Appendix 4. Staff must:

- be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of college and online.

4.2.10 Supporting students who have been abused or may be at risk of harm, including self-harm, in accordance with any agreed child protection or Care Plans.

4.2.11 Working with other agencies to safeguard and promote the welfare a child or adult at risk who has been harmed or is at risk of harm.

4.2.12 Ensuring staff follow accepted health and safety practices when working with students and that, where appropriate, risk assessments are carried out.

Helping students who are over 18 and not defined as adults at risk if they feel they are at risk of harm through creating an environment, where they are encouraged to talk to staff who can support them to talk to the police and/or other specialist services.

4.2.13 Acknowledging that a child that is looked after (CLA - Child that is Looked After) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have the skills, knowledge and understanding to ensure that CLA and children who were previously looked after are kept safe. Our setting will ensure that all agencies will work together, and prompt action will be taken in response to any safeguarding concerns, especially for children, who are a particularly vulnerable group.

4.2.14 Acknowledging that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse.

4.2.15 Recognising that when a child has a social worker, it is an indicator that child is more at risk than most students. This may mean that they are more vulnerable to harm, as well as facing educational barriers to attendance, learning behaviour and poor health.

4.2.16 Ensuring that sanctions applied due to behaviour incidents involving children with special educational needs and disabilities (SEND), are appropriate and the additional vulnerability of the group is considered. See guidance: Reducing the Need for Restraint and Restrictive Intervention – June 2019

4.2.17 Ensuring appropriate response to any concern or allegation about a member of staff or volunteer including any low-level concerns as set out in the Group Policy for Low Level Safeguarding Concerns and the Procedure for Dealing with Allegations Link.

**4.3 Monitoring and recording**

4.3.1 The Group will ensure that all Safeguarding records are complete, timely and robust to ensure the early identification of students who need support and respond effectively to any concerns including the analysis of safeguarding concerns & trends at Group and college level.

4.3.2 Establishing procedures for reporting and dealing with allegations of abuse and exploitation.

4.3.3 Ensuring the robust recording of safeguarding concerns and subsequent follow-up on CPOMS.

4.3.4 Ensure procedures for reporting and addressing support as soon as a problem emerges e.g. Early Help referrals.

4.3.5 Ensuring monitoring procedures which promote safer use of the internet and technology as per the college's Online Safety Policy.

4.3.6 Ensuring the safe recruitment of staff and the maintenance of a single central record.

4.3.7 Ensuring that students at risk of being drawn into terrorism are identified and referred to the Prevent and Channel Co-ordinator for appropriate support.

**5. Missing children, attendance, and safety concerns**

5.1 All students under 18 or who are an Adult at Risk who have unexplained persistent absences from college, or their whereabouts are unknown will be considered a safeguarding concern. If the student is deemed to be at immediate risk the safeguarding team at the College attended by the student concerned will undertake checks with the family/authorities to ensure the case has been reported to the Police. Any relevant information that might help to find or support the child will be shared. If the student is a Looked After Child, a Care Leaver or an Unaccompanied Young Person the college will immediately contact police and social services. If a child or Adult at Risk with a recorded safeguarding incident is absent from the college on repeated occasions the Safeguarding Team will undertake appropriate checks with the family/authorities. If any child or Adult at Risk is absent from the college on repeated occasions and there is a safeguarding concern it must be referred immediately to the nominated safeguarding officer by the teacher/tutor/member of staff.

Similarly, if a student experiences multiple suspensions' or are at risk of permanent exclusion this should be reported as a safeguarding concern to the CSL (Centre Safeguarding Lead), Group DSL or Executive Principal (Skills and Inclusion) to ensure appropriate safeguarding checks take place and early help is requested from social services as appropriate.

5.1.2 Authorised absence and planned withdrawal.

5.1.3 If the Group becomes aware of a risk to a student's safety caused by factors such as actual or threats of violence and/or gang related activity which could also have implications for the safety of the student concerned and/or the wider student community a student safety risk assessment would be undertaken by the Group to identify the safety risks and any measures that could be put in place to mitigate the risk to a low level. The risk assessment would be developed following consultation with the student, parent/carer and relevant external agencies supporting the student.

5.1.4 After considering discussions with, and representations from, the student, relevant external agencies and parents, carer or Virtual School (as appropriate) the Group may decide to require the student to take an authorised absence which would usually be no longer than 5 working days to enable the risk assessment and associated measures to be undertaken and where possible put in place. Any decision to authorise an absence on this basis would be made by the relevant Executive Principal, following consultation with the relevant College Principal and the DSL or in their absence the relevant Head of Student Services.

5.1.5 Subsequently, and normally no longer than 4 weeks, if any measures arising from the safety risk assessment cannot be achieved and/or put in place to reduce the risk the Group will withdraw the student from the college. Any decision for a planned withdrawal of the student would be considered by a Panel including the Group DSL and/or Executive Principal (Skills and Inclusion), a CSL (Centre Safeguarding Lead) and College Principal. The panel would consider the reasons for the withdrawal presented to it and any representations from the students, parents or carers and agencies supporting the students prior to making its decision. Any appeal against the decision made by the panel would be made to the Executive Principal (Skills and Inclusion) within 5 working days and the appeal would be considered by a member of the Senior Leadership Team (SLT) not previously involved in a decision to withdraw the student concerned.

5.1.6 The DSL should record the number of students that have a safety risk assessment and should report to the SLT via Safeguarding Review Group the termly position including those students that have been withdrawn or left the Group since the safety risk assessment.

## 6. Allegations or Low-level concerns about an adult working in the Group whether as a tutor, agency staff, support staff, other staff, volunteers or contractors.

6.1 At STCG we recognise the possibility that adults working in the Group may harm children and young people, including governors, volunteers, temp staff and contractors. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young

person, parent or other adult within or outside of the organisation; or because of vetting checks undertaken.

**Low-level safeguarding concerns**

6.1.1 The term 'low-level' concern does not mean that it is insignificant. A low-level safeguarding concern is a concern raised, no matter how small, that an adult may have acted in a manner that appears to be below the 'harm' threshold that would lead to a formal safeguarding allegation but is inconsistent with the expected standards of behaviour, even if not linked to a particular act or omission, to create an unease as to the adult's behaviour particularly towards or around children. A 'low-level' concern is any concern that an adult working in or on behalf of the Group may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the relevant Designated Officer (formerly LADO).

Examples of such behaviour could include, but are not limited to:

- being over friendly with children, including being friends on social media
- having favourites
- taking photographs of children on their mobile phone, contrary to college policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or meeting a young person outside of the college setting for non-college reasons or
- humiliating children.

6.1.2 If any staff has any concerns about a member of staff or a volunteer staff, agency staff, contractors they must inform one of the following staff as soon as reasonably possible and, in any event, within 24 hours of becoming aware the concern if it relates to a particular incident:

- Relevant member of SLT:

  - Executive Principal Skills and Inclusion
  - Executive Principal Quality and Improvement
  - Deputy Chief Executive (DCE)
  - Executive Director Business Partnerships

- Group Designated Safeguarding Lead (DSL) – Director Student Services
- Centre Safeguarding Lead (CSL) – Head(s) of Student Services

6.1.3 If the low-level safeguarding concern has not been reported directly to one of the above, the recipient of the concern must inform the relevant member of SLT, Group DSL or Centre Safeguarding lead as soon as possible and in any event within 24 hours of becoming aware of it.

