Policy: Safeguarding and Child Protection

Author	Associate Principal - BAB (DSL), Deputy Principal (DSL), DDSL
Date Last Reviewed	September 2025
Approval Route	College Leadership Team, Corporation
Date Approved	16th September 2025
Review Cycle	Annually
Date Review Due	September 2026
Contractual or Non-Contractual	Contractual
Location of Copies	College Website
Policy Version	Version 6

Contents

1. Purpose	4
1.1 Scope	4
1.2 Legal Definition	7
1.3 Equality Statement	8
2. Roles and Responsibilities	**9**
2.1 Franklin Sixth Form College Safeguarding Team	9
2.2 Role of the DSLS	9
2.2 Role of the DDSLS	10
2.3 Role of Principal	11
2.4 Role of the Governing Body	11
2.5 Role of all Staff	12
2.6 Staff Training	12
2.7 Professional Boundaries	13
2.8 Partnerships with Parents and Carers	13
2.9 Public Interest Disclosure	13
2.10 Safer Recruitment	14
3. Contextual Safeguarding	14
4. Abuse	15
4.1 Definitions	15
4.2 Physical Abuse	15
4.3 Emotional Abuse	15
4.4 Sexual Abuse	16
4.5 Neglect	17
4.6 Financial Abuse	17
4.7 Coercive Control	18
4.8 Forced Marriage	19
4.9 FGM	20
4.10 Prevention, Procedures and Support	20
4.11 Useful Information	21
5. Child on Child Abuse	21
5.1 Definitions	21
5.2 Sexual Violence and Harassment	22
5.3 Prevention, Procedures and Support	22
5.4 Useful Information	24

6. PREVENT 25
6.1 Definitions 25
6.2 PREVENT Strategy 25
6.3 Prevention, Procedures and Support 26
6.4 Useful Information 26

7. Hate Crime 26
7.1 Definitions 26
7.2 Prevention, Procedures and Support 27
7.3 Useful Information 27

8. Exploitation 28
8.1 Definitions 28
8.2 Sexual Exploitation 28
8.3 Criminal Exploitation 28
8.4 Financial Exploitation 29
8.5 Prevention, Procedures and Support 30
8.6 Useful Information 30

9. Serious Violence 31
9.1 Definitions 31
9.2 Prevention, Procedures and Support 31
9.3 Useful Information 32

10. Mental Health 33
10.1 Definitions 33
10.2 Suicidal Thoughts 33
10.3 Self-Harm 33
10.4 Eating Disorders 34
10.5 Prevention, Procedures and Support 35
10.6 Useful Information 36

11. Substance Use 37
11.1 Definitions 37
11.2 Prevention, Procedures and Support 38
11.3 Useful Information 39

12. **Cyber Safety** **39**
12.1 Definitions 39
12.2 Youth-Produced Sexual Imagery 40
12.3 Social Media 40
12.4 AI 41

12.5 Prevention, Procedures and Support 41
12.6 Useful Information 41

13. Vulnerable Groups 42
13.1 Children in Our Care 42
13.2 SEND 43
13.3 Children Absent from Education 43
13.4 LGBTQ+ 44
13.5 Private Foster 44
13.6 Homelessness 44
13.7 Students with Family Members in Prison 44
13.8 Useful Information 45

14. Safeguarding Reporting, Recording and Management 46
14.1 Reporting Protocols for Staff 46
14.2 Recording and Case Management 47
14.3 Partnership and Information Sharing 47
14.4 Early Help 47
14.5 Students Subject to Criminal Investigation 48

15. Allegations Against Staff 49
15.1 Managing Low-Level Concerns / Allegations 49
15.2 Abuse of Position of Trust 49

16. **Staff and Student Safety** 50
16.1 ID Badges 50
16.2 Students or Visitors Under the Age of 16 50
16.3 Visitors 50
16.4 Transporting Students 51
16.5 Use of Reasonable Force 51

17. Relevant Statutory Legislation and Guidance 51

18. Related Documents 51

APPENDIX A - How to Report a Safeguarding Concern 52
APPENDIX B - Safeguarding and Behaviour Threshold 54
APPENDIX C - Safeguarding Vulnerable Adults 56

1. Purpose

1.1 Scope

The purpose of this Policy is 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.

This Policy gives 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, young people and vulnerable adults 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.

This Policy clarifies 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 with Keeping Children Safe in Education (KCSIE) 2025.

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.

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 2025', 'Working Together to Safeguard Children 2023','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: providing help and support to meet the needs of children as soon as problems emerge;

protecting children from maltreatment, whether that is within or outside the home, including online; preventing 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.

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 exploitation, 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, 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 two Designated Safeguarding Leads (DSLs) 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 will include safeguarding procedures and Part One of Keeping Children Safe in Education September 2025 will be mandatory for all staff working in the College.
- Train the Designated Safeguarding Lead 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 Sixth Form 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 and 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.

1.2 Legal Definitions

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 2025', 'Working Together to Safeguard Children 2023', '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: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing 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 Leads. 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.

1.3 Equality Statement

Franklin Sixth Form College is committed to encouraging equality, diversity and inclusion among our students and staff, and eliminating unlawful discrimination. We are committed to providing an inclusive learning environment free from any form of discrimination, harassment, or victimisation.

The vision of the College is to improve the life chances of our local community. We aim to be representative of all sections of our community and for each student and employee to feel respected and able to give their best. It is our intention to create a positive and inclusive environment where all students and staff can thrive, feel valued and respected.

The College's Values are: Aspirational, Supportive, Persistent, Inclusive, Respectful and Even/Consistent.

The legislation provides protection from discrimination at the same level across all protected characteristics and fundamentally protects the rights of people to be treated fairly, with dignity and with respect. As a public sector organisation, we have a legal responsibility under the Equality Act 2010 and Public Sector Education Duty 2011. We will work to fulfil our vision by not unlawfully discriminating because of the Equality Act 2010 protected characteristics of:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

In addition, the College considers socio-economic background as a potential barrier to equality.

In accordance with this legislation, we are committed to:

- Promoting equality and diversity through our safeguarding policies and procedures.
- Ensuring all students, including those who may be more vulnerable to abuse, neglect, or exploitation (such as those with SEND, care-experienced students, or those from minority ethnic or faith groups), receive appropriate and proportionate safeguarding support.
- Challenging discriminatory attitudes, behaviours, or practices wherever they occur.
- Taking proactive steps to prevent all forms of abuse, including racial abuse, gender-based violence, homophobic, biphobic and transphobic bullying, and discrimination based on disability, faith, or belief.
- Providing staff with ongoing training and guidance on recognising and addressing the additional vulnerabilities faced by some students due to inequality or prejudice.

- Encouraging an open culture where students feel confident to raise concerns and are supported to seek help without fear of judgment or discrimination.
- Complying with our legal duties under the Prevent Duty, ensuring students are protected from extremist ideologies that promote hate or intolerance.

Our approach to safeguarding is underpinned by a strong commitment to fairness, inclusion, and respect for all. We believe that safeguarding is most effective in a culture that actively promotes equality and stands against all forms of discrimination.

2. Roles and Responsibilities

2.1 Franklin Sixth Form College Safeguarding Team

Role	Name	Email	Telephone
Designated Safeguarding Lead (DSL) and Associate Principal for Behaviour, Attitudes and Belonging	Shane Harrison	shane.harrison@franklin.ac.uk	01472 875000 Ext. 762
Designated Safeguarding Lead (DSL) and Deputy Principal	Jo North	jo.north@franklin.ac.uk	01472 875000 Ext. 758
Deputy Designated Safeguarding Lead (DDSL)	Charlotte Morris	charlotte.morris@franklin.ac.uk	01472 875000 Ext. 762
Deputy Designated Safeguarding Lead (DDSL)	Darcie Harding	darcie.harding@franklin.ac.uk	01472 875000 Ext. 762

2.2 The Role of the Designated Safeguarding Leads (DSLs)

- The Designated Safeguarding Leads for Franklin Sixth Form College are 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 a DSL is absent. The DDSLs will deputise and if both are absent a member of the College Leadership 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.

2.3 The Role of the Deputy Designated Safeguarding Leads (DDSLs)

- 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, discussions and decisions, including the rationale for those decisions.
- 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 2023.
- 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 DSLs: this lead should not be delegated.

2.3 The Role of the Principal

- The Principal must 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 DSLs/ 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.
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Referrals are made to the Local Authority Designated Officer where allegations of abuse by staff are brought forward, or delegate that responsibility to the DSLs where required.
- 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.
- 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.
- That the College adheres to Safer Recruitment procedures and ensures appropriate checks are carried out on all members of staff and volunteers.

2.4 The Role of the Governing Body

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 concerns.
- 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.
- Have an effective Safeguarding and Child Protection Policy (updated annually and on the website) as well as a Staff Code of Conduct and that both are provided to, and followed by, all staff.

- Have procedures for dealing with allegations against staff/volunteers that comply with NELSCPB 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(s), who is a member of the College Leadership Team, trained annually and that the responsibilities are explicit in the role holder's job description. The DSLs 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 DSLs.
- Ensure designated staff receive multi-agency training appropriate to their role when first appointed, and refresher training annually.
- Ensure all staff receive refresher training annually.
- Ensure 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 DSLs 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.

2.5 The Role of 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 on to 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 directly 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.

2.6 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 2025') 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 2025.

