



Child and Adult Protection and Safeguarding Policy 2022-23

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Based on DfE 'Keeping Children Safe in Education' 2022.

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1. Learner Centred Approach to Safeguarding

1.1 Introduction

- Liberty Training recognise our statutory responsibility to safeguard and promote the welfare of all learners. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, directors, leaders, parents, families, and learners) are an important part of the wider safeguarding system at Liberty Training and have an essential role to play in making this community safe and secure.
- Liberty Training Training fully recognises its responsibilities for safeguarding learners. Our learners' welfare and safety are at the heart of our college's ethos and in everything we do. We believe that all learners have the right to be safe in our society. Therefore, we recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of learners by creating a positive college atmosphere through our teaching and learning, pastoral support and care for both learners and college personnel, training for college personnel and with working with parents/carers. We teach all our learners about safeguarding. Liberty Training serves learners up to the age of 25, thus in this policy, a 'learner' means all children and young people below 25 years of age.
- All children (defined as those up to the age of 18 but applicable to all learners at Liberty Training) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with learners at Liberty Training will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any learner or adult, they should act and act immediately.
- Liberty Training recognises the importance of providing an ethos and environment within college that will help learners to be safe and to feel safe. In our college learners are respected and are encouraged to talk openly. We will ensure learner's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
 - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures.
 - **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support:** for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - **Collaborating with parents and other agencies:** to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2022.

1.2 Policy context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2022 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - Keeping Children Safe in Education 2022 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC)

- Ofsted: Education Inspection Framework
 - Framework for the Assessment of Children in Need and their Families 2000
 - [Kent and Medway Safeguarding Children Procedures](#)
 - The Education Act 2002
 - Education and Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Non-Maintained Special Schools (England) Regulations 2015
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
 - Liberty Training will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.
 - Liberty Training recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3 Definition of safeguarding

- In line with KCSIE 2022, safeguarding and promoting the welfare of children (applied to all our learners) is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing impairment of children’s mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes.
- The college acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child-on-child abuse
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
 - Online safety

- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- 'Upskirting'

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2022)

1.4 Related safeguarding policies

This policy is one of a series in the college integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers.
- The staff safer recruitment and selection processes.
- Local Authority policies and procedures on dealing with allegations against members of staff.
- Acceptable Internet Use Policy & Agreement
- Staff code of conduct
- Data Protection & GDPR Policy
- Admission & Attendance policy and Attendance Procedure.
- Learner Behaviour policy.
- Anti-Bullying Policy.
- Anti-Cyber Bullying Policy
- Equality & Diversity Policy.
- Confidentiality Policy.
- Health and Safety Policy.
- Accident & Emergency Procedure
- The Whistleblowing Policy.

1.5 Policy compliance, monitoring and review

- Liberty Training will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2022 as appropriate. This will be shared with all staff during annual September CPD, with staff signing to confirm they have read the document, as well as being displayed on the safeguarding notice board.
- Parents/carers can obtain a copy of the college Child and Adult Protection and Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the college website.
- The policy forms part of our college development plan and will be reviewed annually by the headteacher, leadership team and directors.
- The Designated Safeguarding Lead/Headteacher will ensure regular reporting on safeguarding activity and systems to the directors.

2. Key Responsibilities

2.1 Directors and leadership

- The directors/proprietors have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The directors/proprietors have regard to the KCSIE 2022 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The directors/proprietors will facilitate a whole college approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The directors/proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
- The directors/proprietors and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote learner's welfare.
- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the directors/proprietors, are understood, and followed by all staff.
- The directors/proprietors will ensure an appropriate senior member of staff, from the college leadership team, is appointed to the role of designated safeguarding lead. The directors/proprietors and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The college has a nominated director for safeguarding. The nominated director will support the DSL and have oversight in ensuring that the college has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

2.2 Designated Safeguarding Lead (DSL)

- The college has appointed Emily Hollis MBE, Head of College, as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in college. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The college has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2022. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children

- When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
 - Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018
 - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
 - Representing, or ensure the college is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
 - Managing and monitoring the college role in any multi-agency plan for a child.
 - Being available during term time (during college hours) for staff in the college to discuss any safeguarding concerns.
 - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college leadership staff.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - As the headteacher, be aware of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3 Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for learners, promote learner's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
 - provide a safe environment in which children can learn.
 - be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
 - know what to do if a learner tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
 - be able to identify and act upon indicators that learners are, or at risk of developing mental health issues.
 - be prepared to identify learners who may benefit from early help.
 - understand the early help process and their role in it.
 - understand the college safeguarding policies and systems.
 - undertake regular and appropriate training which is regularly updated.
 - be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - know how to maintain an appropriate level of confidentiality.
 - reassure learners who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - safeguard learner's wellbeing and maintain public trust in the profession as part of their professional duties.
- Staff at Liberty Training recognise that learners 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 being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a learner.