6.1.4 Initially the relevant member of SLT, as the case manager, will determine, in consultation with the Group Designated Safeguarding Lead and Director of Human resources, that it is a low-level safeguarding concern and should not be reclassified as a safeguarding allegation which would meet

the 'harm threshold'. The circumstances in which a low-level safeguarding concern might be reclassified as an allegation are where:

- The threshold is met for an allegation
- There is a pattern of low-level concerns which collectively amount to an allegation
- There is other information which when considered leads to an allegation
- It is a concern which involves a member of staff and a student or students

Where necessary advice will be sought from the Designated Officer (LADO) by HR, if necessary, on a no-names basis.

6.1.4 Having established that the safeguarding concern is low-level, the case manager will identify an appropriate member of staff to or nominated deputy collect as much evidence as possible by speaking:

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

6.1.5 Records will be kept by HR and must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified.

The Low-Level Safeguarding Concerns Policy: Link.

**Safeguarding Allegations**

6.1.6 A safeguarding allegation is a claim that a staff member / volunteer / agency staff or contractors has committed a serious wrongdoing that does meet the 'harm threshold' such as physical, emotional, or sexual abuse which requires a formal investigation and notification of Designated Officer (Local Authority Designated Officer). This includes any information which indicates that a member of staff/volunteer may have:

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

6.1.7 If a member of staff receives an allegation against another member of staff, or if they themselves believe a staff member has committed a serious wrongdoing, they must report the allegation immediately to a member of the Safeguarding Allegation Panel:

- Deputy Chief Executive (DCE)
- Executive Principal Skills and Inclusion (EP)
- Director of Student Services (DSL)
- Director of HR

6.1.8 Following receipt of the allegation the Panel will then convene with at least 3 members present and will initially review the allegation, determine if further information is required and/or to decide whether to notify the Designated Officer (Local Authority Designated Officer) of the allegation. In all instances, irrespective of their attendance at the panel, the Executive Principal for Skills and Inclusion, as the Senior Postholder for Safeguarding will be informed.

6.1.9 If the Designated Officer (LADO) determines that the safeguarding allegation meets the threshold for the Designated Officer process, the Designated Officer will, working with the Group, oversee the investigation to ensure it is fair, timely, and transparent, potentially involving the police or children's social care.

6.1.10 Where the Designated Officer determines that the allegation meets the threshold the members of the Panel and the Principal / CEO will be informed.

6.1.11 In the event of allegations against the Group Principal/CEO these should be reported to the Clerk to the Corporation who will plan for the allegations to be reported to the Chair of Governors. In the event of the need for the involvement of the Group Principal/CEO or the Chair of Governors, they will be required to undertake the actions defined for the case manager. If an allegation is made against a governor, the Group will follow the relevant local procedure. Where an allegation is substantiated, the procedures for removing the governor from office will be followed.

6.1.12 The nature of the allegation and any advice from the LADO will inform any action required by the Group. This may include a risk assessment and support plan, overseen by the Group DSL / Centre Safeguarding Lead to support both the student concerned, other students and the member of staff.

Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors: Link

## 7. Whistleblowing

7.1 As stated in KCSiE 2025, 'all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership team.'

7.1.2 If a member of staff, governor, volunteer or visitor has concerns about how a potential or actual safeguarding case is being managed, these should be raised with the Designated Safeguarding Lead in the first instance. If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

7.1.3 In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

7.1.4 Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: Multi-Agency Safeguarding Hub: 0300 126 7000, NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child

protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

General advice can be found at: www.gov.uk/whistleblowing
Whistleblowing Policy: Link

## 8. Safer Working Practice

8.1 To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document - Guidance for safer working practice for those working with children and young people in education settings (2022).

8.1.2 The document seeks to ensure that the responsibilities of college leaders towards young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the Staff Code of Conduct policy for more information.

8.1.3 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. The single central record must cover the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school and Governors.

8.1.4 Every job description, person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. In line with guidance included within Keeping Children Safe in Education 2025 and reflecting good safer recruitment practice the College will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.

8.1.5 We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 3 years and that those members of staff who are safer recruitment trained refresh their knowledge every one to three years.

Safer Recruitment Policy: Link

## 9 Staff Induction, Training and Development

9.1 All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic safeguarding training on how to recognise signs of abuse, how to respond to any concerns, online safety (including their roles and responsibilities around filtering and monitoring systems within our setting) and familiarisation with the safeguarding policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges and other related policies. There are mechanisms in place, such as safeguarding updates, to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. Staff should also read, "Working Together to Safeguard Children." 2023. Staff are advised to maintain and attitude if 'it could happen here' where safeguarding is concerned.

9.1.2 The training provided at induction will be proportionate to staff members' and governors' roles and responsibilities.

9.1.3 All Designated Safeguarding Leads (DSLs) will undergo updated DSL safeguarding training every two years. DSLs should undertake Prevent awareness training and disseminate an understanding of the Prevent Duty through the annual training programme delivered to staff each academic year. All safeguarding officers will receive dedicated and appropriate safeguarding training.

9.1.4 All staff members of the college receive appropriate training including a requirement to complete on-line CPD and attend relevant SG briefings / training during the academic year. The training will include the following aspects: Staff understand the difference between a safeguarding concern and a student in immediate danger or at risk of significant harm. When concerned about the welfare of a student, staff should always act in the best interests of the young person. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff know how best to respond to a student who makes a disclosure of abuse or harm and if unsure always refer it to the DSL/CSL/DCSL /Safeguarding team. If staff have any concerns about a student's welfare, they should act on them immediately. In addition, there will be specific training will enable staff to:

- proactively engage in preventing radicalisation and extremism, as part of the Government's "Prevent" strategy.
- proactively engage in preventing sexual abuse, harassment and harmful sexual behaviour.
- understand and be alert to the fact that technology is a significant component in many safeguarding and wellbeing issues.
- be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of college and online.
- be aware that harm can include ill treatment of others and that this can be particularly relevant, for example in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- be aware of the indicators of serious violence and its associated risks regarding youth violence, gang involvement and exploitation of children through child criminal exploitation and county lines.
- be aware that children are at risk of abuse or exploitation in situations outside their families.
- be aware of issues relating to the welfare of young people and adults within the Group.
- be alert to the identification of young people and adults who are, or may become, vulnerable, who are at risk of significant harm.
- Be alert to children who may be more at risk than most students. This may mean that they are more vulnerable to harm, as well as facing educational barriers to attendance, learning behaviour and poor health. This includes:
    - Has a Social Worker
    - Is in Care or has been in Care
    - Is in the Youth Justice System, or has been known to the Youth Justice System
- Understand their statutory response to the disclosure of FGM, that whilst all staff should speak to the Centre Safeguarding Lead, Deputy Safeguarding Lead and or Group DSL with regards to concerns about female genital mutilation (FGM), there is a legal duty in teachers, in the course of their work, to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18.

9.1.5 The nominated governor for safeguarding will undergo training prior to or soon after appointment to the role; this training will be updated every three years. All governors undergo specific awareness training to equip with them with the knowledge to provide strategic challenge, to ensure safeguarding policies/procedures are effective and deliver a robust whole-college approach to safeguarding as set out in KCSiE 2025.

9.1.6 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the college.