Staff also undertake 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.

2.7 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, a DSL, a DDSL or a member of CLT.

2.8 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 honour based violence including 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 in 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.

2.9 Public Interest Disclosure

Staff should acknowledge their individual responsibility to bring matters of concern to the attention of the College Leadership Team 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.

2.10 Safer Recruitment

The College pays full regard to DfE guidance on Safer Recruitment in Education which is detailed in KCSIE 2025. 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 and 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 is 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's policy to have at least one person on an interview panel who has completed Safer Recruitment Training.

3. 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.

4. Abuse

4.1 Definitions

Abuse can take many forms including emotional, physical, sexual, financial and neglect. 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 2025'. All staff are required to access Part 1 of this document and to read and understand it. All staff working directly with those under 18 must also read Annex A.

4.2 Physical Abuse

Physical abuse 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. Examples which may indicate physical abuse (not to be used as a checklist):

- Patterns of bruising; inconsistent account of how bruising or injuries occurred.
- Finger, hand or nail marks, black eyes.
- Bite marks.
- Round burn marks, burns and scalds.
- Lacerations, wealds.
- Fractures.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.

4.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may also

involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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. Examples which may indicate emotional abuse (it is not designed to be used as a checklist):

- Over-reaction to mistakes, continual self-deprecation.
- Delayed physical, mental, emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug or solvent abuse.
- Fear of parents being contacted.
- Running away / going missing.
- Compulsive stealing.
- Masturbation.
- Appetite disorders - anorexia nervosa, bulimia.
- Soiling, smearing faeces, enuresis.

Some situations where children stop communication suddenly (known as “traumatic mutism”) may indicate maltreatment.

4.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual 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. Examples which may indicate sexual abuse (it is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.

- Aggressive behaviour including sexual harassment or molestation.
- Unusually compliant.
- Regressive behaviour, Enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming.
- Bruises, scratches in genital area.

4.5 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result 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).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Examples which may indicate neglect (it is not designed to be used as a checklist):

- Hunger.
- Tiredness or listlessness.
- Child dirty or unkempt.
- Poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Untreated illnesses/injuries.
- Pallid complexion.
- Stealing or scavenging compulsively.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Neurotic behaviour.

4.6 Financial Abuse

Financial abuse involves the unauthorised, improper, or illegal use of a person’s money, property, possessions, or financial resources. It can be carried out by individuals in positions of trust, peers, family members, carers, or strangers. Financial abuse is a form of exploitation and can seriously affect a

person's wellbeing, autonomy, and access to education and support. Examples of financial abuse include:

- Theft: stealing money, belongings, or financial documents such as bank cards.
- Fraud: coercing or manipulating someone to provide personal financial details or using those details to commit fraud.
- Coercion in financial matters: forcing or pressuring someone to hand over money, apply for loans or benefits, or make purchases they do not want or need.
- Misuse of allowances or benefits: controlling or mismanaging a student's education maintenance allowance, bursary, or student loan without their consent or to their detriment.
- Exploitation: using someone's finances or resources for personal gain—e.g. making them pay for others, exploiting them in a relationship for financial benefit, or 'money muling' (using their bank account to launder criminal funds).
- Online financial exploitation: scams, phishing, or coercion through online relationships or social media to extract money, gifts, or personal financial information.

Financial abuse may be peer-on-peer, for example, students pressuring others to give them money or hand over possessions; family-based, where a student is being financially exploited by a parent, guardian, or relative or linked to wider abuse, often co-occurring with emotional abuse, neglect, domestic abuse or exploitation. Some learners may be especially at risk, including those with learning disabilities, young carers, care leavers, or students experiencing homelessness or domestic abuse.

4.7 Coercive Control

Coercive control is a pattern of controlling, threatening, humiliating, or intimidating behaviour used to harm, punish, or frighten a person. It is a form of psychological and emotional abuse, and is recognised in UK law as a criminal offence under the Serious Crime Act 2015.

Coercive control can seriously undermine a learner's autonomy, self-worth, and ability to make independent decisions. It is often seen in abusive relationships, including those involving young people, and may be perpetrated by peers, partners, family members, or others in a position of power or trust.

Coercive control typically involves ongoing behaviour that:

- Seeks to dominate or isolate the victim.
- Restricts a person's freedom, independence, or daily life.
- Uses intimidation, threats, manipulation, or emotional abuse.
- Makes the victim feel dependent, powerless, or fearful.

Coercive or controlling behaviour may include (it is not designed to be used as a checklist):

- Isolation: preventing someone from seeing friends, family, or support services; monitoring or restricting their communication or movements.

- Monitoring behaviours: repeatedly checking someone's messages, emails, social media, or location; using tracking devices.
- Control over daily life: dictating what someone wears, eats, who they speak to, or where they go.
- Financial control: restricting access to money, education bursaries, or financial aid; taking control of someone's bank account.
- Threats and intimidation: threatening harm to the victim, their family, pets, or property; threatening to share private or embarrassing information.
- Gaslighting: manipulating someone into questioning their own memory, perception, or sanity.
- Enforcing trivial demands: Creating rules or routines that must be strictly followed, punishing small infractions.
- Sexual coercion: pressuring or blackmailing someone into sexual activity against their will.

4.8 Forced Marriage

Forced marriage is when one or both individuals do not freely consent to the marriage and are pressured, coerced, threatened, or deceived into it. It is a criminal offence in the UK under the Anti-social Behaviour, Crime and Policing Act 2014, which makes it illegal to force someone to marry, whether the force is physical, emotional, psychological, financial, or through threats of harm or consequences.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, families may be involved in introducing potential partners, but both individuals have the free will to accept or decline. In a forced marriage, consent is absent or obtained under duress, which can include physical violence, emotional pressure (such as shaming or invoking family honour), blackmail, isolation, or threats of abandonment.

Forced marriage can affect both young people and adults, and it is recognised as a form of abuse, particularly when it involves children or vulnerable adults. It may also intersect with other safeguarding concerns such as domestic abuse, honour-based abuse, emotional abuse, and sexual exploitation. Victims may be taken abroad for the purpose of a forced marriage (known as transnational forced marriage), or the marriage may take place within the UK.

Victims of forced marriage often face severe and long-lasting consequences, including physical and mental health issues, loss of educational or career opportunities, and social isolation. Some may be threatened with or subjected to violence if they refuse to comply, and in extreme cases, forced marriage can be linked to honour-based violence or even homicide.

Learners at risk of forced marriage may show signs such as sudden family pressure to travel abroad, concerns about engagement or marriage plans, fear or anxiety about upcoming family events, or withdrawal from education or social life. They may confide in staff or peers about restrictions, threats, or fears related to marriage or family expectations.

4.9 FGM

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.

4.10 Prevention, Procedures and Support

We take a proactive, whole-college approach to prevention and support including:

- **Education:** safeguarding themes are embedded into the Aspire tutorial programme including healthy relationships, consent, sexual harassment and violence and recognising abusive behaviour.
- **Culture:** all students are encouraged to speak out, report concerns and seek help. All forms of abuse, harassment and discrimination are challenged and addressed appropriately.
- **Staff Training:** all staff receive annual safeguarding and child protection training, including updates on specific types of abuse. Staff are trained to identify early warning signs and to refer concerns to the Safeguarding Team.
- **External Support:** the College works with organisations such as Blue Door, Remedi and Women's Aid to provide support and guidance for students who require it.

Any concerns about a student or disclosures of abuse must be reported immediately to the DSL(s) or deputies. Staff must not investigate or promise confidentiality but provide reassurance and a referral to the Safeguarding Team. A record of the concern must be completed either in the company of the student or as soon as possible after the concern has been reported to the Safeguarding Team.

The DSL or deputies will assess the concern and take appropriate actions which may include a referral to Children's Social Care and the Police. Where appropriate, the DSL or deputies may consider support from external agencies via an Early Help assessment. Depending on the nature of the concern, the DSL(s) or deputies will also consider whether a safety plan needs to be implemented to support the student attending College.

Regarding female genital mutilation (FGM), whilst concerns should be discussed with a DSL or deputies, under the mandatory reporting legislation, teachers are required to report known cases of FGM in under 18s to the Police.

The College is committed to multi-agency working to support students who are experiencing or have experienced abuse. The College may develop individual support plans in collaboration with the student,

parents and carers (where appropriate) and external agencies including Children's Social Care or Early Help. Access to support services can also be facilitated by the College including counselling or emotional wellbeing support, school nursing services and other appropriate safeguarding organisations.

4.11 Useful Information

Keeping Children Safe in Education
Statutory guidance for safeguarding, including sexual abuse, peer-on-peer harm, neglect and other safeguarding concerns.
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

DfE - Domestic Abuse Statutory Guidance
Includes coverage of abuse types, including sexual abuse, financial abuse, coercive and controlling behaviour, FGM, forced marriage and neglect.
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Freedom Charity
A UK-based charity offering education, specialist support and helpline services for victims of forced marriage and violence upon women.
https://freedomcharity.org.uk/

Women's Aid
A national charity dedicated to ending domestic abuse against women and children. They co-ordinate a network of over 180 organisations providing support, including refuges, outreach work, advocacy and children's services.
https://www.womensaid.org.uk/

5. Child-on-Child Abuse

5.1 Definitions

All staff should recognise that children can abuse other children, often referred to as child on child abuse. This can take different forms including, but not limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Sexual violence and sexual harassment - see Part 5 of KCSiE 2025 for further guidance.
- 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.

