

Safeguarding, Child Protection and Vulnerable Adults Policy

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1. Purpose

The purpose of this Policy is to provide all employees, volunteers, partners and other stakeholders (incl. contractors) with a clear understanding of the issues around child protection and safeguarding vulnerable adults and to explain Trafford & Stockport College Group's (TSCG or the Group) processes and procedures if an allegation is made.

The Group is committed to creating a culture of vigilance where students' welfare is promoted and where timely and appropriate safeguarding action is taken for students who need extra help or who may be suffering or likely to suffer harm. We hold a zero tolerance approach for any form of harassment and sexual misconduct. TSCG prides itself on ensuring that we create a safe and inclusive learning environment.

Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

2. Scope

This Policy deals with the protection of children and vulnerable adults, regardless of level, age or location, and is supported by the Staff Behaviour Code of Conduct, which sets out required standards and expectations. **Children' includes everyone under the age of 18 including customers, contractors, employees, students and visitors** and will include those on school links courses although for these students the relevant school policy will take precedence. The policy includes incidents on-campus, off-campus and online conduct Peer **refers to any learner at the college including adults and children incorporating specifically child-on-child abuse (KCSIE, 2026).**

'College' means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector. 2 College also means providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended)3: 16-19 Academies, Special Post-16 institutions and Independent Training Providers. For colleges, the guidance relates to their responsibilities towards children who are receiving education or training at these institutions.

In respect of children, the policy is informed by the statutory guidance outlined in the Department for Education publication, 'Keeping Children Safe in Education' (September 2026) the statutory guidance 'Working Together to Safeguard Children'. The departmental advice What to do if you are worried a child is being abused – Advice for practitioners and the departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

Safeguarding and promoting children and young people's welfare is defined as (KCSIE, 2026):

- Protecting children from harm and maltreatment within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- Providing help and support to meet the needs of children as soon as problems emerge.

- We recognise that learners with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children/vulnerable adults. These can include:
    - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's/vulnerable adult's condition without further exploration
    - these children/vulnerable adults being more prone to peer group isolation or bullying (including prejudice-based bullying) than others
    - the potential for children/vulnerable adults with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
    - communication barriers and difficulties in managing or reporting these challenges
    - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating

- Any reports of abuse involving children/vulnerable adults with SEND require close liaison with the designated safeguarding lead (or a deputy), the inclusion lead and pastoral teams.

- Further information can be found:
    - SEND code of practice: 0 to 25 years
    - Supporting pupils with medical conditions at school (2014)

- And from specialist organisations such as:
    - The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
    - Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
    - Children with special educational needs and disabilities (SEND) | NSPCC Learning and Safeguarding Deaf and disabled children | NSPCC Learning

Note: Children includes everyone under the age of 18.

For adults the key reference points are the **2015 document 'No Secrets' (Adult Protection)** which provides a definition of abuse of adults, the Equality Act 2010, and Protection of Freedoms Act 2012. Vulnerable adults are defined as students on progression curriculum learning programmes and any other adult learners identified as being vulnerable through social, medical or mental health conditions impacting on their learning. A more detailed definition of vulnerable adults is available at Appendix C of this Policy.

The Policy is also informed by the following legal/statutory regulations:

- Keeping Children Safe in Education, 2026
- Revised Prevent duty guidance: for England and Wales: on the duty of schools and other providers in the Counter-Terrorism and Security Act, 2015
- Children and Social Work Act, 2017
- General Data Protection Regulation, 2018
- Human Rights Act, 1998
- Data Protection Act, 2018
- Modern Slavery Act, 2015
- Safeguarding Children and Young People from Knife Crime (Ofsted), 2019

- Education and Training (Welfare of Children) Act, 2021
- Equality Act, 2010
- Public Sector Equality Duty
- Education Act, 2002 (Section 175)
- Care Act, 2014
- Working Together to Safeguard Children, 2023
- What to do if you're worried a child is being abused – advice for practitioners, 2015

Trafford & Stockport College Group has a separate Fitness to Study Procedure that is designed to support students whose medical condition means that they may have difficulty completing their programme of study but contains within the guidelines of the procedure, the option to terminate a student's learning contract.

3. Legislative Requirements

The Group has a statutory and moral duty to ensure that the Group functions with a view to protecting, safeguarding and promoting the welfare of students receiving education and training at the Group. The Group's statutory responsibilities include the requirement to have due regard to the need to prevent people from being drawn into terrorism (Prevent Duty).

