



1 Authority & Context

- 1.1 This policy provides a framework that sets out requirements, guidelines and procedures related to the College's legal obligation to safeguard and promote the welfare of children and vulnerable adults as defined in the Children Act 2004 (Section 11); Education Act 2002 (Section 175), Safeguarding Vulnerable Groups Act 2006, Section 26 (1) of the Counter Terrorism and Security Act 2015, Working Together to Safeguard Children 2018 (updated Dec 2023), Keeping Children Safe in Education Statutory guidance September 2024, Protection of Freedoms Act (2012) Part 5 – Safeguarding vulnerable groups, criminal records etc., Education and Training (Welfare of Children) Act 2021.
- 1.2 Safeguarding is a whole-College responsibility; all staff have a duty of care to ensure all students can learner and thrive in a safe and secure environment, identifying those that may require support and taking action to ensure that referrals are made in a time-efficient way, so that each student's individual needs are met.
- 1.3 Legal Framework
 - 1.3.1 Colleges have a duty, under the Children Act 2004 to safeguard and promote the well-being of children and young people. The College also has a duty, under the Safeguarding Vulnerable Groups Act 2006, to promote and safeguard the welfare of vulnerable adults.
 - 1.3.2 The Education Act 2002 requires governing bodies of further education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
 - 1.3.3 The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children.
 - 1.3.4 Colleges also have a duty under Section 26 (1) of the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism, which includes not just violent extremism but also non-violent extremism.
 - 1.3.5 The College operates in line with the statutory guidance in Keeping Children Safe in Education 2024 (linked in section 5 below - Associated Documents).
 - 1.3.6 The Oldham College adheres to the Oldham Safeguarding Partnership guidelines.
 - 1.3.7 The Policy supports the College's improvement strategies in contributing to a safe and positive environment for learning and personal development for all students.

2 Scope

- 2.1 This Policy applies to all students at the College, including 16-18 year old and adult students on both full-time and part-time programmes and apprentices of all ages.
- 2.2 Safeguarding is everybody's responsibility and, as such this policy applies to all staff, Governors and others who work in direct contact with learners in the College. This also includes Apprenticeship, work experience placement settings and subcontractors delivering programmes on behalf of Oldham College. It also includes contractors, visitors and volunteers.
- 2.3 Abuse may take place both outside and inside of the College setting; everyone who is part of the College community is responsible for safeguarding, promoting and protecting the welfare of children

and vulnerable adults.

- 2.4 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - 2.4.1 providing help and support to meet the needs of children as soon as problems emerge;
 - 2.4.2 protecting children from maltreatment, whether that is within or outside the home, including online;
 - 2.4.3 preventing the impairment of children's mental and physical health or development;
 - 2.4.4 ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - 2.4.5 taking action to enable all children to have the best outcomes.
- 2.5 Safeguarding adults
 - 2.5.1 In addition to the safeguarding of young people (under eighteen or under twenty-five with and EHCP), the policy is designed to cover the safeguarding and protection of adults at risk. An adult at risk of abuse or neglect is defined as 'someone who has needs for care and support, who is experiencing or at risk of, abuse or neglect and as a result of their needs is unable to protect themselves. The content of this policy will be applied with appropriate adaptations for adults.

3 Policy Content

- 3.1 The College recognises that for young people who have been abused, or who are being subjected to abuse, college may be the only stable and secure element in their lives. The College's Safeguarding policy and procedure is based on the following principles:
 - 3.1.1 zero tolerance towards all forms of harassment and abuse;
 - 3.1.2 an ethos that promotes a positive, supportive and secure environment where students feel valued and safe;
 - 3.1.3 early help where required for potentially vulnerable students;
 - 3.1.4 liaison with other internal and external agencies that support learners, such as social/children's services, Positive Steps, housing trusts, Police and the Local Authority Safeguarding Partnership;
 - 3.1.5 all allegations and suspicions of abuse are taken seriously and responded to swiftly and appropriately by trained and experienced staff.
- 3.2 There are five main elements to the policy:
 - 3.2.1 ensuring the College practices safe recruitment in checking the suitability of students who are enrolled onto its programmes and staff or volunteers who work with young people.
 - 3.2.2 raising awareness of safeguarding and child protection issues and their effective handling amongst staff.
 - 3.2.3 developing and implementing procedures for identifying and reporting cases or suspected cases, of abuse.
 - 3.2.4 supporting effectively and in a timely manner the student who has been abused.