## 10 Records and monitoring

10.1 The Group recognises its responsibility to keep accurate and up to date records of concerns and disclosures of abuse and the action taken to address these. The Group will ensure:

10.1.2 All staff are aware of the need to report and record any concerns.

10.1.3 All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing. If in doubt about recording requirements, staff should discuss with a Safeguarding Officer /or Centre Safeguarding Deputy or CSL as appropriate.

10.1.4 All staff receiving a disclosure they should record it as follows:

- As soon as possible after the conversation using the relevant College Safeguarding Reporting Form.
- Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the student.
- Use a body map to indicate the position of any injuries and a clear description of the injury.
- Record statements and observations rather than interpretations or assumptions.
- Do not destroy any original records in case they are needed by a court.
- All records need to be reported and logged on Group Safeguarding systems/files promptly. No copies should be retained by the member of staff or volunteer.
- The DSL / Deputy (Centre Lead) will ensure that all safeguarding records are managed in accordance with the requirements set out in KCSIE 2025.

10.1.5 Safeguarding records are secure and separate from other student records.

10.1.6 If a young person for whom the Group has, or has had, safeguarding concerns moves to another education establishment where known, the safeguarding team will endeavour to pass their child protection file promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the safeguarding team will contact the DSL of the receiving school and offer information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

10.1.7 The safeguarding team will contact the previous education establishment if a safeguarding concern becomes known, and the college does not have a SG file from the previous provider.

10.1.8 Child Protection files are kept and transferred in line with requirements set out in KCSIE 2025.

## 11 Confidentiality and Information Sharing

11.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Where there is significant risk of harm (section 47) relevant information will be shared with or without the consent of the subject.

11.1.2 The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4).

11.1.3 When the safeguarding team is considering whether, or not, to share safeguarding information (especially with other agencies) STCG will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within CPOMs.

11.1.4 All relevant information can be shared without consent if to gain consent would place a child at risk.

11.1.5 Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children/young people. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

11.1.6 Safeguarding young people raises issues of confidentiality that must be clearly understood by all staff/volunteers in colleges.

11.1.7 Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person's best interests.

11.1.8 Staff/volunteers who receive information about young people and their families.
in the course of their work should share that information only within appropriate professional contexts.

11.1.9 Timely information sharing is essential to effective safeguarding.

11.2 Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

## 12 Communication with Parents/Carers

12.1 STCG will ensure the Safeguarding Policy is available publicly via the Group website.

12.1.2 Where appropriate, we will discuss any concerns about a child/young person with their parents. The safeguarding team will normally do this in the event of a suspicion or disclosure.

12.1.3 If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care before doing so.

12.1.4 In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

## 13 Contractors, Service and Activity Providers, Visitors

13.1 We will ensure that contractors and providers are aware of our school's safeguarding policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns. The Safeguarding and External Contractors Procedure Link.

We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2025.

13.1.2 We will check the identity of all visitors and volunteers coming into college. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the college site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

13.1.3 South Thames College values the opportunities presented by external speakers. The Group will not accept the use of language by external speakers that offends and is intolerant. Specifically, this means 'street', misogynistic, sexual or racist language irrespective of context. Direct attacks in any religions or beliefs are not permitted. The Group will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people experience fear, harassment, intimidation or violence.

Freedom of Speech and Visiting Speaker Policy: Link

13.1.4 The Group will not accept the behaviour of any individual, parent or anyone else, that threatens security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the college sites.

## 14. Work based learning

14.1 All students on work-based learning programmes receive an induction, which includes raising awareness of the Group's commitment towards safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the safeguarding team.

14.1.2 The understanding of all aspects of safeguarding, preventing extremism and radicalisation and safe working practices is checked and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's wellbeing is safeguarded by the work placement assessors.

14.1.3 The Group has arrangements in place to ensure that, prior to work- based learning commencing:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant Group policies

- The requirements for DBS checks are assessed and the relevant processes undertaken where required

**15. Work experience**

15.1 All work placement providers will be given safeguarding information at the time of placement. The Group has arrangements in place to ensure that, prior to work experience:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details.
- Employers are made aware of relevant Group policies.
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

**16 Organisations of Individuals Using College Premises**

16.1 We will ensure that when our premises are used by organisations or individuals outside of the college day that all reasonable steps are taken, as required by law, to ensure the safety of the children and to protect them from harm. We will ensure that providers, their staff, and volunteers have a duty of care toward the children who attend. The guidance on Keeping children safe in out-of-school settings – April 2022 details the safeguarding arrangements that schools and colleges should expect these providers to have in place. Also refer to Guidance-for-parents-and-carers-on-safeguarding-children-in-out-of-school-settings/using-after-school-clubs-tuition-and-community-activities

16.1.2 We will follow our safeguarding policies and procedures, as with any safeguarding allegation, including informing the Designated Officer (LADO), if we receive an allegation relating to an incident that has happened when an individual or organisation has used our college premises for the purposes of running activities for children. This will cover any community group, sports associations, or service provider that runs extra-curricular activities on any of our college sites.

**17 Online Safety**

17.1 We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers. When children / young people use the Group's network to access the internet, they are protected by accessing inappropriate content by a digital filtering system (FortiGuard Web Filtering) which flags students who are trying to access malicious, hacked or inappropriate websites.

17.2 The Group DSL reviews annually with the Director of Digital and IT and the Lead Governor the Groups filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content.

17.3 The system will also alert the Group to inappropriate narrative or causes for concern which are typed in the browser. However, as many students can access the internet using their own data plan, to minimise inappropriate use, students receive tutorials on online safety.

17.4 All staff are made aware of the e-safety Policy sets our expectations relating to:

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

17.5 All staff will receive on-line safety training as part of the ongoing safeguarding offer, which, amongst other things, will include an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. This training offer will be covered as part of induction. Alongside our Governing Body we will review the DfE Filtering and Monitoring Standards which can be found in the document Meeting Digital Technology Standards in Schools and Colleges (last updated March 2023) and discuss with IT staff and service providers what more needs to be done to meet all the standards in our setting. (See KCSIE 2025 for further information).

17.6 Staff must read the Staff Code of Conduct in relation to personal online behaviour and complete training in cyber security.

17.7 The Group will actively promote on-line safety on several platforms including the Pastoral Tutorial programme. This will include guidance on how to keep safe on-line, how to identify on-line risks and how to report a concern. This will also include the 'content risk' presented by misinformation, disinformation and conspiracy theories (including fake news).