The Group recognises that for students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps prevention.
The Group will therefore:

- Establish and maintain an ethos where students feel secure, are encouraged to talk, and are listened to.
- Ensure the students know that there are adults in the Group who they can approach if they are worried or are in difficulty. Curriculum and pastoral staff will ensure that students are aware of their role in this area.
- Include within the curriculum discussions which will help students develop realistic attitudes to the responsibilities of adult life.
- Ensure that wherever possible every effort will be made to establish effective working relationships both with parents/carers and with colleagues from other relevant agencies.
- Follow safer recruitment practices when hiring staff, which includes a check of the List of those Barred from Working with children and vulnerable adults. As part of due diligence, the Group may carry out a search via an online search engine on shortlisted candidates, in line with KCSIE 2026 and safer recruitment guidance.

4. Role and Responsibilities

4.1 Trafford & Stockport College Group Governing Body

The Governing Body has a duty to ensure Trafford & Stockport College Group complies with relevant legislation and is committed to ensuring that the Group:

- Provides a safe environment for students to learn in.
- Identifies students who are suffering, or likely to suffer, significant harm.
- Takes appropriate action to see that such students are kept safe, both at home and within college.

In pursuit of these aims, the Governing Body will approve and review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of students and the promotion of a safe environment within college.
- Aiding the identification of students at risk of significant harm and providing procedures for reporting concerns.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- Ensuring the Group understands its responsibilities under the Prevent Duty and that staff implement the Duty effectively.
- Setting the Prevent Duty strategy within the context of the safeguarding policy.

In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Department for Education, Home Office and other relevant bodies and groups. The Group's procedures have been developed in cooperation with the Local Safeguarding Children's Boards (LSCB).

The Group will refer concerns where students might be at risk of significant harm to the relevant multi-agency team at Trafford, Stockport or other local authority as appropriate.

Referrals in relation to concerns about individuals being at risk of radicalisation/extremism are made to Channel or the relevant local authority multi-agency team. Channel is a multi-agency that provides support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

The Governing Body will receive an annual report from senior officers which reviews how the duties have been discharged.

4.2 Designated Governor

There is a designated member of the Governing Body with responsibility for child protection and safeguarding issues (including Prevent). The designated Governor is responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over safeguarding matters, including:

- Ensuring that the Group has procedures and policies which are consistent with Local Safeguarding Children's Board procedures.
- Ensuring that the governing body considers and reviews the Group policy on safeguarding each year.
- Ensuring that each year the governing body is informed of how the Group and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.
- Ensuring that adequate policies, procedures and training are in place in relation to the Prevent duty.
- Ensuring the Group assesses the risk of radicalisation and develops an action plan to minimise the risk.
- Ensuring standards for Filtering and Monitoring are met as detailed in Meeting Digital Technology Standards in Schools and Colleges.

The designated Governor may also be a key link in the liaison between agencies such as the police and social care in connection with allegations against the Principal or the Senior Staff Member with Lead Responsibility. This will not involve undertaking any form of investigation but will ensure good communication between the parties and the provision of information to assist enquiries.

4.3 Senior Staff Member with Lead Responsibility for Safeguarding Issues: Group Principal

The designated Senior Member of Staff with lead responsibility for safeguarding issues is the Group Principal.

The designated Senior Member of Staff will have a key duty to take lead responsibility for raising awareness with the staff of issues relating to the welfare of students, and the promotion of a safe environment for students within Trafford & Stockport College Group.

The designated Senior Member of Staff is responsible for:

- Developing and reviewing the Child Protection and Safeguarding Vulnerable Adults policy.
- Undertaking the lead responsibility for raising awareness with governors and staff in relation to Child Protection/ Safeguarding and the Prevent duty, providing advice and managing the completion of the Prevent risk assessment and action plan.
- Overseeing the referral of cases of suspected abuse to the relevant agencies.
- Ensuring appropriate referral records are maintained.
- Ensuring an effective relationship with appropriate agencies is developed and maintained and liaising with the LADO and LSCB and other appropriate agencies to share information as required.
- Ensuring that governors and staff receive appropriate training in child protection/safeguarding and Prevent duties and are aware of the child protection procedures.
- Ensuring standards for Filtering and Monitoring are met as detailed in Meeting Digital Technology Standards in Schools and Colleges by overseeing:
    - Procurement of filtering and monitoring systems
    - Documenting decisions on what is blocked or allowed and why
    - Reviewing the effectiveness of provision
    - Overseeing reports

