

# SAFEGUARDING POLICY

## Safeguarding Children and Adults

### Policy / Document Purpose Statement

This document sets out the policy and procedures supporting child protection and safeguarding for adults at the Cornwall College Group.

### Application

The objective of this document is to provide a framework to ensure young people and adults can learn and work in a safe environment at college, understand risks at home or in the wider community, and can access appropriate safeguarding services and support if they are at risk.

### Interpretation

Further guidance on the use or interpretation of this policy may be obtained from the responsible post holder.

### Legislator / Regulatory Compliance

Compliance with relevant current Health and Safety legislation, Data Protection Act and other legislation / regulations named within the body of the document.

### Publication Restrictions

A version of this document is available to view on the Cornwall College website.

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1. Purpose of the Policy	4
2. Applicability / Scope	4
3. Statutory Obligations	4
4. Key staff role abbreviations:	5
5. Definitions	5
6. Key Principles	6
7. Responsibilities	7
8. Multi-agency working	11
9. College Managed Accommodation	12
10. Safer Recruitment and Selection	12
11. Safeguarding Types, Themes and Specific Safeguarding Issues	12
12. Safeguarding and Child Protection Procedure	13
13. Prevention and Support for Wellbeing	13
14. Early Help	14
15. Learners potentially at greater risk of harm	15
16. Peer on Peer (Child on Child) abuse	15
17. Safeguarding Concerns in relation to staff, governors or volunteers	16
18. Work Placements	16
19. On-line Safety and E-Safety	16
20. Whistleblowing	18
21. Supervision	18
22. Safeguarding Child Protection Policy and Procedure updates	19
23. Confidentiality	19
24. Equality and Diversity	20
25. Related documents	20
Appendix A: DESIGNATION AND CONTACTS – INTERNAL AND EXTERNAL	21
Primary Contacts	21
Key External Contacts	21
Appendix B – FORMS OF ABUSE	22
Appendix C – SIGNS AND INDICATORS OF POTENTIAL ABUSE	24
Appendix D – Intervention Framework	26
Risk Level 1 - Universal (pastoral or wellbeing need but not safeguarding).	26

Risk Level 2 - Vulnerable (low safeguarding need)	26
Risk Level 3 - Complex (medium safeguarding need)	26
Risk Level 4 - Acute (high safeguarding need)	26

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

### **1. Purpose of the Policy**

- 1.1. The aim of this policy is to keep children, young people and adults safe by providing a framework to ensure a safe environment for them to learn and work, whilst contributing to the prevention of harm or abuse and the protection of those individuals who are identified as suffering or likely to suffer harm from any such risk to their safety, health or well-being, whether off-line or online in college, at home or in the wider community.

### **2. Applicability / Scope**

- 2.1. The policy set out in this document (and associated procedures) applies to all campuses, sites and activities that form part of The Cornwall College Group (TCCG), including work-based learning, sub-contracted provision, college-managed residential accommodation and all off site activity including college-led trips and off-site events organised and/or led by staff employed by TCCG.
- 2.2. Our policy and procedures apply to all learners, staff, governors, visitors, contractors, volunteers, advisory board members, and staff from partner organisations working on our sites, including those organisations using or hiring college sites or facilities.
- 2.3. Sub-contracted partners providing education and training for TCCG enrolled learners on non-college premises will be required to apply due regard to this policy and provide assurance and evidence that their own safeguarding policies and procedures meet the statutory requirements and obligations below.
- 2.4. Everyone has the right to be protected against risk to their safety, health and well-being and everyone has the responsibility to safeguard others against such risks.

### **3. Statutory Obligations**

- 3.1. TCCG and sub-contracted partners have a statutory duty under Section 175 of the Education Act (2002) and must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated TCCG policies and procedures listed, the web links provided and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.

- 3.2. This policy considers, amongst others, the following publications, including recent / relevant guidance and legislation in this area:
- 3.2.1. **Keeping Children Safe in Education (KCSIE):** Statutory guidance for schools and colleges. (Department for Education, September 2025) [Keeping children safe in education - GOV.UK](#)
  - 3.2.2. **Working Together to Safeguard Children 2023:** A guide to multi-agency working to help, protect and promote the welfare of children. (HM Government, July 2023) [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)
  - 3.2.3. **Statutory guidance: Care and support statutory guidance** (updated 12<sup>th</sup> August 2024 and currently under review). that provides detailed guidance on all aspects of implementing the requirements contained in the Care Act (2014) to local authorities, the NHS, police and other relevant partner organisations. (Department of Health and Social Care) [Care and support statutory guidance - GOV.UK \(www.gov.uk\)](#)
  - 3.2.4. **The Prevent Duty:** Departmental advice for schools and child care providers (Department for Education. Published October 2022 and updated September 2023). [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](#)
  - 3.2.5. **Prevent Duty Statutory Guidance:** for further education institutions in England and Wales (Home Office. Updated 6<sup>th</sup> March 2024). [Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK \(www.gov.uk\)](#)
  - 3.2.6. TCCG policy and procedures are in accordance with those set out on the South West Child Protection Procedures website (<https://swcpp.trixononline.co.uk/>) which is the guidance issued by the various local multi-agency safeguarding partnerships and boards.

