| POLICY / PROCEDURE TITLE | | DATE OF APPROVAL |
|---|---|---|
| NCG Safeguarding Policy | | September 2024 |
| **APPROVED BY** | **VERSION NO.** | **VALID UNTIL** |
| Corporation Board | 4 | September 2025 |

| OWNER | Executive Director Quality |
|---|---|
| **GROUP EXECUTIVE LEAD** | Executive Director Quality |
| **DOCUMENT TYPE** | Policy ☒          Group Procedure ☐          Local Procedure ☐ |
| **PURPOSE** | The purpose of this [policy / procedure] is to set our NCG's arrangements for safeguarding young people and adults at risk. The policy implements national legislation, and statutory guidance. |
| **APPLICABLE TO** | All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG [amend as appropriate]. |
| **EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]** | Yes ☒ — No ☐ — N/A ☐ |
| | (If EA not applicable, please explain) |
| **KEY THINGS TO KNOW ABOUT THIS POLICY** | 1. This policy implements legislation and statutory guidance, it is an employment condition that staff read, understand, and follow this policy<br>2. This policy sets out what staff need to know, and do, in the context of safeguarding children and adults at risk<br>3. Every year, the successful implementation of this policy results in thousands of concerns raised, across the Group, and contributes to action that keeps hundreds of learners. |
| **EXPECTED OUTCOME** | Staff are expected to read, understand, and follow this policy in full. They should be able to recognise the signs of abuse, neglect, and exploitation, and know how to act accordingly to protect our young people, and adults at risk. |

| MISCELLANEOUS | |
|---|---|
| **LINKED DOCUMENTS** | • [ESFA funded adult education budget (AEB): funding and performance management rules 2024 to 2025](#) |

| | |
|---|---|
| | <ul><li>The Equality Act (2010)<br>https://www.legislation.gov.uk/ukpga/2010/15/contents</li><li>The Children and Families Act (2014)<br>https://www.legislation.gov.uk/ukpga/2014/6/contents</li><li>The Care Act (2014)</li><li>Prevent Duty Guidance (statutory guidance)</li><li>Keeping Children Safe in Education (statutory guidance)</li><li>Working Together to Safeguard Children (statutory guidance)</li><li>NCG Safeguarding Procedure</li><li>NCG Teaching, Learning and Assessment Policy</li><li>NCG Attendance Management Policy</li><li>NCG Disclosure & Whistleblowing Policy</li><li>NCG Equality, Diversity, Inclusion and Belonging (EBID) Policy</li><li>NCG FE and Apprenticeships Admissions Policy</li><li>NCG Tutorial, Progress and Attainment Policy</li><li>NCG Learner Positive Behaviour Policy.</li><li>NCG Careers Education, Information Advice and Guidance Framework policy.</li><li>NCG Staff Code of Conduct</li><li>NCG Drugs, Alcohol, Weapons Policy</li></ul> |
| **KEYWORDS** | <ul><li>Abuse</li><li>Neglect</li><li>Exploitation</li><li>Reporting</li><li>My Concern</li><li>DSL</li><li>Referral</li><li>Children</li><li>Adults at Risk</li><li>Child Sexual Exploitation</li><li>Modern Slavery</li><li>Domestic Abuse</li><li>County Lines & Youth Violence</li><li>Online Abuse</li><li>Prevent</li><li>Radicalisation and Extremism</li></ul> |

# Equality Impact Assessment

| EQUALITY IMPACT ASSESSMENT | Yes | No | Explanatory Note if required |
|---|---|---|---|
| EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2? | ☒ | ☐ | The answer to this must be YES |
| EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below? | ☐ | ☒ | |
| Age | ☐ | ☒ | The answer to this must be NO |
| Disability / Difficulty | ☐ | ☒ | The answer to this must be NO |
| Gender Reassignment | ☐ | ☒ | The answer to this must be NO |
| Marriage and Civil Partnership | ☐ | ☒ | The answer to this must be NO |
| Race | ☐ | ☒ | The answer to this must be NO |
| Religion or Belief | ☐ | ☒ | The answer to this must be NO |
| Sex | ☐ | ☒ | The answer to this must be NO |
| Sexual Orientation | ☐ | ☒ | The answer to this must be NO |
| EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals? | ☐ | ☒ | The answer to this must be NO |
| EIA4 - Does the policy/process discriminate or victimise any groups or individuals? | ☐ | ☒ | The answer to this must be NO |
| EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals? | ☐ | ☒ | The answer to this must be NO |
| EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals? | ☒ | ☐ | The policy highlights learners that may typically be deemed vulnerable, and the arrangements to provide support. |
| EIA 6 - How do you know that the above is correct? | This policy has been reviewed by the NCG Safeguarding Council and NCG Executive, prior to approval by NCG Corporation. The membership of these groups is indicative of the wider population within NCG. | | |

1.    **GENERAL POLICY STATEMENT**

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

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

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

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

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

The term 'child on child' abuse is used to specifically relate to young people aged 14-18. Peer on peer will refer to staff/adult learners aged 19 and above.

1.1.    **Safeguarding Young People (Children)**

The Children Act (1989) defines a child as any person under the age of 18 years. Section 175 of the Education Act 2002 makes explicit the responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible.

