



Policy: Safeguarding and Child Protection

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1. Purpose

- To set out the College's commitment to keeping children and young people safe from harm and how, in broad terms, the College will meet this commitment. The College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering support and protection, and accepts that it has a legal and moral responsibility to implement procedures, to provide a duty of care to young people, to safeguard their wellbeing and to protect from abuse.
- To give clear direction to staff, governors, volunteers, visitors, students and parents/carers about expectations and our legal responsibility to safeguard and promote the wellbeing of all children and young people at College. Everyone who is part of the College community is responsible for safeguarding, promoting and protecting the welfare of children, young people and vulnerable adults.
- To clarify the procedures for reporting suspected wrongdoing or bad practice in respect of the protection of children and young people at Franklin Sixth Form College.
- This policy should be read in conjunction with Keeping Children Safe in Education (KCSIE) 2023.

2. Scope and legal definitions

This policy deals with the protection of children and young people and all adults at risk. For the purposes of clarity, any person under the age of 18 is deemed to be a child, and an adult at risk is deemed to be a person who is or may need community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation. An adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing. Any person up to the age of 24 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding & child protection legislation.

All references to staff or adults comprise teaching staff, other staff, governors and volunteers working in the organisation, any supply staff, visitors including contractors to the organisation with direct contact with learners, regardless of position, role or responsibilities.

The term 'safeguarding children, young people and adults at risk' embraces both reactive child protection and a preventative approach to keeping young people and adults safe. The statutory guidance 'Keeping Children Safe in Education 2023', 'Working Together to Safeguard Children 2018', 'The Protections of Freedom Act 2012', and the 'Safeguarding Vulnerable Groups Act 2006', are the key documents upon which this policy is predicated.

Safeguarding and promoting the welfare of children and young people is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's mental and physical health; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The development and implementation of the Policy is overseen by the Designated Safeguarding Lead. There is a training and development plan covering the whole College community. There is a Prevent strategy in place which is an integral part of safeguarding. The College's Prevent Duty responsibilities are set out in the Counter Terrorism and Security Act, February 2015 and are detailed in the College's Prevent Strategy.

Information is displayed around the College explaining the College's commitment to creating and maintaining a safe learning and working environment, and posters throughout the College identify members of the Safeguarding Team, with photographs attached.

3. Policy Statement

Franklin Sixth Form College Safeguarding looks to protect everyone from:

- groups and individuals presenting violent extreme ideologies
- abuse or inappropriate relationships
- sexual violence and sexual harassment between children
- grooming (in person, online, by phone)
- inappropriate supervision (by parents or staff, e.g. too much)

- bullying, cyber-bullying
- cybercrime
- upskirting
- sextortion
- serious violence
- self-harm, risky behaviour
- unsafe activities and environments
- crime
- fear of crime
- Female Genital Mutilation (FGM)
- Child Criminal Exploitation (CCE) including county lines
- Child Sexual Exploitation (CSE)
- homelessness and unsuitable housing
- victimisation and prejudice due to race, sexuality, faith, gender, disability
- alcohol and drug misuse
- eating disorders
- child-on-child abuse; including sexting and initiation/ hazing type rituals.
- so-called honour-based violence (which can include FGM)
- not understanding the additional safeguarding vulnerabilities of learners with SEND and disabilities, and how those barriers can be overcome.
- issues arising from children with family members in prison
- domestic abuse
- issues arising from children being in the Court System
- trafficking
- children absent from education
- serious violence
- mental health
- misogyny/ misandry
- anything which causes the College to be concerned that any student or member of staff might be at risk of significant harm because of one or more of the above.

Abuse can take many forms including emotional, physical, sexual and mental. Whilst it is more common for there to be a perceived disproportionate power differential between abuser(s) and abusee(s), child-on-child abuse is a significant issue. It must never be tolerated or treated as 'banter' or just 'part of growing up' and the College take a complete zero-tolerance approach to such issues.

Child-on-child abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment. All disclosures will be recorded in the Safeguarding case files and reviewed on a regular basis by the Designated Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead(s) (DDSL) to ensure appropriate support mechanisms are in place for both victims and perpetrators. Whilst it is clear that child-on-child abuse disproportionately affects females and the College must have appropriate support mechanisms in place; males, LGBTQ+ and SEND students will also be affected by this issue and staff must be aware of this and prepared to act accordingly.

The College has processes in place to identify these vulnerable young people and all efforts are taken to ensure that they are safe from abuse and neglect. All these groups may benefit from early help assessments and the College refers to the Local Authority Early Help procedures.

Further advice and guidance on the range of abuse and indicators of abuse can be found in Annex A of 'Keeping Children Safe in Education 2023'. All staff are required to access Part 1 of this document and to read and understand it; all staff working directly with under 18s must also read and understand the Annex.

Franklin Sixth Form College has a statutory and moral duty to ensure the safety of, and to promote the welfare of children, young people and at-risk adults attending the College. The term 'safeguarding' embraces a holistic approach to both child protection and a preventative approach to keeping young people and adults safe. The College will carry out these responsibilities under relevant current legislation and formal guidance.