4.4 Assistant Principal Student Support, Safeguarding and Inclusion

The Assistant Principal Student Support, Safeguarding and Inclusion is the Deputy Strategic Designated Safeguarding Lead and is responsible for:

- The referral point for local schools and Connexions for whom appropriate arrangements need to be in place on transition or for raising concerns.
- Developing appropriate student support policies, procedures and processes which support child protection/ safeguarding and responsibilities associated with the Prevent duty.
- Produce a termly report to governors on safeguarding including how the Group is meeting its responsibilities.
- Ensuring standards for Filtering and Monitoring are met as detailed in Meeting Digital Technology Standards in Schools and Colleges by taking responsibility for:
    - Procurement of filtering and monitoring systems
    - Documenting decisions on what is blocked or allowed and why

- Reviewing the effectiveness of provision
- Overseeing reports

4.5 Director of Curriculum – Student Support and Safeguarding

The Director of Curriculum – Student Support and Safeguarding is the Senior Operational Safeguarding Officer and is responsible for:

- Undertaking strategic leadership of safeguarding services to support Assistant Principal Student Support, Safeguarding and Inclusion.
- Leading on safeguarding arrangements for Trafford & Stockport College Group including responsibilities in respect of the Prevent Duty.
- Collaborating with Centre Managers to advise and support Designated Safeguarding Officers for safeguarding/PREVENT disclosures/incidents liaising with multi agency teams and families where appropriate,
- Supporting the implementation of all aspects of the Groups' Safeguarding Strategy.
- Acting as an advisor to the Groups' Committees and Board in respect of safeguarding matters.
- Supporting the Centre Managers in supporting those learners with Assessed levels of need.
- Overseeing delivery of staff and Governor safeguarding and PREVENT training as required across the Group.
- Acting as an advisor on the Fitness to Study Policy and support the delivery of plans with learners and tutors.
- Effectively lead the Centre Managers and Designated Safeguarding Leads, by motivating and coaching through direct reports to achieve, improve and develop to their full potential.
- Supporting Human Resources processes and procedures and their implementation including safer recruitment and selection, Mental Health First Aid, safeguarding and prevent training.
- Taking lead responsibility for safeguarding and online safety by overseeing:
  - filtering and monitoring reports
  - safeguarding concerns
  - checks to filtering and monitoring systems

4.6 Centre Managers

The Centre Managers are the Safeguarding Officers designated for each campus and are responsible for:

- Acting as the lead operational safeguarding/ prevent designated officer in the case of the Centre Manager for Altrincham and Stretford (for Trafford), the Centre Manager for Stockport and Centre Manager for Cheadle and Marple.
- Ensuring all employees within the department undertake their duties in accordance with child protection/safeguarding and Prevent statutory requirements.
- Providing advice and support to employees and students.
- Updating the Safeguarding Operational Group and Safeguarding Committee on case referrals and child protection/ safeguarding and Prevent duty activities.
- Maintaining a record of any child protection referral, complaint or concern (even where that concern does not lead to a referral).
- Raising awareness with staff of issues relating to the welfare of students and the promotion of a safe environment for students who are learning within the Group or in the community.
- Providing mandatory safeguarding training to staff and partners.

- Nominating members of staff for learners who have had/have a social worker. These learners are potentially at a greater risk of harm (KCSIE, 2026)
- Supporting the Director of Learner Services by acting upon and taking appropriate action in relation to:
    - Filtering and monitoring reports
    - Safeguarding concerns
    - Checks to filtering and monitoring systems

Directors of Curriculum/Heads of Studies

The Directors of Curriculum/Heads of Studies are responsible for:

- Ensuring that parents and carers of children, young people and adults at risk within the College are aware of the Group's Child Protection and Safeguarding Vulnerable Adults policy.
- Liaising with employers and training organisations that receive children, young people or adults at risk from the Group on placements to ensure that appropriate safeguards are put in place.
- Ensuring that their employees undertake training and adhere to the child protection/ safeguarding procedures.
- Ensuring that no member of staff, worker or volunteer undertakes work without appropriate DBS/ risk assessment clearance.
- Ensuring that appropriate sessions promoting child protection/ safeguarding and Prevent guidance are delivered within the curriculum.