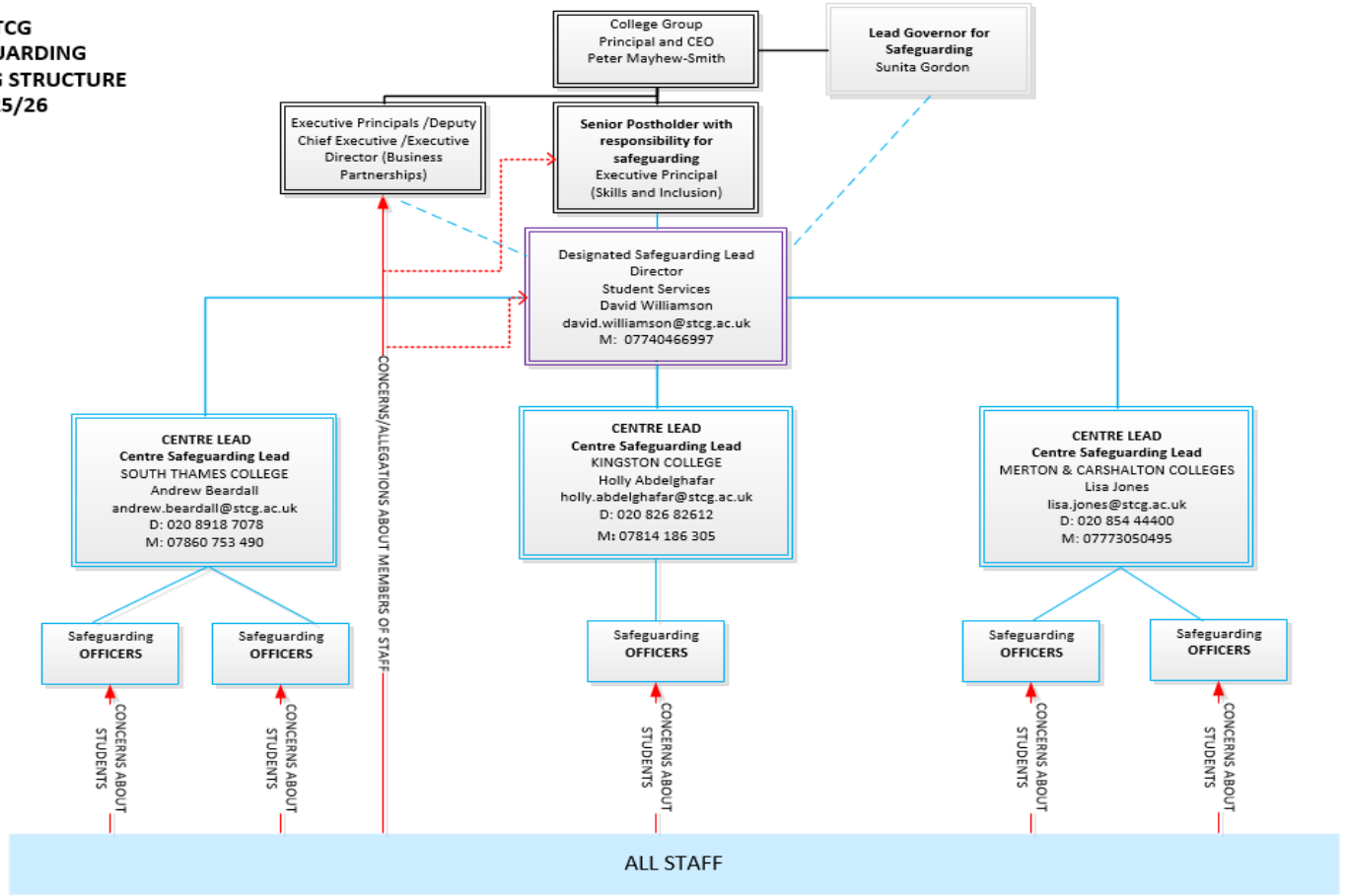
## 18. Review

18.1 The policy will be subject to, at least, annual review and approval by Governors. The review will be initiated by the Designated Safeguarding Lead and will involve consultation with staff, managers, governors and students where appropriate.

## 19. Access to the policy

19.1 The policy will be published on the Group website.

**STCG SAFEGUARDING REPORTING STRUCTURE 2025/26**



**Appendix 1: KCSiE Part One: Safeguarding information for all staff**

All staff at STCG are required to read Part 1.

**Appendix 2: Group Roles and Responsibilities**

- The Group will ensure the safety and welfare of children is embedded in the organisation's processes and procedures. Safeguarding is a fundamental responsibility of all individual staff, however the oversight and management of safeguarding within the Group is given to the Corporation, the Principal/CEO, the Senior Post-Holder with responsibility for safeguarding, the Designated Safeguarding Lead and the Centre Leads (Deputy Designated Safeguarding Leads). They ensure that structures and staffing are in place to ensure the effective delivery of safeguarding procedures within the individual Colleges.

**Responsibilities of the Corporation (Governing Body)**

To fulfil its strategic responsibilities for the Group's safeguarding arrangements, as set out in KCSIE 2025, the Corporation (Governing Body) will:

- Select a Governor to take leadership responsibility within the Corporation for the organisation's safeguarding arrangements.

- Undertake appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the Group's safeguarding arrangements are effective and support a whole college approach to safeguarding. This training will be regularly updated.

- Ensure an appropriate senior member of staff, from the Group leadership team, is appointed to the role of designated safeguarding lead, that this is explicit in the role-holder's job description and that they have the appropriate status and authority to carry out the duties of the post. They should also have additional time, funding, resources, training and support to carry out their role effectively.

- Ensure there are appropriate policies and procedures in place so that action can be taken to safeguard and promote children's welfare. This includes, but is not limited to, the Group having:

    - an effective safeguarding policy (including child protection procedures) which is reviewed at least annually and approved by Governors
    - a student behaviour policy
    - a staff behaviour policy/code of conduct which includes low level concerns, whistleblowing and use of social media and technology
    - appropriate safeguarding responses to children who are frequently missing from education, experience multiple suspensions or are at risk of permanent exclusion
    - safer recruitment policy and procedures which are effective

- Assure itself that the Group fulfils its obligations under legislation and statutory guidance (KCSIE 2025) which includes ensuring the Group:

    - works with other agencies to safeguard students and shares information in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
    - provides training to staff on safeguarding and child protection at induction (including online) and that this training is regularly updated.
    - teaches students about how to keep themselves safe, including online, and has appropriate filtering and monitoring systems in place which are reviewed to ensure they are effective.
    - has procedures in place to manage concerns/allegations, against staff (including agency staff and volunteers) that might indicate they would pose a risk of harm to children.
    - remedies any identified deficiencies or weaknesses regarding child protection arrangements.

**Responsibilities of the Group Principal/CEO**

The CEO will:

- Ensure the Group's Policy for Safeguarding children and vulnerable adults and other related Group policies and procedures (including the safer recruitment of staff and managing cases of allegations made against staff) are in place and implemented to ensure the welfare of students.

- Delegate operational management responsibility and implementation of procedures to a Senior Postholder and a Designated Safeguarding Lead.

- Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.

- Ensure staff are familiar with this Policy and Procedure, and specifically have signed to say they have read and understood KCSiE 2025 Part One.

- Be responsible for receiving allegations against a College Principal. The allegation should initially be discussed between the 'case manager' and Designated Safeguarding Lead (DSL) referring to the LADO threshold as set out in the Dealing with allegations of abuse against staff procedure.

**Responsibilities of the allocated Senior Post-Holder – Executive Principal (Skills and Inclusion)**

The Senior Post-Holder will:

- Have overall management responsibility for Safeguarding across the Group and act as line Manager for the Designated Safeguarding Lead.

- Ensure the Group has up to date safeguarding policies and procedures in place to ensure the safeguarding of all children and adults at risk, and that these are reviewed at least annually.

- Ensure that the Group safeguarding arrangements are fit for purpose.
- Ensure procedures are in place which promote safer use of the internet and technology, as per the Groups Online Safety Policy.
- Ensure effective arrangements are in place for the safe recruitment of staff and the maintenance of a single central record.