Aims

- To provide a safe environment for children, young people and adults in which to work, learn and take part in social and recreational activity
- To identify people who are experiencing, or likely to experience, significant harm; providing support and taking appropriate action with the objective of producing positive outcomes for those people
- To foster, promote and maintain a genuine feeling of safety throughout the College via the curriculum, pastoral support, and appropriate working practices through the promotion of a College ethos where everyone feels secure, valued and listened to
- To act where appropriate to safeguard the person following the North East Lincolnshire Safeguarding Children Partnership (NELSCP) through collaboratively working with multi agencies to ensure the safeguarding of children, young people and vulnerable adults
- To ensure that the College has processes in place to identify vulnerable young people and all efforts are taken to ensure that they are safe from abuse/neglect, and that these identified groups may benefit from Early Help and the College has robust referral procedures to the Local Authority Early Help procedures
- To educate all students and staff in safeguarding and child protection issues so that they become more aware and confident in dealing with issues relating to those matters
- To ensure parents/carers are clear about the value the College places on safeguarding
- To identify designated personnel to take responsibility of and oversee and monitor, safeguarding concerns
- To ensure all students know that the College takes the safeguarding agenda very seriously and will follow the appropriate procedures for identifying and reporting abuse and for dealing with allegations against staff. When these are updated, staff are informed through training or additional briefing sessions
- To take account of and inform policy in related areas such as learning behaviour, sexual harassment and violence and cyber safety.

The College has processes which:

- identify children, young people and adults at risk of significant mental or physical harm, or where there are concerns for a person's welfare, provide procedures for reporting and addressing such concerns
- prevent unsuitable people from working with children, young people and adults
- maintain channels for reporting and dealing with all allegations of abuse
- work in partnership with local agencies including the sharing of information
- provide a safe environment for children, young people and adults within the College
- appropriately filter and monitor student internet usage.

The College will act to:

- appoint and train a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) with responsibilities to lead on all matters pertaining to safeguarding and child protection, and who will ensure that appropriate and robust systems are in place that will co-ordinate reporting, monitoring, referral, and support procedures. Name, role and contact details will be available to all staff, students and parents/carers
- train all staff to Recognise, Respond, Record and Report regarding Safeguarding procedures with training updates provided on a termly basis. Induction training that includes safeguarding procedures and Part One of Keeping Children Safe in Education September 2023 will be mandatory for all new staff working in the College
- train the Designated Safeguarding Leads and Deputy Safeguarding Leads every two years with annual updates on emerging themes and local risks
- keep accurate and secure records of concerns about individuals, even when there is no need for immediate referral to outside agencies
- provide a systematic means of monitoring children, young people and adults known, or thought to be, at risk of harm, and contribute to assessments/support plans with other agencies
- make sources of help and support accessible for anyone who may experience abuse
- develop effective working relationships with other agencies: Police, Social Services, Health Authority, Clinical Commissioning Group etc.

- train staff and volunteers in safe practices to protect children, young people and adults in the learning environment, and also to protect themselves from false allegations of abuse or low level concerns
- ensure safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), taking of references, online searches, social media checks and training interviewers in accordance with Department of Education guidance to effectively establish suitability for role at the time of employment
- provide tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help children, young people, and adults to develop their self-esteem, assertiveness and problem-solving skills, to promote their resilience, and foster positive behaviours in accordance with the Franklin College ABC expectations.
- Appoint a nominated governor to be responsible for liaising with the DSL and DDSLs to monitor the effectiveness of this policy in conjunction with the full governing body
- train all governors on appropriate safeguarding and child protection at induction, and then at regular intervals to ensure safeguarding policies and procedures are effective.

The College is not a 24 hour emergency service so outside College times students and parents/carers are directed to external safeguarding and emergency services. The email address safeguarding@franklin.ac.uk is monitored regularly but not in College holidays or outside of College hours.

3.1 Duty of Care

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and people from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of the College. Staff behaviour should demonstrate integrity, maturity and good judgement, e.g. management of risk in external visits/residential visits.

All staff should understand that children may not feel ready or know how to tell someone they are being abused. This should not prevent staff from having a professional curiosity and

speaking to a member of the Safeguarding Team if they have concerns about a young person.

3.2 Managing low level concerns/allegations that do not meet the harm threshold

The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a young person does not meet the harm threshold.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the Staff Code of Professional Conduct and College ASPIRE values, including inappropriate conduct outside work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- showing favouritism
- being over friendly
- using inappropriate sexualised, intimidating or offensive language
- taking photographs of students on their personal mobile device

Any low-level concerns should be reported to either the DSL or HR Manager or Principal in a timely fashion.

3.3 Abuse of Position of Trust

All staff are aware what constitutes inappropriate behaviour towards students and that all such behaviour is unacceptable; their conduct towards students must be beyond reproach.

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as

the young person, even if he/she does not teach the child. Where a sexual relationship exists between a staff member and a student aged 18 or over, it is required that the staff member discloses this to HR immediately as this is unacceptable to the College and may result in dismissal as this is gross misconduct.

3.4 Professional Boundaries

It is the responsibility of all staff to maintain professional boundaries, remembering that they are in a position of trust. Any member of staff requiring clarification of professional boundaries should consult with their line manager, DSL or DDSLs or a member of CLT.

3.5 Partnerships with parents and carers

We are committed to working with parents and carers positively, openly and honestly and to treating everyone with respect, dignity and courtesy. However, the College will not discuss concerns with parents and carers in the following circumstances:

- Suspected sexual abuse or sexual exploitation within the family
- Where female genital mutilation is suspected
- Where fabricated or induced illness is suspected
- In cases of forced marriage
- In cases where a child /young person is suspected of being subjected to radicalism and /or extremism within the family
- Where contacting parents/carers would place a child, young person, or others at immediate danger.

The College shares a purpose with parents and carers to keep children and young people safe from harm and to have their welfare promoted.