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as Youth Produced Sexual Imagery).
- Initiation/hazing type violence and rituals
- Emotional abuse and coercive control

Staff must be aware that any student can experience child on child abuse but the following are more vulnerable: female students, ethnic minority students, those who are, or perceived to be, LGBTQ+, and students with special educational needs and/or disabilities.

5.2 Sexual Violence and Harassment

Sexual violence refers to sexual offences as defined under the Sexual Offences Act 2003, including:

- Rape.
- Sexual assault.
- Assault by penetration.
- Causing a person to engage in sexual activity without consent.

Sexual harassment is defined as unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment can take many forms and can include (it is not designed to be used as a checklist):

- Sexual comments, such as making lewd remarks, sexual jokes, or commenting on someone's appearance in a sexual way.
- Sexual 'jokes' or taunting that targets someone's gender or sexuality.
- Physical behaviour such as deliberately brushing against someone, unwanted touching, or sexual gestures.
- Displaying or sharing sexual images or videos without consent, including on social media.
- Online harassment, including sexually explicit messages, cyberstalking, or non-consensual sharing of sexual images (sometimes referred to as 'revenge porn').
- Pressuring or coercing someone into sexual activity.

5.3 Prevention, Procedures and Support

The College has a zero-tolerance approach to child on child abuse. All staff are trained to challenge inappropriate behaviours between students 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 young people and, in worst case scenarios, lead to a culture that normalises abuse leading to young people accepting it as normal and not coming forward to report it.

All staff should recognise that child on child abuse, including sexual harassment and violence, can happen both inside and outside of College, including online. Even if there are no reported cases of child-on-child abuse, this does not mean it is not happening within the College. All staff are advised to maintain an attitude of 'it could happen here'.

Staff who suspect or witness child on child abuse, or receive a disclosure, must intervene immediately and report the concerns to the DSL or deputies. All reported concerns about child-on-child abuse will be treated seriously, with appropriate support provided to those affected and actions taken in accordance with the College's safeguarding, disciplinary and referral procedures.

Reports of child-on-child sexual violence or sexual harassment will be taken seriously and dealt with immediately, whether the alleged incident was face-to-face or online. When dealing with reports of child-on-child sexual harassment or sexual violence:

- 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 violence will have to be shared further.
- The DSLs or deputies will make an immediate risk assessment and assessment of need to consider the victim, especially their protection and support, and take any immediate actions that are 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 must 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 displaying harmful sexual behaviour (HSB) is complex and the College will work with external agencies to risk assess and maintain the 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 or deputies as soon as possible.

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.
- Regular focus groups are conducted with students to ascertain the prevalence and nature of child-on-child abuse, including sexual violence and harassment, in their lives.
- 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.

5.4 Useful Information

Keeping Children Safe in Education
Statutory guidance for safeguarding, including sexual abuse, peer-on-peer harm, neglect and other safeguarding concerns.
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Safeguarding Network - Online Safety and Cybercrime
Definitions and signs of online harm, guidance for staff and DSLs (including downloadable posters and training materials and updates) and updates aligned with the Online Safety Act and evolving digital technologies.
https://safeguarding.network/content/safeguarding-resources/online-safety/

NSPCC Learning - Recognising Child Sexual Abuse
Information, guidance and support on physical, behavioural and emotional indicators of sexual abuse, as well as guidance on risks specific to children who display harmful sexual behaviour.
https://learning.nspcc.org.uk/child-abuse-and-neglect/child-sexual-abuse?

Lucy Faithful Foundation / Stop it Now - Help and Support
The Lucy Faithful Foundation provides anonymous helpline, email and chat services for anyone with concerns about child sexual abuse. https://www.stopitnow.org.uk/

6. Prevent

6.1 Definitions

Prevent is one of the four strands of the UK Government's counter-terrorism strategy (CONTEST). It aims to stop people from becoming terrorists or supporting terrorism. The Prevent duty refers to the legal obligation placed on colleges and other education providers to have "due regard to the need to prevent people from being drawn into terrorism."

The duty applies to all staff and learners, and it forms a key part of the College's wider safeguarding responsibilities.

The Prevent strategy has three key objects:

- To respond to the ideological challenge of terrorism and the threat from those who promote it.
- To prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support.
- To work with sectors and institutions where there are risks of radicalisation.

6.2 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.

6.3 Prevention, Procedures and Support

The College follows the national Prevent Duty framework and works in line with the local authority's safeguarding partnership arrangements.

All concerns about radicalisation or extremist behaviour must be reported to the DSLs or deputies, or the Prevent Lead without delay.

The College's Prevent Strategy further explains prevention methods, procedures and support implemented when a student is identified as being at risk of radicalisation or displaying extremist behaviour: Prevent Strategy 2025-26

6.4 Useful Information

Prevent Duty - Guidance for England and Wales
Specific guidance on Prevent for FE and HE, with an emphasis on 'due regard' under the Counter Terrorism and Security Act 2015. It also explains the importance of embedding Prevent into wider safeguarding and risk assessments.
https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

NSPCC Learning - Radicalisation and Child Protection
Useful information and resources on radicalisation and challenging and tackling extremism.
https://learning.nspcc.org.uk/safeguarding-child-protection/radicalisation

National Education Union
Advice for schools and colleges on the importance of considering the Prevent duty alongside actively promoting equality and diversity.
https://neu.org.uk/advice/classroom/safeguarding/prevent

7. Hate Crime

7.1 Definitions

Hate crime is defined as a criminal action, typically one involving violence (but not exclusively), that is motivated by prejudice based on a protected characteristic. Examples of hate crimes include (but not limited to):

- 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.

Hate crimes and incidents, whether experienced directly, indirectly, in person or online can have a 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.

7.2 Prevention, Procedures and Support

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.

7.3 Useful Information

Stop Hate UK - Reporting, Training and Youth Resources
Stop Hate provides a 24/7 hate crime reporting helpline, as well as an app for discreet reporting. They also provide workshops on hate crime awareness, racism, online hate and media bias.
https://www.stophateuk.org/

Educate Against Hate - Safeguarding and Teaching Support
Offers a wide range of teaching resources and materials, including lesson plans on hate crime, stereotyping, resilience, and British Values, along with policy and self-assessment tools for FE and college environments.
https://www.educateagainsthate.com/resources/

Safeguarding Network - Hate Crime Resources
A portal for accessing information, resources and guidance on hate crime, signs and response strategies. The website also includes materials like presentations, handouts, quizzes and training modules.

https://safeguarding.network/content/safeguarding-resources/bullying/hate-crimes/

8. Exploitation

8.1 Definitions

Exploitation is a form of abuse that involves taking advantage of a person's vulnerability, age, dependency, or circumstances for personal, financial, or criminal gain. Exploitation may involve manipulation, coercion, threats, deception, or abuse of power or trust. It can occur in person or online and often targets individuals who are isolated, under pressure, or lack support. Exploitation can be perpetrated by individuals, groups, or organised networks and may be linked to wider issues such as modern slavery, human trafficking, gang involvement, or domestic abuse.

8.2 Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

8.3 Criminal Exploitation

Child Criminal Exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or other advantage of the perpetrator or facilitator, and/or (c) through violence or the threat of violence.

All staff should ensure they are aware of and respond to wider safeguarding issues outlined in KCSIE 2025 Annex B, this includes further information on:

- Child abduction and community safety incidents.
- Children and the court system.
- Children who are absent from education.
- Children with family members in prison.
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).
- County lines.
- Modern Slavery and the National Referral Mechanism.
- Cybercrime.
- Domestic abuse.
- Homelessness.

- So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage).
- Preventing radicalisation (including the Prevent duty and Channel).
- Child on child abuse.
- Sexual violence and sexual harassment between children in schools and colleges (including upskirting).
- Mental health.
- Serious violence.

8.4 Financial Exploitation

Financial exploitation is a form of abuse involving the unauthorised, improper, or illegal use of a person’s money, financial resources, property, or assets. It may be carried out through coercion, manipulation, deception, theft, or misuse of power or trust and is recognised under UK safeguarding law as a form of financial or material abuse. Examples of financial exploitation include:

- Theft or fraud: stealing cash, belongings, or personal financial documents such as bank cards, or using someone's identity to access loans or benefits.
- Coercion and manipulation: pressuring someone into handing over money or possessions, buying items, or taking on debts they don’t want or need.
- “Mate crime”: when someone pretends to be a friend but exploits the individual financially (e.g. asking them to constantly pay for food, travel, or items under threat of social exclusion).
- Money muling: convincing or coercing someone to use their bank account to transfer or launder money, often linked to criminal networks or online scams.
- Control of allowances or benefits: misusing student bursaries, benefits (e.g. Universal Credit), or Education Maintenance Allowance (EMA) without the learner’s knowledge or consent.
- Online exploitation: being groomed through social media, online relationships, or scams to send money, gift cards, or personal financial information.

Staff should be aware of signs that could indicate a student is being financially exploited. These include (but are not limited to):

- Frequently borrowing money or asking for food or travel support.
- Sudden inability to pay for meals, transport, or course materials despite having financial support.
- Unexplained loss of money, possessions, or bank access.
- Appearing anxious, secretive, or withdrawn when asked about finances.
- Being accompanied or controlled by someone who appears to make financial decisions on their behalf.
- Sudden engagement in risky online behaviour, scams, or suspicious banking activity.