- Staff at Liberty Training will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.

2.4 Children and young people

- Children and young people have a right to:
 - Feel safe, be listened to, and have their wishes and feelings taken into account.
 - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of college safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

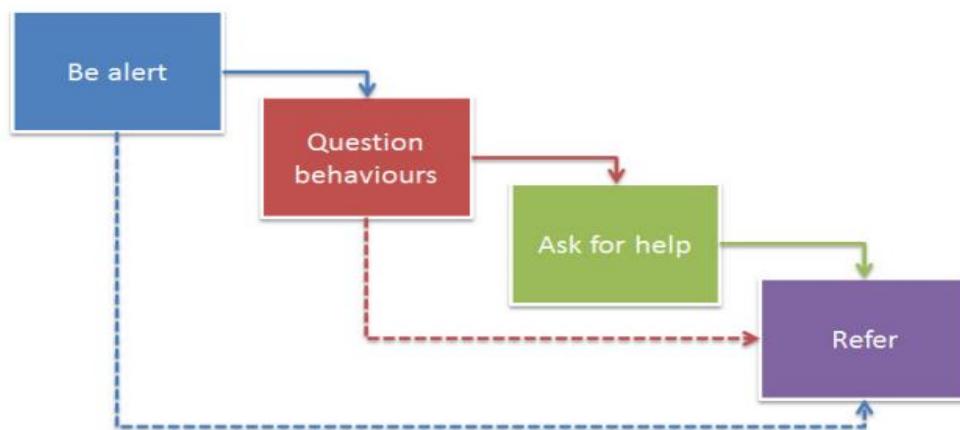
2.5 Parents and carers

- Parents/carers have a responsibility to:
 - Understand and adhere to the relevant college policies and procedures.
 - Talk to their children about safeguarding issues and support the college in their safeguarding approaches.
 - Identify behaviours which could indicate that their child is at risk of harm including online.
 - Seek help and support from the college or other agencies.

3. Child Protection Procedures

3.1 Recognising indicators of abuse and neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2022. This is outlined locally within the [Kent Support Levels Guidance](#).
- Liberty Training recognise that when assessing whether a learner may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a learner:



[‘What to do if you are worried a child is being abused’ 2015](#)

- Liberty Training recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from learner to learner. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Liberty Training recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the college. Learners can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Liberty Training recognises that technology can be a significant component in many safeguarding and wellbeing issues; learners are at risk of abuse online from people they know (including other young people) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- Liberty Training recognises that some learners have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a learner’s safety or welfare, the searching and screening of learner’s and confiscation of any items, including any electronic devices, will be managed in line with the college behaviour policy which is informed by the DfE [‘Searching, screening and confiscation at school’](#) guidance.

- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a learner was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the learner who has been searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

3.2 Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to child, reflecting back the concern.
 - use the learner's language.
 - be non-judgmental.
 - avoid leading questions; only prompting the learner where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern using the facts as the learner presents them, in line with college record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a learner's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- Liberty Training will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
 - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services
- Where it is identified a child may benefit from Early Help support (as provided by [ICS](#)), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
 - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the [Education Safeguarding Service](#) if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures.
 - Liberty Training recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the [Education Safeguarding Service](#) before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the [Education Safeguarding Service](#).

3.3 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the college safeguarding system and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.
- Incident/Welfare concerns are kept on our MIS system.
- Records will be completed as soon as possible after the incident/event, using the learner's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the learner in the college. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent education provider, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a learner leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the college receives child protection files from another setting, the DSL will ensure key staff such as the named person with oversight for SEN, will be made aware of relevant information as required.

- Where a learner joins the college and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the learner, and if so, if the files have been sent.

3.4 Multi-agency working

- Liberty Training recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The college leadership team, directors/proprietors and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- Liberty Training recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The college will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The headteacher/DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our college behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

3.5 Confidentiality and information sharing

- Liberty Training recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Liberty Training has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our college is compliant with all matters relating to confidentiality **and information sharing requirements. The DPO at Liberty Training is Caz Place, Office Manager.**
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. 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 2022). KCSIE 2022, the [Information Commissioner's Office](#) the (ICO) and the DfE '[Information sharing advice for safeguarding practitioners](#)' (2018) guidance provides further details regarding information sharing principles and expectations.
- The headteacher/DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality procedures. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a learner that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the learner.