3.6 Safeguarding Reporting Protocols for staff:

All staff are responsible for safeguarding one another and our students. Where a student makes a disclosure to a member of staff they should do the following:

- **LISTEN** carefully, stay calm; do not express shock or embarrassment
- **DO NOT** guarantee confidentiality, but be clear that you will act sensitively and explain what will happen next

- **GIVE REASSURANCE** that you are taking the information seriously
- **DO NOT** ask leading questions
- **DO NOT** examine any physical injuries
- **DO NOT** attempt to investigate the allegations yourself
- **NEVER JUDGE** – even if the allegation is against a colleague
- **RECORD** what was said, also time, date and place
- **CONTACT** a member of the Safeguarding Team as soon as is reasonably possible

All staff will:

- Be familiar with the Safeguarding and Child Protection Policy including issues of confidentiality
- Understand that it is everyone’s responsibility to safeguard students and that students have the right to be protected from harm
- Be alert to signs or indicators of abuse
- Record concerns on a referral form and management information systems where appropriate
- Deal with disclosures of abuse from a student in line with recommendations within the Policy
- Receive appropriate safeguarding and child protection training, which is regularly updated
- Monitor internet usage in accordance with Prevent/KCSIE23 and know how to recognise and respond to inappropriate internet use
- Be aware of the Early Help process and understand their role within this
- Be subject to Safer Recruitment processes and appropriate checks whether they are new staff, governors, supply staff, contractors or volunteers.

3.7 College Safeguarding Recording & Case Management Procedure

- All safeguarding concerns are either identified by, or referred through to, the Safeguarding Team by members of staff, external agencies, students (either self-referring or bringing concerns about peers) or parent/carers

- The Safeguarding Team will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency, and/or compose an Early Help Assessment, taking advice from the DSL as needed
- The Safeguarding Team will meet on a regular basis to review all new cases, monitor on-going cases, and review and monitor a watch-list of those cases where there are concerns or known pertinent information but that have not yet met an intervention threshold
- Cases are opened and closed by common agreement with the DSL or DDSL. The DSL always makes final judgement
- All cases are recorded in a secure folder on the College's safeguarding database.

3.8 Social Media

Franklin Sixth Form College recognises that the use of social media by young people has grown exponentially and that social media has become a focus for a number of issues including cyber-bullying, sexting, sharing of inappropriate images, the promotion of radical and extreme viewpoints, grooming and Child Sexual Exploitation.

All staff will be trained to be aware of and sensitive to this area of activity and the College will ensure that suitable IT policies are in place to address access, filters and monitoring of social media activity. **It is expressly forbidden for staff to either share their personal contact details with existing students, or to seek to befriend/accept friend requests from existing students on any social media platform.** This includes the sharing of personal mobile telephone details, personal e-mail addresses and any personal contact information. Any member of staff found to be in breach of this will be liable to disciplinary action.

3.9 SEND students

Students with SEND are more likely to be abused and/or neglected. The College will monitor and support these students through the Learning Support Team and the DSL or DDSLs to ensure these students are appropriately identified and supported.

- The College will ensure that guidance is available so that all staff have an awareness that: behaviour, mood and injury may relate to potential abuse and not just as a result of SEND

- SEND students face a higher risk of peer group isolation
- That bullying and/or harassment has a disproportionate impact on SEND students
- That difficulties with communication may also adversely impact SEND students

SEND students are offered transitional support to ensure a smooth transition from secondary school or other destination. They are also allocated where necessary a Learning Support Assistant and a Progress Coach who will address any concerns throughout the year and provide or signpost support.

3.10 LGBTQ+ students

LGBTQ+ students can be vulnerable and a target for child-on-child abuse. The College will seek to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with a member of the Safeguarding Team.

3.11 Students or Visitors under the age of 16

Where a safeguarding concern is made regarding a young person under 16, members of staff must follow the same safeguarding procedures. If it is a visitor, the DSL will liaise with the DSL from the visitor's school, ensuring that the learner is informed of this process.

3.12 Contextual Safeguarding

All staff need to ensure that they are considering the context within which such incidents and/or behaviours occur. Safeguarding incidents and or behaviours can be associated with factors outside of College and can occur between students outside of the College. It is crucial to consider wider environmental factors that may be present that are a threat to their wellbeing or safety. Contextual Safeguarding therefore expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

The College will ensure that all staff have an effective understanding of the local context and all safeguarding training will acknowledge and reference the local context to ensure that staff are adequately prepared to manage such issues that arise from this.

3.13 Early Help Assessment

Early help assessment means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an Early Help Inter-Agency Assessment should be arranged. Chapter one of 'Working Together to Safeguard Children 2018' provides detailed guidance on the Early Help process. The Safeguarding Team will be responsible for identifying and implementing any Early Help measures which are required.

Any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement
- is at risk of criminal exploitation or 'county lines' - when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs and association with organised crime groups
- is frequently absent or is absent from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child.

3.14 Child-on-child abuse

The College will seek to minimise instances of child-on-child abuse by ensuring that:

- students are made aware of child - on-child abuse and how to report it through the ASPIRE programme
- staff receive training to recognise the indicators of child-on-child abuse across its spectrum, the gendered nature of child-on-child abuse and know how to refer cases and support students
- The provision of a Safeguarding Team that works directly with staff and students in a pro-active manner to inform awareness of child-on-child abuse and provides guidance and support on how to manage and address it, including the consistent challenge and management of so-called 'banter'
- the Safeguarding Team will work closely with curriculum staff, students and parent/carers to ensure that both victims and perpetrators have access to support and guidance mechanisms
- all cases of child-on-child abuse will be recorded and managed through the existing safeguarding referral and case management procedure
- in terms of sexual harassment and sexual violence, victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however be balanced with the College's duty and responsibility to protect others
- students are aware that the law is in place to protect rather than criminalise them and that the College must be part of the discussions with statutory safeguarding partners.

