

LINCOLN COLLEGE

**SAFEGUARDING POLICY AND
PROCEDURES**

POLICY SG/PO/4

SPONSOR
Head of Student Services

EQUALITY AND DIVERSITY STATEMENT

Lincoln College strives to treat all its members and visitors fairly and aims to eliminate all forms of unlawful discrimination, specifically across all protected characteristics. We will work towards a fair and just organisation and promote inclusion for all those impacted by Lincoln College and the wider community.

LINCOLN COLLEGE

SAFEGUARDING POLICY AND ACCOMPANYING PROCEDURES

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SAFEGUARDING POLICY AND PROCEDURES

1 PURPOSE

- 1.1 Lincoln College is committed to safeguarding and promoting the welfare of children and young people under the age of 18 who receive education or training at the College, and to protecting adults at risk of harm where relevant to the College's responsibilities. The College recognises that safeguarding is everyone's responsibility and that effective safeguarding requires a child-centred, inclusive and coordinated approach involving learners, staff, parents and carers, safeguarding partners and other relevant agencies.
- 1.2 The College will have regard to the statutory guidance Keeping Children Safe in Education 2026 and will maintain safeguarding arrangements that are consistent with Working Together to Safeguard Children 2026, local safeguarding arrangements and other relevant statutory guidance.
- 1.3 For the purposes of this policy, a child means anyone under the age of 18. The College also recognises its responsibilities towards adults at risk of harm. Where appropriate, safeguarding procedures may be applied alongside the College's adult safeguarding arrangements and relevant Care Act 2014 requirements.
- 1.4 Safeguarding concerns may arise inside or outside the College, at home, in the community, during work experience or other external activities, online or through a combination of online and offline circumstances.
- 1.5 The College will:
 - provide a safe environment in which children and young people can learn and develop;
 - identify concerns at the earliest opportunity and provide or facilitate appropriate help and support;
 - protect children from abuse, neglect, exploitation and other forms of harm;
 - promote the physical and mental health and wellbeing of children;
 - respond appropriately to safeguarding concerns, disclosures and allegations;
 - work effectively with parents, carers and safeguarding partners;
 - share information appropriately where this is necessary to safeguard a child;
 - provide effective safeguarding training and supervision;
 - maintain robust safer recruitment arrangements;
 - ensure appropriate arrangements are in place for children who may be at greater risk of harm;
 - address online and digital safeguarding risks;
 - promote an inclusive and anti-discriminatory safeguarding culture; and
 - regularly review the effectiveness of its safeguarding arrangements.

Related policies that may need to be read in conjunction with this document are:

- Mental Health and Disability Policy
- Drugs and Alcohol Policy
- Criminal Disclosure Policy
- Guidance for the use of Medicines Policy
- Staff Disciplinary Procedures
- Learner Conduct Policy
- Transgender Policy
- E-Safety and Social Media Policy
- Equality and Diversity Policy
- Customer Complaints and Grievance
- Code of Conduct Policy
- Personal Relationships between Students and Staff Policy
- Work Experience Policy
- Recruitment and Selection Code of Practice
- Safer Recruitment Policy
- Suicide Mitigation and Response Policy
- Searching, Screening and Confiscation Policy
- College Appeals Panel Policy and Procedure

2 AIM

2.1 The aim of this policy is to establish clear arrangements for safeguarding and promoting the welfare of children and young people who receive education or training at Lincoln College.

2.2 The College will ensure that:

- safeguarding is embedded throughout College culture, leadership, teaching, learning, pastoral support and student services;
- all staff understand their safeguarding responsibilities;
- concerns are identified, reported, recorded and acted upon promptly;
- children and young people are listened to and their wishes and feelings are taken into account;
- children and young people receive appropriate help before concerns escalate wherever possible;
- safeguarding concerns are considered holistically, recognising that children may experience multiple and overlapping forms of harm;
- appropriate action is taken where a child is at risk of harm from adults, peers, family members, individuals in the community or online;
- allegations and concerns relating to staff, volunteers, contractors, agency workers and other adults in positions of trust are managed appropriately;
- safer recruitment and ongoing suitability arrangements are maintained;
- information is shared appropriately and securely;
- safeguarding arrangements are regularly reviewed for effectiveness; and

- the College works constructively with safeguarding partners and other agencies.

3 INTRODUCTION

- 3.1 Safeguarding and promoting the welfare of children is everyone's responsibility.

The College recognises that safeguarding is not limited to responding to abuse or neglect. It includes providing help and support when problems first emerge, protecting children from maltreatment and exploitation, preventing impairment of mental and physical health or development, ensuring safe and effective care, and taking action to enable children to achieve the best possible outcomes.

- 3.2 The College will adopt a person-centred approach. Staff should consider at all times what is in the best interests of the person, while taking account of the child's wishes and feelings and their individual circumstances.

- 3.3 No single member of staff or agency is likely to have the complete picture of a child's circumstances. Staff must therefore remain professionally curious, share relevant information appropriately and take prompt action where concerns arise.

- 3.4 Safeguarding concerns may occur independently or may overlap. A child may experience several forms of harm simultaneously and may be at risk from family members, peers, adults in positions of trust, individuals in the community, organised groups or online contacts.

- 3.5 The College recognises the importance of identifying extra-familial harm. This may include:

- child sexual exploitation;
- child criminal exploitation;
- county lines;
- serious violence;
- gang or organised crime involvement;
- teenage relationship abuse;
- stalking;
- sexual harassment and sexual violence;
- online abuse and exploitation;
- financial exploitation;
- radicalisation;
- trafficking and modern slavery;
- honour-based abuse;
- forced marriage;
- female genital mutilation;
- harmful sexual behaviour; and
- other forms of exploitation or abuse occurring outside the family home.

- 3.6 The College recognises that technology is a significant component of many safeguarding and wellbeing concerns. Harm may take place wholly online or technology may be used to facilitate harm occurring

offline. Online safeguarding is addressed further in the College Online Safety and Social Media Policy.

- 3.7 Staff must not assume that a particular behaviour, injury, change in presentation, attendance pattern or mental health concern is unrelated to safeguarding. Staff should maintain professional curiosity and seek advice from the Designated Safeguarding Lead (DSL) or Deputy DSL where appropriate.

4 DEFINITIONS;

4.1 Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

4.2 Physical Abuse

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

4.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying) causing children to feel frightened or in danger or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of children, though it may occur alone.

4.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence,

whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4.5 Neglect

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

- provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4.6 Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education, taunting and sexting put children in danger.

The Designated Safeguarding Officer (or their nominee) should be informed of all allegations that come to the College's attention so that they can consult Police and Children's' Social Care services as appropriate.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Further information can be found on the TES, MindED and NSPCC websites.

All staff must maintain awareness of safeguarding issues that may affect children and young people. These include, but are not limited to:

- abuse and neglect;
- child-on-child abuse;
- bullying, cyberbullying and discriminatory bullying;
- harmful sexual behaviour;
- sexual violence and sexual harassment;
- making or sharing nudes and semi-nudes;
- online abuse and exploitation;

- child sexual exploitation;
- child criminal exploitation;
- county lines and organised criminal exploitation;
- serious violence and knife crime;
- domestic abuse and teenage relationship abuse;
- stalking and coercive control;
- mental health concerns;
- self-harm and suicide;
- substance misuse;
- trafficking and modern slavery;
- honour-based abuse;
- female genital mutilation;
- forced marriage;
- radicalisation and extremism;
- hate crime;
- racism and other discriminatory abuse;
- misogyny and misandry;
- homelessness and housing insecurity;
- children missing from education, home or care;
- private fostering;
- children with additional vulnerabilities arising from SEND or medical conditions;
- young carers;
- children who have or have had a social worker;
- looked-after and previously looked-after children;
- care leavers;
- children affected by parental imprisonment;
- children affected by domestic abuse;
- financial exploitation;
- harmful online content and contact;
- AI-generated or manipulated harmful content; and
- any other circumstance in which a child may be at risk of harm or exploitation.

4.6.1 Child-on-Child abuse

The College recognises that children and young people can abuse other children and that child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child who has displayed harmful behaviour.

Child-on-child abuse may occur in person, online or through a combination of online and offline behaviour.

It may include:

- bullying and cyberbullying;
- physical abuse;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- the making or sharing of nudes or semi-nudes;
- coercion and sexual exploitation;
- unwanted sexual comments or messages;
- sharing pornography with a person who does not wish to receive it;
- misogynistic or misandrist abuse;
- discriminatory or racist abuse;

- initiation or hazing rituals;
- threats involving weapons;
- serious violence;
- intimidation;
- financial exploitation; and
- other abusive, coercive or harmful behaviour.

Abuse must never be dismissed as "banter", "just a joke", "part of growing up" or normal adolescent behaviour.

The College recognises that children who display harmful behaviour may themselves have experienced abuse, exploitation or other adversity and may require safeguarding support.

All concerns must be reported to the DSL or Deputy DSL and managed in accordance with the College safeguarding procedures.

4.6.2 Serious Violence

All staff should be aware of indicators, which may signal that children or young people are at risk from, or involved with serious violent crime. This may include increased absence from College, a change in friendships with older individuals or groups, a significant decline in performance, signs of self-harm or change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or possessions could also indicate that children are involved with, or have been approached by individuals associated with criminal gang and networks.

Staff should also be alert to weapon carrying or access, threats involving weapons, changes in friendship groups, involvement in gangs or organised crime, criminal exploitation, county lines, debt or financial exploitation, sudden acquisition of money or possessions, online indicators, and changes in behaviour associated with fear, coercion or intimidation.

Staff can get further support from the Safeguarding team and also visit the Home Office website for guidance on, 'preventing youth violence and gang involvement' and 'criminal exploitation of children and vulnerable adults – county lines'.

4.6.3 Sexual Violence and Sexual Harassment

The College recognises that harmful sexual behaviour exists on a continuum, from behaviour that may initially appear developmentally inappropriate or harmful through to serious sexual violence.

The College will not tolerate sexual harassment or sexual violence and will not dismiss such behaviour as "banter", "just joking", "normal" or "part of growing up".

Staff should adopt an "it could happen here" approach and should report concerns even where they are uncertain whether the behaviour meets a criminal threshold.

Sexual harassment may include:

- sexual comments or jokes;
- sexualised name-calling;
- remarks about appearance or clothing;
- unwanted touching;
- sexualised bullying;
- unwanted sexual messages;
- online sexual harassment;
- sharing sexual images or pornography;
- non-consensual sharing of nudes or semi-nudes;
- sexual coercion or threats;
- upskirting; and
- other unwanted conduct of a sexual nature.