3.6 Complaints

- All members of the college community should feel able to raise or report any concerns about learner safety or potential failures in the college safeguarding regime. The college has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the website and safeguarding notice board.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at college can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at Liberty Training will take all concerns reported to the college seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- Liberty Training is aware of the range of specific safeguarding issues and situations that can put learners at greater risk of harm. In addition to Part one, DSLs, college leaders and staff who work directly with children will read Annex B of KCSIE 2022 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child abuse

- All members of staff at Liberty Training recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of college and online.
- Liberty Training recognises that child-on-child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - Abuse in intimate personal relationships between children
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Upskirting (which is a criminal offence), 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
 - Initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022 (in particular, part two and five).
 - Liberty Training adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
 - All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
 - Liberty Training recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
 - In order to minimise the risk of child-on-child abuse, Liberty Training will:
 - Implement a robust anti-bullying policy, provide an age/ability/need appropriate PSHE and RSE curriculum, provide a range of reporting mechanisms.
 - Liberty Training want learners to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated college policies, including child protection, anti-bullying, and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
 - Concerns about learners' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils/students' and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
 - Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
 - taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies, for example, the college anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

4.2 Child-on-child sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, Liberty Training will follow the guidance outlined in Part five of KCSIE 2022.
- Liberty Training recognizes that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of ‘it could happen here.’ Liberty Training recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
- Liberty Training recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to learners that avoids alarming or distressing them.
- Liberty Training recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
 - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from the [Education Safeguarding Service](#).
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult learners, and staff and any actions that are required to protect them.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the college and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
 - the wishes of the victim in terms of how they want to proceed.
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - the ages of the children involved.
 - the developmental stages of the children involved.
 - any power imbalance between the children.
 - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - understanding intra familial harms and any necessary support for siblings following incidents.
 - whether there are any ongoing risks to the victim, other learners, children, or college staff.
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The college will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other

agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

4.3 Nude and/or semi-nude image sharing by children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it has been read by the safeguarding team at Liberty Training.

- Liberty Training recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
 - to report any concerns to the DSL immediately.
 - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - not to delete the imagery or ask the child to delete it.
 - to avoid saying or doing anything to blame or shame any children involved.
 - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
 - to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - A referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
 - The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

- If DSLs are unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

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

- Liberty Training recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- Liberty Training recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- Liberty Training recognises that CSE 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. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Serious violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from college, 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 and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or 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 HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. This duty applies to qualified teachers, however at Liberty Training we will ensure that any staff member alerts the Headteacher/DSL whom has qualified teacher status and will report to the police.

4.7 Preventing radicalisation

- Liberty Training is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Liberty Training recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow. If there is an immediate threat, the police will be contacted via 999.

4.8 Cybercrime

- Liberty Training recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection and other appropriate policies.

4.9 Domestic abuse

- Liberty Training recognises that 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 abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children’s health, well-being, development, and ability to learn.
- Liberty Training is an [Operation Encompass College](#). This means we work in partnership with Kent Police to provide support to learners experiencing domestic abuse.
- If staff are concerned that a learner may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

4.10 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that learner's experiences, for example where learners have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe learners 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.
- If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** learners should be protected, Liberty Training acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

- Liberty Training acknowledges that learners with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- Liberty Training recognises that learners with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Learners will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that learners with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that learners with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our college will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SLT member responsible for SEND (Lauren) and Director for SEND (Jojo) to plan support as required.
- Our college has robust intimate/personal care policies which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found in our policies.

5.2 Children requiring mental health support

- Liberty Training has an important role to play in supporting the mental health and wellbeing of our pupils/students. Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

- Where there are concerns regarding possible mental health problems for learners staff should:
 - Follow our processes for identifying possible mental health problems, alert the Tutor who is the learners first point of contact, seek support from the Wellbeing TA (Melanie Cole), escalate to the Mental Health Lead (Emily Hollis MBE, Head of College and DSL).
- Age/ability appropriate education will be provided to our learners to help promote positive health, wellbeing, and resilience.

5.3 Children Missing from Education (CME)

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.
- Where possible, the college will hold more than one emergency contact number for each learner so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.
- Where the college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

5.4 Elective Home Education (EHE)

- Where a parent/carer expresses their intention to remove a child from college with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#). We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the learner, in line with compulsory education age and needs of the learner.