Child-on-child abuse can take a range of different forms including, but not limited to:

- Child-and-child sexual violence and sexual harassment. Part 5 of the KCSiE 22 guidance sets out how colleges should respond to reports of sexual violence and sexual harassment, as does the newly published 'Sexual Violence and Sexual Harassment Between Children In Schools and Colleges' (Sept 22)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- upskirting; taking a picture under a person’s clothes without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- sexting (also known as youth produced sexual imagery). This will be treated sensitively by the College and, where disclosed or discovered, the participants will be supported and guided appropriately. In the case of malicious intent being shown the Police will be informed and the College’s Disciplinary Procedure invoked.
- initiation/hazing¹ type violence and rituals.

3.15 Child-on-child sexual violence and sexual harassment:

All staff, volunteers and trainees should recognise that children are capable of abusing other children. This can take several different forms including sexual violence and harassment, including rape and sexual assault; causing someone to engage in sexual activity without consent, sexting (sharing of nude and semi-nude images) and upskirting.

There is a zero-tolerance approach to child-on-child sexual violence and harassment here at Franklin Sixth Form College. It is essential that all staff challenge inappropriate behaviours between peers and a whole-College approach has been embedded through a number of awareness raising and training sessions conducted with staff. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and young people and, in worst case scenarios, lead to a culture that normalises abuse leading to children and young people accepting it as normal and not coming forward to report it. Child-on-child abuse can happen both inside and outside of school or college and online. Even if there are no reported cases of child-on-child abuse, this does not mean it is not happening within the College. It is important that staff report any concerns about child-on-child abuse to a member of the Safeguarding Team. Work to prevent sexual harassment, online sexual abuse and sexual violence operates through a culture-led, whole-College approach that includes training sessions with staff, awareness raising group tutorials on sexual violence and harassment,

¹ Hazing refers to the practice of rituals, challenges and other activities involving harassment, abuse or humiliation as a way of initiating a person into a group. The initiation rites can range from relatively harmless pranks to protracted patterns of behaviour that may rise to the level of abuse (e.g., physical or psychological) and/or criminal misconduct (e.g., sexual assault)

tutorials on consent and healthy relationships, posters displayed around College raising awareness of the issue and focus groups with students to ascertain the prevalence and nature of sexual violence and harassment in their lives.

Where any reports are made of child-on-child sexual violence or sexual harassment these must be dealt with seriously and quickly, whether the alleged incident was face – to - face or online. All staff working with students are advised to maintain an attitude of ‘it could happen here’ and a whole-College, zero tolerance approach applies.

When dealing with reports of child-on-child sexual harassment, sexual violence and sexual abuse:

- All victims are reassured that they are being taken seriously and that they will be supported and kept safe
- Staff never promise confidentiality as it is extremely likely that a concern of sexual harassment or abuse will have to be shared further
- A member of the Safeguarding Team makes an immediate risk assessment and assessment of need to consider the victim, especially their protection and support, and takes any immediate actions that is appropriate to protect them
- The wishes of the victim are always given high priority in terms of how they want to proceed and any support provided. Victims are given as much control as is reasonably possible over decisions; although, ultimately, we have to balance the victim’s wishes against our duty to protect the victim and other children
- The alleged perpetrator is provided with support as appropriate and any appropriate disciplinary action taken
- Parents or carers are normally informed (unless this would put the victim at greater risk)
- If the victim does not give consent to share information, staff may still lawfully share it to protect children from harm and to promote the welfare of children
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is referral to the Police
- All discussions, actions, decisions, and reasons for decisions should be recorded.

The management of young people with Harmful Sexual Behaviour (HSB) is complex and the College will work with external agencies to risk assess and maintain safety of the College community. Young people who display such behaviours may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour should speak to the DSL/DDSLs as soon as possible.

3.16 Hate Crime

Hate crime is defined as an criminal action, typically one involving violence (but not exclusively), that is motivated by prejudice on the basis of a protected characteristic.

Examples of hate crimes include (this list is not exhaustive):

- Verbal abuse like name calling or offensive jokes or banter
- Assaults
- Criminal damage
- Harassment
- Sexual assault
- Murder
- Theft
- Fraud
- Burglary
- Hate mail
- Bullying or intimidation
- Hoax calls, abusive phone or text messages
- Online abuse via social media platforms
- Malicious complaints
- Arson
- Displaying or circulating discriminatory literature or posters.

The College is committed to raise awareness of this issue, to ensure all staff are clear on acceptable behaviour and all staff and students are aware of how to report any incidents. The College has a zero tolerance approach to all forms of hate crime and any abusive or discriminatory behaviour.

The reporting of hate crimes is encouraged at the earliest opportunity. This includes anyone who has witnessed a hate crime or incident, where a hate crime or incident is reported to them by victims or witnesses or has a strong suspicion or evidence of a hate crime. Any staff posting or sharing hate speech via social media platforms will result in disciplinary action.

Hate crimes and incidents, whether experienced directly, indirectly, in person or online can have serious impact on an individual's wellbeing. Individuals subjected to hate crimes can suffer increased stress levels, anxiety, depression, PTSD or injuries, which can result in increased sickness and absences.

3.17 Female Genital Mutilation

Female Genital Mutilation is the partial or complete removal of external female genitalia for non-medical reasons. It is mostly carried out – without anaesthetic – on girls between infancy and age 15. FGM has zero health benefits and often results in lifelong health problems, increased risks during childbirth, psychological trauma, and even death.

