

<b>Policy Title</b>	<b>NCG Safeguarding Policy</b>	
<b>Policy Category</b>	Compliant	
<b>Owner</b>	Executive Director of Quality	
<b>Group Executive Lead</b>	Chief Executive Officer	
<b>Date Written</b>	May 2022	
<b>Considered By</b>	Safeguarding Council	
<b>Approved By</b>	Corporation	
<b>Date Approved</b>	September 2022	
<b>Equality Impact Assessment</b>	The implementation of this policy is not considered to have a negative impact on protected characteristics	
<b>Freedom of Information</b>	This document will be publicly available through the Groups Publication Scheme.	
<b>Review Date</b>	September 2023	
<b>Policy Summary</b>	This version ensures alignment with KCSIE 2022 which has strengthened aspects relating to sexual violence/harassment, disclosure, domestic abuse, equality and governance. This version also references the use of MyConcern. This version also includes links to Safer Suicide Strategy in line with OfS Suicide-Safer Universities initiative.	
<b><u>Applicability of Policy</u></b>	<b><u>Consultation Undertaken</u></b>	<b><u>Applicable To</u></b>
Newcastle College	Yes	Yes
Newcastle Sixth Form	Yes	Yes
Carlisle College	Yes	Yes
Kidderminster College	Yes	Yes
Lewisham College	Yes	Yes
Southwark College	Yes	Yes
West Lancashire College	Yes	Yes
Professional Services	Yes	Yes
<b><u>Changes to Earlier Versions</u></b>		
<b><u>Approval Date</u></b>	<b><u>Summarise Changes Made Here</u></b>	
<b>Sep 22</b>	This version ensures alignment with KCSIE (Keeping Children Safe in Education) 2022 which has strengthened aspects relating to sexual violence / harassment, disclosure, domestic abuse, equality and governance. This version also references the use of MyConcern. This version also includes links to Safer Suicide Strategy in line with OfS (Office for Students) Suicide-Safer Universities initiative	
<b>Sep 21</b>	Annual update to align with KCSIE 2021 / OfS and strengthens guidance associated with sexual abuse; substantive changes highlighted in yellow.	
<b>April 20</b>	Interim update following requirement for home study and working during COVID19 lockdown	
<b><u>Linked Documents</u></b>		
<b><u>Document Title</u></b>	<b><u>Relevance</u></b>	
<b>NCG Safeguarding Procedure</b>	Local arrangements for implementation of this policy within colleges.	
<b>Admissions Policy / Recruitment Policy</b>	Arrangements for safe recruitment of staff	
<b>Attendance Management Policy</b>	Monitoring regular attendance of students	
<b>Disclosure Policy</b>	Whistleblowing arrangements	
<b>Equality Diversity Inclusion Belonging Strategy and Policy</b>	Arrangement for promoting and embedding EDI into our strategic themes and aims	
<b>Health, Safety and Wellbeing Policy</b>	Arrangements for keeping staff, students and visitors to the college safe and well.	
<b>Student Positive Behaviour Policy</b>	Learner review process is an important way in which a learner may make a disclosure.	



<b>Teaching, Learning and Assessment Policy</b>	Makes clear the method by which leaders undertakes periodic evaluation of learner experience and welfare in their learning environment
<b>Unified Tutorial, Progress and Attainment Policy</b>	Arrangements to facilitate and record the learner journey. Extends to recording of the learner journey from initial assessment, through to achievement and progression
<b>Drugs Alcohol and Weapons Policy</b>	Arrangements for dealing with allegations or use of drugs, alcohol and weapons. Extends to the protocols and permission to search students. Recently updated following case review of child Q.

Equality Impact Assessment - July 2022

	Judgement	Explanatory Note if required
<b>EIA 1 - Does the proposed policy / procedure align with the intention of the NCG Mission and EDI Intent Statement in 2.0?</b>	Yes	Business Critical Policy, related to the safety and welfare of learners at NCG
<b>EIA 2 - Does the proposed policy / procedure in any way impact unfairly on any protected characteristics below?</b>		
<b>Age</b>	No	The statutory requirements for safeguarding are primarily aimed at younger learners (children) and adults at risk, however arrangements in this policy will support all learners
<b>Disability / Difficulty</b>	No	
<b>Gender Reassignment</b>	No	
<b>Marriage and Civil Partnership</b>	No	
<b>Maternity and Pregnancy</b>	No	
<b>Race</b>	No	
<b>Religion or Belief</b>	No	
<b>Sex</b>	No	
<b>Sexual Orientation</b>	No	
<b>EIA3 - Does the proposed policy / processes contain any language / terms / references / phrasing that could cause offence to any specific groups of people or individuals?</b>	No	
<b>EIA4 - Does the policy/process discriminate or victimise any groups or individuals?</b>	No	
<b>EIA 5 - Does this policy / process positively discriminate against any group of people, or individuals?</b>	No	
<b>EIA 5 - Does this policy / process include any positive action to support underrepresented groups of people, or individuals?</b>	Yes	The policy highlights learners that may typically be deemed vulnerable and the arrangements to support.
<b>EIA 6 - How do you know that the above is correct?</b>	<p>This policy has been reviewed by the NCG Safeguarding Council and NCG Executive, prior to approval by NCG Corporation.</p> <p>The membership of these groups is indicative of the wider population within NCG.</p>	

## 1. Scope and Purpose of Policy

NCG, and its constituent colleges, is committed to the safety and well-being of its learning community. In doing so, this policy will be adopted through a single supporting procedure and associated appendix, for college specific terms and considerations.

Note the term **college** refers to the constituent parts of NCG and professional services refers to those NCG centralised services, nominally located in Rye Hill House Newcastle and residing in college business support functions.

**NCG staff** refers to all staff in the organisation, including volunteers, sessional workers, agency staff and volunteers.

The term **learner** is used in its widest sense and includes all learners, whether young people aged 14-18, learners with specific high needs, apprentices, adult learners, or higher education students.

The term **DSL** is used to refer to the designated safeguarding leads at NCG. For specific reference Group ((GDSL) (Group Designated Safeguarding Lead)), or at College (CDSL) will be used.

The term 'child on child' abuse is used within this version, to comply with KCSIE 2022 and to specifically relate to young people.

### 1.1. Safeguarding Young People (Children)

In June 2004 Section 175 of the Education Act 2002 came into force. The provisions of Section 175 make explicit the responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, arrangements must be made in accordance with any guidance issued by the Secretary of State.

Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002), the Education (Independent School Standards) Regulations (2014) and the Non-Maintained Special Schools (England) Regulations (2015). Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise. KCSIE is updated annually, this policy is in line with the September 2022 version.

KCSIE (2022) defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all children to have the best outcomes.

This policy and the derivative college procedures have been developed in response to KCSIE. The Children Act (1989) defines a child as any person under the age of 18 years. This includes all 14–16-year-old children attending any College of NCG for whom additional procedures apply.

## **1.2. Young Learners with special education needs or disabilities (SEND)**

Learners with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Staff should note the additional barriers that can exist when recognising abuse and neglect in this group of children (see KCSIE, p 48, para 198).

## **1.3. Young learners who are Lesbian, Gay, Bisexual or Transsexual (LGBT)**

Whilst the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Young learners who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with a tutor, or member of staff (see KCSIE, p49, paras 202-204).

## **1.4. Safeguarding Adults at Risk**

This policy and the derivative procedure have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES / NIACE publication “Safer Practice, Safer Learning “(2007). The guidance applies to all education providers of post-16 learning and skills.

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and because of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 19 or above at the point of enrolment.

The term ‘Adult at Risk’ is used to describe a vulnerable adult.

At the time of writing, the UK remains within a COVID-19 pandemic, as such this policy is required to be compliant with the following, additional guidance: <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

The NCG Executive will continue to monitor the guidance and provide relevant updates on the NCG website. [Coronavirus \(COVID-19\) Information - NCG \(ncgrp.co.uk\)](#). Key policies, including this one, will continue to be dynamically updated, as and when required.

## 1.5. The Types and forms of Abuse

Abuse is described as 'a violation of a person's human or civil rights by any other person or persons'.

There are four main categories of abuse that apply to both children and adults at risk:

- Physical.
- Emotional.
- Neglect.
- Sexual.

There are additional categories of abuse for adults at risk:

- Modern Slavery / Exploitation.
- Organisational / Institutional.
- Discriminatory.
- Financial.
- Domestic.
- Self-Neglect.

There are various signs and indicators to be aware of, which can be separated into two categories: physical and behavioural / emotional.

Keeping Children Safe in Education (2021) defines a further 16 specific safeguarding issues, including:

- Bullying including Cyber Bullying.
- Child Sexual Exploitation and Child Criminal Exploitation.
- Domestic Abuse, Violence and children as witnesses to abuse.
- Drugs.
- Fabricated or Induced illness.
- Faith use.
- Female Genital Mutilation (FGM).
- Forced Marriage.

- Gangs and Youth Violence.
- Gender Based Violence against Women and Girls (VAWG).
- Mental Health.
- Private Fostering.
- Radicalisation.
- Sexting.
- Teenage Relationship Abuse.
- Trafficking.

**Several recent additions to the KCSIE guidance / NCG Policy (since 2020) are highlighted below:**

**1.5.1. Child on Child abuse, including sexual abuse and harassment**

Examples of child-on-child abuse (from a longer list including physical and sexual abuse), include:

Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery).

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Down-blousing, which involves taking a picture down a dress, vest, shirt, or blouse, with the intention of viewing a person's breasts.

Initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Staff are required to understand the procedures to minimise the risk of child-on-child abuse and know how to respond to allegations.

All staff are requested to be vigilant around issues associated with sexual violence and sexual harassment between children and adults at risk in schools and colleges.

The KCSIE guidance provides clarity of managing child-on-child abuse and additionally physical relationships between children.

In the last 24 months there has been more attention drawn to this area and the behaviour of pupils / learners / students in and outside the educational organisation. NCG Colleges will follow [DfE \(Department of Education\) guidance on Relationships Education and Sex Education \(RSE \(Relationship and Sex](#)

[Education\)\) child on child abuse](#) and this will be integrated into college tutorial content. Additional notes have been added to appendix A with regard to sexual abuse and all staff should now assume that sexual harassment and online sexual abuse is happening, whether it is reported or not. Staff are required to be proactive in promoting RSE in tutorial and within the wider curriculum and be vigilant in monitoring and responding to any concerns by referring to the CDSL. CDSLs will ensure that appropriate support is available for both the victim, and perpetrator of child-on-child abuse (given the fact the latter may be children / adults at risk and may themselves require training and support).

Teachers of Higher Education provision should note the [Office for Students Statement of Expectations and resources](#) available to support this agenda.

<https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/prevent-and-address-harassment-and-sexual-misconduct/statement-of-expectations/>

#### **1.5.2. Serious Violence, Organised Violence, Knife Crime and County Lines**

Staff are required to be vigilant around the indicators of learners being at threat and/or drawn into serious violence and gang cultures. Staff should understand the local hazards and risks and advise learners on how to avoid them.

Advice for colleges is provided in the Home Office's documents: [Preventing Youth Violence and Gang Involvement](#) and [Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance](#) these documents should be reference in the procedure.

#### **1.5.3. Online Safety and Remote Study / Working**

Colleagues are additionally expected to be vigilant around harmful online material that may constitute one or more types of abuse. The period of home study resulting from the COVID outbreak throughout 2020 and 2021 has increased the amount of online learning and study significantly, and staff are required to be aware of the risks to their learners for them to take steps to reduce those risks through training and education.

There are four areas of risk associated with online safety content:

- Content (being exposed to illegal or harmful content – for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism).



- Contact (being subjected to harmful online interaction with other users, including commercial advertising and adults posing as children).
- Conduct (personal online harm – for example, making, sending and receiving explicit images).
- Commerce (including online gambling and gaming).

Additional arrangements (such as additional training, learner engagement, wellbeing monitoring and learner surveys) may be necessary in the event of a prolonged period of home study, which will be advised to staff via the NCG website.

<https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/>

#### **1.5.4. Child Sexual Exploitation and Child Criminal Exploitation**

Child sexual exploitation (CSE) can include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet. This exploitation can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge – for example, through others sharing videos or images of them on social media.

Since 2020/21, the DfE have updated their guidance notes to clarify that the experiences of girls being exploited can be different to boys, and training should identify the differences in risks and indicators.

Staff should be aware that children involved in criminal exploitation often commit crimes themselves, and their vulnerability as victims must concurrently be recognised as such with appropriate support required.

KCSIE 2021 provided additional information on both CSE and CCE (Child Criminal Exploitation) which are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and / or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to

complex organised abuse. It can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted that as well as being physical, exploitation can be facilitated and / or take place online.