Keeping Children Safe in Education (KCSIE) is statutory guidance published annually by the Department for Education and is issued under Section 175 of the Education Act (2002), the Education (Independent School Standards) Regulations (2014) and the Non-Maintained Special Schools (England) Regulations (2015). Schools and colleges must have due regard to this Guidance when carrying out their duties to safeguard and promote the welfare of children. KCSIE is updated annually, this policy is in line with the September 2024 version, and it must be read alongside:

- statutory guidance [Working Together to Safeguard Children](#), and

- departmental advice [What to do if you're worried a child is being abused: advice for practitioners](#)

KCSIE defines safeguarding and promoting the welfare of children 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 the impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes

This policy and the derivative procedure have been developed in response to KCSIE.

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

These learners will typically have sensory, physical, or learning/educational disabilities/difficulties. Learners with special educational needs or disabilities (SEND) can face additional safeguarding challenges when studying and training in college, at home, or online. Staff must note the additional barriers that can exist when recognising abuse and neglect in this group of children (see KCSIE, para 202-205).

## 1.3. Young learners who are lesbian, gay, bisexual, gender questioning, or transexual (LGBT)

Whilst the fact that a child or a young person may identify as LGBT is not in itself an inherent risk factor for harm. Young learners who are LGBT can be targeted by other children/adults. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who identify as LGBT feel like they lack a trusted adult with whom they can be open and share concerns. It is therefore vital that staff endeavour to work to the NCG values, be open to the concerns of others, and work proactively to remove perceived barriers and provide for a safe space for learners and staff to speak out or share their concerns with a tutor, or trusted member of staff (see KCSIE, para 205-209).

## 1.4. Safeguarding Adults at Risk

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

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

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

**1.5. The Types and forms of Abuse, Neglect and Exploitation**

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

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

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

There are additional categories of abuse for adults at risk:

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

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

Keeping Children Safe in Education defines further specific safeguarding issues, including:

- Bullying including Cyber Bullying.
- Child Sexual Exploitation and Child Criminal Exploitation.
- Domestic Abuse, Violence, and children as witnesses to abuse.
- Drugs.
- Fabricated or Induced illness.
- Faith
- Female Genital Mutilation (FGM).
- Forced Marriage.
- Gangs and Youth Violence.
- Gender Based Violence against Women and Girls (VAWG).
- Mental Health.
- Private Fostering.
- Radicalisation.
- Sexting.

- Teenage Relationship Abuse.
- Trafficking.

**The paragraphs below highlight key changes and amplifications in KCSIE since 2020:**

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

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

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

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

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

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

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

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

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

In the last 36 months there has been more attention drawn to this area and the behaviour of pupils / learners / students in and outside the educational organisation. NCG Colleges will follow [DfE (Department of Education) guidance on Relationships Education and Sex Education (RSE (Relationship and Sex Education)) child on child abuse](#) and this will be integrated into college tutorial content. Additional notes have been added to appendix A regarding sexual abuse and all staff should now assume that sexual harassment and online sexual abuse is happening, whether it is reported or not. Staff are required to be proactive in promoting RSE in tutorial and within the wider curriculum and be vigilant in monitoring and responding to any

concerns by referring to the DSL. DSLs will ensure that appropriate support is available for both the victim, and perpetrator of child-on-child abuse (given the fact the latter may be children / adults at risk and may themselves require training and support).

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

[https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/prevent-and-address-harassment-and-sexual-misconduct/statement-of-expectations/](https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/prevent-and-address-harassment-and-sexual-misconduct/statement-of-expectations/)

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

Staff are required to be vigilant around the indicators of learners being at threat and/or drawn into serious violence and gang cultures. Staff should be aware of the local community risks and advise learners on how to avoid them wherever the opportunity arises (for example by changing peer groups, or by joining recognised and safe community sports teams or volunteer groups).

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

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

Colleagues are additionally expected to be vigilant around harmful online material that may constitute one or more types of abuse. The period of home study resulting from the COVID outbreak throughout 2020/21 has increased the amount of online learning channels exponentially, and staff are required to be aware of the risks to their learners for them to take appropriate steps to reduce those risks through training and education. NCG will remain compliant with the [Cyber security standards for schools and colleges.](#)

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

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

- Contact - being subjected to harmful online interaction with other users, including commercial advertising and adults posing as children.

- Conduct - personal behaviour that falls below widely acceptable behaviours or laws– for example, making, sending, and receiving explicit images, including those

generated by AI, or using social media to post harmful, hurtful, or abusive messages and images.

- Commerce -including online gambling and gaming.

Additional arrangements (such as additional training, learner engagement, wellbeing monitoring and learner surveys) may be necessary in the event of a prolonged period of home study, which will be advised to staff via the NCG website. https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/

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

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

Guidance highlights the fact that the experiences of girls being exploited, can be different to boys, and training must identify the differences in risks and indicators.

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

KCSIE provided additional information on both CSE and CCE (Child Criminal Exploitation) which are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious characteristic, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and / or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted that as well as being physical, exploitation can be facilitated and / or take place online.

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

If a staff member or learner has a concern about a learner's mental wellbeing, this may also be a safeguarding concern. Immediate action must be taken by following this Policy and the accompanying NCG Safeguarding Procedure by raising concerns with the relevant Designated Safeguarding Lead, usually via MyConcern.