8.5 Prevention, Procedures and Support

The College is committed to preventing exploitation by:

- Delivering education and awareness through the Aspire tutorial programme, with sessions covering different forms of exploitation, and the risks, signs and consequences.
- Creating opportunities for community partners including the Police and Exploitation Prevention Teams, to engage with students via guest talks and safeguarding events.
- Working closely with local agencies and community partners to understand the local picture, identify local risk factors and known patterns of exploitation.
- Providing staff with ongoing safeguarding training on how to recognise and respond to exploitation.
- Creating a safe and trusting environment where students are encouraged to speak up without fear of judgement.

The College recognises that young people who are being exploited may not see themselves as victims and may need time, patience and a non-judgemental approach to build trust and accept help. Where staff receive a disclosure or hold a concern that a student may be at risk of exploitation, or actively being exploited, they should report this immediately to the DSLs or deputies. The DSLs or deputies will refer to statutory guidance and local safeguarding partnership procedures, completing a risk assessment and determining whether a referral to Children's Social Care and/or the Police is necessary. Any online elements of exploitation will be addressed in line with both safeguarding and digital safety procedures.

The College will work in partnership with relevant agencies to ensure a coordinated safeguarding response, including providing emotional support for the young person. The College is committed to providing trauma-informed support to any student affected by exploitation, including those at risk of being targeted or groomed. This can include:

- Pastoral support and regular check-ins with trusted members of staff.
- Counselling and access to external mental health support.
- Safety planning to support college attendance.
- Advocacy when engaging with external agencies.

Any students displaying concerning or exploitative behaviours will also be supported where appropriate to address underlying needs, receive education around consequences, and reduce risk of further harm to themselves or others.

8.6 Useful Information

Home Office / Gov - Child Exploitation Disruption Toolkit
Guidance for education staff and frontline practitioners to help identify and respond to both child sexual exploitation and criminal exploitation.

https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit/child-exploitation-disruption-toolkit-accessible

It's Not Okay - Professional Resources
A platform providing guidance and tools such as Barando's 'real Love Rocks' (CSE prevention toolkit) and additional materials from NSPCC, NHS and local authorities.
https://www.itsnotokay.co.uk/professionals/resources/

NSPCC Learning - Protecting Children from Child Criminal Exploitation
Up to date definitions and guidance covering CCE, country lines and financial exploitation.
https://learning.nspcc.org.uk/child-abuse-and-neglect/child-criminal-exploitation

GOV UK - Money Mule / Financial Exploitation Guidance
Accessible guidance on financial exploitation, especially via social media, vulnerable demographics and advice for frontline professionals.
https://www.gov.uk/government/publications/money-mule-action-plan/money-laundering-linked-financial-exploitation-guidance-for-frontline-professionals-accessible

9. Serious Violence

9.1 Definitions

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.

9.2 Prevention, Procedures and Support

Franklin Sixth Form College is committed to ensuring a safe and respectful environment for all students, staff and visitors. We aim to support young people and prevent serious violence through education, early intervention and partnerships with students, families and external agencies. Where incidents occur, we will respond swiftly, proportionately, and in line with our legal responsibilities.

Our approach focuses on education, vigilance and positive relationships including:

- **Education:** topics including exploitation, county lines, the dangers of carrying weapons, healthy relationships and conflict resolution are delivered via the Aspire programme.
- **External Organisations:** including the Police, charities and youth workers visit the College to speak with students and staff, providing real-life context and guidance.
- **Staff Training:** all staff are trained to recognise the indicators that a young person may be a risk or involved in serious violent crime and how to refer concerns to the Safeguarding Team.
- **Environment and Culture:** the College seeks to promote a culture of respect, inclusion and belonging, with clear expectations for student behaviour. Students are also encouraged to report concerns safely and anonymously if necessary.

Staff who suspect a student may be vulnerable to, or involved in, serious violent crime should immediately report their concerns to the DSLs or deputies. If a student is in immediate danger or has brought a dangerous weapon to College, the student will be safely isolated and the emergency services contacted. The College retains the legal right to search students and confiscate prohibited items in accordance with DfE guidance. The possession of a weapon on the College site will be dealt with as gross misconduct and the strictest penalties applied.

If the College is made aware that a student is at risk of or involved with serious violent crime, a risk assessment will be conducted to determine next steps and whether the student can safely remain in college. The College, where appropriate, will work with Police, social care or youth offending services to provide support to a student at risk.

9.3 Useful Information

GOV UK - Serious Violence Duty (Strategic Needs Assessment Guide)
Guidance from Gov UK on the Serious Violence Duty, providing details on multi-agency strategic needs assessments to help understand and address serious violence, including firearms, knife crime, gang-related activity and county lines exploitation.
https://www.gov.uk/government/publications/serious-violence-duty-strategic-needs-assessments/serious-violence-duty-strategic-needs-assessment-guidance

GOV UK - Multi-Agency Responses to Serious Youth Violence
An official Gov UK publication outlining multi-agency working, building trust with children and families, understanding youth needs and best practices.
https://www.gov.uk/government/publications/multi-agency-responses-to-serious-youth-violence-working-together-to-support-and-protect-children/multi-agency-responses-to-serious-youth-violence-working-together-to-support-and-protect-children

10. Mental Health

10.1 Definitions

Mental health refers to a person's emotional, psychological, and social well-being. It influences how individuals think, feel, and behave, how they manage stress, relate to others, make choices, and cope with everyday challenges. Mental health is a fundamental part of overall health and wellbeing, and it affects a person's ability to learn, develop, and thrive both academically and socially.

Mental health exists on a spectrum, ranging from positive mental wellbeing to severe mental illness. A person's mental health may fluctuate over time due to various internal and external factors, including personal experiences, trauma, physical health, family circumstances, academic pressure, or social and environmental challenges.

10.2 Suicidal Thoughts

Suicidal thoughts - also referred to as suicidal ideation - are thoughts, feelings, or expressions about wanting to end one's life, or believing that death is the only way to escape unbearable pain or distress. These thoughts can range from fleeting feelings of hopelessness or worthlessness, to clear intentions or plans to take one's own life. Suicidal thoughts are a serious mental health concern and should always be treated with sensitivity, compassion, and urgency within safeguarding procedures.

Suicidal ideation can affect anyone, regardless of age, background, or circumstances, but it often arises in response to overwhelming emotional distress, mental health difficulties, or adverse life experiences. Common contributing factors may include depression, anxiety, trauma, bullying, abuse, relationship breakdowns, bereavement, exam stress, isolation, substance misuse, or identity-based discrimination (such as racism, homophobia, or transphobia). While suicidal thoughts do not always lead to suicide attempts, they are a significant indicator of distress and a potential risk of harm.

Learners may not always disclose suicidal thoughts directly. They may show changes in behaviour, withdraw from others, talk about feeling hopeless or like a burden, or express thoughts of not wanting to be alive. They may also exhibit risk-taking behaviours, self-harm, or give away personal belongings.

10.3 Self-Harm

Self-harm is the act of intentionally causing harm to oneself as a way of coping with or expressing emotional distress, overwhelming thoughts, or psychological pain. It is often a sign that a person is struggling to manage difficult feelings or experiences and may not have found a safe or healthy outlet for their emotions. While self-harm is not always a suicide attempt, it is a clear indicator of emotional and mental health difficulties and should always be taken seriously as a safeguarding concern.

Self-harm can take many forms and varies from person to person. Common methods include cutting, burning, scratching, hitting oneself, pulling out hair, preventing wounds from healing, or deliberately

misusing substances or medication. In some cases, behaviours that place a person at significant risk - such as reckless actions, substance use, or disordered eating - may also be considered forms of self-harm if motivated by a desire to cope with internal distress.

People who self-harm often describe it as a way to feel temporary relief from intense emotions, a sense of control, or to express things they cannot put into words. However, the underlying emotional pain remains, and without appropriate support, the behaviour can become repetitive and escalate. Self-harm may co-exist with other mental health conditions such as depression, anxiety, trauma, or low self-esteem, and is often linked to adverse experiences such as bullying, abuse, neglect, bereavement, or identity-based discrimination.

Students who self-harm may or may not disclose their behaviour. Warning signs may include unexplained injuries, wearing long sleeves in hot weather, social withdrawal, changes in mood or behaviour, or openly talking about feeling overwhelmed, numb, or hopeless. Self-harm is most common among adolescents and young adults but can affect individuals of any age or background.

10.4 Eating Disorders

Eating disorders are serious mental health conditions characterised by an unhealthy relationship with food, body image, weight, or shape, which significantly impact a person's emotional and physical well-being. They can involve behaviours such as restricting food intake, binge eating, purging (vomiting or using laxatives), or excessive exercise, and are often linked to deeper issues such as low self-esteem, perfectionism, trauma, or a need for control during stressful or overwhelming periods.

Common eating disorders include:

- Anorexia nervosa – marked by extreme food restriction, fear of gaining weight, and distorted body image, often resulting in dangerously low body weight.
- Bulimia nervosa – characterised by cycles of binge eating followed by compensatory behaviours such as vomiting, fasting, or over-exercising.
- Binge eating disorder (BED) – involves regular episodes of consuming large quantities of food in a short period, often accompanied by feelings of guilt, shame, and lack of control.
- Other Specified Feeding or Eating Disorders (OSFED) – a category for disordered eating patterns that don't meet the full criteria of the above disorders but are still harmful and clinically significant.