**Responsibilities of the Group Designated Safeguarding Lead**

The Designated Safeguarding Lead has **lead responsibility for safeguarding across the Group.**
The Designated Safeguarding Lead will:

- Undertake the training, including Prevent awareness training, required to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.
- Raise awareness of issues relating to the welfare of young people and adults within the college community and promote a safe environment for these students including apprentices.
- Ensure effective arrangements are in place to enable the early identification of and support for young people and adults who are, or may become, vulnerable, who are at risk of significant harm, and provide procedures for reporting and addressing concerns.
- Understand the importance of information sharing and the requirements of data protection legislation and regulations.
- Coordinate safeguarding practices across the Group and keep the Executive Team and CEO informed of ongoing enquiries under Section 47 and police investigations including the requirement for children to have an Appropriate Adult.
- Work with Executive Principals, Deputy Chief Executive and the Director of Human Resources to deal with allegations against members of staff, agency staff, contractors and volunteers.
- Consult with the Group's assigned 'case manager' as appropriate, to ensure that all allegations against staff, contractors and volunteers are dealt with in an objective and transparent way.
- Review the allegations, including low level safeguarding concerns, against staff, agency staff, contractors and volunteers with the Director of HR and Deputy CEO to ensure that any agreed actions with the Designated Officer from the relevant Local Authority are acted on and that outcomes are reported on.
- Work with the Director of Human Resources to ensure that effective arrangements for the safe recruitment of staff and the maintenance of a single central record are in place.

- Ensure that effective arrangements are in place to help identify individuals at risk of being drawn into terrorism and where appropriate, are referred to the Prevent and Channel Co-ordinator for appropriate support.
- Work alongside Centre Safeguarding leads to act as a contact person within the Group for external safeguarding partners and work with Centre Safeguarding Leads to provide advice and support to all staff where required (including temporary, supply staff and volunteers and members of the Governing Body) on safeguarding matters.

- Work with Executive Principals /College Principals to promote educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement.

- Work with Executive Principals /College Principals to encourage a culture of listening to students when putting in place any measures to protect them.

- Work with the Centre Safeguarding Leads to manage referrals and co-ordinate action within each College on child/adult at risk protection and Prevent issues.

- Work with Centre Safeguarding Leads and pan-London and/or local Safeguarding partners and other agencies e.g. CAMHs as necessary to protect and promote the welfare of children.

- Raise awareness about safeguarding and child protection on an on-going basis and be available during term time to discuss safeguarding concerns. Work with Centre Safeguarding Leads to ensure cover/out of hours arrangements are in place to enable staff to access advice.

- Work with the Director of Human Resources and Director Quality and Development to arrange updates on safeguarding and Prevent training for staff on, at least, an annual basis and induction training on child protection (including online) for new staff (to include relevant policies).

- Work with the Director of IT Services and nominated staff to ensure that the College's filtering and monitoring systems are functional and effective.

- Work with the Centre Safeguarding Leads (Heads of Student Services) to ensure that child protection/safeguarding records are secure, kept up to date and maintained and transferred (where necessary) as required under KCSiE 2025.

**Responsibilities of the Centre Safeguarding Lead (CSL)**

The Centre Safeguarding Lead (Head of Student Services) has lead responsibility for safeguarding in their assigned college (s).

**The CSLs will:**

- Be trained to the same standard as the Group DSL and the role will be explicit within their job description.

- Take operational responsibility for safeguarding in an individual College within the Group (which may include more than one site) or to deputise at other sites. Coordinate action within an individual college on child protection issues and raise awareness about safeguarding.

- Take operational responsibility for the arrangements to help identify individuals at risk of being drawn into terrorism and where appropriate, are referred as appropriate to the Prevent and Channel Co-ordinator for appropriate support.

- Work with the College Leadership Team in an individual college within the Group to ensure staff are aware of the issues around safeguarding and prevent.

- Work with College Principals and the local College Leadership Team to ensure that students through enrichment and tutorial activities are aware of the issues around safeguarding and prevent and know who to talk to if they have any concerns.

- Advise and support safeguarding officers in an individual college, providing guidance on cases as appropriate.

- Work with the Group DSL and relevant College Principal to raise awareness of issues relating to the welfare of young people and adults within the college community and promote a safe environment for these students including apprentices.

- Work with the Group DSL to ensure effective arrangements are in place to enable the early identification of and support for young people and adults who are, or may become, vulnerable, who are at risk of significant harm, and provide procedures for reporting and addressing concerns.

- Support Curriculum managers in an individual college to promote educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement. Support curriculum managers to provide additional academic support or reasonable adjustments to help children who have or have had a social worker, reach their potential, recognising that even when statutory intervention has ended, there is still a lasting impact on children's educational outcomes.

- Work with Curriculum Managers to encourage a culture of listening to students when putting in place any measures to protect them.

- Oversee all safeguarding cases within a particular College, working with the designated Safeguarding Officers to liaise with social workers, local authorities and other agencies. Act as a contact person for the relevant college to external safeguarding partners.

- Ensure detailed, accurate, secure written records of safeguarding concerns and referrals are recorded on CPOMS.

- Ensure child protection files in an individual college are kept up-to-date, only accessed by those who need to see them and are transferred with leaving students where appropriate.

- Make referrals to external agencies as appropriate.

- Attend or work with pan-London or local safeguarding partners (previously boards) as appropriate.

**Responsibilities of the Executive Principals, Executive Director and the DCE**

- Ensure the Group's Policy for Safeguarding Children and Adults at Risk, KCSiE 2025 and associated College procedures are implemented the Schools and Services they are responsible for.

- Work with DSL and relevant Centre Safeguarding Lead to promote the educational outcomes and welfare of children who are experiencing welfare, safeguarding and child protection issues to help maximise their academic attendance, engagement and achievement.

- Ensure staff can access and undertake safeguarding training and understand and fulfil their safeguarding roles and responsibilities.

- Establish and maintain a safe environment in which staff and students feel secure and are encouraged to talk freely about anything that concerns them.

- Ensure that staff understand the importance of having a professional curiosity and reporting any concern they may have about a child / young person or vulnerable adult immediately.

- Ensure safeguarding practices are embedded within curriculum design and delivery and that students are taught how to keep themselves safe (including online).

- Raise awareness of issues relating to the welfare of young people and adults within the Group and promote a safe environment for students including apprentices.

- Ensure that effective arrangements for the identification of and support for young people and adults who are, or may become, vulnerable, who are at risk of significant harm.

- Be responsible for receiving allegations (including low level concerns) against members of staff, agency staff, contractors and volunteers.

**Responsibilities of College Principals**

- Effectively promote the educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement.

- Foster a listening culture for students.

- Work with the DSL and Centre Safeguarding Lead (Heads of Student Services) to coordinate action if required where a child or adult is at risk.

- Work with DSL and CSL and where appropriate local Safeguarding partners to protect and promote the welfare of children and adults at risk.

- Ensure students are aware of issues around safeguarding and prevent, know who to talk to if they are concerned, that British values are effectively promoted and that the tutorial programme develops and equip students with the knowledge and skills needed to recognise risk and stay safe from abuse.

- Work with the College Principal to ensure cover/out of hours arrangements are in place to enable staff to access safeguarding advice including the early identification

- Raise awareness of issues relating to the welfare of young people and adults within the relevant college community and promote a safe environment for these students including apprentices.

- Ensure effective arrangements are in place to enable the early identification of and support for young people and adults who are, or may become, vulnerable, who are at risk of significant harm

- Ensure effective monitoring and intervention arrangements are in place for children (under the age of 18) who may be more at risk than most. For example, students who have a social worker; are in Care (CLA) or have been in Care (Care Leaver); Is in the Youth Justice System, or has been known to the Youth Justice System.