The College will consider the safety and wellbeing of all children involved, including the child who has experienced harm and the child who has displayed harmful behaviour.

4.6.4 Domestic Abuse

Domestic abuse can include physical, sexual, emotional, psychological and financial abuse and coercive or controlling behaviour.

Children are victims of domestic abuse if they see, hear or experience the effects of domestic abuse and may experience significant and lasting impacts on their health, development, behaviour, relationships and education.

The College will also recognise teenage relationship abuse, including physical, sexual and emotional abuse, coercive control and stalking.

Staff must report concerns to the DSL or Deputy DSL.

4.6.5 Female Genital mutilation

Where a teacher, in the course of their professional duties, discovers that an act of female genital mutilation appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police and the DSL in accordance with statutory requirements.

4.6.6 Mental Health

The College recognises that mental health difficulties may be associated with safeguarding concerns and that safeguarding concerns may have a significant impact on a child's mental health and wellbeing.

Staff should be alert to changes in mood, behaviour, attendance, relationships, presentation or functioning, including signs of self-harm, suicidal ideation, eating difficulties, substance misuse, trauma or distress.

A mental health concern should be treated as a safeguarding concern where there is reasonable cause to believe that the child may be at risk of harm, abuse, neglect or exploitation.

Staff should report concerns to the DSL or Deputy DSL and should work with the appropriate mental health and pastoral professionals.

The College will ensure that safeguarding responses do not unnecessarily stigmatise children experiencing mental health difficulties.

4.6.7 Exploitation, Trafficking and Modern Slavery

The College recognises that children and young people can be victims of criminal, sexual and other forms of exploitation.

Child Criminal Exploitation and Child Sexual Exploitation may be committed by individuals or organised networks and may involve coercion, manipulation, threats, violence, debt, financial exploitation or the use of technology.

Children may be coerced into criminal activity or sexual activity and may not recognise themselves as victims. A child who has been coerced into offending should not be treated solely as an offender and their safeguarding needs must be considered.

County lines activity may involve children being exploited to transport drugs, money or other items and may involve violence, coercion, trafficking and modern slavery.

Where there are concerns that a child may be a victim of trafficking or modern slavery, the DSL will seek appropriate advice and make referrals in accordance with local and national safeguarding procedures.

4.7 Operational and Strategic Safeguarding groups

The College is committed to ensuring that staff with an enhanced level of responsibility for Safeguarding have access to information and support. It is also committed to ensuring that complex and /or high risk student applicants or disclosures (including poor mental health) or serious misconduct incidents are carefully considered and risk assessed on an individual basis. Please see Appendix 8 for guidance and information on the process involved in the operational and strategic groups.

4.8 Commercial Activity

Lincoln College has a number of commercial centres and activities that take place, which adds value to the curriculum offer and experience to the learners, as well as enhancing the opportunities in the local community. As we take our responsibilities for safeguarding learners very seriously, each of these ventures have been risk assessed. The risk assessments are stored centrally and are reviewed regularly.

4.9 Deans Gym provides free membership to students, who can access the gym between the hours of 9.00am until 4.00pm during college term times. External/Staff and full members can access the gym Monday to Friday in the morning between 6:30am until 8:30am and in the evening between 4:30pm until 8:30 pm and at weekends during normal opening

hours. This mitigates the risk of unsupervised contact between members of the public and students.

5 DESIGNATED STAFF WITH RESPONSIBILITY FOR SAFEGUARDING

5.1 Senior Staff Member with Lead Responsibility

The designated senior member of staff with Lead Responsibility for Safeguarding issues is the Chief People Officer ext. 6240, or in their absence a Strategic Safeguarding Lead. The Designated Safeguarding Lead and their Deputies are required to be Level 3 safeguarding trained.

Staff and learners will be informed of clear and reliable arrangements for raising safeguarding concerns during such periods.

The College operates a confidential shared safeguarding mailbox or equivalent reporting system which is monitored and acted upon without delay.

5.2 Strategic Safeguarding Leads

Deputies will be trained to the same standard as the DSL. The DSL may delegate activities to appropriately trained deputies, but ultimate lead responsibility for child protection remains with the DSL and is not delegated. The Strategic Safeguarding Leads will;

- Report to the senior member of staff with Lead Responsibility
- Know how to make an appropriate referral
- Be available to provide advice and support to other staff on issues relating to Safeguarding
- Have particular responsibility to be available to listen to children and adults at risk studying at the College
- Ensuring that all completed paperwork is recorded on CPOMs, the safeguarding database
- Ensure that Level 3 safeguarding training is completed every two years and that they read all safeguarding updates

During office hours (Monday to Friday) safeguarding responsibility falls to the Student Services Safeguarding Team. Advice, guidance and referrals can be made to the Safeguarding Team via the Single Point of Contact (SPoC). This is a contact number and e-mail address that is monitored from 08.30am to 5pm, Monday to Friday which learners and staff can contact. Any referrals can be made anonymously. The contact details are:

- 07580 975854
- Safeguarding@lincolncollege.ac.uk

After 5pm weekdays or at a weekend, safeguarding responsibility passes to a senior team member who can be contacted on 01522 876000 ext 4000 or 07939 013317.

5.3 Designated Governor

The designated member of the Board of Governors with responsibility for Safeguarding issues is the Chair of the Board of Governors.

The Designated Governor is responsible for liaising with the Principal and CEO and Senior Staff Member with Lead Responsibility over matters regarding safeguarding. The Board will receive sufficient information to provide effective oversight of safeguarding, including information about:

- safeguarding training and compliance;
- safeguarding referrals and emerging themes;
- allegations and concerns relating to staff;
- child-on-child abuse;
- attendance and children missing from education;
- safer recruitment;
- filtering and monitoring;
- online safety;
- Prevent;
- safeguarding arrangements for children at greater risk of harm; and
- actions arising from safeguarding audits, reviews or serious incidents.

Information provided to the Board will be appropriately anonymised where necessary to protect confidentiality.

In the event of an allegation against the Principal and CEO or Senior Staff Member with Lead Responsibility it is the responsibility of The Designated Governor to oversee the liaison between agencies such as the Police and/or Child Services – as defined by the LSCP.

This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries. To assist in these duties, the designated Governor shall receive Level 2 safeguarding training.

5.4 All Staff

All staff members have a responsibility for Safeguarding and monitoring students for any signs or symptoms that something may be causing them worry/harm or distress.

All staff members can contact the Safeguarding team, or one of the Strategic Safeguarding Leads to seek advice and support. Appendix 10 outlines external support in addition to this.

All staff members have a responsibility to ensure that they are wearing their College ID lanyards at all times and it is visible to others. Staff are responsible for ensuring that students are correctly wearing their ID lanyards and to challenge anyone on College premises without appropriate ID, e.g. visitor lanyard. Please see Appendix 7 for the ID Card/Lanyard policy.

6 SAFEGUARDING TRAINING AND AWARENESS

- 6.1 The College recognises that effective safeguarding depends upon all staff understanding their responsibilities and having the knowledge and confidence to identify, respond to and report safeguarding concerns.
- 6.2 All staff will receive safeguarding and child protection training as part of their induction. This training will be appropriate to their role and responsibilities and will include, as appropriate:
- recognising abuse, neglect and exploitation;
 - responding to disclosures and safeguarding concerns;
 - child-on-child abuse;
 - sexual violence, sexual harassment and harmful sexual behaviour;
 - making or sharing nudes and semi-nudes;
 - child criminal exploitation and child sexual exploitation;
 - domestic abuse and teenage relationship abuse;
 - radicalisation and Prevent;
 - online safety and online harms;
 - artificial intelligence and emerging digital safeguarding risks;
 - children missing from education and attendance-related safeguarding concerns;
 - safeguarding children with SEND and medical conditions;
 - information sharing and recording;
 - allegations against staff and low-level concerns; and
 - local safeguarding referral procedures.
- 6.3 All staff will receive safeguarding and child protection updates at least annually, including updates relating to online safety and the College's filtering and monitoring arrangements. Updates may be provided through staff briefings, training sessions, communications, meetings, newsletters or other appropriate mechanisms.
- 6.4 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSLs) and the Strategic Safeguarding Leads will receive safeguarding and child protection training appropriate to their responsibilities. The DSL and DDSLs will update their training at least every two years and will receive regular updates throughout the year to remain current with emerging safeguarding issues, local arrangements, legislation and statutory guidance.
- 6.5 The DSL and DDSL will maintain an appropriate training programme for staff and will ensure that safeguarding training reflects the current safeguarding risks within the College and the local area.
- 6.6 Governors and trustees will receive safeguarding training appropriate to their roles and responsibilities and will receive regular safeguarding updates to enable them to provide effective oversight and challenge.
- 6.7 The College will maintain appropriate records of safeguarding training and will monitor completion to ensure that required training is undertaken within the appropriate timescales.

- 6.8 Staff who do not complete mandatory safeguarding training within the required timescale will be followed up through the College's established management arrangements.
- 6.9 Where staff have specific safeguarding responsibilities, additional role-specific training will be provided. This may include training for the DSL, DDSLs, Prevent Lead, designated teacher for looked-after and previously looked-after children, staff responsible for attendance, staff involved in safer recruitment and those responsible for filtering and monitoring.
- 6.10 The College will ensure that safeguarding training is reviewed regularly and updated to reflect changes to legislation, statutory guidance, local safeguarding arrangements, emerging risks and learning from safeguarding incidents.

7 DEALING WITH DISCLOSURE OF ABUSE AND PROCEDURE FOR REPORTING CONCERNS

- 7.1 Where there is a risk to the life of a child or adult at risk or a likelihood of serious immediate harm 999 should be called. When considering if emergency action is necessary, an agency should always consider whether action is also required to safeguard other children in the same household (e.g. siblings), the household of an alleged perpetrator, or elsewhere. This procedure will be determined primarily by the LSCP, which establishes the locally agreed inter-agency procedures. The following explains the training around disclosure that all staff receives in Safeguarding.
- 7.2 If a child tells a member of staff that they have experienced or may be experiencing abuse, neglect, exploitation or another safeguarding concern, the member of staff should:
- remain calm and listen carefully;
 - allow the child to speak at their own pace;
 - take the child seriously;
 - use open and non-leading questions only where necessary to clarify what the child has said;
 - avoid asking detailed or investigative questions;
 - avoid putting words into the child's mouth;
 - avoid making assumptions or expressing disbelief;
 - reassure the child that they have done the right thing by telling someone;
 - explain that the information cannot be kept secret and will need to be shared with appropriate people in order to keep them safe;
 - explain what will happen next where it is appropriate to do so;
 - consider any immediate safety or medical needs;
 - report the concern to the DSL or Deputy DSL without delay;
 - make a clear, factual and contemporaneous record of the concern, including the date, time, location, what was said or observed, and any action taken; and
 - maintain appropriate confidentiality and only share information with those who need to know.