#### **1.5.5. Mental Health / Mental Wellbeing and Fitness**

If a staff member or student has a concern about a learner's mental wellbeing, this is also a safeguarding concern. Immediate action should be taken: this Safeguarding Policy and Safeguarding Procedure must be followed and concerned parties are required to speak to the Group / College Designated Safeguarding Lead.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe learners' day-to-day behaviours and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff should also be aware that where learners have suffered abuse, neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences can impact on a learner's mental health, behaviour and education. Whilst not always the case, staff should be aware that a learner who is perpetrating bullying / harassment / harm to other learners, may also be the victim of abuse / neglect themselves.

NCG recognise that mental health problems can on occasions develop into self-harm behaviours and suicidal thoughts / heightened suicidal risks. NCG are committed to supporting students' their families and staff with all aspects of mental health and have developed a Suicide Safer Strategy in conjunction with guidance from the OfS and the Suicide Safer Universities framework. The Safer Suicide Strategy can be found at Appendix D.

#### **1.5.6. Radicalisation and Extremism**

The [Prevent Duty Guidance](#) defines **radicalisation** as '*the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups*'. The Counter-Terrorism and Security Act 2015 places a duty on specific organisations, including colleges, to have regard to the need to prevent people from being drawn into terrorism. This policy seeks to put in place the requirements of the Act through a

Prevent Risk Assessment – an NCG cascade policy to be adapted and implemented locally.

[The Counter Extremism Strategy 2015](#) defined **extremism** as *‘the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs.’* For the purposes of clarification, **terrorism** is the act or threat designed to influence a body or organisation through intimidation and violent action.

### **1.5.7. Bullying and Harassment**

Bullying and harassment is a form of emotional abuse and staff must be aware that both the victim(s) and the perpetrator(s) may need specific support. For example, whilst it is natural to focus on / arrange personalised support for the victim, the bully (perpetrator) may themselves be a victim of abuse, and their behaviour may be therefore a symptom of such abuse. It is also worth clarifying that the perpetrator may be a student, or a member of staff, employer supervisor or contractor / supplier to NCG.

- The expectations for student conduct are laid out in the Student Positive Behaviour Policy (owner Group Quality).
- The expectations for staff are set out in the Staff Code of Conduct (owner Group HR).
- The expectations for supplies are set out in the Supplier Code of Conduct (owner Group Finance / Procurement).

Staff and students should report alleged bullying and harassment using the procedures set out in this Safeguarding Policy by notifying the designated safeguarding lead, whether the alleged bully is a student, or a member of staff.

Should the alleged perpetrator be the college principal, then the referral should be made directly to the Group Designated Lead, Group Deputy Designated Lead or CEO. Should the perpetrator be any of these senior post holders, then it should be referred to the CEO or Chief Operations & Compliance Officer and Secretary to the Board (if the allegation is against the CEO).

### **1.5.8. Dangers of Gambling and Gaming**

Staff and students should be made aware of the risks associated with gaming and gambling, for example the potential risks associated with debt, crime, financial abuse and associated mental health conditions. College tutorial activity / signage must clearly signpost professional help and support.

### 1.5.9. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## 2. Policy Statement

All staff (including agency, volunteers and contractors) should be aware of systems / approaches / procedures within their college which support safeguarding, and these should be explained to staff as part of staff on-boarding process and annual updates. This will include:

- NCG Safeguarding Policy (this document) and the NCG Single Safeguarding Procedure for local reporting arrangements.
- NCG Positive Student Behaviour Policy.
- Staff Code of Conduct.
- Designated Safeguarding Leads and key contacts.

It is essential that all children and adults at risk are protected from abuse and have the right to access education and training free from the fear of harm and are protected from mistreatment and abuse, including the risk of radicalisation.

Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on 'specified authorities' which includes NCG, to comply with the *Prevent Duty Guidance: for England and Wales*.

NCG recognises that governors, members of staff and students each have a role to play in safeguarding the welfare of children and adults at risk and preventing their abuse, with specific attention paid to the safeguarding risks of Looked After Children and children / adults at risk who have additional support needs.

In accordance with the statutory guidance across the UK provided in "Keeping Children Safe in Education" and "Safer Practice, Safer Learning" (2007), the following arrangements apply to each College of NCG:

- NCG's Safeguarding Policy applies to all colleges and is made available to parents / carers, learners and customers via a website link: <https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/>
- The KCSIE guidance is to be available via the same link on NCG Intranet and college principals are responsible for ensuring all staff have read it. On their behalf, the GDSL will coordinate annually a staff declaration via iTrent. Reports will identify those staff who have failed to comply and

action to resolve will be taken. For staff new to NCG, the mandatory training will be updated annually.

- The NCG Safeguarding Procedure is developed and updated to support this framework. These procedures are:
  - Developed in accordance with local authority guidance and locally agreed interagency procedures; DfE Guidance Keeping Children Safe in Education and Safer Practice, Safer Learning (2007).
  - To include specific guidelines for dealing with allegations of abuse against members of staff and volunteers.
  - Reviewed and updated annually by Group and College Designated Safeguarding Leads.
  - Approved by the Executive and adopted as procedures by the Local Board and College Leadership Team.
- NCG operates a safe recruitment procedure and ensures that all appropriate checks are carried out on staff and volunteers<sup>1</sup> who work with all learners in regulated activity and are therefore a position of trust. Advertisements and recruitment packs must be designed to make clear the Group's rigorous approach to safe recruitment and seek to deter unsuitable / unsafe applicants. A single central register will be held by Group HR. Interview panels must have at least one safer-recruitment-trained manager present and questions must seek to determine the current understanding of safeguarding as a minimum. Group HR will produce a weekly exception report for college principals and the GDSL with detail of any pending checks, preventing a start date, or detailed supervised arrangements. Any manager starting a new member of staff without due clearance would place learners, the college and Group at considerable risk and this would be referred to formal staffing procedures.
- HR will ensure that a process will be in place to verify that agency staff have been appropriately checked, by the agency. This must be at the appropriate level of check for the role they are undertaking at NCG and it must be done prior to starting work, as set out in the NCG Recruitment and Criminal Disclosure Policy / Procedures. Positive disclosures, and the outcome decision, must be notified to NCG HR by the Agency.
- Group Procurement / Group Estates will ensure that all contractors are either fully supervised in line with contractor risk assessments or cleared at the appropriate level, and that records are maintained. The Group will maintain a zero-tolerance approach to behaviour that does not align with this policy, and the derivative procedure.
- The college principal, working with Group Estates, is responsible for physical security in all college buildings. Adequate measures / deterrents for preventing access to unauthorised personnel must be in place i.e. use of lanyards / CCTV / barriers / security staff.