## 4. Key staff role abbreviations:

- 4.1. DSL: Designated Safeguarding Lead.
- 4.2. DDSL: Deputy Designated Safeguarding Leads
- 4.3. SGO: Safeguarding Officer (and the single point of contact for Safeguarding in campus, site or specialist area)
- 4.4. DT: Designated Teacher for Looked After Children (LAC)
- 4.5. SEM: Student Experience Manager
- 4.6. EPO: Engagement and Progression Officer
- 4.7. Contact details and designation for the above can be found at [www.cornwall.ac.uk/safeguarding](http://www.cornwall.ac.uk/safeguarding)

## 5. Definitions

- 5.1. A **child** is defined as any young person under the age of 18 years.
- 5.2. **Safeguarding** and promoting the welfare of children is defined in KCSIE (2025) as:
  - 5.2.1. providing help and support to meet the needs of children as soon as problems emerge
  - 5.2.2. protecting children from maltreatment, whether that is within or outside the home, including online
  - 5.2.3. preventing the impairment of children's mental and physical health or development

- 5.2.4. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- 5.2.5. taking action to enable all children to have the best outcomes
- 5.3. **Early Help** means providing support as soon as a problem emerges at any point in a person's life, with a particular focus on the life of a child.
- 5.4. An **adult who may have safeguarding needs** is defined in The Care Act (2014) as an adult who:
  - 5.4.1. has needs for care and support (whether or not the local authority is meeting any of those needs) and;
  - 5.4.2. is experiencing or at risk of abuse or neglect and;
  - 5.4.3. as result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect.

## 6. Key Principles

- 6.1. **The Cornwall College Group will ensure that:**
  - 6.1.1. A whole college approach to child protection and safeguarding is adopted.
  - 6.1.2. Safeguarding and promoting the welfare of children, young people and adults at risk of harm or abuse is everyone's responsibility and is child-centred / person-centred, using a co-ordinated approach while ensuring that everyone is acting in the best interests of the child, young person or adult at risk of harm or abuse.
  - 6.1.3. the safety and well-being of children, young people and adults are paramount in all areas of work, including safeguarding our staff / learners and raising their awareness so that they can safeguard themselves and others.
  - 6.1.4. all children and adults, regardless of age, disability, gender, gender reassignment, race, religion or belief, sex, sexual orientation or identity, marital status or culture, can exercise their right to protection from harm, abuse, neglect, harassment or exploitation when engaged in college-related activity or settings and receive college support where they may disclose concerns about their broader lives in the community or at home.
  - 6.1.5. all suspicions and allegations of abuse, harassment, neglect or exploitation will be taken seriously and responded to swiftly and appropriately, with due regard to appropriate levels of privacy and the dignity of those concerned while ensuring that those experiencing abuse are supported and kept safe.
  - 6.1.6. all staff will be made aware of key safeguarding principles/ practice through appropriate safeguarding training (including online and offline safety) and are required to report any disclosures, concerns or allegations in line with our procedures and the statutory guidance.
  - 6.1.7. best practice is used in safer recruitment when recruiting staff/ volunteers to ensure their suitability to work with children, young people and adults who may be at risk of harm, abuse or neglect and appropriate levels of assurance are sought from others who visit/use our sites.
  - 6.1.8. best practice is followed in supervising visitors on sites and working with our students to ensure that appropriate college support and supervision is in place at all times.
  - 6.1.9. all those involved with safeguarding adopt a multi-agency approach, working between and in partnership with other key statutory, non-statutory and voluntary sector organisations to support and protect children, young people and adults at risk

- of harm, abuse or neglect through information sharing and the sharing of best practice to improve safeguarding within our communities.
- 6.1.10. all staff understand the benefits of early help and intervention and are particularly alert to the potential need for early help reflected in this policy, adopting a risk-based approach that reflects the local authority threshold / continuum of needs.
- 6.1.11. everybody adheres to all statutory responsibilities placed upon them and they maintain professional curiosity, appreciative enquiry and an attitude of it could happen here.

## **7. Responsibilities**

### **7.1. The Governing Body of TCCG**

- 7.1.1. The Governing Body of TCCG are responsible for the management of safeguarding and must comply with the statutory guidance set out in Part Two of KCSIE (2025) and related guidance or legislation. This includes that:
- 7.1.2. TCCG has a whole college approach to safeguarding and child protection.
- 7.1.3. A member of the Governing Body is nominated to take lead responsibility as the designated governor for safeguarding for the college's safeguarding arrangements and undertakes appropriate training in this.
- 7.1.4. TCCG has a child protection and safeguarding policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- 7.1.5. All staff undergo safeguarding and child protection training appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
- 7.1.6. The Board receives and considers regular safeguarding update reports.
- 7.1.7. TCCG operates 'safer recruitment procedures' in accordance with statutory requirements and guidance.
- 7.1.8. Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- 7.1.9. A senior manager is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take the lead responsibility across TCCG for safeguarding and child protection.
- 7.1.10. TCCG contributes to multi-agency working in line with statutory guidance.
- 7.1.11. Ensure that staff have the skills, knowledge and understanding to keep children safe

### **7.2. The Designated Safeguarding Lead (DSL)**

- 7.2.1. The DSL has ultimate lead responsibility for safeguarding and child protection with responsibilities set out in Annex C of KCSIE (2025), including online safety and understanding the filtering and monitoring systems and processes in place. Activities may be delegated to an appropriately trained DDSL or Safeguarding Officer but lead responsibility remains that of the DSL. The DSL is responsible for ensuring:

- 7.2.2. Publication and correct implementation of the policy and procedures and reviewing the effectiveness of them annually in a written report to the board of governors.
- 7.2.3. Safeguarding training, appropriate to role, is in place for all staff and is delivered in line with national and local guidance, together with raising awareness of online and offline safety.
- 7.2.4. Learners are aware and understand safeguarding and child protection, together with related themes for both online and offline safety. Knowing where to go and what to do if they have any concerns.
- 7.2.5. Ensure that there is a programme of education to support self-help strategies, access to external services and to support the preventative nature of safeguarding and informed by the needs of learners. This will be embedded into the tutorial and personal development programmes for students.
- 7.2.6. Completion of external and internal audits related to the effectiveness of safeguarding.
- 7.2.7. Oversight of the recording and passing on to external agencies, where appropriate, any disclosures received and liaising with the Local Authority Designated Officer (LADO) on any staff related matters, where required.
- 7.2.8. The appointments of DDSL and Safeguarding Officer are appropriately trained and supported.
- 7.2.9. That the Safeguarding Management Group receives appropriate safeguarding information and advice in all cases where allegations of abuse have been made against a member of staff. (The Chair of the Board, if allegations concern the Chief Executive Officer).
- 7.2.10. Effective liaison and working with the Local Authority Safeguarding Children's Partnership / Boards and the Safeguarding Adult Boards and other agencies.
- 7.2.11. That robust risk assessment and support processes are in place where individuals pose a risk to themselves or others.
- 7.2.12. Undertake training to provide them with the knowledge and skills to carry out the role every two years and complete other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- 7.2.13. To ensure that those who use TCCG premises or provide site-based service to learners are aware of this safeguarding policy and associated procedures and agree to abide by these via a 'Letter of Assurance' or 'Letter of Understanding' that will be held within the Single Central Record.
- 7.2.14. Providing senior management with information on safeguarding incidents and trend analysis for service development and reporting.
- 7.2.15. Chair Safeguarding Team meetings which will occur regularly throughout the year to ensure the continued effectiveness of safeguarding processes, procedures and actions.
- 7.2.16. Effective record keeping while making sure all documents relating to safeguarding are managed and secured in accordance with statutory guidance and legislation.
- 7.2.17. Regular review and re-assessment of interventions when situations do not improve.
- 7.2.18. Ensure supervision is in place to support those supporting student safeguarding.

### **7.3. Deputy Designated Safeguarding Leads (DDSL)**



- 7.3.1. The DDSL is responsible for safeguarding and child protection as set out in Annex C of KCSIE (2025), including:
- 7.3.2. Receiving, recording and passing on to external agencies, where appropriate, disclosures concerning harm, abuse or neglect in accordance with TCCG and local authority procedures.
- 7.3.3. Liaising with the DSL as appropriate.
- 7.3.4. Carrying out 'Unspent Criminal Conviction' risk assessments in line with our admissions and safeguarding policy and procedures, ensuring the implementation of risk control measures.
- 7.3.5. Contributing to safeguarding training for all staff.
- 7.3.6. Working with colleagues to raise the awareness of safeguarding amongst the student body and encouraging concerns to be reported.
- 7.3.7. Undertake training to provide them with the knowledge and skills to carry out the role every two years and complete other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- 7.3.8. Supporting and advising colleagues with potential safeguarding concerns about learners.
- 7.3.9. Effective and secure record keeping and auditing of records to ensure consistency of support and record keeping.
- 7.3.10. Regular review and re-assessment of cases / interventions when situations do not improve.
- 7.3.11. Liaising and working with the different local authorities and other agencies in accordance with statutory guidance.

#### **7.4. The Safeguarding Management Group**

- 7.4.1. Where an allegation of abuse is reported that implicates a member of staff, governor or volunteer, the Safeguarding Management Group will be convened and is responsible for responding quickly and appropriately to allegations of abuse made against staff/ volunteers in line with the statutory guidance set out in Part Four of KCSIE (2025) and Local Authority procedures, overseeing any investigation or external reporting related to this.
- 7.4.2. The Safeguarding Management Group will comprise of at least two of the following:
  - 7.4.2.1. The Designated Safeguarding Lead
  - 7.4.2.2. The Chief Executive Officer
  - 7.4.2.3. The Executive Principal
  - 7.4.2.4. Chief People Officer

#### **7.5. All Staff Members / Volunteers**

- 7.5.1. All staff members and volunteers are responsible for:
- 7.5.2. Reading and understanding Keeping Children Safe in Education: Statutory guidance for schools and colleges Part 1: Information for all school and college staff (Department for Education, September 2025)
- 7.5.3. Providing a safe environment in which children, young people and adults at risk of harm, abuse or neglect can learn.

- 7.5.4. Reporting all safeguarding or child protection concerns in accordance with this policy and associated procedures, while reassuring victims of abuse that they will be taken seriously and will be supported.
- 7.5.5. Ensuring that nobody, in particular children and young people, will ever be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- 7.5.6. Be prepared to identify children, young people and adults at risk of harm, abuse, neglect or exploitation who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- 7.5.7. Following the framework described in Appendix D, together with the correct referral process and procedure described in the Safeguarding and Child Protection Procedures.
- 7.5.8. Know where to go and what to do if they have any safeguarding concerns.
- 7.5.9. Reporting to a DSL, DDSL, Safeguarding Officer or any other support staff any concerns that they may have in relation to learner welfare or where they may need support with a concern or intervention
- 7.5.10. Attending safeguarding training and updates as required, including as part of induction and undertake annual mandatory training.
- 7.5.11. Reading and familiarising themselves with associated policies.
- 7.5.12. Apply due regard and attention to regular updates that come from the Executive Leadership Team, Campus teams, Insight updates and staff briefings.
- 7.5.13. Being aware of how to make referrals to children's social care and adult's social care for statutory assessments via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments.
- 7.5.14. Promoting awareness of safeguarding issues and support amongst learners, colleagues and other stakeholders.
- 7.5.15. Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct, safer working practice and other key safeguarding standards.
- 7.5.16. Wearing their staff ID badge when working on or off college sites.
- 7.5.17. Reporting to the People and Culture team any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with children, young people and adults at risk of harm, abuse or neglect.
- 7.5.18. Reporting to the Principal, DSL, or Chief People Officer any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or Professional Staff Code of Conduct.
- 7.5.19. Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.

## **7.6. Learners**

- 7.6.1. Learners are responsible for:
- 7.6.2. Developing an awareness of safeguarding and child protection with related themes, as provided as part of lessons and college updates, to keep themselves safe both online and offline.
- 7.6.3. Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers and others on site, which includes the wearing of a lanyard and carrying a valid college identification card.