Whilst all staff should speak to a member of the Safeguarding Team with regard to any concerns about female genital mutilation (FGM), under the mandatory reporting legislation teachers are required to report known cases of FGM in under 18s to the Police. A known case is where there has been visual identification (which, usually, applies to healthcare professionals) or direct verbal disclosure.

3.18 Domestic abuse

Types of domestic abuse include intimate partner violence, abuse by a family member, teenage relationship abuse and child parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'.

For any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be given support.

3.19 Serious violence

Staff will recognise when a young person may be at risk from or involved with serious violent crime by recognising the indicators such as:

- Increased absence from College
- Change in friendship groups or relationships
- A decline in performance or attainment
- Signs of self harm
- Noticeable changes in their wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Staff who suspect a student may be vulnerable to, or involved in, serious violent crime should immediately report their concerns to the DSL/DDSL.

3.20 Prevent Strategy

To ensure that the College effectively safeguards students and staff, manages risks and can deal appropriately with issues around radicalisation and extremism, the College will:

- understand the nature of the threat from extremism and how this may impact directly or indirectly on the College
- encourage staff and students to respect and adhere to fundamental British values.
- ensure staff receive awareness training in recognising and preventing extremism and radicalisation
- understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of College premises
- respond rapidly and appropriately to events in local, national or international news that may impact on the College community
- ensure measures are in place to minimise the potential for acts of extremism within the College

- ensure plans are in place to respond appropriately to a threat or incident within the College
- work with sub-contractors, employers and work placement providers to ensure they are compliant with the Prevent Duty and the College's safeguarding procedures.
- adopt effective network security and responsible user policies and promote these to all staff and students.

3.21 Cyber safety

Please read the Franklin Sixth Form College Staff Code of Professional Conduct in conjunction with this document.

The College will ensure there are appropriate filters and monitoring systems are in place and ensure all internet usage within the College is monitored in a responsible and transparent way to ensure and maintain the safety of staff and students.

Cyber safety is exceptionally important and will continue to receive a high priority as an issue as it is often how issues such as CCE, CSE, radicalisation, bullying and sexual harassment are facilitated. The breadth of issues classified within cyber safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example pornography, fake news, racism, misogyny, misandry, self harm, suicide, anti semitism, radicalisation, and extremism

Contact: being subjected to harmful online interaction with other users; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making sending and receiving explicit images including consensual and non-consensual sharing of nudes and semi nudes and/or pornography, sharing other explicit images, sextortion and bullying online

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scam.

Cybercrime is defined as criminal activity committed using computers and/or the internet.

This includes:

- Unauthorised access to computers known as 'hacking'
- Denial of Service attacks known as 'booting'
- Making, supplying or obtaining malicious software, or malware, eg viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Staff should report any signs of cyber crime and follow the appropriate safeguarding procedures where concerns arise.

3.22 Wearing of Identity Badges

In order to ensure that anyone accessing the College campus is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided whenever they are out of the classroom environment.

- All teaching staff are required to check their students' ID badges are worn at the start and at the end of all teaching sessions
- Any student who has forgotten or lost their ID badge must get a Temporary ID from the Reception. A common list of student names will be held on FIS and the date of each occasion a Temporary ID badge is issued will be recorded against that student by the issuing member of staff.

3.23 Looked After Child, young people in care and care leavers

The College will work in close collaboration with the Virtual School Head and Children's Social Services to ensure all Looked After Children (and previously LAC) are identified and offered appropriate support mechanisms. Regular review meetings will take place with each LAC student.

A dedicated Wellbeing and Inclusion Manager ensures that appropriate training is given to staff and ensure staff have the awareness of this group, their needs including contact arrangements.

3.25 Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement between a parent and a carer for 28 days or more. Close relatives are defined as step parents, grandparents, siblings, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

3.26 Partnership and Information Sharing:

The College will work in conjunction with the Local Authority and other multi-agency partnerships to ensure information is passed freely where there are safeguarding concerns and information sharing protocols are well established. When sharing information, it must be necessary, proportionate, relevant, accurate, timely, and secure.

All safeguarding referral protocols will reflect the guidance laid down in Part 1 of KCSiE 2023, including Prevent referrals to Channel.

The College recognises that all matters relating to child protection are confidential.

3.27 Children Absent from Education

Where students under the age of 18 are displaying erratic, long-term or regular absences, or other unusual attendance patterns, the College will ensure that staff follow up with parent/carers to ensure a full understanding of the underlying absence reasons is gained and recorded where appropriate.

In cases where a safeguarding concern is known or suspected the DSL or DDSL will undertake a referral to Families First and/or conduct an Early Help Assessment. All such

cases will be recorded and monitored using the existing referral and case management procedure.

3.28 Students who are subject to criminal investigations

Where a student is subject to a criminal investigation, the College may suspend the student until the criminal investigation and legal proceedings have concluded. This does not automatically preclude the College from progressing its own disciplinary action if appropriate.

Where the nature of the alleged offence suggests that there may be risk to the safety of others, or where the student accused of the offence may be at risk of harm, the DSL will undertake a risk assessment.

When criminal proceedings have concluded, and the student is no longer a member of the College community, the student may reapply for admission but must declare any criminal convictions to be considered prior to a decision regarding an offer of place. Where the student has been acquitted the college will consider the decision of the court.

3.28 Transporting students

Situations may arise, which requires members of staff to take a young person home or to access medical services. Staff should be aware of the risks involved. There must always be an additional member of staff and in agreement with the DSL.