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<sup>1</sup> Staff should note that volunteer DBS checks are often free of charge and should therefore not be a cost barrier for community-minded individuals wishing to get involved

- A member of the Group Executive, the Executive Director of Quality is NCG's Group Designated Safeguarding Lead (GDSL). The GDSL is responsible for this policy framework and to ensure that KCSIE is enacted in all colleges by working with the principal and a team of College Designated Safeguarding Leads (CDSLs) who have delegated responsibility for dealing with all safeguarding issues across NCG's colleges. The Deputy GDSL is the Director of People and Development.
- The potential risks accompanying external speakers must be considered in line with the NCG Prevent Action Plan and Code of Practice on Freedom of Speech Policy. The nature of the proposed delivery content should be considered to be in line with British Values, NCG Values and NCG's Equality Diversity Inclusion and Belonging (EDIB) Policy. Staff should follow the steps laid out in the Code of Practice Policy when organised and facilitating external speakers. They should be treated as visitors when on campus, or on when presenting virtually, and be supervised by a member of NCG's staff (whether physically on campus, or virtually if on Teams / Zoom / Google etc).

### **2.1. College Designated Safeguarding Leads (CDSL)**

- The college principal will identify a senior manager as the College Designated Safeguarding Lead (CDSL) with the responsibility for safeguarding arrangements at the College.
- College Designated Deputy Safeguarding Leads must be identified to deputise in the absence of the College Designated Safeguarding Lead; CDSLs are required to inform the GDSL of the current deputies.
- Additional Nominated Safeguarding Managers / Safeguarding Officers are identified within faculties / schools / departments to ensure that safeguarding requirements are met at local level.
- In addition to basic safeguarding training, NCG's designated safeguarding leads (including Group lead) are required to undertake appropriate training, determined by their operational role, to standards agreed by the Safeguarding Children Partnerships and their Local Adult Safeguarding Board. This will extend to refresher training at two yearly intervals to keep knowledge and skills up to date<sup>2</sup>. Designated Safeguarding Leads, the College Deputy Designated Leads and the additional Nominated Safeguarding Managers / Officers should ensure ongoing CPD (Continuous Professional Development) as and when appropriate, through internal safeguarding meetings and external events. This training is also undertaken by the HR / People Director. Designated Safeguarding Leads will also be provided with additional Reflective Supervision training, to support them with the line management of staff involved in sensitive / emotive safeguarding cases.

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<sup>2</sup> Note Covid has delayed the availability of some local safeguarding training – if this applies, DSLs must complete any refreshers as quickly as possible



- Group and College safeguarding leads are expected to be contactable during normal business hours. NCG and College websites must make clear the external support available during out of hours times (usually on weekdays after 9pm and before 8am, and at weekends). College principals must ensure that DSL cover, or clear signposting to external agencies, is available during extended periods of holiday.

### 2.2. NCG Staff Responsibilities

- **NCG Governors** have a duty to ensure that this policy is current, follows statutory requirements and meets best practice. NCG's Governors will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole. The training will be updated every two years and governors are required to read and understand the applicability of KCSIE parts 1 and 2 annually. Governors should understand how NCG implemented its obligations under the Human Right Act 1998, Equality Act 2020 and their multi agency safeguarding arrangements.
- **NCG leaders** (Executive, College Senior Leaders, Directors and Heads of Depts / Service, DSLs (Designated Safeguarding Leads)) are required to do the same as governors and additionally are required to implement this policy in full. The GDSL will undertake additional specialist training and will chair the **NCG Safeguarding Council** to review the policy, support implementation and share good practice amongst DSLs.
- **All NCG staff** have a responsibility to provide a safe environment in which young people and adults can learn, develop and thrive. NCG staff will be required to undertake e-learning training on joining NCG and every two years thereafter; they will also be required to declare that they have read and understood the annual update of KCSIE (part 1) and attended refresher / update training delivered by the DSL(s).
- **NCG staff teaching, supervising and working with children and adults at risk** are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff should always act in the best interests of the child or adult at risk.
- **All NCG staff** should be aware of indicators of abuse and neglect so that they are able to identify cases of children and adults at risk who may need help or protection.
- **All NCG staff** should be prepared to identify learners who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's or adult at risk's life, from the foundation years, through to the teenage years and beyond into all stages of adulthood. Any learner may benefit from early help, but NCG staff should

be particularly alert to the potential need for early help for a child / adult at risk who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory education, health and care plan).
- Is a young carer, adult carer.
- Is in care of the local authority.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing / goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family situation which presents challenges for the child / adult at risk, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home to their family from care and / or is care experienced.
- Is showing early signs of abuse and / or neglect, including child on child sexual abuse and / or online abuse.
- Is at risk of being radicalised or exploited.
- Is a privately fostered child.

### 2.3. What to do

- **All NCG staff** should know what to do if a child or adult at risk tells them they are being abused or neglected. Staff should also know how to manage the requirement to maintain an appropriate level of confidentiality, which means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's / adult's social care. Staff should never promise a child or adult that they will not tell anyone about a report of abuse, as this may not be in the best interests of the individual.
- All staff should be aware that young people and adults at risk may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, language barriers, or protected characteristics such as disability, or sexual orientation. This should not prevent staff from having a professional curiosity and speaking to the DSL or reporting via MyConcern if they have concerns about a child.