Eating disorders can affect individuals of any age, gender, ethnicity, or background, and may be difficult to detect, particularly when the individual goes to great lengths to hide their behaviour. They often co-occur with other mental health issues, such as anxiety, depression, self-harm, or obsessive-compulsive behaviours. Without appropriate support, eating disorders can lead to serious medical complications, including malnutrition, organ damage, fertility issues, and even death.

Signs that a student may be experiencing an eating disorder include rapid weight loss or gain, obsession with food, dieting, or exercise, frequent trips to the bathroom after meals, withdrawal from social situations, changes in mood or concentration, or evidence of physical symptoms like dizziness, hair loss, or fatigue. Some students may also express feelings of shame or distress around eating or body image.

10.5 Prevention, Procedures and Support

Franklin Sixth Form College is committed to safeguarding the mental health and emotional wellbeing of all students and we are dedicated to ensuring a supportive, safe and inclusive environment where students feel empowered to seek help.

Our response is underpinned by compassion, confidentiality and a clear procedural framework that supports early intervention, risk reduction and recovery, whilst ensuring the safety and wellbeing of all students and staff. We support students at Franklin Sixth Form College using the **Thrive** model: Franklin Sixth Form College: Your Partner in Health and Wellbeing

A whole college approach to mental health promotion and support is adopted including:

- **Mental Health Education:** is embedded into the Aspire tutorial programme to reduce stigma, improve understanding, and promote healthy coping strategies.
- **Pastoral Support:** students can seek support from their Progress Coach who is a first point of contact for concerns, and can signpost students to helpful resources and organisations, as well as offer regular wellbeing check ins.
- **Personal and Professional Development (PPD):** students can engage with sessions which support positive wellbeing, allow them to make friends, relieve stress and do something they enjoy.
- **Wellbeing Team:** our Wellbeing Officers work with students when more intervention is required to build emotional resilience and equip them with coping strategies on a range of topics.
- **Mental Health Services:** students can refer and access local mental health services in college including Cudox, Compass Go and Navigo Talking Therapies for those needing higher level intervention.
- **Staff Training:** ongoing professional development for staff in identifying signs of self-harm, suicidal ideation and eating disorders, and responding appropriately.

Procedures

If a student discloses suicidal thoughts, self-harming behaviours or an eating disorder, a referral must be made to the Safeguarding Team. The DSLs or deputies will meet with the student to understand their needs, provide reassurance and discuss further support. If there is an immediate risk to life, the DSLs or deputies must be notified immediately and emergency services contacted with parents or carers to be informed unless there is a child protection concern.

Where a student has disclosed active suicidal thoughts or self-harm, a safety plan will be discussed with the student and shared with their parents or carers in order to safeguard and support them whilst in College.

External referrals will also be discussed including to Young Minds Matter CAMHS, Talking Therapies and Navigo Eating Disorder Services for students who may need support for eating behaviours. Information will be shared with students, parents and carers on support services and useful resources.

Where a student is experiencing a mental health issue and discloses a risk of harm to others, the College will ask the student to remain off-site whilst a risk assessment is completed and the college consults with any mental health services involved.

10.6 Useful Information

Navigo - Mental Health Support Services
Navigo offers a range of mental health services. Their website provides information on how to access support, including 24/7 support, text services and Talking Therapies.
https://navigocare.co.uk/

Compass Go - Mental Health Support
Compass Go is a mental health service for children and young people who are experiencing mild to moderate emotional and wellbeing difficulties.
https://compass-uk.org/services/north-east-lincolnshire-mhst/

Mind - Useful Contacts
A comprehensive list of support services including CALM, Samaritans, emergency contacts, LGBTQ+ specific support and peer communities.
https://www.mind.org.uk/information-support/suicidal-thoughts-and-suicide-prevention/useful-contacts/

Samaritans - "If You Want to Self-Harm"
A 24/7 confidential helpline for anyone experiencing urges to self-harm. The website includes guidance on seeking help from a GP and accessing local services.
https://www.samaritans.org/how-we-can-help/if-youre-having-difficult-time/if-you-want-self-harm/

NHS - Where to Get Help for Self-Harm
Details of free listening services, community mental health teams, youth services and GP support pathways.
https://www.nhs.uk/mental-health/feelings-symptoms-behaviours/behaviours/self-harm/getting-help/

Beat - UK Eating Disorder Charity
Resource for support, including helplines, a student line, youth line, web chat, self-help guides, peer forums and signposts to local services.
https://www.beateatingdisorders.org.uk/

11. Substance Use

11.1 Definitions

Substance use refers to the consumption or misuse of drugs, alcohol, or other mood- or mind-altering substances. Substance use becomes a concern when it places a young person or vulnerable adult at risk of harm, exploitation, poor mental health, or educational disadvantage. Substances may be legal, illegal, or prescription-based, and include:

- Illegal drugs (e.g. cannabis, cocaine, MDMA/ecstasy, heroin, LSD).
- New Psychoactive Substances (NPS) (formerly known as "legal highs").
- Prescription or over-the-counter medications when used outside of medical guidance (e.g. benzodiazepines, codeine).
- Alcohol.
- Nicotine and vaping products.
- Solvents or volatile substances (e.g. aerosols, glue, gas).

Substance use may occur experimentally, socially, habitually, or problematically. For some, it may be part of a broader pattern of risk-taking behaviour, mental health issues, peer pressure, trauma, or abuse.

The term ‘misuse’ refers to the harmful or hazardous use of substances, where use is:

- Frequent or excessive.
- Having a negative impact on physical or mental health.
- Impairing a learner’s ability to attend, engage, or achieve at College.
- Involving dangerous behaviours (e.g. mixing substances, unsafe injection, drinking to blackout).
- Linked to exploitation or criminal activity (e.g. county lines, money muling, or coercion into dealing).

Substance misuse can place young people at increased risk of harm, including:

- Poor mental health or suicidal ideation.
- Overdose or poisoning.
- Physical harm or self-neglect.
- Sexual or criminal exploitation.
- Violence, gang involvement, or risky associations.
- Academic disengagement or exclusion.

- Homelessness or family breakdown.

11.2 Prevention, Procedures and Support

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.

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.

11.3 Useful Information

With You - Direct Support
With You offers confidential drug and alcohol support services. Resources include self-help advice and one-to-one support.
https://www.wearewithyou.org.uk/what-we-do/young-persons-services/how-we-can-help-drug-and-alcohol-support-for-young-people?

Navigo - Alcohol and Your Mental Health
Information on the mental health impacts of alcohol use, and how to access support when required. The page also features links to other support services including Drink Aware, Alcohol Change, Alcoholics Anonymous and others.
https://navigocare.co.uk/what-we-do/advice-and-support/alcohol

GOV UK - Drug Prevention Framework
The Advisory Council on the Misuse of Drugs (ACMD) outlines a "whole-system" approach to preventing drug use among young people. Includes school-wide approaches to substance education and wellbeing promotion.
https://www.gov.uk/government/publications/a-whole-system-response-to-drug-prevention-in-the-uk/a-whole-system-response-to-drug-prevention-in-the-uk-accessible

DfE and ACPO - Drugs: Advice for Schools
Guidance for school leaders and staff for tackling drug-related incidents, pastoral support and managing drugs.
https://www.gov.uk/government/publications/drugs-advice-for-schools

12. Cyber Safety

12.1 Definitions

Please read the Staff Code of Professional Conduct in conjunction with this document.

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, racism, misogyny, misandry, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

- Contact: being subjected to harmful online interaction with other users; for example: peer to peer 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, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

12.2 Youth-Produced Sexual Imagery

Youth-produced sexual imagery refers to any sexual, nude, or semi-nude images or videos that are created by children or young people under the age of 18 and shared via mobile devices, social media platforms, or other online services. This behaviour is sometimes referred to as "sexting", "nudes", or "nude selfies", but the term "youth-produced sexual imagery" is used in safeguarding contexts to reflect the legal, emotional, and developmental issues involved.

The imagery may be self-generated (taken and shared voluntarily), coerced or pressured (through manipulation, threats, blackmail, or peer pressure), or created and distributed without consent, for example if someone shares an image they received privately with others. It can involve imagery sent within romantic relationships, between peers, or to individuals met online. Even if the sharing is consensual, the creation and distribution of sexual images of anyone under 18 is potentially a criminal offence under the Sexual Offences Act 2003, which prohibits the creation, possession, or distribution of indecent images of children.

Youth-produced sexual imagery can lead to serious safeguarding concerns, especially when there is evidence of exploitation, coercion, grooming, or abuse. It can cause significant emotional distress, damage reputations, and lead to bullying, blackmail, or social isolation. In more serious cases, it may also be linked to child sexual exploitation (CSE) or online abuse by adults.

12.3 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 and Child Criminal 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.

12.4 AI

Artificial Intelligence (AI) refers to systems and technologies that can perform tasks typically requiring human intelligence. This includes machine learning, natural language processing, automated decision-making, facial recognition, and generative AI tools (e.g., ChatGPT, image generators, etc.).

AI is increasingly used for:

- Personalised learning and adaptive platforms.
- Chatbots and virtual assistants.
- Assessment support and marking.
- Learning resources and support.
- Assignment planning.
- Research.