4.7 Designated Safeguarding Officers:

- Will report to the senior member of staff with lead responsibility.
- Will know how to make an appropriate referral.
- Will be available to provide advice and support to other staff on issues relating to child protection and protection of adults at risk.
- Will have particular responsibility to be available to listen to students studying at the Group or community courses.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Will be trained to an appropriate level (Level 4 Safeguarding) and undertake mandatory updating as required.

Written records are made in appropriate and timely way and are held securely. These records are shared appropriately and where necessary with consent.

A designated member of staff for safeguarding/prevent will be available at all times.

4.8 Director of HR & Performance Management

The Director of HR & Performance Management is responsible for:

- Ensuring effective safe recruitment and induction practices including ensuring that appropriate DBS/ risk assessments are undertaken.
- Ensuring the Central Register is maintained.
- Ensuring appropriate arrangements are undertaken and recorded for the engagement of other workers and volunteers with responsibilities for the College's C/VA.

- Managing the delivery of appropriate child protection/ safeguarding and Prevent duty training and the maintaining of appropriate training records.
- Managing the Low-Level Concerns Process.

4.9 Employees, Workers and Volunteers

All employees, workers and volunteers are required to:

- Be clear on the child protection and safeguarding procedures.
- Know what to do if they have a concern and that this information is shared immediately.
- Give the highest priority to the safety and welfare of students.
- Recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- Undertake the required mandatory safeguarding training and attend updates as directed, including new staff who are mandated to complete Attachment Aware & Trauma Informed training.
- Ensure they understand the mandatory duty to report cases of female genital mutilation to the Police, click here for further information.
- Ensure they are aware of the requirements detailed in "Keeping Children Safe in Education (September 2026) Part One: Information for all school and college staff".
- All staff should be prepared to identify children and young people who may benefit from Family Help, or equivalent local early help arrangements, and should follow internal safeguarding procedures where concerns are emerging.

4.10 Safeguarding Arrangements for Subcontracted and School Links Provision

The Group has sub-contracted / partnership provision for 16-18 students and vulnerable adults with the following providers:

- AXIS Performing Arts
- Stockport County Football Club

Partnership Provision:
- Altrincham FC
- Working Wonders
- Code Nation Limited

These organisations have their own safeguarding policies but within these they must refer to Trafford & Stockport College Group's practices and a requirement to pass details of any referrals to one of the Group's designated officers.

All employees delivering courses at a subcontractor / partner must attend the TSCG's own safeguarding training.

Where TSCG hold a managing agent relationship, undertaking delivery on behalf of another organisation or employer, we would comply with that organisation's own Safeguarding Policy, as well as that of Trafford & Stockport College Group.

4.11 Safeguarding Arrangements for Apprenticeship Provision and Work Experience

For students undertaking Apprenticeships and work experience placements the same safeguarding

requirements apply. Where a safeguarding concern arises in the workplace notification must be given to a Designated Safeguarding Officer.

A summary of the Child Protection and Safeguarding Vulnerable Adults Policy is included in the Industry Placement Programme Handbook. The Handbook includes details of how to make a safeguarding referral and links to the full Policy document.

4.12 Safeguarding Arrangements for Trips and Visits

For students participating in off-site trips and visits, where a safeguarding concern arises, the same safeguarding requirements apply. A copy of the Child Protection and Safeguarding Vulnerable Adults Policy should be forwarded to any trip/visit destination and details of how to make a safeguarding referral outlined in the risk assessment document.

4.13 Responsibility for College Students who are 'Looked after Children'

Any child who is subject to a care order or who is accommodated by the local authority is classed as a 'Looked after Child.' Some Local Authorities also use 'Child Looked After'. All looked after children should have a Personal Education Plan and the College seeks to support the implementation of these plans through pre-entry advice and guidance, support during the application and enrolment process, on course support and through monitoring and evaluation. The monitoring of Looked after Children is the responsibility of the Centre Managers at each of the five main sites who act as Designated Tutors. The Designated tutors work with the Virtual School Head to promote the educational achievement of looked after and previously looked after children. This includes working with Virtual School Heads to support attendance, engagement, progress and achievement for looked after and previously looked after children. Statutory guidance on the roles and responsibilities of Virtual School Heads can be found here including responsibility for children in kinship care.

4.14 Safeguarding Arrangements for Host Families

Where any student has an arrangement in place to stay with a host family (i.e. whilst studying with a partner organisation) it is a requirement that all adults over 18 within the host property have an enhanced DBS. These details must be notified to HR who will retain appropriate DBS records for these families.