- Ensure all teaching staff understand the legal duty for teachers, in the course of their work, to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18.

**Responsibilities of College Heads of School**

The Head of School will:

- Work with the relevant Safeguarding Officer and or Centre Safeguarding Lead (Heads of Student Services) and teaching staff to:

- Effectively promote the educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement.

- Ensure students are aware of issues around safeguarding and prevent, know who to talk to if they are concerned, that British values are effectively promoted and that the tutorial programme develops and equip students with the knowledge and skills needed to recognise risk and stay safe from abuse.

- Provide additional academic support or reasonable adjustments to help children who have or have had a social worker and or children who are experiencing welfare, safeguarding and child protection issues.

- Ensure all staff understand the importance of having a professional curiosity and reporting any concern they may have about a child / young person or adult at risk immediately.

- Ensure effective arrangements in each school for children (under 18) who may be more at risk than most students via pastoral tutorial service and working with Student Services. This may mean that they are more vulnerable to harm, as well as facing educational barriers to attendance, learning behaviour and poor health. For example, students who have a social worker, are in Care (CLA) or have been in Care (CL), are in the Youth Justice System, or have been known to the Youth Justice System.

- Ensure all teaching staff understand the legal duty, in the course of their work, to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18.

- Raise awareness of issues relating to the welfare of young people and adults within the school community and provide a safe environment for these students.
- Ensure young people and adults who are, or may become, vulnerable, who are at risk of significant harm are identified early and supported.

- Ensure young people who are frequently missing from education, experience multiple suspensions or are at risk of permanent exclusion are reported as a SG concern.

- Ensure safeguarding practices are embedded within curriculum design and delivery including team meetings, progress reviews and CPD arrangements.

**Responsibilities of Safeguarding Officers**

Safeguarding Officers operate across the Group and consist of staff who have an assigned safeguarding responsibility within Students Services and nominated staff from curriculum areas who receive a remission allowance.

The Safeguarding Officers will:

- Fulfil responsibilities of all staff as set out in KCSIE 2025 (Part 1 & Annex B).

- Receive reports/records of safeguarding concerns and record safeguarding concerns on CPOMS.

- Assess concerns and take appropriate action in liaison with key parties as follows:

    - Report serious/complex cases to the Centre Safeguarding Lead (CSL)
    - Manage low/medium level cases
    - Meet with student/s about whom there are concerns/who have made disclosures
    - Refer students to support services (external or internal as required)
    - Liaise with School staff/managers to ensure a case is managed effectively, appropriate action is taken to safeguard the student
    - Liaise with Pastoral / Personal Tutor/School staff to ensure issues impacting academic attendance/achievement and reasonable adjustments are identified
    - Log accurate, confidential and comprehensive written notes on the safeguarding system (CPOMS)
    - Refer cases to external agencies when necessary

- Liaise with external agencies working with a student, as appropriate, to safeguard the student
- Attend safeguarding committee meetings with the Centre Safeguarding Lead to discuss any cases

- Undertake relevant safeguarding training as directed by the Centre Safeguarding Lead / Group DSL.

- Cascade important safeguarding updates to department/colleagues.

- Champion and promote key safeguarding issues across the relevant college.

**Responsibilities of individual members of staff (see attached flowcharts for individual college)**

**All** staff have a responsibility to safeguard and promote the welfare of children/adults at risk and should:

- Provide a safe environment in which children and Adults at Risk can learn and challenge any inappropriate behaviour.

- Be prepared to identify children who may benefit from early help and be aware of their local early help process. Early help means providing support as soon as a problem emerges.

- Be aware that witnessing the ill treatment of others, such as domestic abuse, is harmful to children.

- Understand the difference between a safeguarding concern and a student in immediate danger or risk of harm. Be familiar with how to report a safeguarding concern, and any staff member who has a concern about a child's welfare should follow the Group's reporting processes. If unsure contact the Centre Safeguarding Lead), Deputy Centre Safeguarding Lead) or a nominated Safeguarding Officer.

- Undertake initial safeguarding training followed by regular updates.

- Know what to do if a child tells them he/she is being abused/neglected and record in writing all safeguarding concerns/disclosures discussions, decisions made and the reasons for them.

- Teachers understand the legal duty to report to the police an act of FGM which appears to have been carried out on a girl under the age of 18.

- Be aware that abuse, neglect are rarely standalone issues and can take place within and outside of families (extrafamilial), online and between children. All staff should be aware of the Group's **child-on-child** abuse procedures (Appendix 4).

    - Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual

harassment. Nor should a victim ever be made to feel ashamed for making a report.

- Be aware that children 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.
- Be aware that a student's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Be professionally curious and report any concern about a child / young person or vulnerable adult immediately.
- Understand that students who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health.

- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Be aware that, whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns of female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a duty to ensure this is reported to the police.
- Refer any concerns they may have about any member of staff in relation to the safeguarding of a child or adult at risk (see section 7).
- Be aware of the Groups unauthorised absence arrangements as set out in the Group Academic Performance Policy.

**Appendix 3: Actions where there are concerns about an Adult at Risk**

Safeguarding will apply to any adult who:

- Has needs for care and support (whether the authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect, and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

**Abuse:** Abuse is a form of maltreatment of a person. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm.

In deciding whether to refer or not, the designated safeguarding lead or deputy designated safeguarding lead should consider:

(1) the adult's wishes and preferred outcome
(2) whether the adult has mental capacity to make an informed decision about their own and others' safety
(3) the safety or wellbeing of children or other adults with care and support needs
(4) whether there is a person in a position of trust involved
(5) whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- the police if a crime has been committed and/or
- the Adult Safeguarding Team for possible safeguarding enquiry
- relevant regulatory bodies such as Care Quality Commission, Ofsted, Charities commission
- service commissioning teams
- family/relatives as appropriate (seek advice from adult social services)

A record of the reasons for referring the concern or reasons for not referring must be kept. Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and volunteers should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

The designated safeguarding lead or centre safeguarding lead is responsible for providing acknowledgement of the referral and brief feedback to the person raising the original concern. Feedback should be given in a way that will not make the situation worse or breach the Data Protection Act. If the police are involved, they should be consulted prior to giving feedback to the referrer to ensure any criminal investigation is not affected.

The local authority will decide on who will lead on a safeguarding enquiry should it progress to that stage. The named organisation should not conduct its own safeguarding enquiry unless instructed to do so by the local authority.

**Appendix 4: STCG Child-on-Child Abuse & Sexual Violence and Sexual Harassment Procedures**

## 1. Introduction

1.1 The South Thames Colleges Group, recognises that children can abuse other children (referred to as child-on-child abuse) and that it can take many forms. It can happen both inside and outside of school/college and online. Incidents of child-on-child abuse including sexual abuse and sexual harassment are not tolerated under any circumstances and will not be passed off as 'banter or growing up'. A victim of child-on-child abuse will always be taken seriously, supported and kept safe.

1.2 The Group is committed to the prevention, early identification and appropriate management of child-on-child abuse. This is underpinned by the principle of a zero-tolerance approach to sexual violence and sexual harassment – it is never accepted. In cases where child-on-child abuse is identified, the Groups child protection procedures will be implemented, taking a contextual approach to support all our learners who have been affected by the situation.