While AI can enhance learning, it also presents emerging safeguarding risks, particularly for young people in college settings. These include, but are not limited to, bias and discrimination, risks to data privacy, misinformation, over-reliance and academic integrity, inappropriate content and exploitation or grooming.

12.5 Prevention, Procedures and Support

The College will ensure there are appropriate filters and monitoring systems 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.

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

12.6 Useful Information

UK Safer Internet Centre - Staying Safe Online
Provides support and advice to parents, young people, children, carers and schools about online safety.
https://saferinternet.org.uk/

NSPCC Learning - Online Safety Resources
CPD certified training courses, policy templates and guidance such as e-safety policy, responding to sharing of nudes and semi-nudes and the Report Remove tool for under 18s to help remove sexual imagery from the internet.
https://learning.nspcc.org.uk/research-resources/online-safety-resources

NSPCC - The 4 C's of Online Safety
Breaks down online risks into Content, Contact, Conduct and Commerce.
https://learning.nspcc.org.uk/news/2023/september/4-cs-of-online-safety

Safeguarding Network - Online Safety and Cybercrime
Definitions and signs of online harm, guidance for staff and DSLs (including downloadable posters and training materials and updates) and updates aligned with the Online Safety Act and evolving digital technologies.
https://safeguarding.network/content/safeguarding-resources/online-safety/

Jisc - Staying Safe Online
Aimed at FE and HE institutions. Jisc provides self-review tools for online safety, guidance on cyber security, data protection and safer digital practices, and support for safeguarding in digital environments.
https://www.jisc.ac.uk/guides/staying-safe-online

DfE - Teaching Online Safety in Schools
Supports embedding online safety into the wider curriculum, including identifying online risks, building digital literacy and the safe use of reporting tools.
https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools

13. Vulnerable Groups

13.1 Children in Our Care

Children in Our Care (also known as Looked After Children, or LAC) refers to children and young people who are in the care of their local authority, either through a voluntary agreement with their parents (under Section 20 of the Children Act 1989) or via a care order made by a court (under Section 31 of the Children Act 1989).

This includes children and young people who are:

- Living with foster carers arranged by the local authority.
- Placed in residential children's homes or secure units.

- Living with extended family or friends under local authority supervision (e.g., kinship care).
- Living in supported or semi-independent accommodation (particularly relevant for 16–18-year-olds).
- Unaccompanied asylum-seeking children (UASC) who are under local authority care.

Young people who were previously looked after but have since left care (e.g., via adoption, Special Guardianship Order, or age-out transition) may also be entitled to ongoing support as care leavers under the Children (Leaving Care) Act 2000 and the Children and Social Work Act 2017.

Children in Our Care often face additional vulnerabilities that can place them at greater risk of:

- Educational disadvantage and exclusion.
- Poor mental health or emotional wellbeing.
- Social isolation or instability in living arrangements.
- Exposure to exploitation (e.g., criminal or sexual exploitation).
- Disengagement from education, employment, or training.

13.2 SEND

Students with SEND are more likely to be abused, neglected and/or exploited and face a higher risk of peer group isolation. Difficulties with communication may also adversely impact SEND students. 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 are offered transitional support to ensure a smooth transition from secondary school or other point of origin. 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.

13.3 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 a DSL or DDSL will conduct an Early Help Assessment, or if necessary, undertake a referral to Children's Social Care. All such cases will be recorded and monitored using the existing referral and case management procedure.

13.4 LGBTQ+

LGBTQA+ 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.

13.5 Private Foster

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 stepparents, 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.

13.6 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare and can have a significant impact on their safety, wellbeing and ability to access education.

Staff are trained to identify the signs that a student may be experiencing or at risk of homelessness, including periods of absence, fatigue, concerns over personal hygiene, or disclosure of family difficulties. Where staff hold concerns for a student or receive a disclosure relating to homelessness, the College's safeguarding procedures should be followed and a report made to the DSLs or deputies immediately.

The DSLs or deputies will work closely with the student and their parents or carers, where appropriate, to ensure they are supported. The DSLs or deputies may make referrals to the local housing authority or homelessness charities. For any student under the age of 18 who is homeless or at immediate risk of homelessness, a referral to Children's Social Care will be made in order to provide support for the young person.

The Homelessness Reduction Act 2017 places a duty on local authorities to provide help to those who are homeless or at risk of homelessness. The College is committed to multi-agency working in order to provide holistic support for any student experiencing or at risk of homelessness.

13.7 Students with Family Members in Prison

Having a parent or close family member in prison can have a profound impact on a young person's emotional wellbeing and educational progress. These young people are at increased risk of poverty, poor mental health, stigma and isolation.

Where the College is made aware that a student has a parent or close family member in prison, staff will respond with sensitivity, discretion and support. Any disclosure will be managed in line with the

College's safeguarding procedures, ensuring the student's confidentiality is respected wherever possible.

The DSLs or deputies will work with the student to ensure access to relevant support services, These may include pastoral support within College, counselling or signposting to specialist organisations such as Barnardo's or NICCO.

The National Information Centre on Children of Offenders (NICCO), provides information designed to support professionals, to help mitigate negative consequences for those children and young people: NICCO.

13.8 Useful Information

NSPCC Learning - Safeguarding Children with SEND
This page on the NSPCC Learning site covers the additional vulnerabilities children with SEND may face, including communication barriers, dependency, misunderstanding of abuse.
https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send

NSPCC Learning - Safeguarding LGBTQ+ Children
Guidance addressing risks such as homophobic / transphobic bullying, sexual exploitations, mental health challenges and online harm.
https://learning.nspcc.org.uk/safeguarding-child-protection/lgbtq-children-young-people

RCPCH - Supporting LGBTQ+ Children and Young People
A professional framework which highlights the need for confidentiality, respectful language, support from staff and training to counter stigma and reduce barriers to care.
https://www.rcpch.ac.uk/resources/supporting-lgbtq-children-young-people

GOV UK - "Good Decisions - Supporting Children Aged 16 and 17 Who Need Help When They Are Homeless"
A useful resource which details the obligations of local authorities, explains accommodation options and the role of education providers in safeguarding.
https://www.gov.uk/government/publications/good-decisions-supporting-children-aged-16-and-17-who-need-help-when-they-are-homeless/supporting-children-aged-16-and-17-who-need-help-when-they-are-homeless

Crisis UK - Homelessness Learning Resources for Young People
Interactive resources aimed at raising awareness, including activities, videos, scenario-based learning, designed to help young people understand homelessness causes, impacts and responses.
https://www.crisis.org.uk/get-involved/fundraise/resources-for-young-people/

UCAS - Adviser Toolkit - "Supporting Children with Imprisoned Parents
Guidance for students applying to University on disclosures, awareness and sensitive handling of the transition from college to university.
https://www.ucas.com/advisers/help-and-training/toolkits/adviser-toolkit-supporting-students-with-individual-needs/supporting-children-with-imprisoned-parents

Safeguarding Network - "Children with Family Members in Prison
A comprehensive free resource hub offering posters, DSL training materials, quizzes, scenarios along with guidance on talking to students, peer support, confidentiality and identifying needs.
https://safeguarding.network/content/safeguarding-resources/parental-issues/children-with-family-members-in-prison/

14. Safeguarding Report, and Management

14.1 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.
- DO NOT look at digital images on a student's phone or digital device.
- 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/KCSiE25 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.

14.2 Recording and Case Management

All safeguarding concerns are either identified by, or referred 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 DSLs 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 DSLs or DDSLs. The DSLs always make final judgement. All cases are recorded in a secure folder on the College's safeguarding database.

14.3 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 2025, including Prevent referrals to Channel. The College recognises that all matters relating to child protection are confidential.

14.4 Early Help

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 three of 'Working Together to Safeguard Children 2023' 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 into 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.
- Has experienced multiple suspensions, or is at risk of being permanently excluded from school or college.
- Is frequently missing/goes missing from education, home or care.
- 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 a parent or carer in custody, or is affected by parental offending.
- 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.

14.5 Students Subject to Criminal Investigation

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 DSLs 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 in the next academic year 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.

15. Allegations Against Staff

15.1 Managing Low-Level Concerns / Allegations

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.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples 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 DSLs, HR Manager or Principal in a timely fashion.

15.2 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 the DSLs, HR and the Principal immediately as this is unacceptable to the College and may result in dismissal as this is gross misconduct.

16. Staff and Student Safety

16.1 ID Badges

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.

16.2 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 DSLs will liaise with the DSL(s) from the visitor's school, ensuring that the learner is informed of this process.

16.3 Visitors

For the purposes of this policy, a visitor is defined as any individual who is not a student and is not recorded on the College's Single Central Record (SCR) of safeguarding checks for staff and volunteers. All visitors must report to Reception upon arrival to sign in and receive the appropriate visitor identification.

Any individual found on site without a visible and authorised lanyard should be escorted by a member of staff to Reception immediately to complete the sign-in process.

Where a visitor is due to be unaccompanied on site and has not undergone relevant safeguarding checks (e.g. DBS clearance), they must be supervised at all times. Supervision includes:

- A member of staff being clearly designated as responsible for the visitor.
- Being aware of the visitor's location at all times.

Visitors without safeguarding clearance must never be left alone with a student under any circumstances.