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

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

### 1.5.6. Prevent Duty, Radicalisation, Extremism & Incident Management

All schools and colleges are subject to a Duty under section 26 of the Counterterrorism and Security Act 2015, in the exercise of their functions, to have due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent Duty.

The [Prevent Duty Guidance](#) defines **radicalisation** as *the process of a person legitimising support for, or use of, terrorist violence.*

NCG enacts it duty through the Prevent Policy & Risk Assessment. This policy seeks to put in place the requirements of the Act, which is also review annually.

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

There are specific steps to be taken when an individual is suspected on engaging with extremism. Should staff have a concern they will refer to the DSL using the recognised reporting procedure, usually MyConcern.

The NCG Prevent Policy & Risk Assessment also sets out the steps to be taken when dealing with major incidents associated with violence and terror.

### 1.5.7. Bullying and Harassment

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

- The expectations for learner conduct are laid out in the Student Positive Behaviour Policy

- The expectations for staff are set out in the Staff Code of Conduct

- The expectations for suppliers and contractors are set out in the Supplier Code of Conduct, and Subcontract Management Framework

Staff must report alleged bullying and harassment using the procedures set out in this Safeguarding Policy by notifying their designated safeguarding lead, whether the alleged bully is a learner, or a member of staff. Learners would be expected to report to their teacher, course leader, or other trusted member of staff. Designated Safeguarding Leads may implement dedicated messaging or email services for learners to report concerns safely and confidentially.

Should the alleged perpetrator be the college principal, then the referral must be made directly to the Professional Services Designated Lead, Executive Principal, or CEO. Should the perpetrator be any of these senior post holders, then it must be referred to the Director of Governance.

NCG staff should be aware that many learners will have regular/unrestricted access to their own 3G/4G/5G mobile/agile devices that connect directly to data providers (such as EE/Sky

etc) are therefore outside of NCG's filtering and monitoring systems. This is a potential source of bullying/harassment and harm.

### 1.5.8. Dangers of Gambling and Gaming

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

It is also the case that NCG procured software such as Microsoft Edge may inadvertently advertise unhelpful websites (for example quick-rich schemes, gambling ads) or news articles that promote headlines/content that does not align with NCG's values. Should this be the case, staff are encouraged to inform learners how to change associated setting, and/or contact the NCG Service Desk.

### 1.5.9. Domestic Abuse

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

## 2. Policy Statement

All staff (including agency, volunteers, and contractors) must be aware of the policy, procedures, and systems associated with safeguarding, and these must be explained to staff as part of staff on-boarding process, inductions, and annual updates and followed. This will include:

- NCG Safeguarding Policy (this document) and the NCG Safeguarding Procedure for local reporting arrangements.

- NCG Positive Student Behaviour Policy.

- Staff Code of Conduct.

- Designated Safeguarding Leads and key contacts

- NCG Attendance Management Policy

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

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

NCG recognises that governors, college board members, members of staff and learners each have a role to play in safeguarding the welfare of children and adults at risk and preventing their abuse, with specific attention paid to the numbers of categories highlighted in para 18 of KCSIE.

In accordance with the statutory guidance such as Keeping Children Safe in Education and Working Together to Safeguard Children.

- NCG's Safeguarding Policy applies to all colleges and is made available to parents / carers, learners and customers via a website link: https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/

- KCSIE is to be made available via the same link on NCG's website and college principals are responsible for ensuring all staff have read, understood, and will follow it. On their behalf, the Professional Services DSL will coordinate annually a **staff declaration** issued and recorded on iTrent, following **annual training updates**, and the issue of the updated policy and procedure. Exception reports will identify those staff who have failed to comply and action to resolve will be taken. For staff new to NCG, the mandatory training will be updated annually.

- **NCG's Safeguarding Procedure** is developed and updated to support this framework. These procedures:

  o are developed in accordance with local authority guidance and locally agreed interagency procedures; DfE Guidance Keeping Children Safe in Education.

  o include specific guidelines for dealing with allegations of abuse against members of staff and volunteers.

- o are reviewed and updated annually by Professional Services and College Designated Safeguarding Leads.

- o are approved by the Executive Board and adopted by college leadership teams and designated safeguarding leads.

- NCG operates a **safe recruitment** procedure to ensure that all appropriate checks are carried out on staff and volunteers[1] who work with all learners in regulated activity and are therefore a position of trust. Advertisements and recruitment packs must be designed to make clear the Group's rigorous approach to safe recruitment and seek to deter unsuitable / unsafe applicants. This extends to online checks of publicly available web-based information, where the candidate has been notified, through advert, that this is a possibility.

- A **single central register** will be held by Professional Services (People & Development) as to the level and status of DBS checks. Interview panels must have at least one safer-recruitment-trained manager present, and questions must seek to determine the current understanding of safeguarding as a minimum. Professional Services People & Development will produce a regular (fortnightly) exception report for college principals and the GDSL with detail of any pending checks, preventing a start date, or staff with a risk assessment (detailing temporary supervision arrangements). Whilst access controls are in place, any manager starting a new member of staff (including agency staff/volunteers) without clearance would place learners and Group at considerable risk. In such a scenario, this would be referred to investigation under the disciplinary policy.