5.5 Children who need a social worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children in the college so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform college decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.6 Looked after children, previously looked after children and care Leavers

- Liberty Training recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- The college has appointed a '[designated teacher](#)' (Emily Hollis, Head of College) who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the college believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.7 Children who are Lesbian, Gay, Bi, or Trans (LGBTQI+)

- The fact that a child or a young person may be LGBTQI+ is not in itself an inherent risk factor for harm, however, Liberty Training recognises that children who are LGBTQI+ or are perceived by other children to be LGBTQI+ (whether they are or not) can be targeted by other children or others within the wider community.
- Liberty Training recognises risks can be compounded where children who are LGBTQI+ lack a trusted adult with whom they can be open. LGBTQI+ is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

6. Online Safety

- It is essential that learners are safeguarded from potentially harmful and inappropriate material or behaviours online. Liberty Training will adopt a whole college approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Liberty Training will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Liberty Training identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Liberty Training recognises that technology, and the risks and harms related to it, evolve and change rapidly. The college will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The headteacher/DSL will be informed of any online safety concern, as appropriate, and will report on online safety practice and incidents, including outcomes, on a regular basis to the wider directors.

6.1 Policies and procedures

- The DSL has overall responsibility for online safety within the college but will liaise with other members of staff, as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- Liberty Training uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All college owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Liberty Training recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2022, Liberty Training has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

6.2 Appropriate filtering and monitoring

- Liberty Training will do all we reasonably can to limit children's exposure to online risks through college provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. Further details can be found in our IT procedures and policy.
 - All decisions will be informed in part by the risk assessment required by the Prevent Duty (See Appendix 6) and is formed based on the age/ability/need of our learners, the number of our learners, how often they access IT systems and the proportionality of costs vs risks. We have consulted the [UK Safer Internet Centre](#) which has published guidance as to what "appropriate" filtering and monitoring might look like.
 - If learners or staff discover unsuitable sites or material, they are required to: turn off monitor/screen, report the concern immediately to a member of staff who will escalate as appropriate.
 - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, Liberty Training will ensure that "over blocking" does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of Liberty Training's approach to online safety.
 - Learners will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
 - Internet use will be supervised by staff as appropriate to learner's age/ability/need.
 - Learners will be directed to use age/ability appropriate online resources and tools by staff.

6.3 Information security and access management

- Liberty Training is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our information security, acceptable use and online safety policy.
- Liberty Training will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Remote/Online learning

Specific guidance for DSLs and SLT regarding remote learning is available at

- DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)
- NSPCC: [Undertaking remote teaching safely](#)
- The Education People: [Remote Learning Guidance for SLT](#)

These have been consulted in formulating our remote learning policy and procedures.

- Liberty Training will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with learners and parents/carers will take place using college provided or approved communication channels.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our college behaviour, code of conduct and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Policy.

6.5 Staff training

- Liberty Training will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

6.6 Educating Learners

- Liberty Training will ensure a comprehensive whole college curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.
- DSL/DSLs and senior leaders have accessed the UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' guidance.

6.7 Working with parents/carers

- Liberty Training will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
 - providing information on our college website and through existing communication channels (such as official social media, emails), offering specific online safety events for parents/carers and highlighting online safety at existing events.

- Liberty Training will ensure parents and carers understand what systems are used to filter and monitor their children's online use at college, what their children are being asked to do online, including the sites they will be asked to access and who from the college (if anyone) their child is going to be interacting with online. This is achieved by:
 - providing information on our college website and relevant policies such as acceptable use, home/college agreements and through existing communication channels.
- Where the college is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE '[Harmful online challenges and online hoaxes](#)' guidance to ensure we adopt a proportional and helpful response. Additional local advice and support is available for DSLs and SLT via the Education Safeguarding Service: '[Think before you scare](#)'.

7. Staff Engagement and Expectations

7.1 Staff awareness, induction and training

- All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.
 - College leaders, including the DSL/DDSLs will read KCSIE in its entirety.
 - College leaders and all members of staff who work directly with children will read annex B.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This information is kept on our training log and MIS system.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the college internal safeguarding processes, as part of their induction. This is achieved through induction training and eLearning. This training is regularly updated and is in line with advice from the safeguarding partners.
- We are in the process of recruiting trustees who will receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole college approach to safeguarding. This training is regularly updated.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually. This will be achieved through annual September INSET.
- Online safety training for staff will be integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning. This will be achieved through annual updates and eLearning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be achieved via email, e-bulletins, staff meetings and weekly CPD slots.
- Liberty Training recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape college safeguarding arrangements and child protection policies. This will be achieved via input from knowledgeable and experienced staff, inviting input at staff meetings.
- The Headteacher/DSL and Office/HR Manager will maintain an up to date record of safeguarding training and who has been trained.