1.3 The Group recognises that child-on-child abuse can manifest itself in many ways such as:

- bullying (including cyberbullying, prejudiced based and discriminatory bullying);
- abuse in intimate personal relationships between teenagers
- 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,[1] 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,[2] such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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
- online sexual harassment including consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery), sexualised online bullying, unwanted sexual comments and messages, sexual exploitation, coercion and threats and coercing others into sharing images of themselves or performing acts they're not comfortable with
- 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; and
- 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).

[1] For further information about sexual violence see Annex B

[2] For further information about sexual harassment see Annex B.

1.4 This procedure focuses primarily on child-on-child abuse in the context of sexual harassment and sexual violence and should be viewed alongside other Group policies and procedures including:

- Student Disciplinary Policy and Procedure
- Student Code of Conduct
- Safeguarding Children and Adults at Risk Policy
- E-safety Policy
- Policy for Low Level Safeguarding Concerns
- Procedure for Dealing with Allegations against members of staff
- Transgender Policy

1.5 It is compliant with the statutory guidance on child-on-child sexual violence and sexual harassment abuse as set out in Part 5 *Keeping Children Safe in Education* and should be read in conjunction with the Local Safeguarding Children Partnership (LSCP) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

## 2. Aims

2.1 These procedures will:

- Set out the Group strategies for preventing, identifying and managing child- on-child abuse.
- Take a contextual approach to safeguarding all students who are involved.
- Acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents or adults in the community.

## 3. Context

### 3.1. Understanding Child-on-child abuse

- Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.
- Sexual harassment and sexual violence may occur online and offline (face to face physically and verbally).
- All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.
- The Group recognises the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB). The Group adopts the NSPCC definition of Harmful Sexual Behaviour SB as: "Sexual behaviours expressed by children, that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child or adult."

### 3.2 Vulnerable groups

The Group recognise that all children can be at risk however, we acknowledge that some groups are more vulnerable to abuse and may face additional barriers to telling someone because of their vulnerability.

This can include:

- experience of abuse within their family
- living with domestic violence
- young people in care
- children who go missing
- children with additional needs (SEN and/or disabilities)
- children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.

Girls are more frequently identified as being abused by their peers and girls are more likely to experience unwanted sexual touching in college, this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour.

## 4. Responding reports of sexual violence and sexual harassment

**4.1** Incidences of child-on-child abuse will follow the Student Disciplinary Policy where appropriate. Reports of sexual violence and harassment will be made on a case-by-case basis in consultation with the Designated Safeguarding Lead, Centre Safeguarding Lead (Head of Student Services) or deputy, as appropriate to advise using their professional judgement and supported by other agencies such as social care or the police as required. In summary there are four ways to respond to an allegation:

1. Following the Student Disciplinary Policy
2. Referral to Early help
3. Referral to local authority children's social care
4. Referral to the police

### 4.2 The immediate response to a reported incident

- The Group takes all reported incidents seriously and will reassure the victim that they will be supported and kept safe.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the relevant safeguarding officer, Designated Safeguarding Lead or local authority children's social care). Staff will only share the report with those who are necessary to progress the case and care will be taken to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.
- A written report using the individual college Safeguarding Reporting Form will be made as soon after the disclosure as possible, recording the facts as presented by the student. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element, the College will follow advice on searching, screening and confiscation. The staff will not view illegal images of a child unless unavoidable and only if another member of staff (preferably the Centre Safeguarding Lead (Head of Student Services) or deputy is present. Illegal images will not be forwarded

- The Group DSL and Executive Principal (Inclusion and Skills) will be informed as soon as possible.

### 4.3 Risk Assessment

When there has been a report of sexual violence, the Safeguarding Officer for the relevant college i.e. the college where the alleged victim is a student (in consultation with the Centre Safeguarding Lead (Head of Student Services or Group Designated Safeguarding Lead) will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them.

Risk assessments will be recorded in the safeguarding files and be kept under review. The relevant Safeguarding Officer (in consultation with the CSL or Designated Safeguarding Lead) will ensure they are engaging with local authority children's social care

### 4.4 Action following a report of sexual violence and/or sexual harassment

Following an incident, the following will be considered:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or harmful sexual behaviour has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, adult students or college staff?
- other related issues and wider context, including links to child sexual exploitation and child criminal exploitation

### 4.5 Follow-up Actions

**Children sharing a classroom:**
While the Group establishes the facts of the case and starts the process of liaising with children's social care and the police:

- In alleged cases of rape, assault by penetration or sexual assault, the alleged perpetrator will be suspended pending a disciplinary investigation as per the Student Disciplinary Policy and removed from any classes they share with the victim.

- In cases of sexual harassment, we will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on college premises and on transport to and from the College.
- Support will be provided by the relevant college for both the alleged perpetrator and victim.

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

**4.6 Options to manage the report**

**a. Manage internally**

In some cases of sexual harassment, for example, one-off incidents, where the children concerned are not in need of early help or statutory intervention it may be appropriate to handle the incident internally, perhaps through utilising the Student Disciplinary policy and by providing pastoral support from the Pastoral Tutor working with the Student Support Team.

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored by the relevant Safeguarding Officer and recorded in the safeguarding files.

b. **Early Help**

In line with 1 above, the group may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence.

c. **Referrals to local authority children's social care**

Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH / SPA following locally agreed protocols.

Where statutory assessments are appropriate, the relevant safeguarding officer will work alongside and cooperating with, the relevant lead social worker (in consultation with the DSL or Centre Safeguarding Lead). Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and where appropriate, the alleged perpetrator and any other children that require support.

d. **Reporting to the Police and criminal investigations**

Where a report of rape, assault by penetration or sexual assault is made, this will be reported to the police. Any report to the police will generally be made through the MASH/SPA as above. The safeguarding officer for the relevant college will follow local processes for referrals.

Where a report has been made to the police, the college will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the Group takes do not jeopardise the police investigation.

### 4.7 The end of the criminal process

Once a criminal process has concluded, the Group will take appropriate action depending on the outcome of the process and in accordance with relevant Group policies:

- If a child is convicted or receives a caution for a sexual offence, the relevant college will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following our behaviour policy.

- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we will take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault by penetration is likely to constitute a serious breach of the Group's Student Code of Conduct and lead to the view that allowing the perpetrator to remain in college would seriously harm the education or welfare of the victim (and potentially other students).

- Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions as set out in the Student Disciplinary Policy and Criminal Convictions Policy including consideration of permanent exclusion.

- If the perpetrator remains in college, we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable.

- Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance. This includes risk assessing on a case-by-case basis. If the College feels that there remains a risk which it cannot mitigate, then they reserve the right to consider not allowing the alleged perpetrator to remain in college.

- Where the alleged perpetrator is going to remain at the College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport.

- The College will include referral/ liaison with wider community and local/national organisations to provide further specialist advice and guidance: involvement from the Police or referrals to Early Help, Specialist Children's Services, or CAMHS.

**4.8 Unsubstantiated, unfounded, false or malicious reports**

4.9 If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead (or deputy) will consider whether the child and/or the person has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In these circumstances a referral to local authority children's social care may be made.

4.10 If a report is found to be deliberately invented or malicious, the Group will decide whether disciplinary action is appropriate.

**4.11 Ongoing Support for Children Affected by Sexual-Harassment and sexual Violence**

4.12 Support for victims of sexual assault is available from a variety of agencies.

4.13 The Group will support the victim of sexual assault to remain in college, but if they are unable to do so the College will support the victim to continue their education elsewhere. This decision will be made only at the request of the child and their family. If the victim chooses to move the College will work to ensure that the new College or training provider are aware of any ongoing support, they may need. The Group will support this move.