Staff must not investigate the concern themselves.

Staff must not promise the child that no one else will be told.

Where there is an immediate risk of serious harm, staff should contact the emergency services as appropriate and should not wait for the DSL to become available.

A flowchart of Safeguarding referrals can be seen in Appendix 3

- 7.3 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.
- 7.4 Please follow the College's whistleblowing procedures if you do not feel confident to report a concern to the Designated Safeguarding Lead. You can also make a referral to the NSPCC whistleblowing helpline if you do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is open 8.00am to 8.00pm, Monday to Friday and email help@nspcc.org.uk
- 7.5 Data protection laws do not prevent the College from sharing information where this is necessary to safeguard and promote the welfare of children.

Information will be shared lawfully, fairly and proportionately and in accordance with applicable data protection laws and relevant safeguarding guidance.

Staff must not allow uncertainty about data protection requirements to prevent necessary safeguarding information from being shared.

Where a safeguarding concern requires information to be shared, staff should seek advice from the DSL where appropriate, but should not delay an urgent referral where delay could place a child at further risk.

The College will maintain appropriate records of significant information-sharing decisions, including the rationale for decisions to share or not share information.

8 SUPERVISION

- 8.1 The College recognises that safeguarding work can involve exposure to distressing information and circumstances. Appropriate supervision, support and reflective practice will therefore be available to safeguarding staff
- 8.2 The College has an appointed external Supervisor who supports Safeguarding Leads to monitor caseloads and ensure the emotional wellbeing of staff.
- 8.3 The College will ensure that the Supervisor is suitably qualified, registered with the British Association of Counselling and Psychotherapy Practice (BACP) and that they have their own supervision.

- 8.4 Any Safeguarding Lead who has dealt with a particularly challenging case should contact the Head of Student Services to access supervision.
- 8.5 Safeguarding Leads who deal with high caseloads of Safeguarding will be expected to attend monthly supervision.
- 8.6 Staff involved in particularly challenging safeguarding cases will be offered appropriate support. To access this service please contact People Services or the Head of Student Services.

9 MULTI-AGENCY WORKING

- 9.1 The College recognises that effective safeguarding depends upon coordinated working between education, children's social care, health, police, safeguarding partners and other relevant agencies.
- 9.2 The College will work in accordance with the current arrangements established by the relevant Lincolnshire or Nottinghamshire safeguarding partners and will have regard to Working Together to Safeguard Children 2026.
- 9.3 The College will contribute appropriately to:
- early help and Family Help;
 - child in need assessments;
 - section 47 child protection enquiries;
 - child protection conferences and reviews;
 - strategy discussions;
 - multi-agency safeguarding meetings;
 - Child Safeguarding Practice Reviews and other learning processes;
 - Channel and Prevent arrangements;
 - arrangements for children who are looked after or have a social worker; and
 - other multi-agency safeguarding arrangements.
- 9.4 The College will share relevant safeguarding information with partner agencies where this is necessary to protect a child and will respond promptly to requests for information from safeguarding partners.
- 9.5 The College will maintain effective working relationships with the Local Authority Designated Officer (LADO), local authority children's social care, Police, health services, safeguarding partners, Virtual School and other relevant agencies.
- 9.6 The College will contribute to safeguarding learning and improvement following serious incidents, reviews and local safeguarding learning where appropriate.

10 ONLINE SAFETY

The College recognises that online safety is an integral part of safeguarding.

Children may experience online harm through content, contact, conduct and commerce. Online risks may include harmful or illegal content, grooming,

exploitation, cyberbullying, sexual harassment, image-based abuse, scams, radicalisation, misinformation and disinformation, misogyny and other discriminatory abuse.

Technology may also be used to facilitate abuse occurring offline.

The College will maintain appropriate filtering and monitoring arrangements and will review their effectiveness at least annually. The review will involve the appropriate Senior Leadership Team member, DSL and IT support and will include checks across relevant internet-connected devices and locations.

The College will provide online safety education and training and will ensure that staff understand their responsibilities in relation to online safeguarding, filtering and monitoring.

The College's detailed arrangements are contained in the Online Safety and Social Media Policy.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content** – being exposed to illegal, inappropriate or harmful material
- **Contact** – being subjected to harmful online interaction with other users
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm
- **Commerce** – risk such as online gambling, inappropriate advertising, phishing and/or financial scams.

11 ALLEGATIONS OF ABUSE MADE AGAINST OTHER CHILDREN

The College recognises that children and young people can cause harm to other children and that child-on-child abuse is a safeguarding issue requiring an appropriate safeguarding response.

Child-on-child abuse may occur online, offline or through a combination of both.

The College will respond to all reports of child-on-child abuse, including where the behaviour may initially appear to be low-level, consensual, joking or "banter".

The response will consider the needs and safety of both the child who has experienced harm and the child who has displayed harmful behaviour.

Further details are contained within the Learner Conduct Policy, Online Safety and Social Media Policy and relevant safeguarding procedures.

The College will address issues of child-onchild abuse through bullying and harassment. Please see Appendix 2.

12 ALLEGATIONS AND CONCERNS ABOUT ADULTS WORKING WITH CHILDREN

- 12.1 This section applies to all staff, volunteers, agency workers, contractors, supply staff, trainee teachers and other adults working in or on behalf of the College.
- 12.2 An allegation or concern must be referred where an adult has:
- behaved in a way that has harmed a child or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 12.3 All such allegations and concerns must be reported immediately to the DSL or the appropriate alternative senior person where the concern relates to the DSL.
- 12.4 The College will consult the Local Authority Designated Officer (LADO) and/or other relevant safeguarding agencies as appropriate and will follow local procedures.
- 12.5 The College will not undertake an internal investigation where this could prejudice a Police or children's social care investigation.
- 10.6 Where an allegation relates to a member of a third-party organisation, the College and the employing/contracting organisation will cooperate to ensure that safeguarding responsibilities are discharged appropriately.
- 12.7 Where a concern does not meet the harm threshold, the College will consider whether it constitutes a low-level concern and will manage it in accordance with the Staff Code of Conduct and low-level concerns procedure.
- 12.8 The College will maintain appropriate records of allegations, concerns, referrals, decisions and outcomes in accordance with safeguarding and data protection requirements.
- 12.9 Where required, the College will make referrals to the Disclosure and Barring Service and other relevant bodies.
- 12.10 The College will consider whether any allegation or concern indicates wider safeguarding issues, training needs, supervision requirements, changes to practice or risks to other children.

12-A. LOW-LEVEL CONCERNS ABOUT STAFF

The College recognises that concerns about the behaviour of staff, volunteers, contractors or other adults working with children may not meet the threshold for an allegation that an adult has harmed or may pose a risk of harm to a child.

A low-level concern is any concern, no matter how small, and even if no more than a nagging doubt, that an adult working with children may have acted in a way that:

- is inconsistent with the College's Staff Code of Conduct or professional expectations;
- is inappropriate in the circumstances;
- does not meet the harm threshold; or
- may indicate a potential safeguarding risk if repeated, combined with other concerns or left unaddressed.

Low-level concerns must be reported in accordance with the College's reporting arrangements.

The College will:

- ensure staff understand what constitutes a low-level concern;
- provide a clear route for reporting concerns;
- record and assess concerns appropriately;
- identify patterns or repeat concerns;
- use professional curiosity when considering whether apparently isolated incidents form part of a wider pattern;
- maintain confidentiality and share information appropriately; and
- consider whether a low-level concern should instead be referred under the harm-threshold procedures.

Low-level concerns will be managed in a way that protects children while also ensuring fairness and proportionality for staff.

13 LOOKED-AFTER, PREVIOUSLY LOOKED-AFTER AND CARE-EXPERIENCED CHILDREN

The College recognises that children who are looked after, previously looked after or leaving care may have experienced trauma, instability, abuse, neglect or other adversity and may therefore require additional safeguarding and educational support.

The College will ensure appropriate liaison with the child's social worker, Virtual School, local authority, carers and other relevant professionals.

Safeguarding information will be shared on a need-to-know basis and appropriate transition arrangements will be maintained when a child moves between settings

Student Services will keep a register of all looked after students and the names of their social workers and ensure that any absence is followed up on a daily basis. Please see Appendix 6 for further information with regards to children in specific circumstances.

14 CHILDREN or YOUNG PEOPLE WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

14.1 The College recognises that children with SEND and certain health conditions may face additional barriers to recognising, disclosing or reporting abuse and may be disproportionately vulnerable to bullying, grooming, exploitation, radicalisation and online harm. Staff must not

assume that behaviour, mood, communication difficulties, injury or distress is attributable solely to a child's SEND or medical condition.

The College will consider communication needs and make reasonable adjustments to ensure children or young people with SEND can report concerns and participate meaningfully in safeguarding processes

The College will work with the SENCO and SEND, team relevant health professionals and other agencies where appropriate.

- 14.2 The College recognises that young carers may experience additional pressures and may be at increased risk of poor attendance, educational disadvantage, emotional distress, social isolation or other safeguarding and welfare concerns.

Staff should be alert to signs that a child may have caring responsibilities and should consider whether they may benefit from additional support.

Where appropriate, the College will work with the child, their family and relevant local authority or support services to identify and address their needs.

The College will ensure that safeguarding concerns are not overlooked because caring responsibilities are viewed solely as a family or pastoral matter.

- 14.3 The College recognises that children with medical conditions may have additional safeguarding needs.

Staff must be alert to the possibility that medical symptoms, changes in presentation, medication issues, treatment requirements or absence may interact with safeguarding concerns.

The College will ensure that safeguarding arrangements are coordinated with appropriate medical, SEND, pastoral and welfare support and that individual healthcare arrangements are appropriately considered.

15 CHILD MISSING FROM EDUCATION

The College recognises that unexplained or repeated absence from education may be a safeguarding concern and may indicate abuse, neglect, exploitation, trafficking, radicalisation, mental health difficulties, family difficulties or other circumstances requiring support.

The College will maintain effective attendance monitoring and safeguarding procedures for children who are absent from education.

Particular attention will be given to:

- repeated or prolonged absence;
- unexplained absence;
- patterns of absence;
- sudden disengagement;
- children known to be at increased risk;
- children who may be experiencing exploitation;
- children with social workers;

- looked-after and care-experienced children;
- children subject to child protection arrangements; and
- children who are difficult to locate or whose destination is unknown.