7.2 Safer working practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the college behaviour policy and code of conduct.
- The Headteacher/DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our child protection policy and are aware of the college expectations regarding safe and professional practice via the staff behaviour policy and code of conduct and Acceptable Use Policy.
- Staff will be made aware of the college behaviour management policy. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant college policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies and social media.

7.3 Supervision and support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a learner's safety or welfare.
- The college will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for learner's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

8. Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

- Liberty Training is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
 - Liberty Training will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The headteacher, directors and leadership team are responsible for ensuring that the college follows safe recruitment processes as outlined within guidance.
 - The headteacher and directors will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The college maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- Liberty Training are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools and colleges.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the college places a learner with an alternative provision provider, the college will continue to be responsible for the safeguarding of that child.
 - The college will undertake appropriate checks to ensure the provider meets the needs of the learner, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the college organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2022.

8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the local Kent allegations arrangements. In depth information can be found within our staff code of conduct policy. This can be found on our MIS.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school/college from potential false allegations or misunderstandings.
- Where the headteacher is unsure how to respond, for example if the college is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

8.2.1 Concerns that meet the 'harm threshold'

- Liberty Training recognises that it is possible for any member of staff, including volunteers, trustees, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
 - behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteacher who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher/, staff are advised that allegations should be reported to the director for safeguarding, Michelle, who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- Liberty may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
 - Liberty Training] has an open and transparent culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the college are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the college may have acted in a way that is inconsistent with our staff code of conduct policy, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our staff code of conduct to Emily Hollis, Head of College, or Michelle Smith, Director if the concern is regarding the headteacher.
 - Where low-level concerns are reported to the college, the headteacher will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
 - The headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
 - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
 - If the college is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
 - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, the college will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, the College has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the college safeguarding regime. The leadership team at Liberty Training will take all concerns or allegations received seriously.
- All members of staff are made aware of the college Whistleblowing procedure, which can be found on our website and on the safeguarding notice board. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk
- Liberty Training has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#) .

9. Opportunities to Teach Safeguarding

- Liberty Training will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through our PSHE and RSHE curriculum.
- We recognise that the college plays an essential role in helping our learners to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- Liberty Training recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole- college approach which prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- Liberty Training has a clear set of values and standards, upheld and demonstrated throughout all aspects of college life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- Liberty Training recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our college systems support learners to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

10. Physical Safety

10.1 The use of premises by other organisations

- Where services or activities are provided separately by another body using the college facilities/premises, the headteacher and directors will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

10.2 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into college as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented in response to any Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. The college expect learners to report concerns to staff.
- The college will not accept the behaviour of any individual (parent or other) that threatens college security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the college site.

11. Local Support

- All members of staff in Liberty Training are made aware of local support available.
 - **Education Safeguarding Service**
 - **Area Safeguarding Advisor – Thanet:** 03301 651 140
 - **Online Safety in the Education Safeguarding Service**
 - 03301 651500
 - onlinesafety@theeducationpeople.org (non-urgent issues only)
 - **LADO Service**
 - Telephone: 03000 410888
 - Email: kentchildrenslado@kent.gov.uk
 - **Integrated Children's Services/ Children's Social Work Services**
 - Front Door: 03000 411111
 - Out of Hours Number: 03000 419191
 - **Early Help**
 - Thanet: 03000 41 95 67 - ThanetEarlyHelp@kent.gov.uk

Contact details for the Thanet Early Help team are:

Service Manager	Nick Moor Nick.Moor@kent.gov.uk 03000 41 08 63
Children's Centre Delivery Manager	Vicky O'Riordan Vicky.O'Riordan@kent.gov.uk 03000 41 56 94
Youth Hub Delivery Manager	Justin Wanstall Justin.Wanstall@kent.gov.uk 03000 41 95 16
Youth Justice Unit Lead	Pat Rouse Pat.Rouse@kent.gov.uk 03000 41 10 75
Area Inclusion and Attendance Lead	Melanie Higgins Melanie.Higgins@kent.gov.uk 03000 41 86 41
Practice Development Leader	Mark Walsh Mark.Walsh@kent.gov.uk 03000 41 93 85

- **Prevent Education Officer**
 - **South/East** - Jill Allen jill.allen@kent.gov.uk 03000 413565
- **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
 - A Designated PCSO will be allocated to Liberty Training. This policy will be updated once this has happened.
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - kscmp@kent.gov.uk
 - www.kscmp.org.uk
 - 03000 421126
- **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

What to do if you have a welfare concern at Liberty Training

Why are you concerned?