3.2.5 establishing a safe and welcoming environment in which students can learn and develop, where they are able to talk and be listened to.

3.3 Filtering and Monitoring

3.3.1 The college will ensure that filtering and monitoring is in place, using the college internal firewall which has active filtering and monitoring capabilities and is Prevent-approved. We also use Smoothwall Web Monitoring which will be in place on college devices.

3.3.2 Further guidance regarding e-safety can be found at the [UK Safer Internet Centre](#) or by contacting a member of the College Safeguarding Team

3.4 Early Help

3.4.1 Staff should be particularly alert to the potential need for early help for a student who:

3.4.1.1 is disabled or has certain health conditions and has specific additional needs;

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

3.4.1.3 has a mental health need;

3.4.1.4 is a young carer;

3.4.1.5 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;

3.4.1.6 is frequently missing/goes missing from education, home or care;

3.4.1.7 has experienced multiple suspensions, or is at risk of being permanently excluded from College;

3.4.1.8 is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;

3.4.1.9 is at risk of being radicalised or exploited;

3.4.1.10 has a parent or carer in custody, or is affected by parental offending;

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

3.4.1.12 is misusing alcohol and other drugs themselves;

3.4.1.13 is at risk of so-called 'honour-based' abuse such as female genital mutilation or forced marriage;

3.4.1.14 is a privately fostered child

3.5 Safeguarding Issues

3.5.1 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos, can be signs that young people are at risk.

3.6 Types and definitions of vulnerable groups

3.6.1 The following definitions apply throughout the Safeguarding policy and associated procedures:

3.6.1.1 Child or Children:

The Children Act 2004 defines a child as a person under the age of eighteen. KCSIE (2024) states that everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

3.6.1.2 Vulnerable Adult or Adults:

- a. The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:
 - i. a substantial learning or physical disability;
 - ii. a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs;
 - iii. a significant reduction in physical or mental capacity.

3.6.1.3 Care Experienced/Child Looked After – CLA

- a. The term 'Child Looked After' in the Children Act 1989 refers to all children and young people being looked after by a local authority, namely:
 - i. those subject to care orders or interim care orders (under sections 31 and 38 of the 1989 Act);
 - ii. those children who have been placed, or are authorised to be placed, with prospective adopters by a local authority (section 18(3) of the Adoption and Children Act 2002);
 - iii. those who are voluntarily accommodated under section 20 of the 1989 Act, including unaccompanied asylum-seeking children (where children are accommodated under this provision, parental responsibility remains with the parents); and
 - iv. those who are subject to court orders with residence requirements (e.g. secure remand or remand to local authority accommodation), in accordance with section 21 of the 1989 Act.

3.6.1.4 Care Leaver – CL

- a. The term 'Care Leaver' in the Children's Act 1989 refers to those young people in local authority care that are transitioning into adulthood, namely:
 - i. The 1989 Act requires the responsible authority to continue to provide various forms of advice, assistance and guidance to young people over the age of 18 making the transition from care to more independent living arrangements. These requirements apply if they have previously been eligible or relevant children, who are described as former relevant children (and may apply to qualifying children, depending on the local authority's assessment of their needs).
 - ii. These duties operate primarily until the young person reaches the age of 21. However, the duties continue beyond a young person's 21st birthday where they remain engaged in education or training and continue until the end of the agreed programme as set out in their pathway plan.
 - iii. Section 24B(2) gives a power to local authorities to assist with the expenses associated with education and training up to the age of 21. For the most part this will be in respect of "qualifying" young people
- b. Oldham college has a designated staff member who will lead in promoting achievement and progression of every Care Experienced student, they will ensure that their personal, emotional wellbeing and academic needs are prioritised and met, they will attend all CLA review meetings and

Personal Education Plans, to fit into the wider care planning duties of the authority which looks after the child.

3.7 Those identified as at greater risk:

3.7.1 Children with an allocated social worker (Child in Need (CIN) and Child Protection Plans (CP))

- a. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- b. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- c. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

3.7.2 Children requiring mental health support

- a. Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.
- b. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- c. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

3.8 Homelessness

Homelessness is an issue which can affect a significant number of young people in Oldham and can place a person at risk of harm from a variety of sources including exploitation. It should be recognised that some sixteen and seventeen year-olds could be living independently from their parents or guardians through exclusion from the family home. In cases where young people are homeless, referral to Children's Services is required as they are the lead agency for these young people.