- Professional Services People & Development will ensure that a process will be in place to verify that **agency staff** have been appropriately checked, by the agency provider. This must be at the appropriate level of check for the role they are undertaking at NCG, and it must be done prior to starting work, as set out in the NCG Recruitment and Criminal Disclosure Policy / Procedures. Positive disclosures, and the outcome decision, must be notified to Professional Services (People & Development) designated lead by the Agency. Agency staff are mandated to remain up to date with their duties under KCSIE, whether through agency-led training, independent professional updating, or through NCG training.

- Professional Services Procurement / Professional Services Estates will ensure that all **contractors** are either fully supervised in line with the visitor procedures, or are cleared at the appropriate DBS level, and that records are maintained.

- The college principal, working with the Director of Estates, is responsible for **physical security** in all college buildings. Adequate measures / deterrents for preventing access to unauthorised personnel must be in place i.e., use of lanyards / CCTV / barriers / security staff.

- Professional Services Estates/Procurement will work with DSLs to ensure that the use of NCG premises for '**non-school' activity** is appropriately covered. For example, hire or regular lettings. Where services are not provided under the direct management of NCG staff, then safeguarding arrangements must

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

be clear in any transfer of control agreement as a condition of use. Failure to comply will result in termination of contract. Where possible, feasible and relevant, NCG will use a specialist provider to support this aspect. Should any NCG member of staff become aware of any concerns, they will report this to the DSL in the standard way.

- A member of the NCG Executive will be appointed as the **Professional Services Designated Safeguarding Lead (GDSL)**. This is the Executive Director Quality. The GDSL is responsible for this policy framework and to ensure that KCSIE is enacted throughout NCG by working with the Executive Board and a team of college-based **Designated Safeguarding Leads** (DSLs). DSLs have delegated responsibility for dealing with all safeguarding issues across NCG's colleges. They work to the college principal as part of the College Leadership Team. DSLs will deputise for the Professional Services DSL for case referrals. In the event of GDSL unavailability for an executive-level/policy decision, then DSLs must contact the college principal, or the Executive Principal (People & Culture).

- The potential risks of facilitating **external speakers** must be considered in line with the Prevent Policy & Action Plan and Freedom of Speech Policy. The nature of the proposed delivery content must be in line with British Values, NCG Values and NCG's Equality Diversity Inclusion and Belonging (EDIB) Policy. Staff must follow the steps laid out in the Freedom of Speech Policy when organised and facilitating external speakers. They should be treated as visitors when on campus, or on when presenting virtually, and be supervised by a member of NCG's staff (whether physically on campus, or virtually if on Teams / Zoom / Google etc).


## 2.1. Designated Safeguarding Leads (DSL)

- The college principal will identify a senior manager to work as the **Designated Safeguarding Lead** (DSL) with the responsibility for safeguarding arrangements at the College. The list of DSLs is published on the NCG website: [Safeguarding | NCG (ncgrp.co.uk)](#)

- **Designated Deputy Safeguarding Leads** must be identified to deputise in the absence of the Designated Safeguarding Lead; DSLs are required to inform the Professional Services DSL of the current deputies. Additional Safeguarding Managers / Safeguarding Officers may be identified within the college to ensure that safeguarding requirements are met at local level.

- In addition to basic safeguarding training, NCG's designated safeguarding leads (including Professional Services lead) are required to undertake **appropriate training,** determined by their operational role, to standards agreed by the Safeguarding Children Partnerships and their Local Adult Safeguarding Board. This will extend to refresher training in line with local authority timescales to help maintain up to date knowledge of procedures and working practices. Designated Safeguarding Leads, the Deputy Designated Leads and the additional Nominated Safeguarding Managers / Officers should attend CPD (Continuous Professional Development) as and when appropriate, through internal safeguarding meetings and external/online training events.

- Designated Safeguarding Leads will have access to **peer support** through NCG's Safeguarding Council. Occasional reflective supervision training/opportunities, extending to away days, will be provided to support these key staff with the demands of managing safeguarding caseloads. DSLs are encouraged to do the same for their teams, and officers.

- Designated Safeguarding Leads, or their deputies, are expected to be contactable during normal business hours. However, this support is not expected to be 24/7 emergency service. Therefore NCG/College websites must make clear the external **emergency and professional support available during out of hours** times. For the purposes of this policy, we deem weekend, and Monday to Friday (between 6pm and 8am) as out of hours. College principals must ensure that DSL cover, or clear signposting to external agencies, is available during extended periods of holiday.

## 2.2. NCG Staff Responsibilities

- **NCG's Corporation Board** has a duty to ensure that this policy is current, follows statutory requirements, and meets best practice. NCG's Governors and College Board members will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective. The training will be updated every three years, and governors and college board members will additionally receive an annual update where they are also required to read, understand, and follow the applicability of KCSIE parts 1 and 2 annually. Governors should understand how NCG implements its obligations under the Human Right Act 1998, Equality Act 2020, and their multi agency safeguarding arrangements.