Where there are safeguarding concerns, the matter must be referred to the DSL without delay.

The College will work with parents/carers, local authorities and other agencies as appropriate to identify and address the reasons for absence and reduce the risk of a child becoming missing from education.

16 PREVENTING RADICALISATION

- 16.1 The College recognises its statutory responsibility under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

The College will comply with the Prevent Duty Guidance for England and Wales 2023 and relevant Department for Education guidance.

- 16.2 Radicalisation is the process through which a person comes to support terrorism or forms of extremism that may lead to terrorism.

The College recognises that vulnerability to radicalisation can arise from a range of personal, social, psychological, political, economic or other circumstances and that radicalising influences may operate online or offline.

- 16.3 Staff should be alert to changes in behaviour, relationships, online activity, language, attitudes or circumstances which may indicate that a learner is vulnerable to radicalisation.

No single indicator should be treated as proof of radicalisation. Staff should exercise professional curiosity and seek advice from the DSL or Prevent Lead.

- 16.4 Where a learner may be vulnerable to radicalisation, the College will consider whether they require safeguarding support and whether a Prevent referral is appropriate.

Where appropriate, referrals may be made to the local Prevent team and/or Channel programme.

- 16.5 The College will promote a culture in which learners can participate in open and respectful discussion while ensuring that teaching and learning do not promote terrorism or extremist ideology.

The College will comply with its legal obligations relating to political impartiality and balanced presentation of political issues.

- 16.6 The College will assess and manage Prevent-related risks, including risks associated with online activity, external speakers, events, premises, teaching materials and access to extremist content.

- 16.7 Staff responsible for safeguarding will receive appropriate Prevent training and updates.
- 16.8 Prevent concerns will be recorded and managed through the College safeguarding procedures. Information will be shared with relevant agencies where necessary and proportionate to protect the learner or others.
- 16.9 The College will maintain appropriate records of Prevent referrals and actions taken and will contribute to local Prevent and Channel arrangements where required.

17 BRITISH VALUES

Lincoln College will promote British Values to all students and staff through literature and electronic information.

The College will actively promote the fundamental British values of:

- democracy;
- the rule of law;
- individual liberty; and
- mutual respect and tolerance for those with different faiths and beliefs.

The promotion of these values will be embedded through teaching, learning, learner support, College culture, enrichment activities and appropriate discussion of current affairs.

The College will promote respectful challenge and open discussion and will not equate legitimate disagreement, political debate or the expression of lawful views with extremism.

The College will challenge racism, discrimination, misogyny, misandry, hatred and behaviour that promotes or facilitates violence or terrorism

APPENDIX 1

SAFER RECRUITMENT PROCEDURES

This section should be read in conjunction with the College's Recruitment and Selection Code of Practice and Safer Recruitment Policy.

The aim of the Safer Recruitment Policy and associated procedures is to detail the relevant legislation applicable and checks that are required for any individual working for Lincoln College, to ensure that they are suitable to work within our learning environment.

These safer recruitment checks are in place to:

- **Deter** unsuitable people from seeking employment or opportunities to volunteer to work with children and young people
- **Reject** applications from unsuitable people
- **Identify** people who might abuse children.

Safer Recruitment is about more than obtaining a satisfactory criminal record check. It is about attracting the right candidate for the post and ensuring that the information a candidate has given on their application form is consistent, can be verified and is accurate.

Having Safer Recruitment practices in place can also help to assess whether the candidate has the right attitudes, values and behaviours to work with young people.

Safer Recruitment is embedded into the Lincoln College recruitment process to ensure the following:

- Students are able to learn and thrive in a safe environment
- Statutory responsibilities are adhered to
- Appropriate staff are appointed for the job they do
- Recruited staff and volunteers are the best in their field.

The Safer Recruitment Policy, along with the Lincoln College Recruitment and Selection Code of Practice, describes in detail the recruitment processes and the checks which are in place to help deter, reject or identify people who are unsuitable to work within our learning environment.

Our Safer Recruitment practices cover:

- Training for new starters - in line with the Keeping Children Safe in Education statutory guidance, all staff undergo mandatory safeguarding training at induction. This safeguarding training is in line with advice from Lincolnshire Safeguarding Children Partnership (LSCP) and is updated regularly
- Training for managers to ensure that all managers involved in the recruitment process are aware of their responsibilities with regards to safer recruitment practices
- Information available to candidates to help deter those that are unsuitable from applying and to ensure those that are successfully appointed are clear on the culture of safeguarding and its importance within Lincoln College

- Safer Recruitment Checks – The College will undertake all required pre-employment safeguarding checks in accordance with the current KCSIE guidance, applicable legislation and the College Safer Recruitment Policy.
- This includes appropriate DBS and barred-list checks, prohibition checks where applicable, identity checks, right-to-work checks, qualifications, references and checks relating to overseas activity where required.
- The College will assess the appropriate level of check for volunteers, contractors, agency workers, work-experience supervisors and other individuals working with children.
- The College will maintain a single central record as required.
- The College will comply with its statutory duty to make a referral to the Disclosure and Barring Service where the relevant harm and regulated-activity conditions are met.

Please consult the Safer Recruitment Policy and Recruitment and Selection Code of Practice for detailed guidance.

APPENDIX 2

BULLYING AND HARASSMENT PROCEDURE

1. Purpose

- 1.1 Lincoln College is committed to providing an environment in which children and young people are safe from bullying, harassment, discrimination and other forms of harmful behaviour.
- 1.2 Bullying and harassment may occur in person, online or through a combination of online and offline behaviour.
- 1.3 This procedure should be read alongside the College Safeguarding Policy and Procedures, Learner Conduct Policy, Equality and Diversity Policy, Online Safety and Social Media Policy and other relevant College procedures.
- 1.4 The College will not dismiss harmful behaviour as "banter", "just a joke", "part of growing up" or normal adolescent behaviour.

2. Bullying and Harassment

- 2.1 Bullying and harassment may include behaviour that is intended, or has the effect, of intimidating, humiliating, threatening, excluding, degrading or causing distress to another person.
- 2.2 Behaviour may be:
 - physical;
 - verbal;
 - emotional;
 - discriminatory;
 - sexual;
 - online;
 - social or relational; or
 - a combination of these.
- 2.3 Bullying and harassment may be a safeguarding concern where a child or young person is at risk of harm.
- 2.4 The College recognises the protected characteristics under the Equality Act 2010 and will challenge discriminatory behaviour relating to protected characteristics.

3. Examples of Bullying, Harassment and Harmful Behaviour

- 3.1 This is not an exhaustive list. Examples may include:
 - physical assault or threats of violence;
 - intimidation or coercion;
 - verbal abuse, insults or threats;
 - racist or discriminatory language;
 - misogynistic or misandrist abuse;
 - homophobic, biphobic or transphobic abuse;
 - derogatory comments about disability, religion or belief;
 - name-calling or humiliating behaviour;

- unwanted physical contact;
- sexual comments, jokes or remarks;
- sexualised name-calling;
- sexual harassment;
- sexual violence;
- sharing sexual images or pornography without consent;
- making or sharing nudes or semi-nudes;
- upskirting;
- cyberbullying;
- unwanted or threatening messages;
- impersonation;
- doxxing;
- harmful use of social media;
- exclusion or deliberate isolation;
- initiation or hazing rituals;
- threats involving weapons;
- financial exploitation; and
- other abusive, coercive or harmful behaviour.

4. Child-on-Child Abuse

- 4.1 The College recognises that children and young people can cause harm to other children and that child-on-child abuse is a safeguarding issue.
- 4.2 Child-on-child abuse may occur in person, online or through a combination of both.
- 4.3 The College will consider the needs and safety of:
 - the child who has experienced harm; and
 - the child who has displayed harmful behaviour.
- 4.4 Where a child displays harmful behaviour, the College will consider whether that child may themselves have experienced abuse, exploitation, trauma or other adversity and may require safeguarding support.
- 4.5 All concerns about child-on-child abuse must be reported to the DSL or DDSL and managed in accordance with the College safeguarding procedures.

5. Reporting Concerns

- 5.1 Any student, staff member, volunteer or visitor who becomes aware of bullying, harassment or child-on-child abuse should report the concern promptly.
- 5.2 Students may report concerns to a trusted member of staff, tutor, Student Services or directly to the Safeguarding Team.

Staff must report safeguarding concerns to the DSL or DDSL without delay.
- 5.3 Where there is an immediate risk of serious harm, the emergency services should be contacted and staff should not wait for the DSL to become available.

5.4 Staff must not investigate safeguarding concerns themselves.

6. Response

6.1 The College will:

- take all reports seriously;
- consider the immediate safety and welfare of those involved;
- assess whether the matter is a safeguarding concern;
- consider whether external agencies need to be involved;
- take appropriate action under safeguarding and/or learner conduct procedures;
- provide appropriate support to those affected;
- consider the needs of the child displaying harmful behaviour;
- record significant concerns and actions taken; and
- review whether further or additional safeguarding action is required.