3.9 Types of abuse and neglect:

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

3.9.1 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 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 wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

3.9.1.1 Physical Abuse:

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a child. It may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

3.9.1.2 Emotional Abuse:

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

3.9.1.3 Sexual Abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

3.9.1.4 Neglect:

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.9.2 Other Definitions:

3.9.2.1 Terrorism is defined by the Terrorism Act 2000 as:

"an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause."

3.9.2.2 Extremism is defined in the national Counter-extremism Strategy as:

“the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces, as extremist.”

3.9.2.3 Radicalisation is defined in the Revised Prevent duty guidance 2015 as:

“the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.”

3.9.2.4 Prevent:

Prevent is about safeguarding students to keep them safe from being radicalised and/or exploited by extremists. The Prevent Duty is not about discouraging students from having political views and concerns and should balance its legal duties in terms of both ensuring freedom of speech but also of protecting students and staff welfare.

Please refer to Appendix 1 for the Oldham College Commitment to Prevent and Protect.

3.9.3 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children and 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 exploitation as well as being physical can be facilitated and/or take place online.

3.9.4 So called ‘Honour Based’ violence and abuse:

- a. So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.
- b. Project choice is a greater Manchester service which provides practical and emotional support for those affected by all forms of “So called honour-based violence and abuse” including Forced marriage and Female Genital Mutilation, regardless of age, gender and sexual orientation. Project choice also provides specialist advice and training to practitioners on SCHBV. Please refer to Appendix 2 for the HBV power and control wheel developed by Project Choice.

3.9.5 Forced Marriage:

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

3.9.5.1 Where staff have any concerns that a student that is at risk of Forced Marriage or is already the victim of Forced Marriage, they should refer to the Safeguarding Team immediately, *and must not*.

- i. treat such allegations merely as a domestic issue and send the student back to the family home.

- ii. ignore what the student has disclosed or dismiss out of hand the need for immediate protection.
- iii. decide that it is not the staff's responsibility to follow-up the allegation.
- iv. approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to the staff's concerns and may place the student in danger.
- v. contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children's social care, either by telephone or letter.
- vi. share information outside information sharing protocols without the express consent of the student.
- vii. attempt to be a mediator or encourage mediation, reconciliation, arbitration or family counselling.

Please see Appendix 3 for indicators that someone may be at risk of Forced Marriage and College process for all students requesting a holiday/ 1 week or more off college.

3.9.6 Female Genital Mutilation:

- a. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- b. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Appendix 4 - mandatory reporting of female genital mutilation procedural information.
- c. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Please see Appendix 4 for summary of mandatory reporting duties and advice on identifying cases of Female Genital Mutilation.

3.9.7 Domestic Abuse:

- a. Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.
- b. Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- c. Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

- d. Children and young people can be victims of domestic abuse, they may hear, see or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationship (teenage relationship abuse). It is now recognised that all of this could have a detrimental and long-term impact on their health, well-being, development and ability to learn.

3.9.8 Private fostering:

Private fostering is different to the fostering organised by a Local Authority. It is arranged by the carer or the child themselves. Under the Children Act 2004, all professionals have a duty to identify and notify us of private fostering arrangements. In every single case, there is a legal duty to notify. If you have any concerns that a student has been privately fostered please inform the safeguarding team immediately.

3.9.9 Peer on Peer abuse:

Children can abuse other children; this is classed as peer on peer abuse and can take many forms, including but not limited to: bullying/cyberbullying; sexual violence and sexual harassment; physical abuse; sexting; CSE; serious youth crime/violence; harmful sexual behaviours.

For Oldham's local response please refer to the guidance on peer on peer abuse in Oldham that can be found on the safeguarding page on the staff Intranet.