4.16 Safeguarding Arrangements for Higher Education

For students undertaking Higher Education the same safeguarding requirements apply. Where a safeguarding concern arises notification must be given to a Designated Safeguarding Officer.

A summary of the Child Protection and Safeguarding Vulnerable Adults Policy is included in the Higher Education Handbook. The handbook includes details of how to make a safeguarding referral and links to the full policy document.

4.17 Private Fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children.

Where the arrangements come to the attention of the college (and the college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. When college is involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

Comprehensive guidance on private fostering can be found here: Private fostering: local authorities.

5. Training

5.1 Governors and Lead Governor

All Governors are required to undertake mandatory iHasco safeguarding training every three years. All Governors are required to read the Keeping Children Safe in Education Guidance annually. The Link Governor with special responsibility for safeguarding will undertake appropriate additional training and duties as required.

5.2 Designated Senior Lead Officer for Safeguarding Issues

The designated senior member of staff has received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board (LSCB) and will receive refresher training as least annually with safeguarding training every two years. In addition, they will keep up to date with developments in safeguarding issues.

5.3 Designated Safeguarding/Prevent Officers

The Designated Safeguarding/Prevent Officers have received training in child protection and safeguarding issues and inter-agency working and will receive refresher training as required and at least every two years.

5.4 Human Resources Officers

Employees within the Human Resources Team will undertake Safer Recruitment training, which will be updated normally on a three-year basis. Each interview panel should have a trained HR member of staff, else an alternative trained member of staff in their absence.

5.5 All Employees

All employees are provided with key details of lead officers for safeguarding (including Prevent) on commencement to their post. All staff participate in an induction process which includes the provision of written statements of policies and procedures in relation to safeguarding. All employees within the Group including the Principal, the Leadership Team, and Business support staff are required to attend Safeguarding Training (including Prevent) to familiarise themselves with safeguarding issues,

individual responsibilities, the Group's procedures and policies. All staff will receive regular updates on safeguarding at least annually.

This also includes the Student Code of Conduct which details the Group's expectations in respect of behaviour, and the procedure for monitoring attendance and punctuality.

All employees are required to read Keeping Children Safe in Education Part 1. See Appendix E.

6. Safe Recruitment and Selection

The Group is committed to safer practice in recruitment this means thinking about and including issues to do with safeguarding at every stage of the process and ensuring that people who work with students whether they are paid employees or volunteers, are safe to do so. Safe recruitment practices will be in accordance with the requirements detailed in "Keeping Children Safe in Education (2026), Part Three: Safer Recruitment".

During the recruitment and selection process the Group will take into account the latest changes to the National Vetting and Barring Scheme as per the Protection of Freedoms Act 2012. To support safe recruitment and selection the following are in place:

- Advertisements make reference to the need for the successful applicant to undertake an Enhanced Disclosure Check including a check of the DBS Barred Lists via the Disclosure and Barring Service where the post holder undertakes regulated activity.
- Job descriptions make reference to the responsibility for safeguarding.
- Person specifications include specific reference to working with children or adults at risk.
- Comprehensive information from applicants is obtained and scrutinised.
- Independent professional and character references are used to assess an applicant's suitability to work with children and/or adults at risk.
- Face-to-face interviews are undertaken by suitably trained staff and used to explore a candidate's suitability to work with children and/or vulnerable adults at risk.
- Previous employment history and experience is checked.
- Qualifications are verified.
- A minimum of two references are obtained for shortlisted candidates prior to appointment; one will be the applicant's current or most recent employer; one will also be from the employer by whom the person was most recently employed to work with children. References will not be accepted from friends. References will cover the candidates last 2 years of employment.
- Proof of identity is requested such as a birth certificate, driving licence or passport combined with evidence of address. Some form of photographic identity will be seen except where for exceptional reasons none is available.
- All volunteers, governors and staff who work at the Group will undergo an Enhanced Disclosure check through the Disclosure and Barring Service.
- All posts which undertake regulated activity within the Group have been identified by the Human Resources Department in liaison with the director/manager of each department and are required to undergo an Enhanced Check through the Disclosure and Barring Service plus a check of the DBS Barred Lists for Children or/and Adults as required. (For further information on regulated activity refer to the Disclosure and Barring Service website).
- Where the DBS check identifies an issue or it is necessary for the person to commence without a DBS check, a risk assessment must be completed by the relevant department and HR. This will be signed off by the Vice Principal Curriculum or Vice Principal Corporate Services.
- The Disclosure and Barring Service identify a number of acceptable documents which are

required to undergo the Disclosure check. The Group can process the check where the documents are from the Primary Trusted ID Credentials list. Where the documents are from the government state issued or financial social history, an external ID validation service will be used to check the applicant against records to establish their name and living history footprint.