Where there is a criminal investigation and the alleged perpetrator remains in, the College will be removed from any shared classes with the victim, and we will also consider how best to keep them a reasonable distance apart on the College premises or on college transport. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings.

**5. Physical Abuse and Serious Violence**

5.1 While a clear focus of these child-on-child abuse procedures is around sexual harassment and sexual violence, physical assaults, initiation violence/rituals from student to student can also be abusive.

5.2 Some students may also be at risk from or are involved with serious violent crime. All staff should be aware of indicators, which may signal that learners are at risk from, or are involved with serious violent crime. These may include:

- increased absence from college,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing,
- or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

5.3 Child-on-child physical abuse and serious violence will not be tolerated and if it is believed that a crime has been committed, will be reported to the police.

5.4 The Student Disciplinary Policy and Procedure will be applied in these cases, with recognition that any police investigation take priority.

5.5 When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

## 6. Online Behaviour

6.1 Many forms of child-on-child abuse have an element of online behaviour which can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing if indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

6.2 All staff should be aware that technology is a significant element for many safeguarding and wellbeing issues – notably child-on-child abuse.

6.3 Given the high frequency sharing of nude and semi-nude images – students who engage in consensual image sharing of nudes and semi-nude images and videos – especially between older students need to understand that it is illegal and could be reported to the Police as well as being regarded as a disciplinary matter as set out in the Student Code of Conduct and the Student Disciplinary Policy and Procedure.

## 7. Prevention

7.1 STCG, actively seeks to raise awareness of and prevent all forms of child-on-child abuse by educating all Governors, Senior Leadership Team, staff and volunteers, students and parents /carers about this issue. This will include training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it.

This includes:

- Contextual Safeguarding
- The identification and classification of specific behaviours and
- The importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed.

## 8. Working with students

8.1 In order to prevent and protect students from child-on-child abuse, the Group will:

- Inform students about the nature and prevalence of child-on-child abuse via tutorials and the wider curriculum.
- Provide numerous opportunities for students to be heard and understood on this matter.
- Ensure students know what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- Ensure students understand the zero-tolerance policy towards all forms of child-on-child abuse and its implications.
- Support both alleged perpetrators and victims of sexual harassment and abuse as outlined above.
- Create culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to.

## 9. Multi-agency working

9.1 The Group actively engages with its local partners in relation to child-on-child abuse, and works closely with, Local Safeguarding Children's Partnerships, Safeguarding Hub (SPA/MASH), children's social care, and/or other relevant agencies, and other Colleges.

9.2 The relationships the Group has built with these partners are essential to ensuring that the Group is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse.

They help the College to:

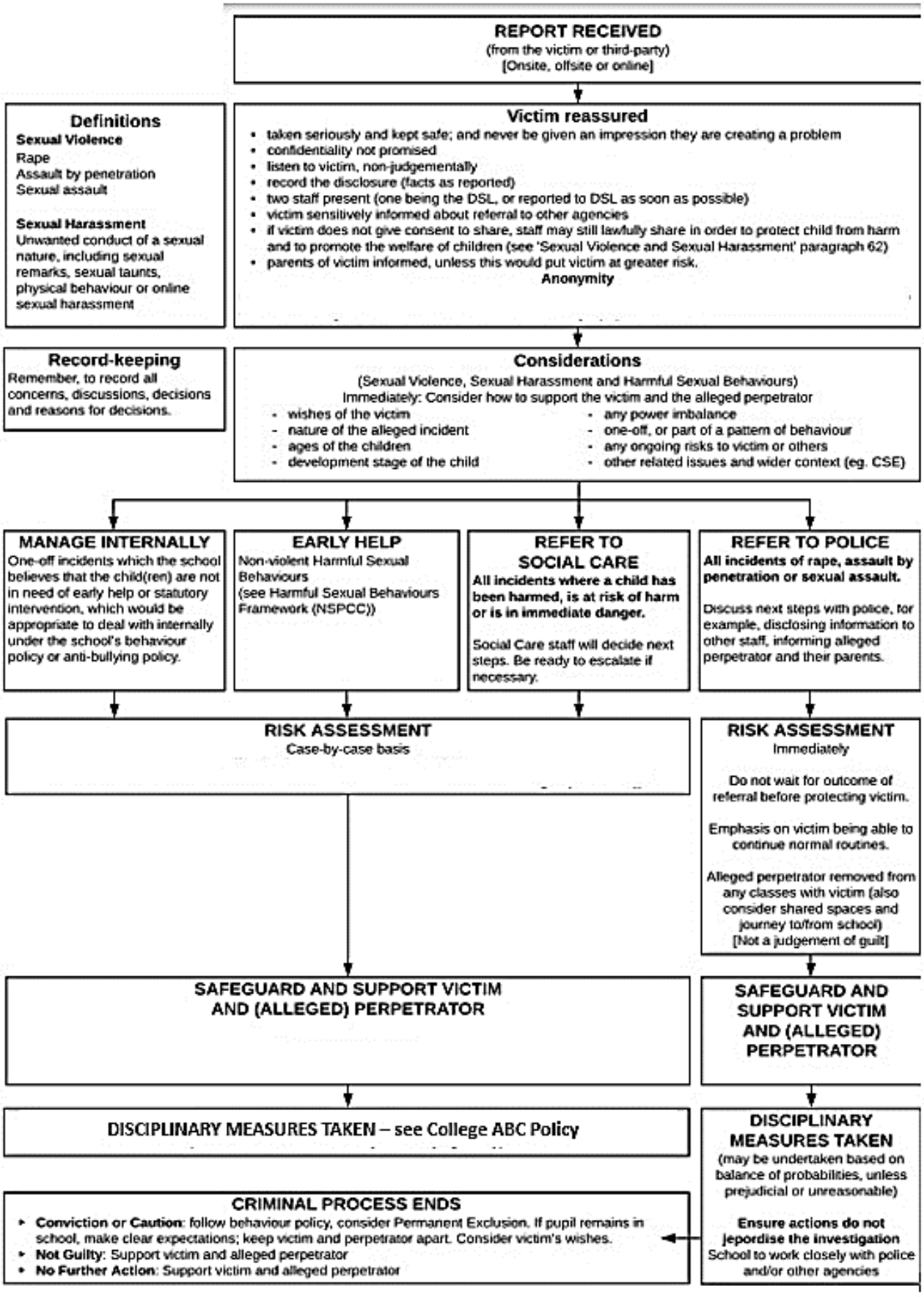
(a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist.
(b) ensure that our students can access the range of services and support they need quickly.
(c) support and help inform our local community's response to child-on-child abuse.
(d) increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

9.3 The College actively refers concerns/allegations of child-on-child abuse where necessary to the relevant MASH, children's social care, and/or other relevant agencies. Children resident out of county but attending STCG will be reported to their home MASH or equivalent Social Care. In cases involving children who are subject to risk, harm and abuse and who have CLA status, the children's social worker will be informed and a coordinated approach to address any incidents or concerns will be required.

**Appendix 1**

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant – link here.

**Appendix 2**

Sexual Behaviours Traffic Light Tool – Book

## Appendix 2 CHILD-ON CHILD/ SEXUAL VIOLENCE/ HARASSMENT ABUSE FLOWCHART