For example

- Something a learner has said – for example, an allegation of harm
- Learner's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the college procedure

- Reassure the learner
- Clarify concerns, using open questions if necessary (**TED: Tell, Explain, Describe**)
- Use learner's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Emily Hollis MBE, Head of College)

Inform the Designated Safeguarding Lead
Emily Hollis MBE (Inform a DDSL if the DSL cannot be located)

Designated Safeguarding Lead

- Consider whether the learner is at immediate risk of harm: are they safe to go home?
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police or make a Request for Support via Integrated Children's Services
- If unsure, consult with Area Education Safeguarding Advisor or Local Authority Social Worker at the Front Door: www.kscmp.org.uk

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:

- Follow college complaints procedures

Record decision making and action taken in the learner MIS (Databridge) child protection file.

Monitor

Be clear about:

- What you are monitoring. For example behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support if necessary

At all stages, the learner's circumstances will be kept under review
 The DSL/staff will request further support if required to ensure the **learner's safety is paramount**

Appendix 2 – Key Contacts

Designated Safeguarding Lead

Name	Emily Hollis MBE
Contact email	emily@libertygrouppltd.co.uk
Telephone	01843 446 906 07917 909277

Lead Deputy Designated Safeguarding Lead

Name	Lauren Lawley
Contact email	lauren@libertygrouppltd.co.uk
Telephone	01843 446 906 07380164507

Deputy Designated Safeguarding Leads

Name	Ian Wyles Melanie Cole Tim Brown Tabitha Sturgess-McCourt Caroline Place
Contact email	safeguarding@libertygrouppltd.co.uk
Telephone	01843 446 906

Pastoral Staff

Name	Emily Hollis MBE
Contact email	emily@libertygrouppltd.co.uk
Telephone	01843 446 906
Name	Lauren Lawley
Contact email	lauren@libertygrouppltd.co.uk
Telephone	01843 446 906

Senior Mental Health Lead

Name	Emily Hollis MBE
Contact email	emily@libertygrouppltd.co.uk
Telephone	01843 446 906

Wellbeing Coordinator

Name	Melanie Cole
Contact email	mel@libertygrouppltd.co.uk
Telephone	01843 446 906 07976620827

Designated Looked After Children Lead

Name	Emily Hollis MBE
Contact email	emily@libertygrouppltd.co.uk
Telephone	01843 446 906

Nominated Director for Safeguarding

Name	Michelle Smith
Contact email	michelle@libertygrouppltd.co.uk
Telephone	01843 446 906 07946032122

Nominated Governor for Safeguarding

Name	Chris Davies
Contact email	governance@libertygrouppltd.co.uk
Telephone	01843 446 906

Local Authority Designated Officer (LADO)

Email	kentchildrenslado@kent.gov.uk
Telephone	03000 410 888

Local authority safeguarding contact numbers and emails

The Education Safeguarding Service Area Office - Thanet: 03301 651140

Social Services - During Office Hours

Telephone: 03000 411 111 (under 18) or 03000 416 161 (over 18)

Contact Email: social.services@kent.gov.uk

Social Services - Out of Office Hours

Contact: 03000 419 191

Police

Contact: 101 or 999 in an emergency.

If a learner may be at risk of imminent harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191) or the Police on 999.

If you are concerned about extremism in college, or if you think a learner might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk



Safeguarding Team

Safeguarding is everyone's responsibility

We want all learners at Liberty Training to feel safe and to know that there is someone they can turn to if they are worried about anything.



Emily Hollis
Designated Safeguarding Lead
Head of College
emily@libertygrouppltd.co.uk



Lauren Lawley
Lead Deputy Designated
Safeguarding Lead
SLT and Tutor
lauren@libertygrouppltd.co.uk



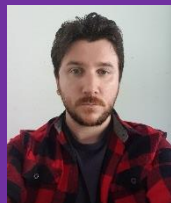
Ian Wyles



Caroline Place



Mel Cole



Tim Brown



Tabitha Sturges-McCourt

Deputy Designated Safeguarding Leads
safeguarding@libertygrouppltd.co.uk

If something is bothering you, then please speak to a member of the Liberty Training Safeguarding Team. If you are unable to locate any of the safeguarding team, please call 01843 446906 between 8:30am – 4:30pm Monday to Friday.