3.9.10 Serious Violence:

- a. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- b. All staff should be aware of the associated risks and understand the measures in place to manage these

3.9.11 Child on child sexual violence and sexual harassment (See also Part 5 KCSIE 2024)

- a. Sexual violence and sexual harassment can occur between two children or young people of any age or sex
- b. It can occur through a group of children/young people sexually assaulting or sexually harassing an individual or a group of children.
- c. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally)
- d. All staff are advised to maintain an attitude of 'it could happen here'
- e. Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur between children and young people or adults, online or offline, and both inside and outside of an education setting. It includes:
 - sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names;
 - sexual "jokes" or taunting;
 - physical behaviour, such as, deliberately brushing against someone, interfering with someone's clothes (settings should consider when any of this crosses a line into sexual violence – it is important to talk to and take into account the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
 - online sexual harassment - including non-consensual sharing of nude and semi-nude images or videos, sharing of unwanted explicit content, upskirting, sexualised online bullying, unwanted sexual comments or messages (including on social media), sexual exploitation, coercion and threats.

3.9.12 Mental Health

- a. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- b. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- c. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is essential that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
- d. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in line with this policy and other protocols, by speaking to the designated safeguarding lead or a deputy

3.9.13 Online safety

- a. **Online safety** is an umbrella term for promoting the safeguarding of children and young people when using any device over the internet. The online world can add great value to the personal lives and education of children and young people, but it also presents risks and threats. Technology is always evolving, and with developments in virtual reality and artificial intelligence (AI), there are major shifts in how young people interact with the world.
- b. **Online safety awareness** means being aware of the nature of the possible threats that you could encounter whilst engaging in activity through the internet (KCSIE).
- c. **Online abuse** is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones.
- d. **Cybercrime** is criminal activity committed using computers and/or the internet.

3.9.14 Other types of safeguarding issues include:

- i. Bullying including online bullying
- ii. Children missing from education
- iii. Missing from home or care
- iv. Substance misuse
- v. Faith abuse
- vi. Gangs and youth violence
- vii. Gender-based violence/violence against women and girls (VAWG)
- viii. Hate crime
- ix. Mental health
- x. Relationship abuse
- xi. Sexting
- xii. Human trafficking and modern slavery

3.10 Safer recruitment of staff (see also **Safer Recruitment Policy**)

3.10.1 Oldham College has a defined staff recruitment process which ensures that it does not recruit staff that present a risk to other members of the College community, and in particular young people and vulnerable adults.

3.10.2 The following measures are deployed to assure recruitment processes in line with the principles of the College Safeguarding and Child Protection policy:

- i. advertising that emphasizes the College's approach to safeguarding;
- ii. a standard application form which captures information related to safeguarding;
- iii. a criminal record self-disclosure for shortlisted candidates;
- iv. online searches for shortlisted candidates;
- v. an interview/selection panel of at least two members, at least one of which has received safer recruitment training;
- vi. standard safeguarding questions used in the interview;

- vii. the requirement to obtain two written employment references and to see evidence of qualifications;
- viii. DBS check at an appropriate level for the role;
- ix. a range of pre-employment checks following selection of a suitable candidate;
- x. mandatory safeguarding training during the new staff induction;
- xi. adjusted processes to ensure safe recruitment of agency staff;
- xii. adjusted processes to ensure safe recruitment of contractors including a DBS check at an appropriate level;
- xiii. written confirmation from initial teacher training providers that all necessary checks have been carried out prior to engagement

3.11 Safe recruitment of learners

3.11.1 The College undertakes procedures to ensure that its students are suitable to study in a college setting. It also reserves the right to refuse entry to any applicants whom it has a reasonable belief may pose a risk to learners. To ensure this is addressed appropriately the college has:

- i. signed declarations by all learners upon enrolment;
- ii. schools to College procedure please see Appendix 5;
- iii. DBS/CRB checks for learners on relevant college programmes;
- iv. risk assessment of vulnerable students that display risky harmful behaviours;
- v. risk assessment of anyone that has been the subject of a disciplinary situation or criminal investigation regarding children, young people or vulnerable adults;
- vi. risk assessment of ex-offenders with unspent convictions in accordance with the Rehabilitation of Offenders Act 1974.
- vii. multi-agency response to ensure that any students identified as at risk within the community have a robust risk assessment in place to ensure they have access to education

3.11.2 In accordance with the Regulations, records of all checks carried out are kept centrally and confidentially on the Safeguarding database.

3.12 Staff Development and Training

3.12.1 All staff in the college undergo a mandatory induction programme which includes safeguarding training. The College's Safeguarding policy, procedure and accompanying guidance are issued to all new staff as part of their induction.

3.12.2 All staff also participate in annual training programmes for emerging concerns such as Child Sexual Exploitation, EWMH and Prevent, Mental Health, Online Safety all staff members also receive updates on safeguarding, this could be via, email, bulletins, briefings and staff meetings.