- 7.6.4. Reporting any concerns to any trusted member of staff with whom they feel comfortable discussing these concerns.
  - 7.6.5. Abiding by TCCG learner code of conduct which is designed to safeguard all those on college sites or using college facilities, including the IT network.
  - 7.6.6. Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.
- 7.7. Other individuals working on TCCG sites / provision**
- 7.7.1. Visitors to college sites must be directed to sign in and collect a visitor's badge/lanyard that must be visible always while on site. They must be collected from the reception area, accompanied always by a member of staff and returned to reception to sign out and hand in their badge/lanyard.
  - 7.7.2. Contractors and tenants operating on Group premises must contractually agree and abide by safeguarding conditions set out by TCCG.
  - 7.7.3. Sub-contracted providers of education and training to TCCG enrolled learners will be contracted to provide assurance and evidence to the sub-contract Officer that due diligence has been placed to safeguarding and child protection and that they have complied with statutory requirements.
  - 7.7.4. The college departments responsible for managing / administering all other individuals working or coming into contact with TCCG enrolled learners will be represented on the Safeguarding Committee to ensure that the relevant processes are reviewed and updated regularly and for key messages to be shared to partners.
  - 7.7.5. Other organisations working with learners on TCCG premises are required to sign a Letter of Assurance to confirm that they have complied with statutory requirements of safer recruitment and agree to comply with TCCG Safeguarding Policy and Procedures.
  - 7.7.6. Any organisations not working with TCCG learners but who are renting, leasing, hiring or using space on TCCG premises and are engaged in regulated activity, must provide evidence that they are adhering to the statutory requirements. If the organisation is not engaged in regulated activity, they may complete a Letter of Understanding but will be more strictly monitored.
  - 7.7.7. In the case of learners directly employing their own support worker, TCCG reserves the right to require that safer recruitment processes are adhered to and that the details will be recorded on the single record.

## **8. Multi-agency working**

- 8.1. As a relevant agency, TCCG will work with the statutory partners and other statutory and non-statutory agencies in accordance with the statutory guidance and published arrangements. This will include working with the Safeguarding Adults Board (SAB) and partners in accordance with statutory guidance relating to adult safeguarding.
- 8.2. We will work closely with local safeguarding boards, Early Help Hubs and other single agencies in support of our students.
- 8.3. We will receive Operation Encompass notifications from the police where they are aware that domestic abuse is affecting one of our learners. This will ensure that we can provide appropriate awareness and support for the student, however they are affected.

- 8.4. Public Protection Notices will also be received by the college to provide any other updates from the police that might impact the safety and wellbeing of our students.
- 8.5. We will request child protection information for students aged under 18 from their previous education establishment to ensure that we have the most up to date information to be able to provide the support and safety of each new student.

## **9. College Managed Accommodation**

- 9.1. The Residential Manager must ensure that all college managed accommodation complies with relevant legislation and National Minimum Standards<sup>1</sup>.
- 9.2. The Residential Team will be responsible for the out-of-hours administration of safeguarding in college managed accommodation in accordance with TCCG Safeguarding policy and procedures, together with the National Minimum Standards. During curriculum hours the overall lead responsibility for safeguarding and child protection will be undertaken by the Campus / Site Safeguarding Officer.
- 9.3. The Residential Manager will be responsible for leading the Residential Team in the management and administration of safeguarding in college managed accommodation but this must be in collaboration with the DSL, DDSL or site Safeguarding Officer who has overall lead responsibility for safeguarding and child protection, being able to take a holistic and universal view of all learners in college managed accommodation.

## **10. Safer Recruitment and Selection**

- 10.1. TCCG will select and recruit in accordance with the statutory guidance set out in Chapter 3 of KCSIE (2025), which details Safer Recruitment practice and process.
- 10.2. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in TCCG, including staff, volunteers and staff employed by external partners / contractors.
- 10.3. Sub-contracted partners will provide assurance and evidence that compliance with safer recruitment processes has been adhered to for all staff working with TCCG enrolled learners.
- 10.4. The Chief People Officer will ensure that a single central record is maintained of all pre-appointment checks, which the DSL will review regularly.

## **11. Safeguarding Types, Themes and Specific Safeguarding Issues**

- 11.1. In accordance with 7.5.2 all staff must read and familiarise themselves with the different types of harm, abuse and exploitation, together with various safeguarding themes and specific safeguarding issues outlined in Part One and Annex B of KCSIE (2025). A summary of these types and themes are at Appendix B of this policy, together with possible signs and indicators at Appendix C.
- 11.2. This document should be used alongside specific other policies to support students including the Peer on Peer Abuse and Anti-Bullying Policy and Sexual Abuse and Harassment guidance.

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<sup>1</sup> Further education residential accommodation: national minimum standards (2018)  
Safeguarding Policy-v6.26.1  
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- 11.3. The Governments Counter Terrorist Strategy (CONTEST) places a specific duty<sup>2</sup> on the college to prevent radicalisation and extremism. TCCG's PREVENT (Extremism & Radicalisation) policy and procedures, which focusses on the Prevent referral process and Channel, must be read alongside this policy.
- 11.4. TCCG is committed to supporting national, regional and local authority strategies to prevent learners from being exploited and will adopt a holistic and contextual safeguarding approach that seeks to understand the communities in which learners live and the influences / factors around learners at risk of exploitation. Exploitation in all its forms is a type of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or adult into doing something they would not ordinarily do, including sexual or criminal activity.

## **12. Safeguarding and Child Protection Procedure**

- 12.1. The process for reporting a safeguarding concern is outlined in a separate 'Safeguarding Procedure' document and outlines how staff can report concerns to the safeguarding team. However, a direct referral should be made to the local authority safeguarding unit or the police when:
- 12.2. it may not always be appropriate to go through all stages sequentially because there is immediate danger or risk of harm. Before doing so, basic facts should try to be established. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation.
- 12.3. a member of staff has concerns about the safety or welfare of a child and feel they are not being acted upon by their manager or named DSL, DDSL or Safeguarding Officer.
- 12.4. there is a specific legal duty on teachers to report to the police if they discover that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18.
- 12.5. It is important to refer to social care but when making a direct referral and, in doing so, consideration must be given to the wider context and safeguarding risks / concerns outside of the family / home, often referred to as contextual safeguarding.
- 12.6. Where a direct referral is made staff should record, in writing, all concerns and discussions, the decisions made and the reasons for those decisions, which should be passed to the Safeguarding Officer, DDSL or DSL at the earliest opportunity.
- 12.7. Allegations of abuse, or other safeguarding concerns, raised against a teacher or other member of staff, including supply teachers and volunteers, should be dealt with in accordance with part four of KCSIE and the procedure outlined in the TCCG safeguarding procedure.