- The process for referral is to the College Designated Safeguarding Lead or their nominated team / deputies. Group Services will refer to the Group Designated Safeguarding Lead. The names and contact details for DSLs can be found open source on the [NCG website](#).
- Where a child / adult at risk is suffering, or is likely to suffer from harm, it is important that a referral to children's / adult's social care (and if appropriate the police) is made immediately. Referrals should follow the college and local authority's referral process and will be made by the College Designated Safeguarding Lead. In the unlikely event that the College Designated Safeguarding Lead or nominated deputy be unavailable, then staff are duty bound to refer to the local authority without delay. The staff member should call the local authority and ask to speak with the duty children and families or adult team (depending whether it is a child or adult at risk). If the referral involves concerns raised about an NCG staff member towards a child or adult at risk, HR must be informed immediately by the Group or College Designated Safeguarding Lead at [Referrals@ncl-coll.ac.uk](mailto:Referrals@ncl-coll.ac.uk), along with the local authority designated officer (LADO). In the unlikely event that the concern is about the Group or College Designated Safeguarding Leads, then the member of staff must contact the principal who will follow the same procedure.
- **All NCG staff** who have a concern about a child or adult at risk should follow the referral processes set out in this policy. Staff should expect to support social workers and other agencies following any referral.
- **All NCG staff** (including casual staff and volunteers) who will (or will potentially) work with young people are required to read and understand the document 'Keeping Children Safe in Education: information for all school and college staff' at least annually. Keeping Children Safe in Education is now part of the safeguarding and prevent module, as is the additional categories of abuse for adults; additional arrangements may be made for key publication updates.
- All staff in NCG who will (or will potentially) work with young people and adults at risk are required to undertake mandatory training to equip them to carry out their responsibilities for safeguarding young people and adults at risk effectively, which is kept up to date by refresher training at two yearly intervals. A log of training will be maintained by Group HR which will be sent at least fortnightly to college principals and Designated Safeguarding Leads for maintaining compliance.
- The **Safeguarding Council** is collectively responsible for ensuring that the modules are appropriate, current and accessible through the People Portal.
- The **College Designated Safeguarding Lead** and the recruiting manager (or their equivalent) must ensure that permanent staff, temporary staff and volunteers who work with children and adults at risk receive induction to include the Safeguarding Policy, Code of Conduct for staff and the College procedures for safeguarding children, young people and adults at risk, including their own responsibilities.

- All staff are required to comply with the NCG Code of Conduct. HR / DSLs / Leaders should also be mindful and adhere to the KCSIE guidance for sharing low level concerns, extending to NCG's contractors.
- The Chair of the Corporation, or in their absence, the Vice Chair, is nominated to be responsible for liaising with the local authority and / or partner agencies as appropriate, in the event of allegations of abuse being made against the Group Chief Executive.
- In terms of strategic oversight, the Corporation Board discharges its statutory leadership responsibility through NCG's Local Boards – this is due to the proximity of the Local Board members to the College Designated Safeguarding Leads and learners. Local Boards are required to name a Link Member for Safeguarding which is published as an appendix to this policy. Corporation assurance is met through reporting of the Group Designated Safeguarding Lead into the Corporation Board.

### 2.4. Safeguarding and Whistleblowing (Disclosure Policy)

- A member of staff with a concern about another member of staff should follow the same process in this policy and speak to the designated safeguarding lead or principal. Professional Services staff should refer to the Group Designated Safeguarding Lead, or HR / People Director. There is clear guidance in Part 4 of KCSIE for dealing with allegations and finding the right balance between an impartial and critical investigation of the facts and providing support to an employee.
- If the concern / allegation is with the CEO or principal, then it should be referred to the Group Executive Director for Governance, Assurance and Risk who will liaise with the relevant chair of governors.
- If the concern / allegation is with the Group Designated Safeguarding Lead, then it should be referred to the Chief Executive.
- NCG has a whistleblowing policy that protects staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties. This duty is contained with the NCG Disclosure Policy.
- Where the staff member thinks that the college will cover up malpractice, treat them unfairly if they complained, or if they have raised the matter before but the concern hasn't been dealt with, then they should report the issue to the Group Designated Safeguarding Lead or follow the Disclosure Policy.
- Independent advice is always available from the NSPCC:  
[help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### 2.5. General Arrangements

- **Group HR** will ensure that procedures for recruiting staff are in line with sector guidance – this will extend to use of application forms, the use of

references for interview, safer recruitment checks and using interview questions that are intended to identify any gaps in career and deter potential offenders / perpetrators. They will act proportionally in line with KCSIE if processes establish an ongoing or prior allegation against an applicant. Staff interview panels must have at least one manager trained in safer recruitment ((ETF (Education and Training Foundation) module or equivalent)).

- **Principals** will ensure that procedures are in place for the effective training and probation of staff and learners, taking time to ensure that learners understand the types of neglect, how that could be applicable in their own circumstances and how to seek help whilst ensuring that they remain safe.
- The **NCG Executive** will ensure that steps are taken to ensure that the NCG campus is a welcoming and safe environment; positive action will be taken to promote healthy lifestyles and mental wellbeing / fitness.
- **The Corporation** will remedy without delay any deficiencies or weaknesses regarding safeguarding arrangements that are brought to its attention.
- **NCG Data and Information Services** will ensure appropriate filters / blocks are in place in respect of potentially inappropriate online material. These should be reviewed and tested regularly and records maintained. Alerts based on keywords thought to identify potential harm will be reported to designated safeguarding leads. However, care should be taken to avoid 'over-blocking' and ensure that unnecessary restrictions are not placed on what learners can reasonably and legitimately access to further their studies and wellbeing.
- Policy is reviewed at least annually by the **Group Designated Safeguarding Lead** and information is provided to Governors about how the above duties have been discharged.
- All complaints, allegations or suspicions are taken seriously and discussed with the College Designated Safeguarding Lead and / or Group Designated Safeguarding Lead before any steps are taken. Where action is necessary, this will be undertaken with due regard to procedures within each college.
- The DfE places a specific requirement on colleges to refer to the ESFA (Education and Skills Funding Agency) in certain circumstances, as set out in the funding contract. The GDSL will undertake reporting to the DfE where applicable.
- The GDSL will inform the ESFA area manager of any substantiated referrals that involve NCG staff and send a copy of the annual safeguarding report to the DfE regional manager, once approved by governors.

### 2.6. NCG Safeguarding Council

- The **NCG Safeguarding Council** is a subgroup of the NCG Executive and is convened and chaired by the NCG Group Designated Safeguarding Lead. The Council will comprise of all college designated safeguarding leads and the Director of HR / People to ensure the adequacy and currency of policy.
- It shall meet at least half termly and DSLs will review policy and procedures, identify local risks and share best practice.
- The Council is intended to ensure that policy frameworks are current, to facilitate the transfer of knowledge (extending to local risk) and to provide an expert supervisory panel for peer support to DSLs.

### 2.7. MyConcern

- MyConcern is a specialist application to assist the secure referral, monitoring, and reporting of safeguarding incidents. It is configured to align with this policy and the operation is detailed in the NCG Safeguarding Procedure.