- **NCG leaders** (Executive Board, College Senior Leaders, Directors and Heads of Depts / Service, Designated Safeguarding Leads) are required to complete NCG mandatory training at induction and refresh every 3 years. They are required to read understand, and follow annual updates of parts 1, 2 and 5 of Keeping Children Safe in Education. DSLs undertake additional specialist training. The GDSL will chair the **NCG Safeguarding Council** to review the policy, support implementation and share good practice amongst DSLs.

- **All NCG staff** have a responsibility to provide a safe environment in which young people and adults can learn, develop, and thrive. NCG staff will be required to undertake e-learning mandatory training on joining NCG and every three years thereafter. Staff will additionally participate in annual refresher training, and they will be required to declare that they have read and understood and follow the annual update of KCSIE (parts 1 and 5) and attended refresher / update training delivered by the DSLs. The same process will include an annual declaration that there have been no changes to DBS (recent cautions or convictions), of it there has, then it reported to HR Business Partners.- Recruiting managers will also read, understand, and follow part 2 of KCSIE.

- **NCG staff teaching, supervising, and working with children, and adults at risk** are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff must always act in the best interests of the child or adult at risk.

- **All NCG staff** must be aware of indicators of abuse and neglect so that they are able to identify cases of children and adults at risk who may need help or protection.

- **All NCG staff** must be prepared to identify learners who may benefit from early help. Early help is defined in [Working together to safeguard children - GOV.UK (www.gov.uk)](https://www.gov.uk) and it means providing support as soon as a problem emerges at any point in a child's or adult at risk's life, from the foundation years, through to the teenage years and beyond into all stages of adulthood. Any learner may benefit from early help, but NCG staff must be particularly alert to the potential need for early help for a child / adult at risk who:

  - is disabled or has certain health conditions and has specific additional needs.

  - has special educational needs (whether or not they have a statutory Education, Health, and Care plan)

  - has a mental health need.

  - is a young carer.

  - 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.

  - has frequent 'unexplainable and or/persistent absences from education or care (commonly known as 'going missing')

  - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.

  - is at risk of being radicalised or exploited.

  - has a parent or carer in custody or is affected by parental offending.

  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.

  - is misusing alcohol and other drugs themselves.

  - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

  - Is a privately fostered child.

### 2.3. What to do

- All NCG staff must **know what to do** if a child or adult at risk tells them they are being abused or neglected. This is to inform the DSL/Safeguarding Team using **MyConcern** (main reporting channel).

- If it is technically not possible to report using MyConcern, then the staff member must call directly, or send an email marked 'highly confidential. The names and contact details for DSLs/Safeguarding Team can be found open source on the [NCG website.](#)

- Staff should also know how to manage the requirement to maintain an appropriate level of confidentiality, which means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's / adult's social care. Staff should never promise a child or adult that they will not tell anyone about a report of abuse, as this may not be in the best interests of the individual.

- All staff should be aware that young people and adults at risk may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, language barriers, or protected characteristics such as disability, or sexual orientation. This should not prevent staff from having a professional curiosity and speaking to the DSL or reporting via MyConcern if they have concerns about a child.

- All staff must pay particular attention to attendance patterns as set out in the NCG Attendance Management Policy. A lack of attendance is not necessarily a safeguarding concern; however, it could be an indicator. Furthermore, NCG is obliged to inform the local authority of any young person who has unexplainable and or/persistent absences from education (previously known as 'going missing'), so that alternative education and support can be provided. Please note this requirement does not just apply to curriculum/teaching/pastoral staff, occasionally professional services staff may legitimately access records (for ILR processing/assurance/audit purposes) and must proactively raise concerns with course leaders.

- Course leaders (or equivalent) and teaching staff are expected to closely monitor learners who may have characteristics that may make them vulnerable, for example those that are care experienced, or those with SEND. Professional Services LDS will ensure that relevant reports, via The Source, and dashboards are in place to identify this risk. As above, staff must be aware that there is a statutory duty placed on local authorities for [children who become absent in education](#), and DSLs may need to report any relevant cases through to relevant parties.

- Where a child / adult at risk is suffering, or is likely to suffer from harm, it is important that a referral to children's / adult's social care (and if appropriate the police) is made immediately. External referrals will be made by the Designated Safeguarding Lead/deputy. In the unlikely event that the Designated Safeguarding Lead or nominated deputy be unavailable, then staff are duty bound to refer to the local authority without delay. In these

rare circumstances the staff member should first try and contact one of the other NCG DSLs first (using the list on the website for advice).

- If the referral involves concerns raised about an NCG staff member, the DSL must be informed immediately. The DSL will liaise with the principal/GDSL along with the local authority designated officer (LADO). In the event that the concern is about the DSL/GDSL then the member of staff must contact the principal/CEO who will follow the same procedure. The Director of Governance is responsible for liaising with the local authority in the event of allegations of abuse being made against the Group Chief Executive Officer.

- All NCG staff who have a concern about a child or adult at risk must follow the referral processes set out in this policy. Associated staff should expect to support social workers and other agencies following any referral, although in most cases it will be the DSL/deputy who undertakes this role.

- All NCG staff (including casual staff and volunteers) who will (or will potentially) work with young people are required to read and understand the document 'Keeping Children Safe in Education: information for all school and college staff' at least annually. Keeping Children Safe in Education is now part of the safeguarding and prevent module, as is the additional categories of abuse for adults; additional arrangements may be made for key publication updates.