## **13. Prevention and Support for Wellbeing**

- 13.1. Part of our safeguarding provision will be to raise awareness through training, education, campaigns and wider activity
- 13.2. This will be delivered through our EMPOWER Personal Development and Participation programme which is delivered through tutorial activity, student notices, workshops and enrichment on campus, and access to internal and external support.

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<sup>2</sup> The Prevent Duty: Departmental advice for schools and child care providers (Department for Education. March 2024).  
Safeguarding Policy-v6.26.1  
Review Date: August 2025  
Review Due Date: October 2026

13 of 26  
Owner: Safeguarding

The Cornwall College Group

- 13.3. Safeguarding reports provide a summary of support and interventions on campus and Student Experience Teams will contextualise support and external services for their students based on student need.
- 13.4. A whole college approach will be delivered through Personal Development and Participation lessons to support student wellbeing, developing understanding of risks and where to access support.

## 14. Early Help

- 14.1. Early help means providing support as soon as a problem emerges at any point in a child's or adult's life. Staff should be particularly alert to a learner who:
  - 14.1.1. is disabled, has certain health conditions and has specific additional needs;
  - 14.1.2. has special educational needs (whether they have a statutory Education, Health and Care Plan or not);
  - 14.1.3. has a mental health need
  - 14.1.4. is a young carer
  - 14.1.5. is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - 14.1.6. is frequently missing/goes missing from education, home or care
  - 14.1.7. has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
  - 14.1.8. is at risk of modern slavery, trafficking, sexual and/or criminal exploitation is at risk of being radicalised or exploited
  - 14.1.9. has a parent or carer in custody, or is affected by parental offending
  - 14.1.10. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - 14.1.11. is misusing alcohol and other drugs themselves
  - 14.1.12. is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - 14.1.13. is a privately fostered child
- 14.2. It is important that staff try to identify early help and support needs during the recruitment, interview and enrolment process, carrying out risk assessments and creating support plans where required.
- 14.3. If there is no pre-existing local authority partner agency involvement or it is felt that the individual case does not require a social worker, then an early help referral can be made directly to the local authority early help teams or by contacting the local authority safeguarding units as described in Appendix A although it is important to do this with the support and assistance of the Safeguarding Officer, DDSL or DSL.
- 14.4. The role of staff in a statutory assessment is detailed in Chapter 1 of Working Together to Safeguard Children (2023). Staff may be required to act as the lead professional for an early help assessment or be asked to participate in such an assessment.
- 14.5. It is important that when contributing to an assessment that college staff provide all available information as part of the referral process.

## **15. Learners potentially at greater risk of harm**

- 15.1.** There are groups of learners who may be at greater risk of harm, abuse or exploitation. TCCG will seek to identify early, those learners who may be at greater risk for one or more of the following reasons:
- 15.2.** Learner has a social worker and are on a Child in Need or Child Protection Plan.
- 15.3.** Learner is a looked after child, who is subject to a care order or a previously looked after child.
- 15.4.** Learner is a care leaver, who is no longer subject to a care order.
- 15.5.** Learner is a young carer or young parent.
- 15.6.** Learner requires mental health support.
- 15.7.** Learner who is, or lives with someone who is, LGBTQ+
- 15.8.** Learners with special educational needs (SEN) and disabilities who may face the following additional challenges:
  - 15.9.** assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without exploration;
  - 15.10.** being more prone to peer group isolation than other children;
  - 15.11.** the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
  - 15.12.** communication barriers and difficulties in overcoming barriers.
- 15.13.** Consideration must be given to the assessment and implementation of extra pastoral support and protection in collaboration with relevant social workers, virtual school, care leaver teams and other professionals / agencies as required and based on the needs and wishes of the learner.
- 15.14.** LGBTQ+ and SEND learners will have access to a safe space and trusted adult for them to speak out or share their concerns.

## **16. Peer on Peer (Child on Child) abuse**

- 16.1.** Peer on peer abuse can occur in college settings, outside college or online and will be treated seriously and not dismissed or downplayed, which could lead to a culture of unacceptable behaviour, creating an unsafe environment.
- 16.2.** TCCG will endeavour to create as many ways as possible to enable individuals to feel safe and supported, while giving them the confidence to report peer on peer abuse that they may be experiencing or that others are experiencing. Ultimately, all systems, processes and policies should operate with the best interests of the student.
- 16.3.** TCCG recognises that females are more likely to be victims of sexual harassment and sexual violence and that it is more likely it will be perpetrated by males but any report of sexual harassment or sexual violence will be taken seriously and victims will be supported and kept safe. A victim will never be given the impression that they are creating a problem. Nor will they ever be made to feel ashamed for making a report.
- 16.4.** Even if there are no reports of peer on peer abuse, including sexual harassment or sexual violence, this does not mean it is not happening. As such, all staff will report any concerns regarding possible peer on peer abuse directly to the Safeguarding Officer, DDSL or DSL.

- 16.5. All staff will act in accordance with the college's Peer on Peer Abuse and Anti-Bullying Policy and associated Procedure for guidance in understanding, reporting and recording all inappropriate behaviours between peers. Where the abuse involves a child on child incident, then all staff will act in accordance with the additional guidance in Part Five of Keeping Children Safe in Education (2025).