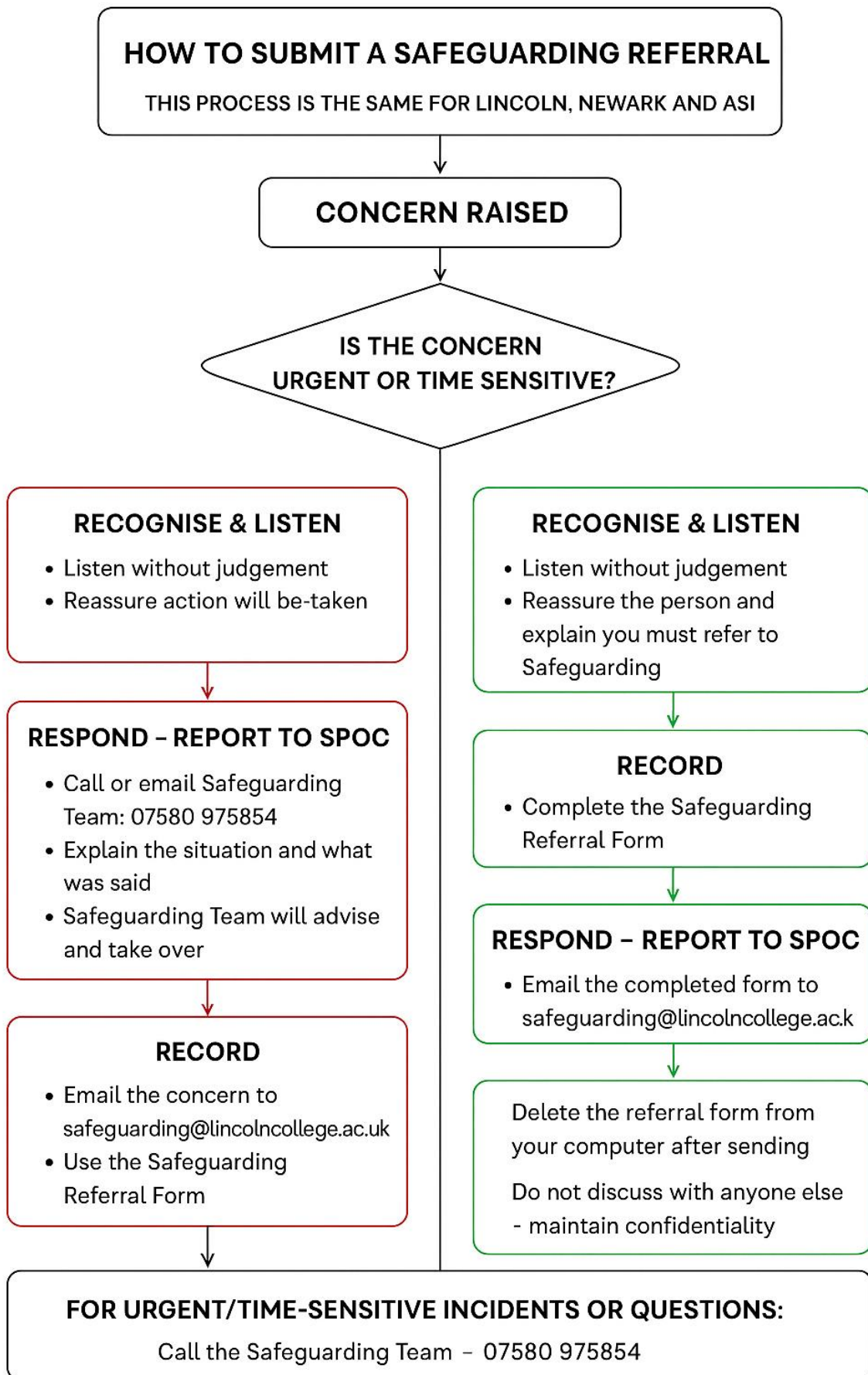
6.2 The College will consider the context, frequency, severity and impact of the behaviour and whether there are any factors which increase vulnerability or risk.

7. Recording and Information Sharing

7.1 Safeguarding concerns must be recorded clearly, factually and contemporaneously.

7.2 Information will be shared only with those who need to know and in accordance with safeguarding and data protection requirements.

7.3 The College will use information about bullying, harassment and child-on-child abuse to identify patterns, emerging risks, training needs and opportunities to improve safeguarding practice.



APPENDIX 4

REPORTING AND DEALING WITH ALLEGATIONS AGAINST MEMBERS OF STAFF

1. Purpose

- 1.1 The College recognises that safeguarding concerns may arise about the behaviour of a member of staff, volunteer, agency worker, contractor, supply staff member, trainee teacher or any other adult working on behalf of the College.
- 1.2 All concerns about adults working with children and young people must be taken seriously and dealt with promptly, fairly and consistently.
- 1.3 The purpose of this procedure is to ensure that:
 - concerns are reported and considered without delay;
 - children and young people are appropriately safeguarded;
 - concerns are dealt with proportionately;
 - allegations that meet the harm threshold are distinguished from low-level concerns;
 - appropriate external agencies are consulted or notified where required;
 - confidentiality is maintained;
 - records and decisions are appropriately documented; and
 - staff involved in an allegation are treated fairly and supported appropriately.

2. Scope

- 2.1 This procedure applies to concerns about the behaviour of any adult working for or on behalf of the College, including:
 - employees;
 - volunteers;
 - agency workers;
 - contractors;
 - supply staff;
 - trainee teachers;
 - work placement staff; and
 - other adults who have contact with students through their work for the College.
- 2.2 It applies whether the concern relates to conduct:
 - on College premises;
 - during College activities or trips;
 - online or through digital communication;
 - outside the College where the behaviour may affect the person's suitability to work with children and young people; or
 - through any other activity connected with the individual's role.

3. When an Allegation Meets the Harm Threshold

- 3.1 An allegation should be treated as meeting the harm threshold where there is information or evidence suggesting that an adult has:
 1. behaved in a way that has harmed a child, or may have harmed a child;
 2. possibly committed a criminal offence against or related to a child;

3. behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
 4. behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 3.2 These criteria apply whether the concern relates to a single incident or a pattern of behaviour.
- 3.3 Where there is uncertainty about whether the threshold has been met, the DSL should seek appropriate advice and, where required, consult the Local Authority Designated Officer (LADO).

4. Reporting a Concern

- 4.1 Any member of staff who has a concern or receives an allegation about an adult working with children must report it **without delay**.
- 4.2 The concern should normally be reported to the **Designated Safeguarding Lead (DSL)** or a **Deputy Designated Safeguarding Lead (DDSL)**.
- 4.3 Staff should not:
- investigate the allegation themselves;
 - interview the child or adult about the allegation;
 - seek statements from witnesses;
 - confront the person who is the subject of the concern;
 - promise confidentiality; or
 - attempt to determine whether the allegation is substantiated.
- 4.4 The person receiving the concern should make a clear and factual record of what has been reported, including the date, time, people involved, relevant information and any immediate safeguarding action taken.

5. Where the Concern Relates to the DSL

- 5.1 Where the allegation or concern relates to the DSL, it must not be reported to or dealt with by the DSL.
- 5.2 The concern should be reported to the appropriate senior College leader or person designated to receive allegations about the DSL.
- 5.3 Where appropriate, the matter will be referred to or discussed with the LADO and/or other relevant external agencies.
- 5.4 The same principles of confidentiality, impartiality and safeguarding apply.

6. Initial Consideration

- 6.1 The person receiving the allegation will consider the immediate safeguarding position and whether any urgent action is required.
- 6.2 The initial consideration should establish:
- what is alleged or reported;
 - who is involved;
 - whether a child is currently at risk;

- whether emergency action is required;
- whether the concern may meet the harm threshold;
- whether the concern may constitute a low-level concern;
- whether the Police, Children's Social Care, LADO or another agency needs to be contacted; and
- what immediate steps are necessary to safeguard children.

6.3 The College will avoid unnecessary investigation or duplication of enquiries where an external safeguarding agency is already involved.

7. Decision: Harm Threshold or Low-Level Concern

7.1 The College will distinguish between concerns that meet the harm threshold and concerns that do not.

7.2 A. Concern meets the harm threshold

Where the concern appears to meet one or more of the four criteria in Section 3:

- the DSL or appropriate senior leader will consider the need for immediate safeguarding action;
- the LADO will be consulted where appropriate;
- the Police and/or Children's Social Care will be contacted where required;
- the College will cooperate with any external investigation;
- any College investigation will be coordinated appropriately with external agencies; and
- appropriate employment, disciplinary or other internal procedures will be considered separately where necessary.

The College will not undertake an internal investigation in a way that could prejudice a Police or safeguarding investigation.

7.3 B. Concern does not meet the harm threshold

Where the concern does not meet the harm threshold, the College will consider whether it constitutes a **low-level concern**.

A low-level concern may relate to behaviour that is:

- inconsistent with the Staff Code of Conduct;
- inappropriate or concerning;
- not sufficiently serious to meet the harm threshold; or
- potentially significant if repeated or combined with other concerns.

Low-level concerns will be managed in accordance with the College's Low-Level Concerns Procedure and Staff Code of Conduct.

A concern should not be dismissed simply because it does not meet the harm threshold.

8. Low-Level Concerns

8.1 Low-level concerns should be reported to the appropriate person in accordance with the College's safeguarding arrangements.

Examples may include behaviour that:

- breaches professional boundaries;
- involves inappropriate communication with a student;
- involves inappropriate online or social media behaviour;
- involves unnecessary or inappropriate physical contact;
- shows favouritism or inappropriate relationships with students;
- is inconsistent with expected professional conduct; or
- causes concern about an adult's professional boundaries, even where there is no indication of abuse.

8.2 The College will consider the context, frequency and circumstances of the behaviour.

8.3 A pattern of low-level concerns may indicate that a concern should be escalated and reconsidered against the harm threshold.

9. Immediate Risk

9.1 Where there is an immediate risk of harm to a child, the College will take immediate safeguarding action.

This may include:

- ensuring the child is safe;
- contacting the Police or Children's Social Care;
- contacting emergency services where appropriate;
- making arrangements to prevent further contact where necessary; and
- seeking advice from the LADO or other relevant safeguarding professionals.

Any action taken must be proportionate to the identified risk.

10. Suspension and Alternative Measures

10.1 The existence of an allegation does not automatically mean that the person concerned should be suspended.

10.2 Any decision about suspension or alternative working arrangements will be made on the basis of the circumstances and the identified risks, taking account of safeguarding advice and relevant College procedures.

10.3 Alternative arrangements may include, where appropriate:

- changes to duties;
- changes to supervision arrangements;
- temporary restrictions on contact with students;
- adjustments to working arrangements; or
- other proportionate risk-management measures.

Any such decision will be reviewed as appropriate.

11. Confidentiality

11.1 Allegations against adults must be treated as confidential.

11.2 Information will only be shared with those who need to know in order to safeguard children, manage the concern or meet legal or procedural requirements.

- 11.3 Staff must not discuss allegations with colleagues, students, parents/carers or other individuals unless specifically authorised to do so.
- 11.4 The College will ensure that information is shared appropriately with external agencies where necessary to safeguard children.

12. Support for the Child

- 12.1 The welfare and safety of the child or children involved will remain the primary consideration.
- 12.2 The College will consider whether the child requires:
- safeguarding support;
 - pastoral support;
 - wellbeing support;
 - academic support;
 - adjustments to their education or timetable;
 - support from external agencies; or
 - other appropriate assistance.
- 12.3 The College will seek to ensure that children are not disadvantaged because they have reported or been involved in a safeguarding concern.

13. Support for the Adult

- 13.1 The College recognises that an allegation can be stressful for the adult involved.
- 13.2 Subject to safeguarding and confidentiality requirements, the College will provide appropriate information about the process and available support.
- 13.3 The adult will be treated fairly and will have an opportunity to respond to allegations through the appropriate process.
- 13.4 Nothing in this procedure prevents the College from taking immediate safeguarding action where required.