- All NCG staff who will (or will potentially) work with young people and adults at risk are required to undertake mandatory training to equip them to carry out their responsibilities for safeguarding young people and adults at risk effectively, which is kept up to date by mandatory training every three years. A log of training will be maintained by Professional Services People & Development which will be sent at least fortnightly to college principals and Designated Safeguarding Leads for maintaining compliance. Annual updates will be provided by DSLs, alongside an annual declaration made by all staff members. The Safeguarding Council is collectively responsible for ensuring that the modules are appropriate, current, and accessible through the People Portal.

- The DSL and the recruiting manager (or their equivalent) must ensure that permanent staff, temporary staff, and volunteers who work with children and adults at risk receive an induction to include the Safeguarding Policy, Code of Conduct for staff and the Safeguarding Procedure , including their own responsibilities.

- All staff are required to comply with the NCG Code of Conduct. Professional Services People & Development / DSLs / Leaders should also be mindful and adhere to the KCSIE guidance for sharing low level concerns, extending to NCG's contractors.

- In terms of strategic oversight, the Corporation Board discharges its statutory leadership responsibility through NCG's Executive Boards and the work of the Safeguarding Council.

## 2.4. Safeguarding and Whistleblowing (Disclosure Policy)

- A member of staff with a safeguarding concern about another member of staff must follow the process in this policy and speak to the DSL or principal. Centralised Professional Services staff should refer to the GDSL or a member of Professional Services People & Development. There is clear guidance in Part 4 of KCSIE for dealing with allegations and finding the right balance between an impartial and critical investigation of the facts and providing support to an employee.

- If the safeguarding concern / allegation is with the CEO or principal, then it must be referred to the Director of Governance who will liaise with the relevant chair.

- If the safeguarding concern / allegation is with the GDSL, then it must be referred to the Chief Executive Officer, or a member of People & Development.

- NCG has a whistleblowing policy that protects staff members who need to report colleagues that they believe are doing something wrong or illegal, or who are neglecting their duties. This duty is contained with the NCG Whistleblowing & Disclosure Policy. Where the staff member thinks that the malpractice would not be investigated, that they would treated unfairly if they complained, or if they have raised the matter before but the concern has not been dealt with, then they should report the issue to clerk@ncgrp.co.uk

- Independent advice is always available from the NSPCC: help@nspcc.org.uk.

### 2.5. General Arrangements

- **Professional Services People & Development** will ensure that procedures for recruiting staff are in line with sector guidance – this will extend to use of application forms, the use of references for interview, safer recruitment checks and using interview questions that are intended to identify any gaps in career and deter potential offenders / perpetrators. They will act proportionally in line with KCSIE if processes establish an ongoing or prior allegation against an applicant. Staff interview panels must have at least one manager trained in safer recruitment ((ETF (Education and Training Foundation) module or equivalent)). Candidates must be informed in advance where NCG may intend to conduct online searches for potential risks, including open social media. This may be done to identify risks or issues that are publicly available.

- **College Principals** will ensure that procedures are in place for the effective training and probation of staff and learners, taking time to ensure that learners understand the types of neglect, how that could be applicable in their own circumstances and how to seek help whilst ensuring that they remain safe.

- The **NCG Executive** will work collectively to ensure that steps are taken to ensure that the NCG campus is a welcoming and safe environment; positive action will be taken to promote healthy lifestyles and mental wellbeing / fitness.

- **The Corporation** will remedy without delay any deficiencies or weaknesses regarding safeguarding arrangements that are brought to its attention.

- **NCG Data and Information Services** (accountable officer: Chief Information, Data and Estates Officer) will ensure the Group has appropriate filters / blocks in place in respect of potentially harmful online material, working to [DfE guidance on safe monitoring](#) and cyber security. The CIDO will ensure that specialist software is procured to enable this control. Care will be taken to avoid 'over-blocking' and ensure that unnecessary restrictions are not placed on what teachers and learners can reasonably and legitimately access to further their studies and wellbeing. Filtering and monitoring software will be regularly tested with records maintained.
- Daily web alert reports, based on identified words, which may indicate potential harm/risks, will be reported to DSLs daily, The NCG Safeguarding Council will review the list of keywords annually.

- Policy is reviewed at least annually by the DSLs and information is provided to Governors about how the above duties have been discharged.

- All complaints, allegations or suspicions will be taken seriously.

- The DfE places a specific requirement on colleges to refer to the ESFA (Education and Skills Funding Agency) in certain circumstances, as set out in the funding contract. The GDSL will undertake reporting to the DfE where applicable. In these cases, the GDSL will inform the DfE case manager in the agreed format and maintain records for oversight.


## 2.6. NCG Safeguarding Council

- The NCG Safeguarding Council is a subgroup of the NCG Executive and is convened and chaired by the Professional Services DSL. The Council will comprise of all DSLs to ensure the adequacy and currency of policy.

- It shall meet at least half termly, and DSLs will review policy and procedures, identify local risks, and share best practice.

- The Council is intended to ensure that all policy frameworks are current, to facilitate the transfer of knowledge (extending to local risk) and to provide an expert supervisory panel for peer support to DSLs.