3.13 Action to take on suspicion of somebody being abused

3.13.1 All staff, volunteers and others working in direct contact with students in the College environment must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of the College setting, or to whom a student discloses issues relating to safeguarding, should contact one of the Designated Safeguarding Team immediately.

3.13.1.1 The Strategic Safeguarding Lead Officer is:
 Alan Benvie 0161 785 4079

3.13.1.2 The Designated Safeguarding Lead is:
David Littlewood 0161 785 063

3.13.1.3 Additional Safeguarding & Welfare Officers are:
Reuben Campbell 0161 785 4113
Chloe Morris 0161 785 4114
Rebecca Hilton 0161 785 4116
Leanne Backer 0161 785 4117
Cara Ebden 0161 785 4112
Kayleigh Moss 0161 785 4113

3.13.1.4 For children attending Butterflies Nursery contact:
Claire Johnson 0161 785 4090

3.13.1.5 For UCO Safeguarding & Welfare queries:
Laura Macmillan 0161 785 8877

3.13.2 Staff who are not designated to safeguarding, but who are approached with concerns about a student, must bring the concerns raised to the attention of one of the Safeguarding Team immediately.

3.13.3 All staff to whom a student discloses issues that may be related to safeguarding must refer these concerns to a safeguarding officer using the online safeguarding and welfare referral form that can be found on the staff intranet and call any of the above telephone numbers.

3.13.4 The Designated Safeguarding Lead Officer will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including attendance at case conferences.

3.13.5 All Safeguarding Officers will liaise with and represent the College at external child protection or core group meetings, including those relating to Children Looked After and Care Leavers, Child Sexual Exploitation, Child Criminal Exploitation and Prevent.

3.14 Allegations of abuse against members of College staff:

3.14.1 Allegations of abuse, or concerns raised against members of College staff will always be treated seriously.

3.14.2 The allegation must always be referred to a Deputy Principal who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations.

3.14.3 An allegation against the Principal should be made to the Chair of Governors via the Clerk to Governors.

3.14.4 The Designated Safeguarding Lead Officer will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk.

3.14.5 The Designated Safeguarding Lead Officer will also inform The Principal and the Director of Human Resources in order that College procedures may be followed.

3.14.6 If the allegation or concern is against one of the Designated Safeguarding Team, it should be reported to the Principal.

- 3.14.7 Where there is a complaint against a member of staff, the Oldham Authority LADO (Local Authority Designated Officer) will be informed and involved.
- 3.14.8 This may result in possibly criminal (police) investigations and/or a child/vulnerable adult's protection investigation carried out by Social Services. In this instance, the Oldham Safeguarding Partnership, LADO Procedure should be followed.
- 3.14.9 All steps of this procedure will be advised and supported by the LADO, working in partnership with the college. The LADO Procedure is available on the Local Safeguarding Partnership website.
- 3.15 Allegations of abuse made against teachers and other staff, including supply teachers and volunteers. (Please refer also to the Low Level Concerns Policy)
- 3.15.1 Guidance here refers to allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children or vulnerable adults in the College.
- 3.15.2 The guidance should be followed where it is alleged that anyone working in the College including supply teachers and volunteers has:
- behaved in a way that has harmed a young person or vulnerable adult;
 - possibly committed a criminal offence in a way that indicates he or she may pose a risk of harm; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 3.15.3 This guidance relates to members of staff including supply/agency staff and volunteers who are currently working in the College, regardless of whether the alleged abuse took place in the College.
- 3.15.4 Allegations against a teacher or other member of staff who no longer works at the College should be referred to the Police.
- 3.15.5 The College has a duty of care to its employees, and will provide effective support for anyone facing an allegation, and provide them with a named contact if suspended. Where the College is no longer the employer of the individual, they still have a responsibility to ensure allegations are dealt with appropriately, and that they liaise with relevant parties. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in the College is dealt with very quickly in a fair and consistent way that provides effective protection for the affected young person or vulnerable adult, and at the same time supports the person who is the subject of the allegation.
- 3.15.6 For further guidance, please refer to parts 3 and 4 of Keeping Children Safe in Education 2024.
- 3.16 Allegations of abuse against other students:
- 3.16.1 Should a student make an allegation against another student, these will be dealt with under the following procedures:
- Safeguarding and Child Protection Procedure
 - Student Disciplinary Procedure
- 3.17 Reporting cases to the Disclosure & Barring Service
- 3.17.1 The Oldham College has a statutory duty to make reports, and provide relevant information to the Disclosure & Barring Service (DBS) where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct.