## **17. Safeguarding Concerns in relation to staff, governors or volunteers**

- 17.1. The Staff Professional Code of Conduct outlines the expected behaviours of staff and, as part of our whole college approach to safeguarding, we promote an open and transparent culture where any concerns about adults working with children can be shared.
- 17.2. Where staff have concerns in relation to a member of staff working with children, these concerns should be reported to the Designated Safeguarding Lead or Chief People Officer, should the DSL not be available then the Executive Principal should be contacted
- 17.3. These will be reviewed by the Safeguarding Management Group (see 7.4) and considered in line with KSCIE Part Four (2025) and Local Authority procedures.
- 17.4. We will work closely with, and take guidance from, the Local Authority Designated Officer (LADO) where safeguarding concerns are identified for a member of staff, governor or volunteer that meet the harm threshold.
- 17.5. Where concerns do not meet the harm threshold as outlined in KCSIE Part Four (2025), these 'low-level concerns' will be reviewed in line with 'Code of Conduct-Staff Professional Guidance' and support or intervention provided where appropriate.
- 17.6. In all cases we will take into account our duty of care for employees and students and address concerns confidentially and sensitively to protect those working in, or on behalf of, the college from becoming the subject of potential false low-level concerns or misunderstandings.

## **18. Work Placements**

- 18.1. Employers and training organisations will be required to co-operate with TCCG in putting appropriate safeguards in place. Failure to do this will result in TCCG not using them as a work experience placement provider.
- 18.2. Where a placement is long term or meets certain criteria following a risk assessment that increases the safeguarding risks to children or adults at risk of harm, abuse or neglect, then TCCG will ensure that additional safeguards are in place or decline the placement based on the lack of suitability. DBS checks will be carried out on learners who will be working in regulated activity, which must be completed prior to the placement starting.

## **19. On-line Safety and E-Safety**

- 19.1. TCCG will endeavour to both filter and monitor all computer and on-line usage within the college or on college systems in a responsible and transparent way to ensure and maintain the safety of staff and learners.



- 19.2. All learners and staff must accept, agree and adhere to the acceptable use policy and the Online and e-Safety Policy.
- 19.3. We recognise the dangers and impact of life online to individuals and communities and the importance of protecting students from harm whilst at college. However, whilst we can offer a level of protection within college and with the use of systems, the online world will travel with students when not in college and therefore, in order to protect from future harm, a range of methods to support online safety will be used.
  - 19.3.1. **Training and education:** This will support understanding risks to support the prevention of harm. We will provide education as part of personal development and consider the four areas of risk:
    - 19.3.1.1. **content:** being exposed to illegal, inappropriate or harmful material online; including misinformation and disinformation.
    - 19.3.1.2. **contact:** being subjected to harmful online interaction with other users; and
    - 19.3.1.3. **conduct:** personal online behaviour that increases the likelihood of, or causes, harm
    - 19.3.1.4. **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
  - 19.3.2. **Filtering:** We have filtering systems in place to block harmful and inappropriate content. We will take into account the age profile of our students and areas of study and protocols will be reviewed regularly as well in context when required. We will also undertake a filtering test (<http://testfiltering.com/test/>) at least monthly to ensure settings remain appropriate.
  - 19.3.3. **Monitoring:** Monitoring online activity has a number of benefits including identifying trends in searches and access to information online that might have the potential to cause harm or identify specific concerns with an individual. We will therefore use monitoring processes and systems in a range of ways:
    - 19.3.3.1. **Physical / Observation:** Listening to students and monitoring online activity in college will remain an active monitoring tool.
    - 19.3.3.2. **System:** A system based approach to monitor trends and actions online through reports to inform potential areas of future harm and risk and inform personal development or specific interventions for students.
    - 19.3.3.3. **Alerts:** Where the system, or physical observation, identifies a specific or immediate risk of harm, the safeguarding team will be alerted to review and action as required.
- 19.4. Filtering and monitoring will require a collaborative approach between IT professionals, safeguarding teams and wider college staff. Specific responsibilities based on roles include:
  - 19.4.1. **Designated Safeguarding Lead** is responsible for: ensuring appropriate filtering and monitoring systems and processes are in place and reviewed annually in line with DfE filtering and monitoring standards; Liaising with the Head of IT Services to ensure systems are in place; Implementing an effective safeguarding monitoring system and ensuring that alerts are assessed and managed effectively and in a timely way; Utilising reports to inform personal development for online safety education.
  - 19.4.2. **Head of IT Services** is responsible for: Ensuring that filtering and monitoring systems remain up to date and fit for purpose, including routine checks; Advise the DSL and safeguarding team on system changes and improvements; Work with the safeguarding team to review and adapt and improve filtering and monitoring protocols; Undertake a regular review with the Designated Safeguarding Lead to ensure that the filtering and

monitoring systems maintain a level of safety and protection without impacting on learning.

- 19.4.3. **Safeguarding Team** is responsible for acting on any alerts or concerns raised due to information provided by filtering and monitoring.
- 19.4.4. **Student Experience Managers:** Acting on information provided through filtering and monitoring and providing personal development and education to students to support preventative action.
- 19.4.5. **College Staff** have a responsibility to monitor the online activity of students in their care during supervised sessions and to reporting any concerning activity.
- 19.5. The filtering and monitoring systems and categories for reporting will be reviewed at least annually. The Safeguarding Committee will consider IT safety as part of its bi-annual review of college services for safeguarding.
- 19.6. The Safeguarding Team will regularly review reports provided from monitoring systems to inform personal development and education activities.