## 2.7. MyConcern

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

- Given the quantity of confidential personal information contained within the platform, staff access rights to MyConcern will be reviewed at every Council meeting, as a standing item.

3. **Referral to Professional Services**

NCG operates a risk-based monitoring approach internally. In addition to external agency reporting, DSLs are required to inform the Professional Services DSL of the following referral categories:

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

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

3. Staff referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police / Channel whereby the staff member is the alleged 'perpetrator'.

DSLs will be issued with a MS Form link to make this notification and should do so immediately where possible, and within 48 hours at most.

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

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

There may be occasions where staff conscientiously refer the siblings of current enrolled learners to Local Authority Services due to emerging concerns. In these cases, there is no compulsion to complete the Notification Forum, unless the potential outcome will have a likely and direct impact on the enrolled learner. For example, a potential intervention from the local authority / police / CAFCAS that would see the family's children removed from their parents / carers, or a potential threat to the learner is apparent because of making the disclosure. A note will still be made on MyConcern, tagged to the enrolled learner for wider context.

### 3.1. Allegations against Staff

An allegation against staff will follow the investigative aspects of the NCG Staff Disciplinary Policy to ensure that it is balanced, fair and diligent process is followed to determine whether there is substance to the allegation. Should the investigation determine that there is substance, it will then follow the procedures laid out in said policy. The Local Authority Designated Officer (LADO) will be notified by the DSL at the earliest opportunity, and within one working day.

If the allegation is serious and involves the police, then the police investigation will take priority before any internal procedures are undertaken.

If an allegation is proven/believed in the balance of probabilities to be unsubstantiated, unfounded, false, or malicious, the DSL should consider whether the child and / or the person who has made the allegation needs help and support, whether the allegation is due to underlying issues associated with abuse or harassment from someone else and whether this is a cry for help.

For this reason, DSLs should be made aware of any allegations pertaining to the treatment of learners.

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

Allegations that are upheld against staff but are deemed as 'low level concerns' should be recorded on iTrent, in accordance with KCSIE.

### 3.1.1 Information Sharing

Wherever possible, Designated Safeguarding Leads will follow the principles of the UK GDPR and Data Protection Act 2018; however, this should not be a barrier to the effective and timely communication of information related to safeguarding. Much of this information will be special category personal data or criminal conviction data and NCG has in place an appropriate policy document that covers processing such data.

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

Further guidance is available here:
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Only senior leaders (principalship), DSLs and Deputy DSLs will liaise with external agencies on information sharing. DSLs/DDSLs should note that it is legitimate and lawful to share information with the police who may occasionally need to investigate a concern, raised internally or externally. DSLs are therefore permitted to share personal information with the police and local authorities if the following simple considerations are met. DSLs are encouraged to consult with the GDSL where these situations arise and to document the outcome on MyConcern

DSLs have a clear and documented understanding of the reason the police or external agency need the information (i.e. a learner is at risk of harm).

a. There needs to be a lawful basis for sharing the information and this should be recorded along with the reasons (if not already covered by point 1 above). The most common lawful bases suitable for safeguarding purposes are public task, legitimate interests and legal obligation. Consent is another lawful basis, but it is not required for sharing information in a safeguarding context (should there be a perceived risk to a child).

b. If special category data is being shared (e.g. information about health or revealing racial or ethnic origin), in addition to identifying a lawful basis, we must also identify a condition for processing under Article 9 of the UK GPDR (for which the conditions are outlined in the link below): https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/special-category-data/what-are-the-conditions-for-processing/

c) Information should always be shared securely (via OneDrive link with restricted access or if it must be by email that any sensitive information is password protected).

d) In an emergency, don't hesitate to share information to safeguard a child. You might not have time to follow all the usual processes however you should make a record of what you shared, who with, and why, as soon as practicably possible.

If there are any queries on the above please contact the Data Protection Officer at dpo@ncgrp.co.uk. The ICO's 10 step guide to sharing information to safeguard children is also linked below for reference:

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/a-10-step-guide-to-sharing-information-to-safeguard-children/

### 3.2. Professional Services Monitoring and Action

The GDSL and designated Executive PA will monitor the external referrals on behalf of the NCG Executive.

The GDSL may be required to seek further clarification or advise next steps on occasion. All information/updates will be held on MyConcern.

## 4. Supervision Arrangements for NCG DSLs

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

Supervision will be provided for DSLs in the following way.

- The Safeguarding Council will be a forum for sharing contextual examples and experiences. This will provide for occasional peer review, group supervision, and support. Members of the Council are encouraged to form a peer community and contact one another for support and guidance outside of the meetings.

- The Professional Services DSL will organise at least one, and preferably two supervision workshops, per academic year for group supervision and training. This will be face to face at a convenient location.

- External supervision arrangements will be organised by DSLs for themselves, and their staff where required. They may wish to consider use of their peers in the Safeguarding Council, or indeed the wider NCG Safeguarding Team where appropriate.

- The Link Governor will also provide a level of supervision. Whilst their primary role is to ensure that the appropriate policy and procedures are in place, the link governor will have a proficient level of experience that may be useful for DSLs to share anonymised, contextual examples. DSLs must not reveal personal details of the learners to governors due to the lower-level requirement of DBS clearance[2].