14. Record Keeping

- 14.1 The College will maintain a clear and confidential record of allegations and concerns involving adults.
- 14.2 Records should include:
- the concern or allegation;
 - the date it was received;
 - the person who reported it;
 - the adult concerned;
 - the child or children involved, where relevant;
 - actions taken;
 - advice received;
 - referrals or consultations with external agencies;
 - decisions reached;
 - the rationale for decisions;
 - actions arising from the decision; and

- the outcome and any required review.
- 14.3 Records relating to allegations and low-level concerns will be stored securely and retained in accordance with the College's safeguarding and information-retention requirements.

15. Review and Escalation

- 15.1 A concern initially assessed as low-level must be reconsidered if:
- further information becomes available;
 - similar concerns are subsequently reported;
 - the behaviour is repeated;
 - the risk increases; or
 - information emerges that indicates the harm threshold may have been met.
- 15.2 Where this occurs, the matter must be escalated and reconsidered under the allegations procedure.
- 15.3 The College will consider whether patterns of low-level concerns indicate a wider safeguarding issue or a need for management action, training or other intervention.

16. External Agencies

- 16.1 Where appropriate, the College will work with:
- the Local Authority Designated Officer (LADO);
 - Children's Social Care;
 - the Police;
 - Prevent or Channel arrangements;
 - the Local Authority; and
 - other relevant safeguarding or regulatory agencies.
- 16.2 The College will follow the advice and procedures of the relevant external safeguarding authority where an external investigation or referral is undertaken.

17. Key Principles

- 17.1 In managing allegations and concerns about adults, the College will:
- act promptly;
 - put the welfare of children first;
 - avoid unnecessary investigation by College staff;
 - distinguish allegations from low-level concerns;
 - seek external safeguarding advice where appropriate;
 - maintain confidentiality;
 - keep accurate records;
 - support children and adults appropriately;
 - review patterns of concerns; and
 - take proportionate action based on identified risk.

APPENDIX 5

PROFESSIONAL CONDUCT GUIDELINES

Lincoln College expects all its employees to behave in a professional manner at all times. This also incorporates considering your personal actions when outside College and giving due consideration for any action that may bring the College into disrepute.

The following information is provided as guidance for what the College deems as acceptable and reasonable behaviour and aims to help staff safeguard students and reduce the risk of conduct which could be mistakenly interpreted as improper and lead to allegations being made against individuals.

Further guidance can also be found within the Personal Relationships between Students and Staff Policy.

This document is for both Lincoln College and its subsidiary company staff.

1 PRINCIPLES

- The welfare of young people and adults at risk is paramount
- Staff are responsible for their own actions
- Staff should be seen to work in a transparent way
- All staff should report any incident which may give rise to concern to their manager
- All staff and work placement providers should be aware of and follow the College's safeguarding procedure
- Staff who breach this code of conduct may be subject to the College's disciplinary procedures
- Serious breach of this code may result in a referral being made to an external or statutory agency such as the local authority Social Care Team or the Police.

2 WORKING WITH STUDENTS

All staff have a duty of care to keep students safe and are accountable for the way in which they use their authority and position of trust. This duty can be best exercised through the development of caring but professional relationships.

- 2.1 Staff should ensure that their relationships with students are appropriate to the age and gender of the student, taking care that their conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when dealing with both young and vulnerable students.
- 2.2 Staff must report concerns about their own or another adult's behaviour where the behaviour may be inappropriate, inconsistent with the Staff Code of Conduct or safeguarding expectations, even where it does not meet the threshold for an allegation of abuse.
- 2.3 Comments by staff to young and vulnerable students, either individually or collectively, can be misconstrued. As a general principle, staff must

not make unnecessary comments to and/or about students, which could be construed to have a sexual connotation.

- 2.4 It is also unacceptable for staff to introduce or to encourage debate amongst students in a class, training situation or elsewhere, which could be construed as having a sexual connotation that is unnecessary given the context of the session or the circumstances.
- 2.5 However, it is recognised that a topic raised by a student is best addressed rather than ignored. It is appropriate for staff to advise the student where they can access further advice and support.

Staff should:

- Treat all students with respect and dignity
- Always put the welfare of the student first
- Understand that the systematic use of insensitive, disparaging or sarcastic comments such as those that refer to a young person's body, intelligence, gender, sexual orientation or ethnicity in any way are unacceptable
- Not swear or use offensive or discriminatory language
- Never make sexual remarks to a student or discuss your own personal sexual relationships
- Avoid any communication which could be interpreted as sexually provocative
- End the discussion if it becomes uncomfortable or embarrassing
- Work in an open environment avoiding private or unobserved situations and encourage open communication
- Give enthusiastic and constructive feedback rather than negative criticism
- Always challenge inappropriate language from students or colleagues
- Never allow allegations made by a student to go unrecorded or not acted upon
- Only ever issue medication if it is in line with the College's Medicines policy.

3 ONE TO ONE SITUATIONS

Staff should be aware of the potential risks which may arise when working alone with a student.

It is recognised that there will be occasions when confidential interviews or meetings must take place:

- If possible leave the door open or use a room with a window in the door
- The use of "engaged" signs or lights are not advisable
- Where such conditions cannot apply, staff are advised to ensure that another adult knows that the meeting is taking place
- Never meet a student away from the College unless your line manager has given permission
- Avoid travelling in a car with one student and inform someone if the situation is unavoidable.

4 EDUCATIONAL VISITS AND COLLEGE ACTIVITIES

Staff should take extra care in less formal situations and remember they are still in a position of trust.

5 CONFIDENTIALITY

Staff should never share information about students in a casual manner or allow student access to information on staff computers or in staff rooms.

Staff should:

- Never give out their own personal details or a student's personal details to other students
- Log off or lock their computer whenever leaving it unattended
- Not allow students to use your computer unless you have logged off
- Staff should only email students from their work email address and not their personal email address

6 BEHAVIOUR

Staff should adopt high standards of personal conduct at all times.

- Staff clothing should reflect a professional appearance and should be suitable for the occupational area in which they are working
- Staff must wear their identity ID card when on College premises
- Staff should, where applicable wear relevant protective clothing to set a professional example to students
- Staff should dress in a manner which will avoid inappropriate comments
- Never act in a way that can be perceived as threatening
- Accessing or bringing images of pornography i.e. sexualised images without artistic merit on site is never acceptable, regardless of format
- Storing or disseminating such material is illegal and if proven will lead to the person being barred from working with young people
- When communicating with students electronically, staff should only use College mobiles, College email or official College internet sites
- Staff should never keep images of students on personal equipment.

7 SOCIAL CONTACT

Staff should never contact a student outside of the College for the purpose of friendship. This is particularly important when there is a possibility of a student becoming infatuated with a member of staff. It is recognised that there may be occasions when accidental or reasonable social contact may be unavoidable, e.g. meeting students at social venues open to the general public or in shops or at private parties. In such circumstances, staff should be mindful at all times of their professional relationship with students.

Staff should never lend money to students. Students who need money for food or travel should be directed to Student Services where appropriate arrangements will be made.

Outside the working hours of Student Services, a Safeguarding Lead within Deans Sport and Leisure can be contacted to deal with emergencies.

- Do not accept gifts that could be construed as bribes (end of term gifts is fine)
- Staff should not give/purchase any food items for students, as you may not be aware if the student has a food allergy
- Never give out personal contact details, mobile phone numbers or personal email or Facebook addresses
- Staff are advised not to have students tagged as friends on Facebook or any other form of social media
- Never accept friendship or access requests from students on any social networking sites
- Report any suspected infatuation
- Report any situation which you may feel compromises your professional standing
- Unavoidable social contact with a student must be reported to your line manager e.g. Where you are a member of the same gym or sports club.

8 MOBILE PHONES

Staff should only use College devices when contacting students i.e. not their personal mobile phone number.

9 SOCIAL MEDIA FOR STUDY

When setting up a Facebook (or other) page for study purposes staff must declare this to their line manager. Also, staff should liaise with the College's IT Manager and External Communications Manager to ensure that the page has the correct security and corporate logos in place.

10 SEXUAL CONTACT

It is a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent, even if the basis for their relationship is consensual. There is NO acceptable behaviour that has either explicit sexual connotations or innuendo. Any such behaviour will always be treated as extremely serious and must be reported immediately.

11 PHYSICAL CONTACT

The use of reasonable force.

In all circumstances you should try to diffuse a situation before it escalates: this may involve you politely and calmly asking a person to come with you where you can sit and talk through the issue or concern.

There are however circumstances when it is appropriate for staff in Colleges to use reasonable force to safeguard children and adults at risk. The term

'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain students. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Staff should remember that they should at no time put themselves at risk of physical danger and if they are concerned they should call the emergency contact number for assistance.

12 INCIDENTS THAT MUST BE REPORTED

- If a student is accidentally hurt
- If you are concerned that a relationship is developing that could represent an abuse of trust
- If you are concerned that a student is becoming attracted to you or a colleague
- If you are concerned that a colleague is becoming attracted to someone in his/her care
- If a student misunderstands or misinterprets something you have done
- If you have had to use reasonable physical restraint to prevent a student harming themselves, or another, or from causing significant damage to property
- If a student makes an allegation of abuse
- If you see any suspicious marks on a student
- If you notice sudden changes in behaviour.

13 WHISTLEBLOWING

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among members of staff.

It can be difficult to accept that a colleague may deliberately harm a vulnerable person. It may also be that the behaviour that causes concern is bad practice rather than abuse.

The College will support and protect all staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

APPENDIX 6

CHILDREN IN SPECIFIC CIRCUMSTANCES

The Lincoln College Group has a designated member of staff within the Safeguarding Team to monitor educational progress and achievement while supporting students who are:

- looked-after children;
- previously looked-after children;
- care leavers;
- unaccompanied asylum-seeking children;
- young carers;
- children with social workers;
- privately fostered children;

As a collective group these students are identified as Care Experienced Students.

The Care Experienced Students offer means the College offers a point of contact for additional support specific to student's individual needs to provide the best opportunities for:

- a smooth transition to College
- support throughout their study programme at College
- continuation of support from Looked After to Care Leaver status
- support to transition into employment/Higher Education

The Designated Teacher will:

- complete the Personal Education Plans for the placing Local Authority
- provide reports for the Review of Current Care Arrangements.
- Work with the Virtual School Co-ordinators, Social Workers, Personal Assistants and Leaving Care Workers to achieve positive educational outcomes for the students.
- Provide a designated point of contact for students
- Support and liaise with tutors to understand the needs of the students.

Private Fostering Arrangements

- 1 When a child under 16 (or 18 if they have a disability) is cared for by someone who is not a close relative for 28 days or more.
- 2 A call must be made to the County Council either Nottinghamshire (0300 500 80 80) or Lincolnshire (01522 782111) as soon as this information is received to ensure that they are aware of the arrangements so a Social Worker from Children's Social Care can visit the child to ensure that the child is safe and the child is being properly cared for. Subsequent regular visits will follow to offer support and to make sure the child remains safe and well.