- Where a volunteer is cleared to work within the Group but does not work for up to a 3-month period, the Volunteer is required to undergo a further check.
- The Human Resources Department maintain a single central record of recruitment and vetting checks including section 128 prohibition checks relating to all staff, volunteers and agency staff. Check a teacher's record - GOV.UK
- All successful applicants are required to demonstrate their eligibility to work in the UK by the provision of the relevant documentation for example: passport, birth certificate, work permit.
- The Information Commissioner has published guidance on employment records here

7. Online Safety

7.1 Filtering and Monitoring

The Group has in place appropriate filters and monitoring systems to protect students from harmful online materials (Appendix F). It is essential that children are safeguarded from potentially harmful and inappropriate online material.

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, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please
- **Report** it to the Anti-Phishing Working Group (https://apwg.org/).

The arrangements for online safety are in accordance with "Keeping Children Safe in Education (September 2026) and Meeting Digital Technology Standards in Schools and Colleges.

Plan technology for your school - GOV.UK New self assessment tool.

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education. This can be found here

7.2 Remote Education

The College Group maintains regular contact with parents and careers to reinforce the importance of children being safe online. Parents and carers are made aware of what their children are being asked to do online, including sites they will be asked to access and be clear who from the College Group (if anyone) their child is going to be interacting with online and over which platform/s.

Guidance to support staff within the College Group to understand how to help keep pupils, students and staff safe whilst learning remotely can be found here and here

8. Dealing with a Disclosure of Abuse and Procedure for Reporting Concerns

8.1 The Governing Body recognises the following as definitions of abuse:

Abuse and Neglect

All staff should be aware of indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All school and college staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Signs and Symptoms of Abuse and Neglect

The signs of child abuse aren't always obvious, and a child might not feel able to tell anyone what's happening to them. Sometimes, children don't even realise that what's happening to them is abuse.

There are different types of child abuse and the signs that a child is being abused may depend on the type. For example, the signs that a child is being neglected may be different from the signs that a child is being abused sexually.

Common signs may include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body.

Reference: www.nspcc.org.uk

Abuse

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

Domestic Abuse

The Government defines domestic abuse as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of their means needed for independence, resistance and escape and regulating their everyday behaviour.

Trafford & Stockport College Group is part of Operation Encompass. Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present

at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

*This definition includes so called 'honour' based violence, female genital mutilation and forced marriage, and is clear that victims are not confined to one gender or ethnic group".

Staff should be aware of the potential short- and long-term detrimental impact/s on children's health, wellbeing and ability to learn of experiencing domestic abuse inside and outside of the home, online or within their own intimate relationships.

Physical Abuse

Physical abuse causes harm to a child or young person and Adults at Risk. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating or otherwise causing physical harm to a child or vulnerable adult. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer feigns the symptoms of or deliberately causes ill health to a child or vulnerable adult whom they are looking after.

Neglect

Neglect is the persistent or severe failure to meet basic physical and/or psychological needs, likely to result in serious impairment of their health or development. It may involve a failure to provide adequate food, clothing or shelter, failing to keep them safe from harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to their basic emotional needs.

Sexual Abuse

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
Information and resources for education settings from the CSA Centre can be found here

Child Sexual Exploitation

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

The Group recognises that harmful sexual behaviour, sexual harassment and sexual violence exist on a continuum and that early intervention is essential. Staff should challenge all inappropriate sexualised language or behaviour and report concerns through the safeguarding process, even where incidents appear low-level or are presented as “banter”.

Information from the Children’s Society on Preventing Child Sexual Exploitation can be found here

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Female Genital Mutilation

Female genital mutilation (FGM) will usually be performed during childhood but there have been reports of young girls or young women undergoing FGM just before a forced marriage. FGM is illegal in the UK and it is also a criminal offence to take someone overseas for the purposes of FGM.

Signs that FGM may happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away - from home.