3.29 Roles and Responsibilities:

Role	Name	Email	Telephone
The Designated Safeguarding Lead (DSL) and Vice Principal Pastoral	Jo North	Jo.north@franklin.ac.uk	01472 875000 ext 758

Deputy Safeguarding Lead (DDSL)	Charlotte Morris	Charlotte.morris@franklin.ac.uk	01472 875000 Ext 762
Deputy Safeguarding Lead (DDSL)	Darcie Harding	Darcie.harding@franklin.ac.uk	01472 875000 Ext 762
Deputy Safeguarding Lead (DDSL)	Vicki Jones	Vicki.jones@franklin.ac.uk	01472 875000 Ext 729
Deputy Safeguarding Lead (DDSL)	Gemma Scott	Gemma.scott@franklin.ac.uk	01472 875000 ext 820

All staff:

- All staff play a fundamental role in ensuring children, young people and adults are kept safe at the College through vigilance, attending training, reporting concerns, and acting swiftly where there is a risk of immediate danger or harm.
- Concerns are any worries about a particular student or colleague that need to be referred onto the Safeguarding Team, wherever there is a lack of surety or clarity about someone's safety.
- Risk of immediate danger or harm means a situation where action must be taken without delay in order to ensure adequate protection is put in place for the person at the centre of the issue. Staff are able to refer direct to Social Services or the Police in these circumstances should the need arise. The Safeguarding Team should be advised of any such action as soon as possible.

Use of Reasonable Force by staff on students:

KCSiE 2023 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard students. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. 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.

The College has adopted the Department for Education's guidance on the use of reasonable force in schools which is made available to all members of staff within the College (<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>)

Role of the Designated Safeguarding Lead:

- The Designated Safeguarding Lead for Franklin Sixth Form College is a member of the College Leadership Team
- Responsible for all safeguarding and child protection matters
- Responsible for the day-to-day operational management of safeguarding issues either directly or through the appointment and management of the Deputy Designated Safeguarding Lead(s)
- Cover must be in place when the DSL is absent. The DDSLs will deputise and if both are absent a senior member of the Safeguarding Team will assume the lead – all appropriately trained.
- Ensure students/parents/carers have access to copies of the College Safeguarding Guidance, which alerts them to the fact that referrals may be made, contact details for the Safeguarding Team, and the role of the establishment
- Responsible for staff induction materials and ensure all resources are relevant and up to date
- Create effective strategies to ensure safeguarding is embedded throughout the College
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding whether to make a referral, by liaising with relevant agencies
- Liaise with the Principal and Link Governor to inform of any issues/ongoing investigations

- Act as the Principal's delegate with Local Authority Designated Officer in reporting and managing cases of alleged staff abuse as appropriate and when required.
- Ensure Safeguarding Policy is updated and reviewed annually, and following ratification is returned by the governing body to the Local Authority
- Link with the NELSCP to make staff aware of training opportunities and the latest local policies and risks on safeguarding
- Provide an annual report to the Corporation.

Role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s):

- Refer cases of suspected abuse or allegations to the relevant investigating agencies
- Maintain and keep accurate records of all safeguarding cases
- Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies
- Maintain high levels of safeguarding and child protection training (minimum Level 3 in Safeguarding updated every 2 years) to be able to recognise signs of abuse, and when it is appropriate, to make a referral. Wider safeguarding training to be updated on an annual basis
- Ensure all Safeguarding Team members have access to appropriate supervision as required.
- Working knowledge of how the multi-agency partnerships, made up of the Local Authority, Clinical Commissioning Group, Multi Agency Prevent Board and the Police work collaboratively, the conduct of case conferences, and be able to attend and contribute to these when necessary
- Ensure all staff have access to and understand the College Safeguarding Policy, and to make it available in a range of formats including audible and non-English where requested
- Ensure all staff have child protection/safeguarding induction training and can recognise and report any concerns as they arise
- Keep detailed, accurate and secure written records of referrals/concerns
- Have access to resources and attend relevant or refresher training courses and to update training annually

- Where a young person leaves an establishment, ensure the file/information is transferred to a new establishment in line with the Working Together to Safeguard Children Guidance 2018
- The Deputy Designated Safeguarding Leads should have the status and authority within the College to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Whilst the activities of the DSLs can be delegated to appropriately trained deputies, the ultimate responsibility for child protection remains with the DSL: this lead should not be delegated.

Role of the Governing Body, College Leadership Team and Principal & Chief Executive

A Governor is nominated with special responsibility for Safeguarding nominated by the Corporation. All governors will receive the appropriate safeguarding and child protection training at induction. They will liaise closely with the Designated Safeguarding Lead and ensure appropriate systems and procedures are in place that meet the statutory requirements for this area of activity.

The governing body will appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full governing body. The DSL cannot also be the lead governor with responsibility for child protection.

The Governing Body must:

- Create a culture where the welfare and safety of students is paramount and staff feel confident to challenge over concerns
- the governing body should ensure the institution has a Safeguarding Policy and procedures that satisfy and evidence statutory requirements and consider safeguarding needs as set out in the Department of Education 'Keeping Children Safe in Education 2014 and all updates and the Prevent Duty Guidance 2015;
- has an effective Safeguarding and Child Protection Policy (updated annually and on the website) as well as a Staff Code of Conduct and both are provided to, and followed by, all staff
- have procedures for dealing with allegations against staff/volunteers that comply with NELSCP procedures, balance the need to protect children whilst protecting

staff/volunteers from false/unfounded accusations and ensure procedures are in place for referral to the Disclosure and Barring Service (DBS)