<https://www.lincolnshire.gov.uk/adoption-fostering/private-fostering>
<http://www.nottinghamshire.gov.uk/care/fostering/private-fostering>

Care Experienced Students

1 Introduction

1.1 Lincoln College is committed to providing a quality education for all its students. The commitment to Care Experienced Students is guided by the principles and practice outlined in, Section 52 of the Children Act 2004, Promoting the Education of Looked After Children, Keeping Children Safe in Education and Working Together to Safeguard Children.

1.2 Looked After Children are young people who may be:

Accommodated (Section 20)

A voluntary arrangement is a joint voluntary arrangement between parents and the Local Authority. The arrangement can form part of a child protection plan negotiated with the family. In these circumstances, the parent(s) retain parental responsibility (PR).

Full Care Order

A child can be identified as a “Looked After Child” if a court has granted a Section 31 Full Care Order. An order may be issued if a child is believed to be suffering or likely to suffer significant harm. A care order generally gives parental responsibility to the local authority.

Remanded/detained

A child can be remanded or detained:

- During the period where an emergency protection order has been issued
- If removed from the home by police using their powers of protection
- By a court following criminal charges
- By a court directing a Children’s Services Department to accommodate a child already subject to a supervision order for criminal behaviour.

2 Supporting Care Experienced Students

2.1 Care experienced students may have:

- Low self-esteem
- Poor education standards due to absence from College
- Delayed social/emotional/cognitive development
- Been bullied or have bullied others
- Mental health issues
- Few friends or feels isolated
- Behavioural issues
- Poor attachment to others.

Care Experienced Students may experience some or all of the issues listed above. This makes them an extremely vulnerable group in terms of realising their educational potential and future life chances.

2.2 Lincoln College is committed to ensuring that Care Experienced Students are fully supported by:

- A Designated member of Staff (Safeguarding Co-ordinator or Designated Teacher for Care Experienced Students), LSA's, Counsellors, Guidance Advisers, Assessment and Support Co-ordinators, Personal Tutors and Financial Support
- Establishing and monitoring robust support contracts recorded on the eILP
- Ensuring that all staff working with Care Experienced Students have a clear understanding of issues that affect them
- Liaising with the Virtual School – Post-16 Education Co-ordinator for Children's Services by organising and co-ordinating termly progression Personal Education Plan meetings
- Liaising and contributing to the review of Care Arrangements process.

3 Confidentiality

Information about Care Experienced Students will be shared with College staff on a "need to know basis".

4 Roles and Responsibilities

4.1 Head of Student Services

The Head of Student Services will:

- Liaise with the nominated member of the Governing Body to provide accurate information regarding Care Experienced Students in the College and to confirm that the support outlined above is in place and working effectively
- Reports forwarded to the nominated member of the governing body will not include the names of individual children for child protection and confidentiality reasons
- Review the effective implementation of this policy on an annual basis or immediately in the light of new guidance and/or legislation being introduced.

4.2 Designated Member of Staff

The Designated Member of Staff will:

- Be an advocate for Care experienced Students
- Monitor attendance of the Care Experienced Students and address any absences with the academic leads
- Ensure that processes are in place to identify Care Experienced Students at the earliest opportunity
- Where there is a learning difficulty or disability, ensure that an assessment of support need and appropriate support is in place

on enrolment with support from the Assessment and Support Team

- Ensure that each Care Experienced Student has an identified member of staff that they can talk to – this will be the Personal Tutor and the Designated Teacher for Care Experienced Students
- Co-ordinate support for the child in the College and liaise with other professionals and carers
- Ensure staff receive relevant information and training and act as an advisor to staff and governors
- Ensure confidentiality for individual children
- Ensure the College is represented at Care Arrangements planning/review meetings
- Ensure that the child and carer(s) receive notification of relevant College meetings, e.g. parents' evenings
- Ensure efficient transfer of information between individuals, relevant agencies and to other colleges as appropriate
- Seek meetings with relevant parties where the child/young person is experiencing difficulties, particularly if there is the danger of disciplinary action.

4.3 The Designated Co-ordinator) with Responsibility for Care Experienced Students

The Designated Co-ordinator with responsibility for Care Experienced Students will:

- Provide support to Personal Tutors, giving advice and guidance on procedures
- Act as the key contact with the Virtual School – Post-16 Education Co-ordinator for Children's Services on behalf of Personal Tutors
- Ensure that ePEPs are completed on a termly basis.

4.4 Personal Tutor

The Personal Tutor will:

- Ensure a supported induction the child/young person and carer(s), and note specific requirements, including care status
- Ensure that the eILP, and other records are up to date
- Liaise with the College Designated Teacher (Safeguarding Leads) and attend an ePEP once per term or provide a report
- Ensure that the Care Experienced Student is informed about and encouraged to attend extra-curricular activities, enrichment and out of hours learning
- Seek meetings with the Designated Teacher (Safeguarding Leads) where the child/young person is experiencing difficulties, particularly if there is the danger of disciplinary action
- As part of CPD, Tutor's should research or attend workshops setting out the additional needs of a Care Experienced Student.

APPENDIX 7

IDENTIFICATION ID CARD/LANYARD

1 PURPOSE

The purpose of the Identification card/Lanyard Policy is:

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

2 AIM

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

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

- Learner Conduct Policy
- Staff Disciplinary Procedures
- Admissions Policy

3 PROCEDURES/RESPONSIBILITIES

3.1 Managers

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

3.2 Staff

- All staff will be issued a photographic ID card and College lanyard by the Digital Engagement Team upon employment
- While in the workshops ID cards may be worn using a clip-on accessory for those staff who would encounter health and safety issues while using a lanyard
- ID cards must be worn using a College breakaway lanyard designated by a blue colour to identify individuals as staff members. If a staff member refuses to wear their lanyard, or has to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances
- The ID card and College lanyard must be visible at all times and not obstructed by clothing
- All staff are responsible for challenging persons not displaying an ID card with a College lanyard
- If a staff member finds a student displaying an out of date ID card, the staff member is responsible for retaining the ID card
- Staff must return their identification ID cards and College lanyards to People Services upon termination of employment
- If staff are found not wearing their ID card and College lanyard, this will be referred to their line manager to issue an informal oral warning

where appropriate. Further incidents of non-compliance will be addressed via the staff disciplinary procedures (Formal)

- Staff who have lost their ID card and College lanyard must go to the Digital Engagement Team to be issued with a replacement ID card and lanyard. A replacement ID card and College lanyard will be issued free of charge but any issued subsequently will incur a fee of £5
- Staff who have not lost their ID card and College lanyard but have forgotten to bring it to work must go to the Digital Engagement Team to be issued with a temporary ID card and College lanyard.

3.3 Applicants

All potential students and their parent/guardian will be monitored whilst on campus. During their visit they will be monitored via one of the following procedures:

- Experience day students will be issued with a temporary badge by the Schools Liaison Co-ordinator (or their nominee)
- Applicants will be signed in by the staff member supervising and issued with a temporary badge for identification. Parents/guardians will be issued with an accompanying adult badge
- Open evening visitors will all receive a temporary badge on arrival.

3.4 Students

- All students will be issued with a photographic ID card and a breakaway College lanyard upon enrolment
- All students should wear their lanyard at all times while on College property (this includes social areas and while moving between buildings)
- Lanyards are to be worn around the neck and not tied to bags/arms or hanging out of pockets. All staff have a responsibility to challenge any student or staff member not wearing a lanyard
- If a student refuses to wear their lanyard, they should be asked to leave College property until such time that they are wearing a lanyard. If they continue to refuse or have to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances
- In exceptional cases, related to Special Education Needs or Disability (SEND), there may be a reason why a staff/student member cannot wear a lanyard around their neck. In this instance a formal request must be made to the Head of Student Services outlining the reasons why and providing any supporting evidence. The supporting evidence should give specific details as to why an individual is unable to wear a lanyard around their neck. An example of supporting evidence would be a Doctor's letter or a Health and Safety Officer. If the evidence supports the request the individual will be issued with an exemption letter by the Head of Student Services that sets out that they are exempt from wearing a lanyard around the neck. It should also detail the alternative method of identification agreed with the individual which should be the wearing of identification on a clip that is clearly visible. A record of this decision should be recorded onto an individual's learner record or staff record as appropriate

- In workshops/high risk environments, students will be asked to remove their lanyard for certain tasks by their tutor. As an alternative, a clip will be provided so that identification is still displayed in these sessions
- Students who have lost their ID card and/or College lanyard must go to the Digital Engagement Team to be issued with a replacement. You can be issued with one replacement free of charge but any issued after this will incur a £5 fee
- Students who have not lost their ID card and College lanyard but have forgotten to bring it must report to the Digital Engagement Team (or report to reception in Newark) to be issued with temporary identification. Students who repeatedly forget their lanyard should be subject to a disciplinary sanction
- When a student leaves or withdraws from a course, they should be requested to hand in their ID card, holder and lanyard on the last day of attendance to a member of staff. Returned ID cards and College lanyards should be returned to the Digital Engagement Team
- If a student is asked to leave by the College, they should be requested to hand in their ID card and College lanyard of the last day of attendance to a member of staff. Returned ID cards and College lanyards should then be returned to the Digital Engagement Team.

3.5 Governors

Governors will be issued with a Governor identification ID card and Governor lanyard.

3.6 Contractors

- All Contractors must report to the Facilities department to be issued a photographic identification ID card
- All contractors must wear their ID cards on the provided College lanyard, around the neck at all times while on campus
- ID cards maybe worn using a clip provided by the College for those personnel who would encounter health and safety issues with the use of a lanyard
- ID cards shall be worn using a breakaway College lanyard designated by the colour red to identify them as a campus contractor
- ID cards and College lanyards must be returned to the Facilities department upon completion of work each day
- Contractors who have lost their ID card and College lanyard must report to the Facilities Department to be issued with a replacement ID card and College lanyard.

3.7 Visitors

- Visitors must report to the Main Reception to be issued with a picture ID card
- When visitors are issued with their ID card they must state what department or person they are on campus to visit
- ID cards shall be worn using a breakaway College lanyard designated by the colour purple to identify them as a visitor. Visitors must return their ID card and College lanyard to the Main Reception at the end of their visit

- Visitors who have lost their ID card and College lanyard must report to the Main Reception to be issued with a replacement ID card and College lanyard.