Visitors wearing a blue lanyard must be accompanied at all times. Visitors wearing a green lanyard are not required to be accompanied when on-site as they have undergone relevant safeguarding checks, including DBS clearance.

16.4 Transporting Students

Situations may arise which require 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 DSLs.

16.5 Use of Reasonable Force

KCSiE 2025 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).

17. 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 agenda. Please refer to the Staff Code of Conduct and the Learning Behaviour and Attendance Policy.

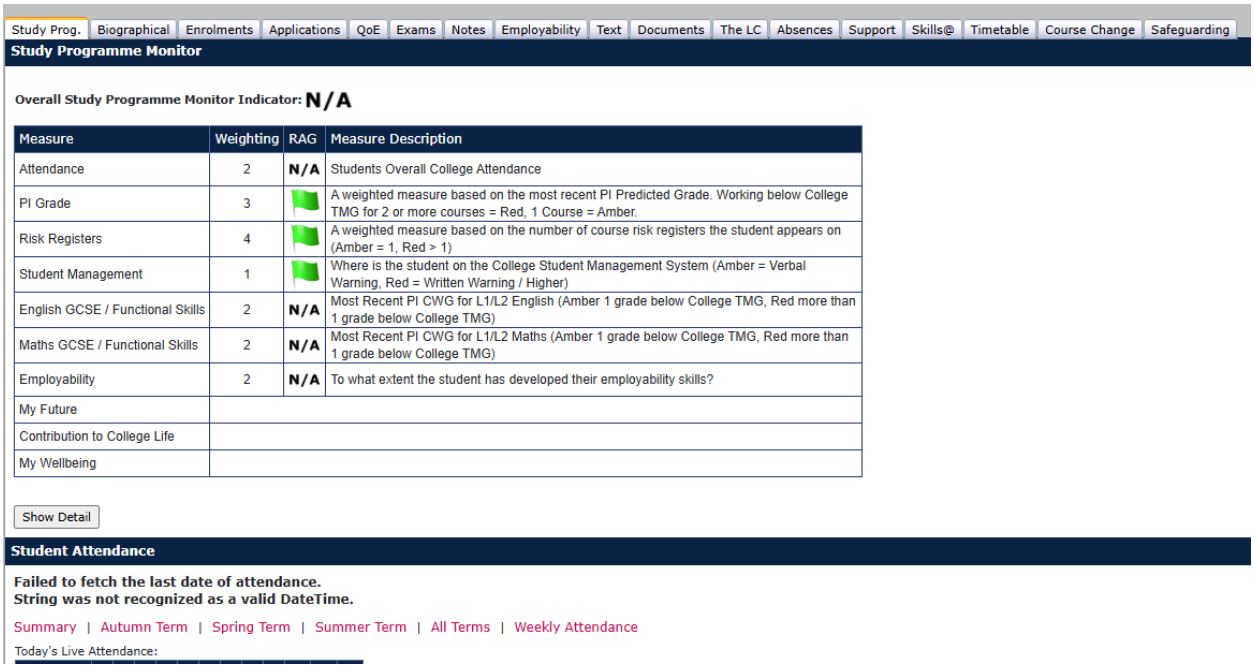
18. Related Documents

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

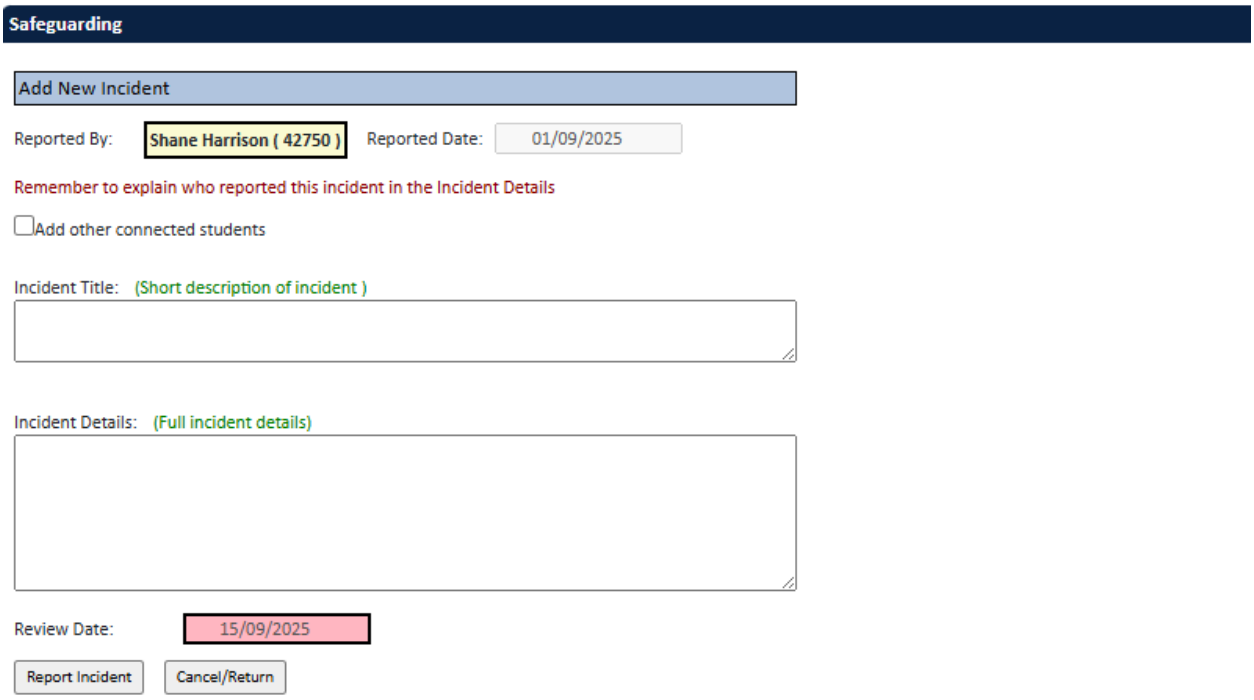
- Staff Code of Conduct
- Recruitment and Selection Policy
- Prevent Policy
- College / Student Agreement
- Health and Safety Policy
- Learning Behaviour Policy
- ABC Expectations
- Allegations Management Policy
- Fitness to Study Policy.
- Single Equality Statement

APPENDIX A - How to Report a Safeguarding Concern

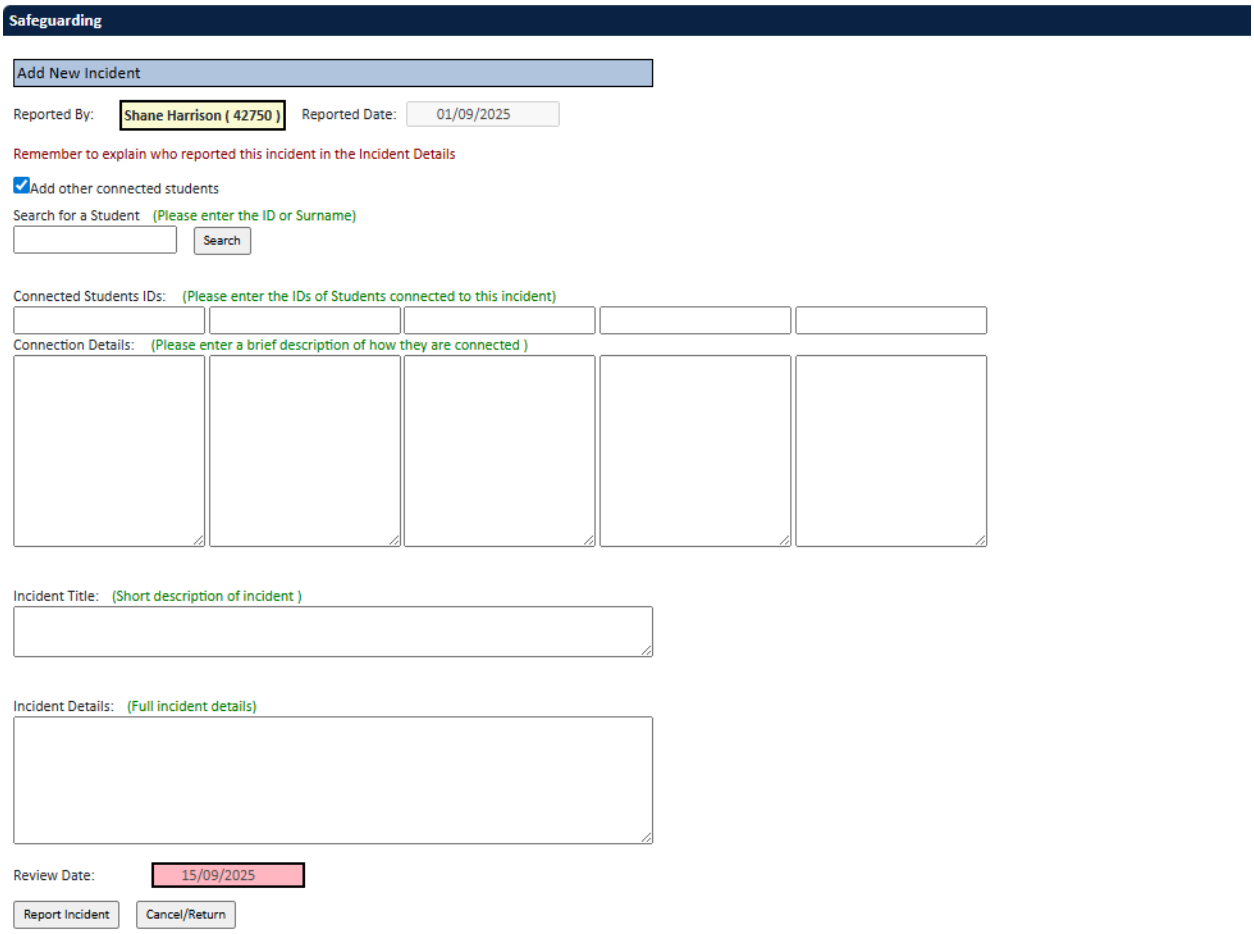
To report a safeguarding concern, go on to the student's FIS profile and select the 'Safeguarding' tab:



Once the Safeguarding tab has opened, select 'Report Safeguarding Issues'. An 'Add New Incident' pop-up will appear. Please provide a description of the safeguarding concern in the 'Incident Title' box:



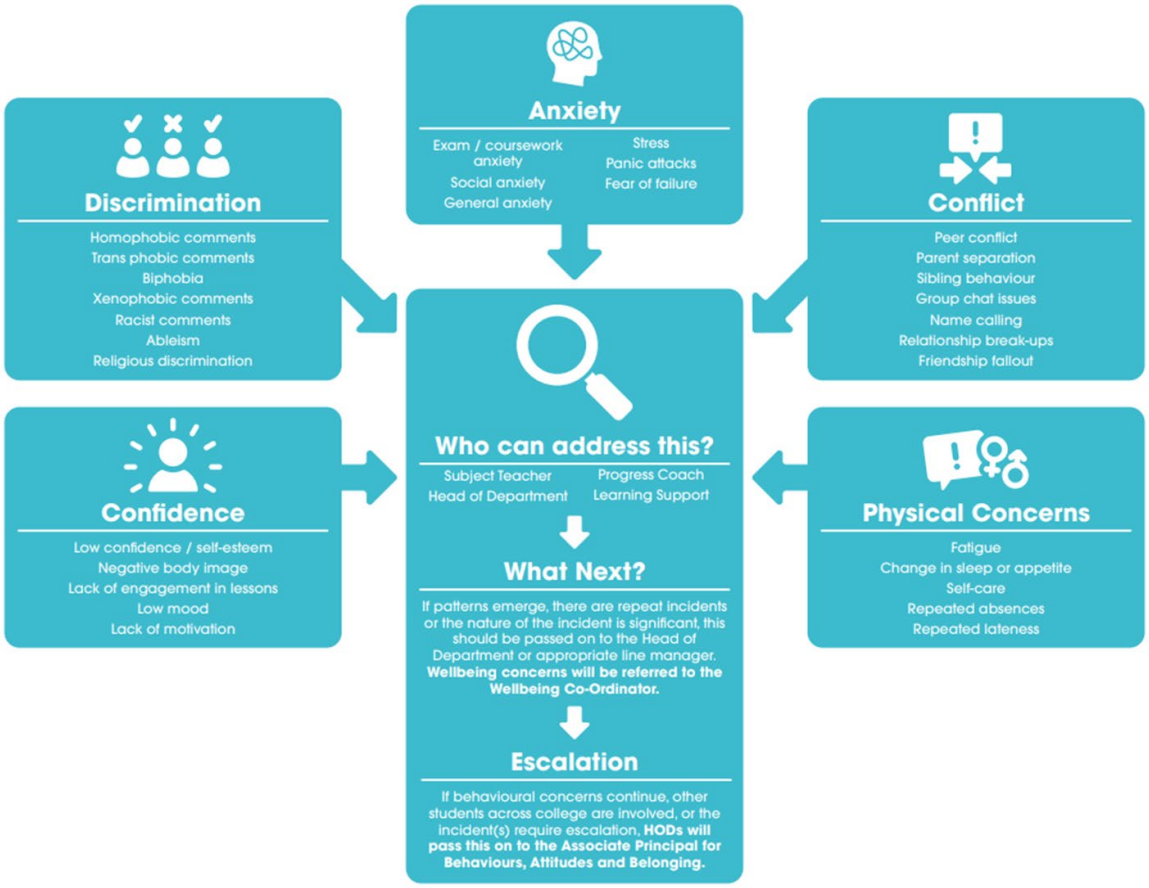
If other students are involved, you can tick the ‘Add other connected students’ option. The form will expand, allowing you to add details of each student involved:



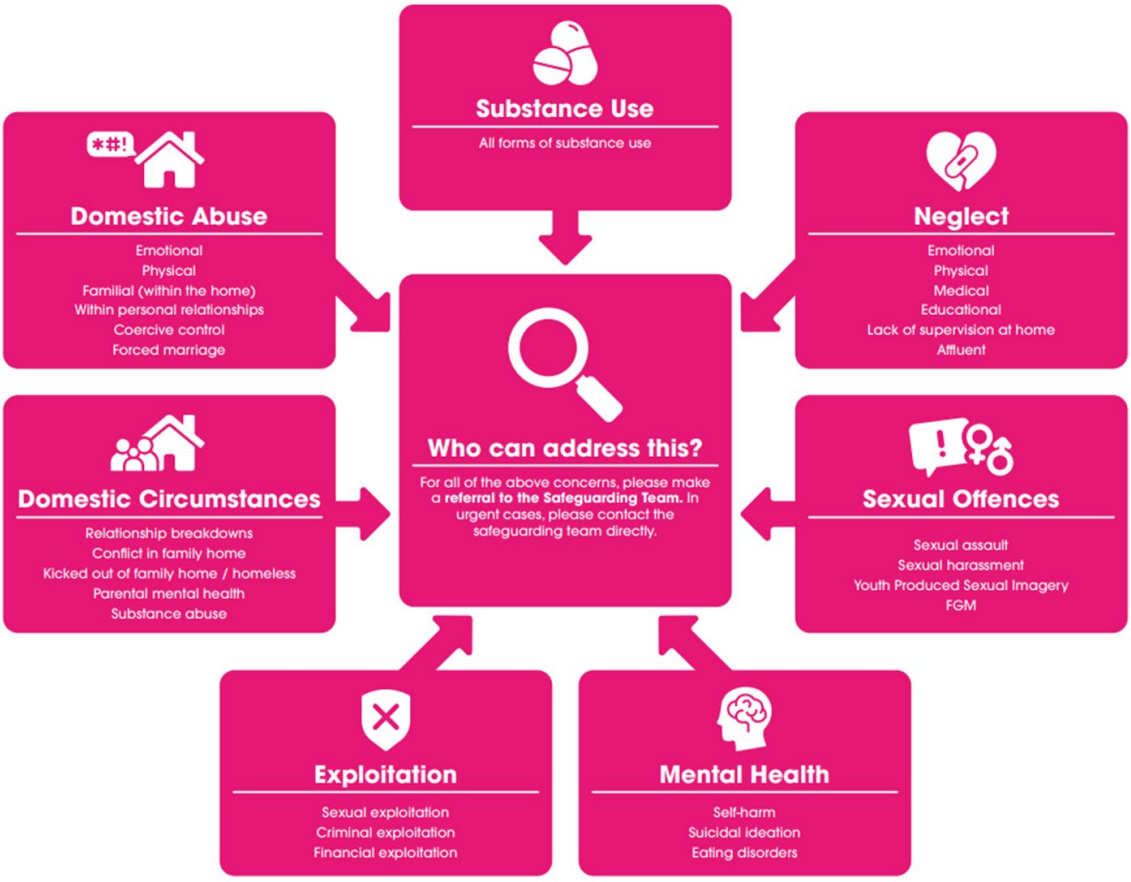
Complete the ‘Incident Details’ box in as much detail as possible, using the words of the student. Once you have completed this section, select ‘Report Incident’ and the referral will be sent to the Safeguarding Team.

APPENDIX B - Safeguarding and Behaviour Threshold

Low Level Safeguarding / Wellbeing / Behaviour Concerns



Serious Safeguarding Concerns



APPENDIX C - SAFEGUARDING VULNERABLE ADULTS

A vulnerable adult - also referred to in safeguarding legislation as an “adult at risk” - is a person aged 18 or over who:

- Has care and support needs (whether or not those needs are being met), and is experiencing, or at risk of, abuse or neglect, and as a result of those needs, is unable to protect themselves from the risk or experience of abuse or neglect (Care Act 2014 - Section 42).

This includes, but is not limited to:

- Adults with learning disabilities, autism, or mental health conditions.
- Adults with physical or sensory impairments.
- Adults who are elderly, frail, or chronically ill.
- Care leavers or those formerly in care.
- Adults who misuse drugs or alcohol.
- Adults experiencing homelessness.
- Adults at risk due to coercive control, domestic abuse, or exploitation.
- Those with communication barriers or limited understanding of safeguarding risks.

Franklin Sixth Form College is committed to providing a safe, inclusive, and supportive environment for all adult learners. We recognise that some learners may be more vulnerable due to health, social, economic, or situational factors, and we will take appropriate and proportionate steps to protect them from harm.

Safeguarding vulnerable adult learners is everyone’s responsibility. All staff must be aware of:

- The signs of abuse or neglect in adults.
- How to report concerns appropriately.
- The need to treat learners with dignity and respect at all times.
- The legal frameworks for adult safeguarding.