3.17.2 The responsibility for reporting cases to the DBS lies with the Director of Human Resources. The DBS make barring decisions as legislated by the Safeguarding Vulnerable Groups Act 2006 which sets out the scope and operation of the vetting and barring scheme.

3.18 Dismissals and Resignations

3.18.1 If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, the College is not prevented from following up an allegation in accordance with these procedures.

3.18.2 Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

3.18.3 The College is legally required to report to the DBS if:

- we have dismissed a member of staff because they have harmed somebody;
- we have dismissed somebody or changed their role because they might have harmed somebody.

3.19 Whistleblowing

3.19.1 The Oldham College has an established Whistleblowing procedure to enable staff to share, in confidence with a designated person, concerns they may have about instances of suspected malpractice in the College.

3.19.2 Malpractice can include fraud and financial irregularities, criminal offences being committed, that have been committed or that are likely to be committed, endangering the health or safety of individuals, and can also include concerns around the protection of children or vulnerable adults.

3.19.3 The procedure is intended to provide safeguards to enable members of College staff to raise concerns without fear of adverse repercussions.

3.19.4 The College recognises that it may be difficult to express concerns about colleagues, and is fully supportive of Whistleblowing for the sake of a child or vulnerable adult, and will provide support and protect those who "blow the whistle".

3.19.5 This procedure is, accordingly, intended to provide safeguards to enable members of staff to raise concerns about malpractice in connection with the College. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally, and, if necessary, externally without fear of adverse repercussions to the individual. It is also intended to promote throughout the College a culture of openness and a shared sense of integrity by inviting all employees to act responsibly in order to uphold the reputation of the College and maintain public confidence.

3.20 Support for Staff

3.20.1 The College is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with one of the Designated Safeguarding Officers or with a trained counsellor. Staff wishing to be referred for counselling should contact Human Resources.

3.21 Equality of Opportunity

3.21.1 All children and vulnerable adults, as part of the College community, have the right to be safeguarded from harm and exploitation whatever their race, religion, gender, sexuality, age, or disability. This policy relates to the College's legal obligation to protect children who are suffering forms of abuse as defined in the Children Act 2004 and is therefore in line with the College's Equality and Diversity policy.

4 Accountabilities

- 4.1 All members of the College community, including staff, governors, students, contract staff, sub-contractors and work experience providers are responsible for safeguarding and promoting the welfare of children and vulnerable adults.
- 4.2 All staff who come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.
- 4.3 All Staff are expected to:
- attend safeguarding training as required;
 - familiarise themselves with the Safeguarding policy and associated procedures;
 - safeguard and promote the welfare of children and vulnerable adults and alert the Designated Safeguarding Officers if they have concerns about a child or vulnerable adult;
- 4.4 The Principal is responsible for ensuring that:
- the College's Safeguarding policy and procedures are fully implemented and followed by staff;
 - the Deputy Principal advises Principalship on strategic decisions in relation to safeguarding, in conjunction with the Vice Principal (Strategic Safeguarding Lead);
 - Designated Safeguarding Officers have sufficient time and resources to carry out their roles;
 - all staff feel able to raise concerns about the safety of children and vulnerable adults;
 - such concerns are dealt with sensitively, effectively and in a timely manner.
- 4.5 College Governors are responsible for ensuring that:
- The College has a safeguarding policy and procedures in place, which includes safer recruitment and dealing with allegations of abuse against members of staff;
 - The College has an appointed Designated Safeguarding Lead Officer.
 - There is a nominated lead safeguarding governor who is responsible for liaising with the Principal, Strategic Safeguarding Lead, Designated Safeguarding Officer regarding safeguarding issues. The role is strategic rather than operational – they will not be involved with concerns over individual students. The nominated governor will receive training relevant to the governance role, and this will be updated every two years.
- 4.6 Designated Safeguarding Officers:
- 4.6.1 The Strategic Designated Safeguarding Lead (SDSL) and the Designated Safeguarding Lead Officer (DSLO) are responsible for safeguarding children and vulnerable adults. There are also additional Safeguarding Officers who work directly for the DSLO. In addition, the Childcare Development Manager (Nursery) is also designated to support with safeguarding issues within their own areas.
- 4.6.2 The Designated Safeguarding Lead Officer and the Safeguarding Team act as the College's source of support, advice and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend training as appropriate, liaise with the Principal, SDSL and other College departments where necessary, and make referrals to external agencies. Other aspects of their role include:
- obtaining information from staff, volunteers, children, parents or carers and external stakeholders who have concerns relating to the protection of children or vulnerable adults, and to record this information;
 - assessing information quickly and carefully and asking for further information where appropriate;
 - consulting with a statutory child protection agency e.g. the local social services department, to clarify doubts or worries;
 - making referrals to statutory child protection agencies or the police without delay;