3.8 Special Events

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

3.9 Agency Workers, Volunteers/ Work placement

- Agency Workers, Volunteers and those on a work placement are to be issued a photographic ID card and temporary lanyard by the Digital Engagement Team upon employment
- While in the workshops ID cards may be worn using a clip-on accessory for those staff who would encounter health and safety issues while using a lanyard
- ID cards must be worn using a temporary breakaway lanyard to identify individuals as an external agency worker, volunteer or an individual on a work placement. If an individual refuse to wear their lanyard, or has to be repeatedly told to wear it, action should be taken in the absence of exceptional circumstances, which could include the termination of the individuals booking or placement
- The ID card and temporary lanyard must be visible at all times and not obstructed by clothing
- All agency workers are responsible for challenging persons not displaying an ID card with a College lanyard
- External Agency Workers and individuals on volunteer/work placements who find a student displaying an out of date ID card, should cease and retain this immediately
- Identification ID cards and temporary lanyards should be returned to People Services upon termination of an individual's booking, assignment or placement
- External Agency Workers and those on volunteer or work placement who have lost their ID card and temporary lanyard must go to the Digital Engagement Team to be issued with a replacement ID card and lanyard. A replacement ID card and temporary lanyard will be issued free of charge but any issued subsequently will incur a fee of £5.

4 OTHER

Customers for Sessions Restaurant, Deans Sport and Leisure or the Salon will not receive an identification ID card and lanyard but must sign in at the individual receptions.

N.B From reviewing this policy, some recommendations/amendments will be made to the safer recruitment policy in order to reflect the above and updates to KCSIE, however this is to be reviewed outside of the above.

APPENDIX 8

OPERATIONAL AND STRATEGIC SAFEGUARDING GROUPS

1. Purpose

- 1.1 The College maintains operational and strategic safeguarding arrangements to ensure that safeguarding concerns are identified, assessed, managed and reviewed appropriately.

These arrangements support the College's wider safeguarding governance and provide a clear route for escalating significant safeguarding concerns, managing risk and ensuring that appropriate actions are taken.

The groups operate alongside, and do not replace, the College's normal safeguarding procedures. Where a concern meets the threshold for referral to an external safeguarding agency, the appropriate referral will be made without delay.

2. Operational Safeguarding Group

- 2.1 The Operational Safeguarding Group provides oversight of significant or complex safeguarding concerns that require coordinated management within the College.

- 2.2 The group may consider cases involving:
- significant safeguarding or welfare concerns;
 - complex or escalating risk;
 - concerns involving multiple agencies or services;
 - concerns where a coordinated College response is required;
 - safeguarding concerns affecting a student's ability to safely access education;
 - risk management arrangements;
 - safeguarding concerns requiring ongoing monitoring and review.

- 2.3 The group will ensure that:
- relevant information is gathered and considered appropriately;
 - safeguarding risks are identified and assessed;
 - appropriate actions and controls are put in place;
 - external referrals are made where required;
 - actions are allocated to named individuals;
 - safeguarding plans and risk management arrangements are reviewed;
 - decisions and the rationale for those decisions are recorded appropriately.

- 2.4 The Operational Safeguarding Group does not replace the DSL's responsibility for safeguarding or the responsibility of individual staff to report concerns promptly.

3. Strategic Safeguarding Group

- 3.1 The Strategic Safeguarding Group provides senior oversight of safeguarding across the College and supports the College's governance and assurance arrangements.

- 3.2 The group will consider:
- significant or persistent safeguarding risks;
 - emerging safeguarding themes and trends;
 - serious incidents and lessons learned;
 - safeguarding risks affecting more than one area of the College;
 - effectiveness of safeguarding policies, procedures and controls;
 - safeguarding training and workforce development;
 - safeguarding audit, monitoring and assurance;
 - recommendations arising from safeguarding reviews or investigations;
 - actions required to improve safeguarding practice.

3.2 The group will provide assurance to the appropriate senior leadership and governance arrangements and will escalate significant risks where necessary.

4. Membership

- 4.1 Membership of the Operational and Strategic Safeguarding Groups will reflect the nature and seriousness of the concerns being considered.
- 4.2 Membership may include, as appropriate:
- Designated Safeguarding Lead (DSL);
 - Deputy Designated Safeguarding Lead (DDSL);
 - Strategic Safeguarding Leads;
 - senior College leaders;
 - safeguarding or student services representatives;
 - relevant curriculum or operational managers;
 - People Services/HR representatives where appropriate;
 - other professionals with relevant knowledge or responsibility.
- 4.3 External agencies or specialist professionals may be invited to contribute where this is appropriate and lawful.
- 4.4 Membership and attendance will be kept under review to ensure that the group has the appropriate expertise and authority to make and implement decisions

5. Confidentiality and Information Sharing

- 5.1 Information considered by the groups will be handled sensitively and in accordance with safeguarding, data protection and information-sharing requirements.
- 5.2 Information will only be shared with those who have a legitimate need to know and where sharing is necessary to safeguard and promote the welfare of children and young people.
- 5.3 Safeguarding information will not be withheld solely because consent has not been obtained where there is a lawful safeguarding basis for sharing.
- 5.4 Records of meetings and decisions will be maintained securely and will include, where appropriate:
- the nature of the concern;
 - information considered;
 - risks identified;

- decisions made;
- the rationale for decisions;
- actions required;
- named individuals responsible for actions;
- review arrangements and outcomes.

6. Risk Management

- 6.1 Where a student remains within the College while safeguarding concerns are being managed, appropriate risk management arrangements will be considered. These may include:
- a written risk management plan;
 - restrictions or adjustments to access;
 - additional supervision;
 - changes to teaching or support arrangements;
 - pastoral or wellbeing support;
 - liaison with parents/carers where appropriate;
 - liaison with external agencies;
 - regular review meetings.
- 6.2 Risk management arrangements must be proportionate to the identified risk and reviewed whenever there is a significant change in circumstances.
- 6.3 A risk management plan does not replace a safeguarding referral where a referral is required.

7. Strategic Safeguarding Panel

- 7.1 Where a safeguarding concern presents significant or ongoing risk, the College may refer the case to the Strategic Safeguarding Panel to consider the appropriate management of the case.
- 7.2 The Panel will consider the available information, the identified safeguarding risks and any relevant external agency involvement.
- 7.3 The Panel may determine that:
- no further College action is required;
 - additional safeguarding or support measures are required;
 - a risk management plan is required;
 - further information or investigation is required;
 - the matter should be referred to an appropriate external agency;
 - restrictions on College attendance or access are required;
 - the matter should be considered under another appropriate College procedure.
- 7.4 Any decision will be recorded together with the rationale for the decision and the actions required.
- 7.5 Where a decision affects a student's status at the College, the relevant College policy and appeals arrangements will apply.
- 7.6 A flow chart for the Panel process can be seen below:

8. Escalation and External Referral

- 8.1 The College will not delay an external safeguarding referral while waiting for an Operational or Strategic Safeguarding Group meeting.
 - 8.2 Where there is an immediate risk of harm, staff must follow the emergency safeguarding arrangements.
 - 8.3 Where a concern may require involvement from Children's Social Care, the Police, Prevent, the Local Authority Designated Officer (LADO) or another safeguarding agency, the appropriate referral or consultation will be made in accordance with the College safeguarding procedures.
- 1.5 The groups may subsequently monitor the College's response and ensure that agreed actions are implemented.

9. Review and Monitoring

- 9.1 Safeguarding cases considered by the groups will be reviewed at appropriate intervals.
- 9.2 The review will consider:
 - whether the identified risks have reduced;
 - whether agreed actions have been completed;
 - whether further safeguarding action is required;
 - whether external agency involvement remains appropriate;
 - whether the student's support needs have changed;
 - whether the case identifies wider learning or training requirements.
- 9.3 Significant themes, trends and lessons learned will be reported through the College's safeguarding governance arrangements.

10. Records and Audit

- 10.1 The College will maintain appropriate records of safeguarding group activity and decisions.
- 10.2 Records will be securely maintained and handled in accordance with the College's safeguarding and data protection requirements.
- 10.3 The College will use information from operational and strategic safeguarding activity to identify themes, monitor safeguarding effectiveness and support continuous improvement.



APPENDIX 9

REMOTE AND ONLINE LEARNING

- Remote and online learning must be conducted using College-approved systems and in accordance with the Online Safety and Social Media Policy, Staff Code of Conduct, IT Acceptable Use Policy and data protection requirements.
- Staff must maintain appropriate professional boundaries when communicating with learners online.
- One-to-one online contact must be conducted through College-approved systems and in accordance with College safeguarding procedures.
- Any concern arising during an online meeting or remote learning activity must be reported through the normal safeguarding arrangements.
- Recording of online meetings or teaching sessions must only take place where there is an appropriate College purpose, lawful basis and approved process.

ARTIFICIAL INTELLIGENCE AND SAFEGUARDING

- The College recognises that artificial intelligence may create or facilitate safeguarding risks, including harmful or abusive content, impersonation, deepfakes, deep nudes, grooming, exploitation, manipulation, misinformation and other harmful interactions.
- Any concern involving the use of AI to harm, exploit, threaten, sexually abuse, impersonate or otherwise target a child must be reported through the College safeguarding arrangements.
- AI-generated or manipulated sexual imagery involving a person under 18 must be treated as a safeguarding concern.
- Staff must follow the College Online Safety and Social Media Policy and AI guidance when using or responding to AI-enabled services

CHILDREN WHO HAVE OR HAVE HAD A SOCIAL WORKER

- The College recognises that children who have or have had a social worker may have experienced significant adversity, trauma, abuse, neglect or other safeguarding concerns.
- The DSL will ensure that, where appropriate, the College understands which children fall within this cohort and considers the potential impact of safeguarding and welfare concerns on their attendance, engagement, progress and achievement.
- The College will maintain high aspirations for these children and will consider whether additional academic, pastoral, SEND, attendance or wellbeing support is required.
- Information will be shared appropriately with relevant staff and agencies to support safeguarding and educational outcomes while maintaining appropriate confidentiality.

CHILD PROTECTION RECORDS AND TRANSFER

- The DSL is responsible for ensuring that child protection records are accurate, secure and up to date.
- Records should distinguish between:
 - observed facts;
 - professional opinion;
 - information provided by others; and
 - historic information.
- Records should include a clear summary of the concern, action taken, decisions reached, the rationale for decisions and outcomes.
- Where a child transfers to another school or college, the child protection file will be transferred securely as soon as possible and, for an in-year transfer, within five days.
- The College will provide a clear summary of current safeguarding concerns, relevant context and ongoing support needs where appropriate.
- The receiving setting should be able to understand current risks and needs without having to rely solely on an unstructured historic record.

APPENDIX 10 – PREVENT REFERRALS