## 3. Referral to Group Services

College Safeguarding Leads are required to inform Group Services of the following referrals:

1. Learner / apprentice (children and adults at risk) referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults' Duty Team / Police / Channel whereby the learner is the alleged 'subject'.
2. Learner / apprentice (children and adults at risk) referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police / Channel whereby the learner is the alleged 'perpetrator'.
3. Staff referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police / Channel whereby the staff member is the alleged 'perpetrator'.

The NCG Prevent and Safeguarding Notification Form should be completed and emailed to [Referrals@ncl-coll.ac.uk](mailto:Referrals@ncl-coll.ac.uk) within 2 days of the referral. All correspondence will be held in the strictest confidence.

College Safeguarding Leads should also submit the form if the College DSL / Safeguarding Team is actively involved in a new referral, but the police is making the referral.

There is no need to submit the form, if external agencies are already actively involved with the learner's case prior to enrolment, periodic updates on agency progress and support (case notes) should instead be made in MyConcern.

There may be occasions where staff conscientiously refer the siblings of current enrolled students to Local Authority Services due to emerging concerns. In these cases, there is no compulsion to complete the Notification Forum, unless the potential outcome will have a likely and direct impact on the enrolled student. For

example, a potential intervention from the local authority / police / CAFCAS that would see the family's children removed from their parents / carers, or a potential threat to the learner is apparent because of making the disclosure. A note will still be made on MyConcern, tagged to the enrolled student for wider context.

### **3.1. Allegations against staff**

An allegation against staff will follow the investigative aspects of the NCG Staff Disciplinary Policy and ensure that a balanced, fair and diligent process is followed to determine whether there is substance to the allegation. Should the investigation determine that there is substance, it will then follow the procedures laid out in said policy.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead (DSL) should consider whether the child and / or the person who has made the allegation needs help and support, whether the allegation is due to underlying issues associated with abuse or harassment from someone else and whether this is a cry for help. For this reason, DSLs should be made aware of any allegations pertaining to the treatment of learners.

In some circumstances, a referral to an external agency may be appropriate. If a report is shown to be deliberately invented or malicious, then the appropriate manager will follow the procedure laid out in the NCG Student Positive Behaviour Policy.

Allegations against staff deemed as "low – level concerns" in accordance with KCSIE 2022 will also be recorded and reviewed by Designated Safeguarding Leads / HR / Line Managers.

### **3.2. Group Monitoring and Action**

The Group Designated Safeguarding Lead and designated Executive PA will monitor the external referrals on behalf of the NCG Executive.

The Group Designated Safeguarding Lead may be required to seek further clarification or advise next steps on occasion. Correspondence will be made through [Referrals@ncl-coll.ac.uk](mailto:Referrals@ncl-coll.ac.uk).

The Group Designated Safeguarding Lead will make arrangements to inform the Education and Skills Funding Agency / DfE of the referral of any cases that meet the criteria / clause in the funding agreement (clause 8.9).

### **3.3. Group Follow-up**

College Designated Safeguarding Leads are required to provide summary follow-up information following referral. The purpose of this procedure is to provide Group Services with oversight and assurance that the referral is being handled with due attention by the relevant agency or service.

From the 2022/23 academic year, updates will be contained within MyConcern.

In some cases, the issues will be resolved quickly, at which point a summary comment will be provided and the referral 'closed / filed / archived.' More complex cases may require ongoing monitoring and review – case notes will be held in MyConcern.

#### 4. Safeguarding and Data Protection Legislation

Wherever possible, Designated Safeguarding Leads will follow the principles of the UK GDPR; however, this should not be a barrier to the effective and timely communication of information related to safeguarding. Much of this information will be special category personal data or criminal conviction data and NCG has in place an appropriate policy document that covers processing such data.

*“The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.”*

KCSIE

Further guidance is available [here](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf), page 19 or [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/722305/Working Together to Safeguard Children - Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf)

#### 5. Supervision Arrangements for NCG DSLs

Supervision is a supportive and impartial reflective process within a safe environment to discuss current case / caseloads and reflect on current and future practice. Supervision is provided to ensure the wellbeing and training of the DSLs and wider safeguarding staff.

Supervision will be provided for DSLs in the following way.

- The Safeguarding Council will be a forum for sharing contextual examples and experiences. This will provide for occasional peer review, group supervision, and support. Members of the Council are encouraged to form a peer community and contact one another for support and guidance outside of the meetings.
- The Group DSL will organise at least one, and preferably two supervision workshops, per academic year for group supervision and training. This will be face to face at a convenient location.
- External supervision arrangements will be organised by DSLs for themselves, and their staff where required. They may wish to consider use of their peers in the Safeguarding Council, or indeed the wider NCG Safeguarding Team where appropriate.





- Link Governors will also provide a level of supervision. Whilst their primary role is to ensure that the appropriate policy and procedures are in place, link governors will have a proficient level of experience that may be useful for DSLs to share anonymised, contextual examples. [DSLs should not reveal personal details of the learners to governors due to the lower level requirement of DBS (Disclosure Barring Service) clearance<sup>3</sup>].

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<sup>3</sup> Governors are required to have a basic check, rather than enhanced.

## **Appendix A – Forms of Abuse**

All college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

- 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. Abuse can take place online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 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.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently 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 a child, although it may occur alone.
- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving an elevated level of violence, whether 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 activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers which are abusive in nature.

Staff must not downplay certain behaviours – for example, dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or "boys



being boys' – as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst-case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

Staff should now consider that sexual abuse between children and online abuse is likely to be happening in the College, even when there are no reports. Staff must continue to be proactive in providing advice and guidance regarding what is acceptable when engaging in a sexual relationship, including inappropriate language and behaviour and the consequences of sharing of sexual images including the law and necessity of consent for adults and children above the age of consent. For example, students should be made aware of support such as [Childline](#) when seeking to remove a nude image online, and DSLs will be aware of how to support such action.