e. initiating relevant internal support mechanisms.

4.7 Programme Tutors, Programme Leaders and Student Support Workers are responsible for ensuring that their students are aware of the services they can approach for support.

4.8 All staff with safeguarding duties have contact telephone numbers for the Local Area Safeguarding Partnership and other statutory agencies.

5 Associated Documentation

- a. [Appendix 1](#) – Oldham College commitment to prevent and protect
- b. [Appendix 2](#) – Honour-based Violence Wheel
- c. [Appendix 3](#) – Indicators somebody may be at risk of forced marriage.
- d. [Appendix 4](#) – FGM mandatory duty
- e. [Appendix 5](#) – Schools to College process
- f. [Keeping Children Safe in Education](#)
- g. Student Handbook
- h. IT Acceptable Use Policy

6 Related Policies and Procedures

- a. [Safeguarding & Child Protection Procedure](#)
- b. Safeguarding Children in Education Audit
- c. [Student Behaviour Policy](#)
- d. [Safer Recruitment Policy](#)
- e. [DBS Policy - Employees](#)
- f. [Data Protection and Data Access Policy](#)
- g. [Equality & Diversity Policy](#)
- h. [Health and Safety Policy](#)
- i. [IT Acceptable Use Policy](#)
- j. [Student Disciplinary Procedure](#)
- k. [Searching Students for Prohibited Items Procedure](#)
- l. [Staff Code of Conduct](#)
- m. [IAG and Admissions Procedure](#)
- n. Prevent Action Plan
- o. [Children, Young Persons and Vulnerable Adults on Oldham College Premises Policy](#)
- p. [Whistleblowing Procedure](#)
- q. Low level Concerns Policy
- r. Sexual Misconduct and Sexual Harassment Policy and Procedure

7 General Data Protection Compliance

	Confirm (x)	Date Reviewed	Reviewer
No personal subject data is placed at risk by implementing this Policy.			
Personal subject data is placed at risk by implementing this Policy but safeguards are in place to mitigate this.	X	8/11/2017	Nick Middleton Peter O'Donnell

This document is uncontrolled when printed or stored outside the College Policies site.

Personal subject data is placed at risk by implementing this Policy and it is unknown if safeguards are in place to mitigate this			
-----------------------------------------------------------------------------------------------------------------------------------	--	--	--

Change History Record

Issue	Description	Approval (author signature)	Date of Issue
1	New format	Sally Lawton	February 2012
2	New legislation & staff changes	Sally Lawton	January 2014
3	Change of names of documents in section 3 and attachment of Appendices 1 and 2	Sally Lawton	May 2014
3	Approved as current for 2014/15 and footer updated to current standard.	Nick Middleton	16.09.14
3.1	Minor amendments to sections 3, 4 and 9 to incorporate 14-16 provision in the scope of the document.	Sally Lawton	24.11.14
3.2	Minor amendments to sections 3, 4, 9 and 10 to incorporate 14-16 provision and update named officers	Sally Lawton	19.3.15
3.3	Minor amendments to sections to 3,5 and 10 to incorporate Prevent agenda and update named officers	Sally Lawton	9.5.15
	Amendments to sections 1, 3, 5, 8 and 10 to include Prevent duty and legislation. Update on change of safeguarding officers. Inclusion of Appendix 3 – Guidance on Infection Control.	Sally Lawton	19.08.15
3.4	Reviewed with minor changes including change of title from Safeguarding Policy	Sam Breckell	07.10.16
3.5	Minor amendments for change of named persons	N. Middleton	14.12.16
3.6	General Data Protection compliance statement. Policy Owner changed.	N. Middleton	25.10.17
3.7	The policy has been reviewed and amendments and additions made to version 3.6: Para 5 Oldham College LAC commitment and definition Appendix 1 added -Oldham College Commitment to Prevent and Protect Added definitions of abuse as defined in KCSIE (2006 and 2018) Updates on definitions of Domestic Abuse and CSE. New Appendices 2 to 5 added Forced Marriage, HBV control wheel and Female Genital Mutilation	Rebecca Hirst	25.06.18