## 5. STATEMENT ON IMPLEMENTATION

Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.

## 6. STATEMENT ON EQUALITY AND DIVERSITY

NCG is committed to providing equality of opportunity. Further details or our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

## 7. STATEMENT ON FREEDOM OF SPEECH

NCG is committed to upholding the principles of freedom of speech as enshrined in UK law. This policy is designed to ensure that all members of our college community, including students, staff, and visitors, can express their views and ideas freely and without fear of censorship or reprisal, provided that such expressions are within the law.

We affirm that this policy does not, in any way, diminish or undermine the rights of individuals under existing Freedom of Speech legislation.

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[2] Governors are required to have a basic check, rather than enhanced.

## 8. STATEMENT ON CONSULTATION

This policy has been reviewed in consultation with members of the NCG Safeguarding Council, and Policy Council.

| VERSION CONTROL | | | | |
|---|---|---|---|---|
| Version No. | Documentation Section/Page No. | Description of Change and Rationale | Author/Reviewer | Date Revised |
| 4 | Annual Update | Full review. | Executive Director Quality | Sep 24 |
| 3 | Annual Update | This version ensures alignment with KCSIE 2023. The main change relates to additional clarification on attendance monitoring, filtering, and monitoring software. | Executive Director Quality | Sep 23 |
| 2 | Annual Update | Ensures alignment with KCSIE (Keeping Children Safe in Education) 2022 which has strengthened aspects relating to sexual violence / harassment, disclosure, domestic abuse, equality, and governance. This version also references the use of MyConcern. This version also includes links to Safer Suicide Strategy in line with Office for Students' Suicide-Safer Universities initiative | Executive Director Quality | Sep 22 |
| 1 | Annual Update | Annual update to align with KCSIE 2021 and strengthens guidance associated with sexual abuse; substantive changes highlighted in yellow. | Executive Director Quality | Sep 21 |

**Appendix A – Forms of Abuse**

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

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff must be aware of it, it is therefore essential that all staff understand the importance of challenging inappropriate behaviours between peers which are abusive in nature. Staff must not downplay certain learner behaviours – for example, dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or "boys being boys'. If left unchallenged it could lead to a culture

of unacceptable behaviours, an unsafe environment for children; and, in worst-case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. Staff should now consider that sexual abuse between children and online abuse is likely to be happening in the College, even when there are no reports. Staff must continue to be proactive in providing advice and guidance regarding what is acceptable when engaging in a sexual relationship, including inappropriate language and behaviour and the consequences of sharing of sexual images including the law and necessity of consent for adults and children above the age of consent. For example, learners should be made aware of support such as  Childline when seeking to remove a nude image online, and DSLs will be aware of how to support such action.

**Appendix B – NCG Suicide Prevention Strategy**

**Introduction**

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

**Stopping the transition from thought to action**



**HAVING SUICIDAL THOUGHTS**     **CREATING A PLAN**     **ATTEMPTING SUICIDE**

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

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

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

**Aims and objectives.**

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

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

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

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

- Positively impact learner and staff mental fitness and learners' ability to stay and succeed in their studies at NCG.

- Raise awareness of suicide, how to recognise signs that someone is suicidal, how to respond and remove the stigmas associated with mental health and suicide wherever possible.

- Promote positive mental health amongst learners and staff to support a positive culture and to help develop resilience.

- Create local and national partnerships to explore, facilitate and support the roll out of a broad range of suicide-safer activities.

**Delivery Model**
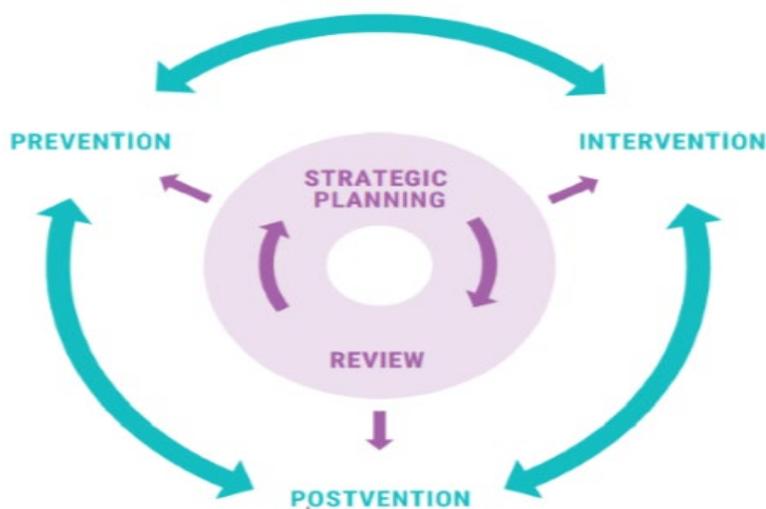


*Suicide-Safer Universities, Universities UK, and Papyrus, 2021*

**Prevention**

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

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

**Intervention**

Equipping learners, staff and the NCG community with the skills to recognize and respond to suicidal thoughts and behaviours is key to intervention. This should be done via a range of training, information sharing and well-defined processes which boost confidence, set clear expectations of responsibility, and provide robust

signposting procedures to a range of professional support services both internally and externally.

**Postvention**

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

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

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

**Measures of success**

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