- Neglect: 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 or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix B - COLLEGE SAFEGUARDING POLICY CHECKLIST

The following should be included in the College Procedures:

Procedure Definitions and Mandatory Content	
1.	The procedure should <b>outline the definitions, signs and symptoms of the four kinds of abuse and neglect, additional content on child-on-child sexual harassment, online abuse and domestic abuse must be prevalent given recent updates in this document (Sep 2022).</b>
2.	The procedure should <b>outline the difference between a 'concern' and 'immediate danger' or 'at risk of harm'.</b>
3.	The procedure should include the <b>signs and symptoms of child sexual exploitation and child criminal exploitation.</b>
4.	The procedure should include the signs and symptoms of <b>female genital mutilation</b> and should refer to the <b>mandatory duty on teachers to report disclosures on FGM about a female under 18.</b>
5.	The procedure should make the responsibilities of staff explicit.
6.	The procedure must be made available and explained to students at <b>induction</b> ; they should be made aware of the NCG Positive Student Behaviour policy or equivalent.  It should detail the specific wider training to be delivered to students including Prevent, relationship and sex education, British Values and risk associated with serious violence / gang cultures as a minimum.
7.	The procedure should include the college's duties under the Counter Terrorism and Security Act 2015 ( <b>The 'Prevent Duty'</b> ) and adopt, adapt and implement the NCG Prevent Risk Assessment.  There will be a clear definition of what constitutes radicalisation and extremism.  The procedure should additionally extend to a description of the risk associated with serious violence, gang cultures (including County Lines) and knife crime. Key government documents as detailed in 3.5 should be referenced in the procedure.
8.	The procedure should define <b>'Private Fostering'</b> and note that there is a mandatory duty to inform the local authority of children in such arrangements.
9.	The procedure should refer to <b>the key areas of risk that students in the college may encounter.</b> Outlining the signs and symptoms staff might notice is useful. You can use information from the local authority child health profiles to identify where your students are at higher risk and ensure those issues are a focus. You can find the profiles here: <a href="http://www.chimat.org.uk/resource/view.aspx?QN=PROFILES_STATIC">http://www.chimat.org.uk/resource/view.aspx?QN=PROFILES_STATIC</a>

	Risks can also be recognised from the safeguarding issues identified from your own annual safeguarding report analysis and changes year-on-year.
10.	The procedure should include a <b>statement identifying that certain groups of learners, including SEND and LGBT are more vulnerable to abuse or neglect</b> , and how the college identifies these learners and seeks to keep them safe. Additional consideration must be given to learners with high needs.
Recruitment	
11.	<p>The principles of <b>safer recruitment</b> should be outlined in the procedure including <b>pre-employment checks</b> such as take-up of two references and <b>DBS checking</b>.</p> <p>It is NCG policy that all <b>NCG governors</b> are required to have an Enhanced DBS check. New governors may be supervised, in line with visitor procedures, until pending checks are cleared. Other than the staff governor, governors are not in regulated activity; however, this additional step has been taken to ensure best practice, particularly if governors wish to undertake learning walks with college leaders.</p> <p>For <b>agency staff</b>, it is a requirement that colleges check that the person presenting at the college is the same person that the agency has provided the vetting checks for. Agency staff in a regulated activity presenting without checks must not be allowed to proceed with employment.</p> <p>The College shall not employ or engage, or continue to employ or engage, any person who is subject to a prohibition order made under section 141B of the Education Act 2002, or an interim prohibition order made under regulation 14 of the Teachers' Disciplinary (England) Regulations 2012, to carry out teaching work (as defined in regulation 3 of the Teachers' Disciplinary (England) Regulations 2012) in respect of any Students under the age of 19 and High Needs Students aged 19 to 25 (as if those Students were pupils for the purposes of the definition of teaching work in regulation 3 of the Teachers' Disciplinary (England) Regulations 2012).</p> <p>Note the NCTL's Teacher Services system (previously known as the Employer Access Service) now provides restriction information about teachers from the European Economic Area (EEA), and these checks must be recorded for staff from these countries.</p>
Requirements	
12.	Policies and procedures include appropriate reporting to the local authority for dealing with learners who go missing from education ( <b>see page 76 and 86 KCSIE</b> ).
13.	The College has at least <b>two Designated Safeguarding Leads</b> (one a deputy) and these are named in the procedure, along with contact

	<p>details (<b>best practice is to have a male &amp; female</b>). Usually a <b>senior member of staff</b>, the CDSL should not delegate their responsibility.</p> <p>For CDSLs there is an increased emphasis on ensuring that they have a <b>job description</b>, and that the cover arrangements are clear (most colleges have a <b>senior management duty rota</b> where the managers have received safeguarding training). The contact details for the Designated Safeguarding Leads will be published as an appendix to this policy.</p>
14.	<p>The College has a <b>named governor for safeguarding</b> who is identified in the procedure, along with appropriate contact details. The procedure should also name the person to whom concerns about the principal can be taken. For NCG, the CEO will act as the named Corporation Link Governor.</p>
15.	<p>The procedure is clear that <b>staff should promptly share their concerns</b> in writing with the CDSL and sets out the procedure for doing so, including the use of MyConcern</p>
16.	<p>The procedure should be clear that all <b>verbal conversations should be promptly recorded in writing</b>.</p>
17.	<p>There should be an <b>identified specific location for the delivery of concern forms</b> and a clear method for alerting the CDSL that a concern form has been raised, including the use of MyConcern</p>
18.	<p>The procedure should be clear about the <b>steps the CDSL should take to refer a concern outside the college</b>, e.g. a social services enquiry or to the Local Authority Designated Officer (LADO) and to Group Services. An up-to-date list of relevant names and contacts details should be included in the procedure.</p>
19.	<p>The procedure will make it clear when to refer to Group and in which format.</p>
20.	<p>The procedure should set out the training opportunities for staff in distinct roles and the type and frequency of training. For CDSL / Deputy there is a two-yearly interval, for all other staff 'regular updating' from September 2016 changed to '<b>at least annually</b>'. In terms of training, the September 2019 version of Keeping Children Safe refers to safeguarding topics that may not have been explicit in the past. These topics include:</p> <p><b>Female Genital Mutilation and Forced Marriage</b></p> <p><b>Strengthening aspects of serious violence and referring to County Lines</b></p> <p><b>Strengthening the nature of sexual abuse and harassment between children by including 'upskirting / down blousing' and child on child abuse, whether in or outside of the college.</b></p>
21.	<p>The procedure should make it explicit how learners will be briefed and trained on the referral process (induction), and how the impact of this</p>