Appendix 4 – Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 5 – Support Organisations

Additional links can also be found in Part Two and Annex B KCSIE.

NSPCC ‘Report Abuse in Education’ Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo’s: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children’s Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>

Appendix 6 – Prevent Duty Risk Assessment

Leadership

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>The values and ethos of the college are unsuitable for promoting resilience against extremist ideologies and promoting British values.</p> <p>Leaders are unaware of their responsibilities under the Prevent duty, and of the context of the college relating to the risk of extremism.</p> <p>The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p> <p>SLT assumes that the basics are sufficient and are not vigilant with ongoing development and consistent review of local and national developments.</p> <p>SLT have a complacency about how extremism and radicalisation may be prevalent in the local area and within the organisation</p>	<p>Learners and staff</p>	<p>The college values clearly set out our commitment to British values.</p> <p>Core Values are displayed on our website and throughout the college.</p> <p>Values include a commitment to tolerance, diversity and mutual respect.</p> <p>SLT are aware of their duty to prevent learners being drawn into terrorism, and make sure all staff know the same.</p> <p>SLT stay up to date with local developments and risks.</p> <p>SLT are aware of the Prevent Duty, having completed basic e-learning, read guidance from Ofsted and other government publications.</p> <p>The need for additional and in-depth courses for at least one SLT member and the DSLs has been recognised and will be a priority to identify and complete.</p> <p>Policies are in place in recognising potential safeguarding concerns around extremism and radicalisation and SLT feedback to staff at staff meetings and/or CPD days with any significant changes or updates. Protocols are in place such as referrals and lockdown when there is a suspicion of activity or actual events.</p> <p>Policies are reviewed at least annually, with regard to new information.</p>	<p>DSL</p>	<p>Low</p>	<p>Refresh the leadership team on the college's responsibilities under the Prevent duty.</p> <p>Identify an appropriate in-depth Prevent course which will extend current knowledge and offer additional thoughts around better practices and protocols.</p> <p>Establish more partnership working with external agencies which is appropriate</p>

Training and capability

HAZARDS	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>College staff are unaware of their responsibilities under the Prevent duty, and the need to promote British values.</p> <p>Staff do not support the college's values and ethos, or they support and promote extremist ideas.</p> <p>Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</p> <p>Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p>	<p>Learners and staff</p>	<p>All staff have read our safeguarding policy and at least part 1 of Keeping Children Safe in Education. All staff have Prevent training through Kent Safeguarding Multi-Agency Partnership, both face to face and eLearning. Staff complete eLearning annually to refresh knowledge.</p> <p>Staff members are aware that they can go to DSL/ DDSL's for advice, support & to escalate concerns.</p> <p>The staff recruitment process reflects the college's values and promotes good safeguarding practice, safer recruitment procedures are followed.</p> <p>CPD workshops held throughout the year to recap on safeguarding including radicalisation.</p>	<p>DSL</p>	<p>Low</p>	<p>KCSIE and Prevent updates shared with staff immediately. Policy updated throughout the year, not just annually, if required.</p>

Working in Partnership

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.</p> <p>Staff do not feel comfortable or capable working with external agencies and sharing concerns about extremism externally.</p>	Learners and staff	<p>We work and communicate with local safeguarding partners and other relevant agencies regarding concerns about extremism. The DSL & DDSL's are aware of the process to contact other agencies and expedite concerns about extremism. Primary contacts within LA's are identified in the safeguarding policy.</p> <p>Records of referrals are kept, and referrals are followed up appropriately. Safeguarding policies promote partnership cooperation.</p>	DSL	Low	Establish better multi-agency links and networking through attending conferences and events.

Speakers and Events

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>Learners are exposed to extremist ideologies by visiting speakers.</p> <p>Inappropriate or extremist materials are shared with learners (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.</p> <p>The college site is used to host events which support extremist ideologies or promote hatred</p>	Learners	<p>The materials and resources that visiting speakers deliver are discussed and approved prior to their visit</p> <p>Visitors are never left alone with learners unless they are approved, regular visitors (counsellor, careers advisor).</p> <p>Visitors must provide a valid DBS to be permitted onsite. Those who are unable to do so are fully supervised by a member of staff throughout their visit. We follow a visible ID policy, and those without a DBS must have a red lanyard.</p> <p>The college site will not be let to any outside organisations and premises may only be used by organisations within Liberty Training Group.</p>	DSL	Low	Continue monitoring of protocols with regards to guest speakers.