## 20. Whistleblowing

- 20.1. All concerns raised about poor or unsafe practice and potential failures in relation to the college's safeguarding regime will be taken seriously and acted upon through the college's whistleblowing policy.
- 20.2. Where a staff member feels unable to raise the issue or concern with the college leadership team or feels that a genuine concern is not being addressed it is suggested that they get free, confidential advice from the independent whistleblowing charity 'Protect' who can help with the decision whether and/ or how to raise the concern. Further information can be found at [protect-advice.org.uk](http://protect-advice.org.uk).
- 20.3. Staff may also use other whistleblowing channels such as the NSPCC or OFSTED whistleblowing helplines: Telephone: NSPCC on 0800 028 0285 / [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or OFSTED on 0300 123 3155 / [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

## 21. Supervision

- 21.1. Supervision for safeguarding staff will be provided through regular pre-arranged meetings. Additional supervision for individuals or groups can be provided on request or as needed.
- 21.2. Supervision will be provided by the direct line manager or delegated to another manager if required.
- 21.3. Access to clinical supervision for safeguarding is available through request from the DSL / DDSL.
- 21.4. Staff also have access to counselling on request through the Online Employee Assistance Platform.
- 21.5. The DSL and DDSL will act as a source of support, advice and expertise for all staff. This is available as required for all staff undertaking specific safeguarding work.
- 21.6. Line Managers will discuss and offer supervision when conducting a performance management review (PMR), during team meetings or other meetings, so that time can be allocated and agreed where necessary.

## 22. Safeguarding Child Protection Policy and Procedure updates

- 22.1. The Safeguarding and Child protection policy will be reviewed, updated and approved by Governors via the Curriculum and Quality Committee on a biennial basis or more frequently if there are changes to national or local guidance.
- 22.2. Safeguarding procedures and supporting guidance will be reviewed on a regular basis, at least annually and as part of national/local case reviews and “learning lessons” data and in the light of feedback from staff or learners.

## 23. Confidentiality

- 23.1. The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk of harm, abuse or neglect
- 23.2. Staff should never promise that they will not tell anyone about an allegation or disclosure, as this may ultimately not be in the best interests of the child, young person or adult at risk of harm or abuse.
- 23.3. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance<sup>3</sup>, using the 7 golden rules.
- 23.4. The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- 23.5. Staff must be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 23.6. Staff should seek advice from Safeguarding Officers if they are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- 23.7. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- 23.8. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- 23.9. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is

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<sup>3</sup> Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (Her Majesties Government July 2018) <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

- 23.10. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## **24. Equality and Diversity**

- 24.1. Consideration must be given to the Rights of the Child, Human Rights Act 1998 and the Equality Act 2010 and all staff should be aware of their obligations in relation to these when intervening in a child protection or safeguarding concern.

## **25. Related documents**

- 25.1. Safeguarding Procedures
- 25.2. Mental Health and Wellbeing Policy
- 25.3. Prevent (Radicalisation & Extremism) Policy and Procedures
- 25.4. The Student Behaviour and Misconduct Policy
- 25.5. Safer Recruitment and Vetting Policy and Procedure
- 25.6. Peer on Peer Abuse and Anti Bullying Policy and Procedure
- 25.7. Drugs and Substance Misuse Policy
- 25.8. Sex and Healthy Relationships Policy
- 25.9. Whistleblowing Policy and Procedure

## Appendix A: DESIGNATION AND CONTACTS – INTERNAL AND EXTERNAL

### Primary Contacts

CONTACT POINT	CONTACT NUMBER
Central Contact Central Safeguarding Number Up to date information of all safeguarding contacts	03332 079675 Email: <a href="mailto:safe@cornwall.ac.uk">safe@cornwall.ac.uk</a> <a href="http://www.cornwall.ac.uk/safeguarding">www.cornwall.ac.uk/safeguarding</a>

### Key External Contacts

Local Authority arrangements may vary when referring allegations of abuse or general safeguarding concerns about young people under the age of 18 years or in the case of adults at risk of harm under the definition of the Care Act 2014.

You should refer to the Local Authority Multi-Agency Safeguarding Unit, Local Safeguarding Children Partnerships (SCP) or Boards (SCB) or Safeguarding Adults Board (SAB) for contact details, advice and the referral process.

The South West Child Protection Procedures (SWCPP) website provides a good link to different local authority safeguarding partnership websites with contact details and procedures. The following link will take you to the website: <https://swcpp.trixonline.co.uk/>

Allegations against staff working with children or adults should be made to the relevant **LADO** (Local Authority Designated Officer) in accordance with the Safeguarding Procedure.

## **Appendix B – FORMS OF ABUSE**

Keeping Children Safe in Education (2025) and other government guidance identifies several categories of abuse and safeguarding themes. These and other types of abuse can relate to either a child under the age 18 years or to an adult at risk of harm, abuse or neglect.

Some of these are outlined below for reference.

All staff responsible for the management of safeguarding have undertaken various specialist training and learning lessons workshops on the above and can provide support, together with contacts in specialist support agencies.

### **Physical Abuse**

This is anything that causes physical harm, injury or illness. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child / young person.

### **Emotional/Psychological Abuse**

This is the persistent emotional ill-treatment of a vulnerable person such as to cause severe and adverse effects on their emotional development.

### **Sexual Abuse, Violence and Harassment**

This involves forcing or enticing child or young person or adult to take part in sexual activities, not necessarily involving violence. The activities may involve physical contact or non-contact, such as involving children/young people/adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

### **Neglect**

This is the persistent failure to meet the child/young person/ adult (who is at risk) basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development.

### **Self-Neglect/Harm**

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to remember that they may owe a duty of care to a child/young person or adult at risk of harm, abuse or neglect, who places themselves at risk in this way. A refusal to engage with services does not override a duty of care to support individuals and they should continue to be encouraged to access support.

### **Domestic Abuse/Teenage Relationship Abuse**

Abuse can be either in the form of being personally abused within a relationship or for a child or young person to witness this within their home, perhaps involving parents/carers. Domestic abuse can be psychological, physical, sexual, financial, or emotional and can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Coercive and controlling behaviours may be part of this abuse.

### **Financial or Material Abuse**

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

### **Discriminatory Abuse**

This includes racist, sexist, or other forms of abuse that are based on a person's protected characteristics and other forms of harassment, or similar treatment. This can be viewed by a victim as hate crime and the Police can prosecute on this basis.