	training will be tested (e.g. student forum, visits to tutorial, survey, audit).
22.	College procedures for the evaluation of teaching and learning must incorporate spot checks for wellbeing and safeguarding (e.g. observation, enquiry). Any apparent or disclosed concerns must be relayed to the tutor in charge of the session and CDSL where appropriate.
23.	The safeguarding procedure should be <b>self-contained</b> and not rely on other documents to understand it – the language must be understandable or free from jargon / acronyms / mnemonics.
24.	The procedure should have a <b>publication date, person responsible and a review date</b> (not later than one year from publication).
25.	The procedure should be <b>available on the college website</b> .
26.	The procedure should set out the other relevant documents <b><i>all staff must have read and understood:</i></b>  <b>Keeping Children Safe in Education (September 2022)</b> <b>NCG Staff Code of Conduct</b> <b>NCG Safeguarding Policy</b>
27.	DSLs must produce and use the <b>annual safeguarding report</b> for continuous improvement of policy. It should be approved annually by the College Board.
28.	<b>Specific training needs</b> must be considered and applied to contextual training for certain groups: governors / DSLs / leaders / staff / students.
29.	Identify awareness campaigns to be raised with learners through training / tutorials / posters in the year of the procedure (Safer Internet, Anti-Bullying).
30.	The procedure should be <b>explicit that GDPR (General Data Protection Regulations) is not a barrier to sharing information</b> with designated colleagues or authorities.
31.	The procedure should explicitly state how the college keeps learners safe from harmful online material, specifically the training delivered and web filters / keyword search checks in place. The action required should a notification be made should be clear, including procedures for communicating with parents on the search activity where relevant. The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: <a href="#">UK Safer Internet Centre: appropriate filtering and monitoring</a>



**Appendix C – Designated Leads**

Refer to NCG website for current list <https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/>

## Appendix D – NCG Safer Suicide Strategy (Suicide Prevention Strategy)

### Introduction

NCG recognises that providing suicide prevention, intervention and postvention to our students and staff is an important part of the health and wellbeing support we offer them. Whilst the requirement for this is primarily in higher education, we have extended to all learners and staff.

Stopping the transition from thought to action



Suicide-Safer Universities, Universities UK and Papyrus, 2021

This Suicide-Safer Strategy is aligned to NCG’s wider business strategy and directly supports the ‘People Strategic Theme of being ‘ambitious and responsible educators and leaders.’ It is underpinned by NCG’s core values of being ‘inclusive and diverse,’ ‘trusting and respecting our communities,’ ‘taking ownership whilst working collaboratively’ and ‘inspiring excellence and curiosity,’ ensuring these are embedded into practice.

It is also aligned to our specific HE (Higher Education) strategic objectives of providing a ‘transformative student experience and outcomes,’ ‘supporting students to stay and succeed,’ and ‘creating a culture of community, inclusion and resilience.’

### Aims and objectives

**The aim of this strategy is to develop a consistent approach to suicide-safer support across NCG with a recognised model of delivery for all students and staff. The strategy will:**

- Provide clear leadership and direction in relation to suicide prevention, intervention and postvention.
- Ensure there is optimal engagement with all stakeholders and effective partnerships locally and nationally.
- Ensure an integrated NCG approach is taken to build resilience and confidence, improving students’ and staffs’ mental fitness.

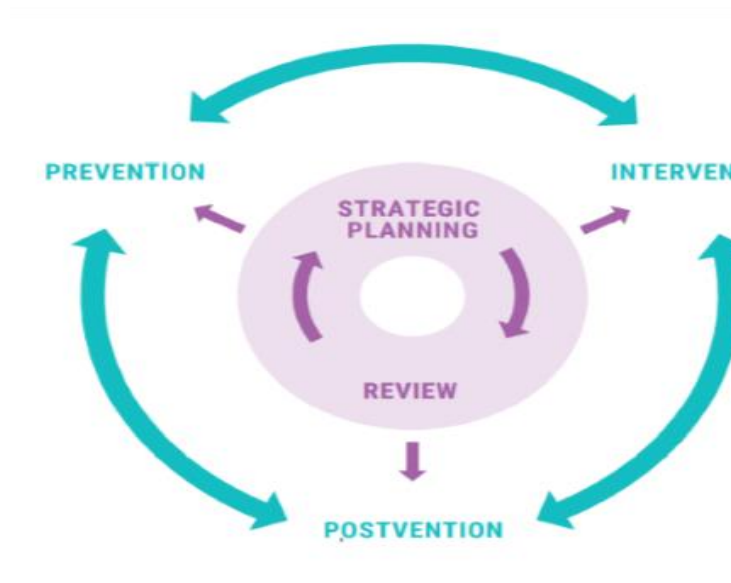
### **Primary Objectives of this Strategy are to:**

- Develop and encourage collaboration and cross-college suicide-safer activity and sharing of best practice across NCG.



- Positively impact student and staff mental fitness and students' ability to stay and succeed in their studies at NCG.
- Raise awareness of suicide, how to recognise signs that someone is suicidal, how to respond and remove the stigmas associated with mental health and suicide wherever possible.
- Promote positive mental health amongst students and staff to support a positive culture and to help develop resilience.
- Create local and national partnerships to explore, facilitate and support the roll out of a broad range of suicide-safer activities.

### Delivery Model



*Suicide-Safer Universities, Universities UK and Papyrus, 2021*

#### Prevention

Many people experience suicidal thoughts, feelings and ideations. Prevention aims to support students and staff before they consider or attempt ending their life. It requires a clear approach to the improvement of student and staff wellbeing and mental health support, using a one-NCG approach.

Prevention also aims to reduce the stigma surrounding suicide, through education and raising awareness. Ensuring smooth transition between educational settings, encouraging involvement and creating compassionate communities is also important.

#### Intervention

Equipping students, staff and the NCG community with the skills to recognise and respond to suicidal thoughts and behaviours is key to intervention. This should be done via a range of training, information sharing and well-defined processes which



boost confidence, set clear expectations of responsibility, and provide robust signposting procedures to a range of professional support services both internally and externally.

### **Postvention**

The immediate aftermath of suicide, or attempted suicide, can be stressful, confusing and highly emotive. Having a plan in place, agreed templates for communications and a nominated lead ensures an effective, appropriate and timely response. NCG's senior leadership team will lead and guide on how the rest of the institution responds to a suicide.

Postvention may also include the support of a student or staff affected by suicide indirectly.

See separate implementation plan for how the delivery model will be rolled out across NCG.

### **Measures of success**

- Staff training records.
- Referral data stats and monitoring of data patterns through MyConcern.
- Student / staff surveys.