- Appoint a DSL, who is a member of the College Leadership Team, trained annually and that the responsibilities are explicit in the role holders job description. The DSL should be given time, funding and training to support this role. There should always be cover for this role
- ensure all new staff who work with young people receive written guidance about the institution's Safeguarding policy/procedures and name/contact of DSL
- ensure designated staff receive multi -agency training appropriate to their role, when first appointed, and refresher training annually
- all staff receive refresher training annually
- all students receive appropriate safeguarding and Prevent education
- ensure that there are appropriate filters and monitoring systems in place. Students should not be able to access harmful or inappropriate material from the College IT system
- remedy any deficiencies or weaknesses in Safeguarding arrangements without delay
- annually review policies/procedures and how duties are discharged
- request multi-agency partnership advice if required (LAs can provide advice/support and access to training/policies/procedures, but do not have to and can charge)
- ensure a senior manager is designated as the senior lead for Prevent
- scrutinise and quality assure the work of the DSL and Safeguarding Team
- in addition, the Chair of the Corporation is nominated to be responsible for liaising with partner agencies, as appropriate, in the event of the allegation of abuse being made against the Principal.

The Principal must ensure:

- ensure that policies , Staff Code of Conduct and procedures are fully implemented and followed by all staff
- sufficient resources and time are allocated so that the DSL/ DDSLs and staff can attend training, strategy discussions, multi-agency meetings, contribute to assessments including cover arrangements where necessary to carry out their role effectively

- Ensure students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- make referrals to the Local Authority Designated Officer where allegations of abuse by staff are brought forward, or delegate that responsibility to the DSL where required
- ensure staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with public interest disclosure policies
- the operation of safe recruitment and checks on new staff and volunteers
- ensure that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service (DBS)
- undertake regular training in safeguarding and child protection
- ensure that the College adheres to Safer Recruitment procedures and ensures appropriate checks are carried out on all members of staff and volunteers.

3.30 Public Interest disclosure

Staff should acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies (Public Interest Disclosure Act 1998). This should be a mechanism by which staff can voice concerns, made in good faith, without fear of repercussion. Staff can also use the NSPCC whistle-blowing helpline number 0800 028 0285, if required.

3.31 Staff Training

All members of the Safeguarding Team are trained to the appropriate level and receive regular updated training and information.

All staff receive adequate training to familiarise themselves with Safeguarding issues and responsibilities at induction (to include 'Part One of KCSiE 2023') and updated at least once on an annual basis, and all staff with a role in directly working with under 18s will be required to read and understand Part One and Annex A of KCSiE 2023.

Staff have also undertaken specific training sessions on sexual harassment and sexual violence to ensure a whole College approach is adopted and embedded. Termly training is provided on emerging themes and local risks to all staff.

3.32 Safer Recruitment

The College pays full regard to DfE guidance on Safer Recruitment in Education which is detailed in KCSIE 2023. It ensures that all appropriate measures are applied in relation to everyone who works in the College.

Safer recruitment practice includes:

- scrutinising applicants credentials
- verifying identity and academic qualifications
- obtaining professional and character references
- checking previous employment history including gaps in employment
- checks on health and physical capacity for the job requirements
- specific safeguarding interview questions
- undertaking Disclosure and Barring Service (DBS) checks
- right to work checks
- social media checks as part of due diligence on shortlisted candidates

The College's approach to Safer Recruitment is included in the Recruitment & Selection Policy. All staff members must undergo safeguarding and child protection training at induction. The training is updated at least annually.

All members of the College Leadership Team involved in recruitment and selection are trained on safer recruitment and this updated every three years.

All recruitment materials refer to the College's commitment to safeguarding and promoting the welfare of its students. It is the College policy to have at least one person on an interview panel who has completed Safer Recruitment Training.

3.33 Relevant Statutory Legislation and Guidance

The College will ensure that all staff and students are aware of and adhere to the relevant legislation and guidance, both statutory and non-binding, that attaches to all aspects of the Safeguarding agenda².

3.34 Related College Documents:

Staff should make themselves aware of the following related policies and procedures