### **Sexting and Revenge Porn**

New legislation came into force in April 2015 to prevent sharing nudes or semi-nude video/images (also known as sexting or youth produced sexual imagery) or posting of nudes using online media to cause harm or distress to the person subject of the material. The new law includes uploading to the internet, sending by text, email or messaging platforms, as well as simply showing someone a physical or electronic image.

### **Radicalisation**

This is a process by which a person comes to support terrorism and/or forms of extremism leading to them committing acts of violence or the support of violence by others in a group. Young people and adults who may be vulnerable are often targeted by groups. They may be drawn into association with these groups through internet chat rooms, possibly motivated by a wish to belong or to make a stand or a difference. Read PREVENT (Radicalisation & Extremism) Policy.

### **Exploitation**

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another person into sexual, criminal or gang related activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur using technology.

### **Female Genital Mutilation (FGM)**

This is an unacceptable and illegal (in the UK) form of abuse and violence towards girls and women involving female circumcision or mutilation of the female genital. There have been incidences of FGM in the South West including Devon and Cornwall.

### **Peer on Peer (Child on Child) abuse**

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age, including abuse in an intimate personal relationship between peers. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the perpetrator as well as the victim. Abuse in intimate relationships between peers can include non-consensual sharing of nude and semi-nude images and/or videos. Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however, it can also affect boys and young men. Specific attention should be given to individuals with learning difficulties or disabilities, LGBTQ and those who are from different communities.

## Appendix C – SIGNS AND INDICATORS OF POTENTIAL ABUSE

Signs of abuse can be many and varied but can also be innocent indications of a transition to adult life. However, they should always be considered as potential causes for concern and followed up/monitored in a sensitive way, with appropriate records dated and kept securely.

Welfare concerns may arise in many different contexts (Contextual Safeguarding), and can vary greatly in terms of their nature and seriousness. Abuse can occur in a family or in an institutional or community setting, by those known to the victim or by a stranger, including via the internet or online media. Extra-familial harm takes a variety of different forms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over time but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a victim's health, development and well-being.

The Safeguarding Teams and other staff are trained and experienced in exploring such issues in a confidential and supportive way and can assist colleagues in this or provide guidance and support. They can also seek external, specialist advice and/or make referrals to statutory agencies.

### Possible indicators of abuse

- Behaviour changes, extreme behaviours both introvert as well as extrovert.
- Excessively withdrawn, fearful, or anxious about doing something wrong
- Don't want to change clothes in front of others or participate in physical activities.
- Regularly missing from education, poor attendance and poor punctuality.
- Concerned for younger siblings without explaining why.
- Shy away from being touched or flinch at sudden movements.
- Physical injuries, including bruises, particularly if reasons for these do not appear plausible or if injuries are repeated or self-harm is suspected
- Emotional distress, fear, unwillingness to go home
- Expressed fear of, or strong effort to avoid individuals without an obvious reason
- Sudden changes in behaviour, e.g. becoming very withdrawn or aggressive
- Significant loss/increase of weight or poor hygiene or appearance
- Hungry at college with no money to buy food or borrowing money to buy food
- Poorly dressed or equipped for college
- Sudden changes of living circumstances, e.g. moving out of home to live elsewhere
- Sudden acquisition of jewellery, gifts from older girl/boyfriends
- Alcohol abuse or substance misuse.
- Displaying knowledge or interest in sexual acts inappropriate to their age
- Asking others to behave sexually or play sexual games out of context
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy



- Expression of radicalised views to others – racism, extreme political views, animal rights, religious ideology etc.
- Expression of Interest in weapons, explosives etc.
- Talking about travelling abroad to conflict zones such as Syria
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons or blaming their problems on their child.
- Parents who are dismissive and non-responsive to practitioners' concerns.

Further signs / indicators specific to children can be found at: [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-abuse-concerns-guide-for-practitioners)

## Appendix D – Intervention Framework

The following framework should be used when determining levels of responsibility for safeguarding intervention. The framework is adapted from the local authority threshold tool and continuum of needs model that was introduced to you in your safeguarding training:

### Level of Safeguarding Need

**Risk Level 1 - Universal (pastoral or wellbeing need but not safeguarding).**

Learners with no additional safeguarding needs, who make good overall progress in all areas of universal development and receive appropriate universal services. The Programme Manager provides normal pastoral and welfare support, signposting to services as required.

**Risk Level 2 - Vulnerable (low safeguarding need)**

Additional needs of the learner are being met or could be met through universal services but there are emerging needs that require early intervention or targeted support. There is no risk of maltreatment and a low risk of harm. Programme Manager to facilitate pastoral and welfare support through support plan in consultation with, and assistance from other support staff as required, which may include referral to external services in consultation with the individual and / or parents / guardians.

**Risk Level 3 - Complex (medium safeguarding need)**

Learners experiencing a situation or circumstance where there is a perceived risk of maltreatment or harm to themselves that requires external support, multi-agency or a co-ordinated response. Any member of staff who has concerns about the treatment or risk of harm to a learner should complete a 'Safeguarding Concern / Disclosure' form and refer to the Safeguarding Officer and Deputy Designated Safeguarding Lead (DDSL) .The concern will be triaged to determine the appropriate support and best course of action and referral as required, in accordance with local authority processes, and always in the best interest of the student.

**Risk Level 4 - Acute (high safeguarding need)**

Learners experiencing maltreatment or significant harm, or where there is a high likelihood of significant harm where protection or prevention measures are needed immediately.

Any member of staff who has concerns about the maltreatment, abuse or significant risk of harm to a learner should complete a 'Safeguarding Concern / Disclosure' form immediately and refer to the Deputy Designated Safeguarding Lead (DDSL) and Safeguarding Officer. They will assess the concern / disclosure and then administer the referral in accordance with local authority processes.