	FGM mandatory reporting duty; Students requesting holiday procedure and Schools to College process. Updated Staffing information		
4.0	Substantial rewrite detailed above, generating full new version. Approved Governors (full Corporation) 03.07.18	Nick Middleton	18.10.18
4.1	Peer on Peer and Private Fostering info added.	Rebecca Hirst	20.11.18
4.2	Name change	Rebecca Hirst	03.12.18
4.3	Lead Governor name change. Reviewed and approved by Governors 11.06.19.	Rebecca Hirst	14.06.2019
4.4	Job title change for R.Hirst. KCSIE Sep 2019 update to link added. Prevent update added.	Rebecca Hirst	1.10.2019
4.5	Change of name LSCB to Oldham Safeguarding Partnership	Rebecca Hirst	23.10.19
4.6	Addition of section 17 (Related Policies and Procedures) and renumbering of subsequent sections.	Nick Middleton	11.02.20
4.7	COVID-19 Annex added	Rebecca Hirst	01.04.20
4.8	Updated with key changes to KCSIE 2020 and updated COVID-19 annex in line with our blended learning offer. Addition of Children, Young Persons and Vulnerable Adults... Policy to list of related policies.	Rebecca Hirst	13.09.20
4.9	Minor amendments – Staffing update, key changes to KCSIE 2021 – Part % Child on Child Sexual violence and sexual harrassment	Rebecca Hirst	03.09.21
4.10	Minor amendments to reflect staffing, key changes to KCSIE 2022 and Domestic Abuse Act 2021	Rebecca Hirst	30/09/2022
4.11	Minor amendments to reflect staffing and key changes to KCSIE 2023	Rebecca Hirst	02/10/2023
4.12	Minor amendments to reflect staff changes and KCSIE 2024	Rebecca Hirst	30/08/2024
4.12	Approved – Corporation 22.10.24	Nick Middleton	23.10.24
4.13	Minor amendment: Section 5 – clause on mental health first aider numbers removed;	David Littlewood	24/10/24
Draft 5.0	Re-written to reflect external safeguarding audit recommendations. Section 3 – Legal Framework moved to 1.4. Section 2 – Scope expanded to include updated definition of safeguarding from KCSIE.	Nick Middleton	12.11.24

	<p>'See also' list (1.4.5) moved to section 16 – Related Policies and Procedures.</p> <p>Section 5 – definition of a child updated (from KCSIE 2024 draft 1).</p> <p>3.1.2 – early help added to principles.</p> <p>Section 16 added – Associated Documentation</p> <p>Section 3.7 added -Safer recruitment of staff.(requires content).</p> <p>3.6.3.1 – Definition of abuse expanded in line with KCSIE draft.</p> <p>Section 3.5 added – 'Safeguarding issues – from KCSIE.</p> <p>Re-ordering of sections implemented and re-numbering.</p> <p>Section 3.9 added – Safer Recruitment of Staff.</p> <p>Section 3.8 added – Homelessness</p> <p>References to covid pandemic removed (inc. 4.3d, and section 5 – Safeguarding during remote working).</p> <p>Clause 1.2 added (moved from previous section 5).</p> <p>All appendices removed from main document, added to policies appendix library and linked into this document.</p> <p>3.9.13 – new section on online safety added.</p> <p>3.9.11 – extended with more content on sexual harassment.</p> <p>3.16 – allegations against a member of staff; copied, re-drafted, reformatted and renumbered from an un-numbered section at the end of the previous version.</p> <p>3.1.1 added regarding zero tolerance towards all forms of harassment or abuse</p> <p>4.5.c added regarding safeguarding lead governor.</p> <p>3.14.3 added re. allegations against the Principal.</p> <p>1.1 Legislation list updated.</p>		
Version 5.0	Approved Governors 17.12.24. Re-baselined.	Nick Middleton	08.01.25