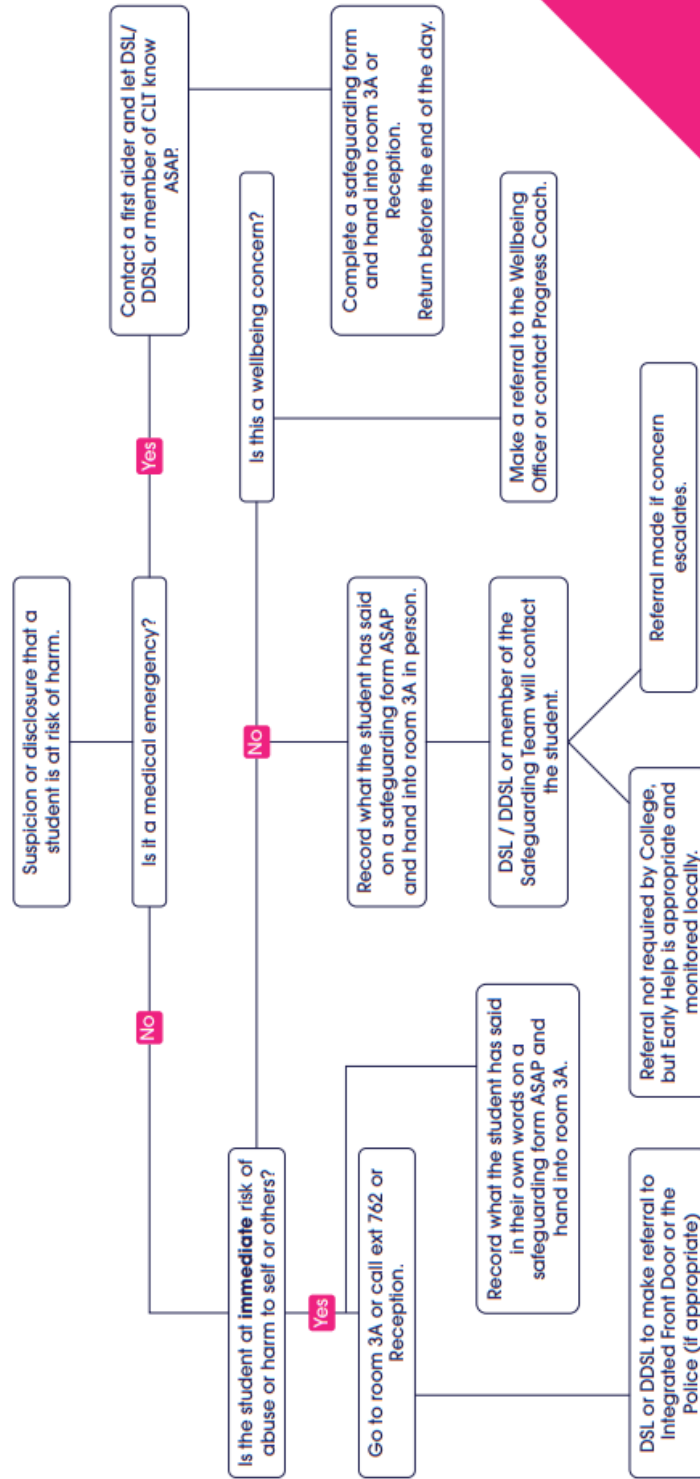
- Staff Code of Conduct
- Recruitment and Selection Policy
- Prevent Policy
- College / Student Agreement
- Health and Safety Policy
- Learning Behaviour Policy
- ABC Expectations
- Allegations Management Policy
- Fitness to Study Policy.

Review

This policy statement will be reviewed annually or sooner, in response to changes in legislation or College organisation.

² Please refer to Staff Code of Professional Conduct and Student Management Policy

Safeguarding procedure for staff responding to a disclosure or suspicion of abuse or harm



Annex 2

Safeguarding Reporting Form

Incident No:

STUDENT SAFEGUARDING INCIDENT REPORT FORM

Student Name: Student ID:	Reported by:
Progress Coach:	Date:

Outline details of incident: (attach further details if applicable)
--

Referred to: (Should be a member of the safeguarding team- Please check the Safeguarding Duty Rota)
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CMS	DHA	VJO	SHA	JNO	LOA	GSC	NKO	STA	CSU	SJE	JRI
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Annex 3

Substance Misuse Guidance

This guidance applies to all users studying, working or visiting College. It includes all educational visits and residential activities. The guidance applies to substance-misuse within, or having an effect within, the grounds and premises of the College. This includes all settings where College activity (including off site visits and residential) takes place.

The College may authorise some College events at which alcoholic drinks are available to staff, guests and students over the age of 18 years.

Prescribed drugs may only be used by the person for whom they are prescribed.

Alcohol may not be consumed outside of licensed areas except at authorised events.

Smoking and vaping is not permitted anywhere on the College premises except in designated smoking shelters.

No substances, either legal or illegal, may be used for the purpose of intoxication on College premises. So-called 'legal highs' (psychoactive substances) are included in this definition.

The possession and/or distribution of paraphernalia on College premises is also strictly forbidden and, where found, will result in seizure of the items and reporting to the Police.

The sale or distribution of illegal substances either within or outside the boundaries of the College will be dealt with as gross misconduct and the strictest penalties applied. The Police will be informed in all cases.

The College reserves the right to require any College user to submit to a drugs test where there is a reasonable suspicion of illegal substance misuse. Refusal to participate could be viewed as prejudicial in any subsequent disciplinary scenario.

Franklin Sixth Form College is committed to –

- Providing a safe and supportive learning environment for students to stay healthy and safe by increasing support for young people engaged in substance misuse, and for staff affected by dealing with these issues
- Helping and supporting, as far as is practical, those students who either have a personal substance-misuse issue or whose lives are affected by the substance-misuse issue of a partner, relative or friend
- Facilitating the prevention of any substance-misuse through education, training and developing good practice and actively discouraging the non-medical use of substances on College premises (with the exception of alcohol for over 18s within licensed areas, or in authorised circumstances)

- Recognising and accepting the College's legal responsibility under the Misuse of Drugs Act (1968 (revised in 1971 and 1993) in not knowingly permitting any user of College premises or grounds to produce, supply, possess or be under the influence of any banned or illegal substances
- Taking appropriate action in any instance where there are students, staff or visitors possessing, using, dealing or producing any substances for the purposes of intoxicating themselves or others
- The Safeguarding Team will act as the first point of contact for all substance misuse issues related to students and will be responsible for providing on-going support where required, and external referral where necessary

Franklin Sixth Form College will endeavour to:

- Maintain confidentiality in accordance with College policies
- Facilitate time-off for advice and treatment in accordance with the usual student sick leave arrangements
- Assess the severity of incidents and situations and carry out normal disciplinary procedures if student behaviour is deemed to be of significant risk of harm to self or others.
- Facilitate and support an affected student's return to previous studies.

General Medication:

Storage:

- All medication must be stored appropriately, in a locked Medicine Cabinet.

NOTE:

No member of staff should dispense any tablets or medicines to treat illnesses or provide medical assistance for general illness or ongoing health challenges to any student of Franklin Sixth Form College unless trained to do so. Only trained First Aiders should provide any emergency care as designated in the College's First Aid Procedure.

Annex 4

Police Contact number for reporting possible FGM cases: Telephone 101