Curriculum and Culture

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
The curriculum teaches damaging material or fails to challenge extremist ideologies and promote British values	Learners	Opportunities to promote British values are clearly identified within all curriculum areas. Use of PSHE & tutorial lessons for sensitive and supportive discussions on radical issues and extreme ideologies.	Programme Manager	Low	Review our current practices for promoting British values and consider where we could do more to embed these values into our curriculum.
A culture of inequality or abuse is allowed to grow, enabling extremist ideology and hate to develop	Learners, staff, and parents	Our behaviour policy clearly sets out that hateful behaviour is not tolerated. Staff know how to respond to witnessing harassment and abusive behaviour. Learners are encouraged to challenge harassment or abusive behaviour among their peers.	Head of College, Directors and SLT	Medium	Increase learner voice through focus groups and tutor discussions.
British values are not promoted outside of the classroom	Learners and staff	Learners participate in democracy through the YPG Events promoting diversity, human rights, and respect are promoted through themed activities e.g. Pride celebrations Celebrations from multiple religions and cultures are celebrated around the college	Programme Manager	Low	Increase celebrations and events prevented by covid.

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>Staff and learners do not understand British Values (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged.</p>	<p>Learners and staff</p>	<p>British Values are promoted in the ethos of Liberty Training. Everyone is treated fairly and equally, everyone is taught to be aware of the needs of others to have greater tolerance of one another, everyone should have mutual respect with one another and everyone has the same rules to follow, with an understanding of individual needs. Feedback from staff and learners strongly suggests that the general feeling is one of support and encouragement towards one another.</p> <p>Inappropriate views, such as racial slurs, are challenged immediately by staff to set the example that those views are not supported.</p>	<p>Headteacher and SLT</p>	<p>Medium</p>	<p>Review our current practices for promoting British values and consider where we could do more to embed these values into our curriculum.</p>

IT and Internet Safety

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>Learners use the college network or college hardware to access extremist material</p>	<p>Learners</p>	<p>Our online safety and safeguarding policy makes reference to the risks of online extremist material.</p> <p>Learners are encouraged to report any material they come across online which makes them worried or uncomfortable.</p> <p>The college IT network has appropriate filters to block sites deemed inappropriate or unsafe.</p> <p>All computer systems at Liberty Training are monitored using protective software managed by an external IT company who specialise in school systems.</p> <p>All learners have individual log-in details which allows for tracking of their internet use.</p> <p>Learners are monitored during lessons when using the computers.</p> <p>Our learner Wi-Fi has appropriate filters to block inappropriate content and learners must sign a user agreement when signing in.</p> <p>Weekly PSHE and tutorial lessons look at various aspects of day-to-day living skills which aim to incorporate British Values to promote positive choices.</p> <p>Any inappropriate use of IT equipment (including learners personal mobile phones) is covered in the learner behaviour policy.</p>	<p>Headteacher/DSL, Office Manager</p>	<p>Medium</p>	<p>Review our online safety policy annually.</p> <p>Online safety training at least annually for all learners and staff.</p>

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
Learners access extremist material on their own devices or on social media, or are specifically targeted for online radicalisation	Learners	The ICT curriculum includes teaching learners how to stay safe online. Parents are provided with support on how to help their children access the internet safely and spot the signs of online radicalisation.	Headteacher/DSL, Programme Manager	Medium	Share online safety factsheets with parents to help them support their children Annual training for learners.

College Security

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
Non-approved visitors access the college site to spread extremist ideology	Learners and staff	All visitors to the college must be signed in at reception and wear ID badges Visitors are to be accompanied around the college site by a member of staff at all times unless we have a copy of their DBS and they are pre-approved.	Office Manager	Low	Review our visitor safeguarding protocols annually.

HAZARD	WHO IS AT RISK?	ACTIONS IN PLACE	PERSON RESPONSIBLE	RISK LEVEL	ADDITIONAL NOTES / NEXT STEPS
<p>The college does not have sufficient security of its premises and learners are targeted by individuals or groups seeking to share extremist views.</p> <p>On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully</p>	Learners and staff	<p>The building has a video entry system and magnetic lock system. Access to the building from reception as well as Teaching spaces and offices require magnetic locks to be activated first and only staff have access. The exterior of the building including the courtyard is monitored by CCTV.</p> <p>Learners are monitored during breaks. Those learners identified as posing a risk to themselves or others are supervised at all times, including lunchtimes.</p> <p>Lockdown protocols are in place in the event of an incident within or outside of the building.</p> <p>Cleaning cupboards are kept locked at all times.</p>	Office Manager	Low	Ongoing reviews of current arrangements.

DATE OF NEXT REVIEW:	SEPTEMBER 2023
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