Signs that FGM may have happened:

- Having difficulty walking, standing or sitting.
- Spending longer in the bathroom or toilet.
- Appearing quiet, anxious or depressed.

- Acting differently after an absence from school or college.
- Reluctance to go to the doctors or have routine medical examinations.
- Asking for help – though they might not be explicit about the problem because they're scared or embarrassed.

See NSPCC website for more information.

There is a mandatory duty on staff to report disclosures of FGM about a female under the age of 18 personally to the police. Information on when and how to make a report can be found at: Mandatory reporting procedural information

Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection, such as to cause severe and adverse effects on behaviour and emotional development, resulting in low self-worth. It may involve conveying to them that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child, young person or vulnerable adult. It may involve causing them frequently to feel frightened or in danger, or their exploitation or corruption. Some level of emotional abuse is present in all forms of abuse.

Additionally, the governing body notes and draws to the attention of the college staff the criminal offences that may be committed in connection with the safeguarding of children and adults at risk, in particular those involving abuse of trust which prohibits staff from engaging in or encouraging sexual activity with students who are under the age of 18 or vulnerable.

Contextual Safeguarding

Contextual Safeguarding recognises that as young people grow and develop, they are influenced by a whole range of environments and people outside of their family. For example, in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe. It's an approach that's often been used to apply to adolescents, though the lessons can equally be applied to younger children, especially in today's changing world (NSPCC).

The Group understands that safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- Children's and learners' health and safety and well-being, including their mental health.
- Meeting the needs of children who have special educational needs and/or disabilities.
- The use of reasonable force. Any use of reasonable force or restrictive intervention must be proportionate, necessary, recorded and reviewed. Staff should always seek to de-escalate and use the least restrictive approach possible.
- Meeting the needs of children and learners with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional well-being.
- Online safety and associated issues.

- Appropriate arrangements to ensure children's and learners' security, taking into account the local context.

County Lines

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend. For Further information visit the National Crime Agency.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society Here.

Honour-Based Abuse

The definition of "honour" based abuse is:

"an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community's code of behaviour."

Additionally, honour based crimes could include:

- Attempted murder;
- Manslaughter;
- Procuring an abortion;
- Encouraging or assisting suicide;
- Conspiracy to murder;
- Conspiracy to commit a variety of assaults.

See the CPS website for further information.

As per the Office for Students' recommendation through Condition E6 (Annex A: Condition E6: Harassment and sexual misconduct) this part of the guidance is aimed at HE students:

Harassment

Harassment is **unwanted behaviour** that causes a person to feel **intimidated, degraded, humiliated, or offended**. It can be **verbal, non-verbal, written, physical**, or **online**.
It becomes **sexual harassment** when the behaviour is of a **sexual nature** and is **unwanted or unwelcome**.

Examples of harassment:
- Making offensive jokes or comments about someone's gender, race, sexuality, or appearance
- Sending repeated unwanted messages
- Displaying or sharing sexually explicit images
- Leering, catcalling, or making sexual gestures
- Repeatedly asking someone out despite being told "no"

Sexual Misconduct

Sexual misconduct refers to **any unwanted sexual activity, contact, or behaviour** that occurs without full, free, and informed consent. It includes behaviour that is **manipulative, coercive, abusive, or exploitative**.

Examples of sexual misconduct:
- Sexual assault or rape
- Unwanted sexual touching or kissing
- Coercing someone into sexual activity
- Sharing private sexual images or videos without consent (image-based abuse)
- Stalking with a sexual motive
- Grooming (building a relationship to exploit someone sexually, often online)

Victimisation

Victimisation occurs when someone is **treated unfairly or badly** because they:
- Reported harassment or sexual misconduct
- Supported another person's complaint
- Participated in an investigation

Examples of victimisation:
- Excluding someone socially for reporting a safeguarding concern
- Threatening or bullying someone who made a complaint
- Spreading rumours about someone who spoke out

Bystander Behaviour

Bystander behaviour refers to how a person **witnesses or becomes aware** of harmful behaviour. A **proactive bystander** is someone who **safely intervenes, supports the victim, or reports the behaviour**.

Examples of positive bystander actions:
- Interrupting inappropriate jokes or comments
- Helping someone who appears vulnerable or in distress
- Reporting concerning behaviour to a member of staff or via an official reporting tool
- Checking in with someone who might be affected

8.2 The Corporation also recognises that safeguarding action may also be needed to protect students from the following:

- Racist, disability and homophobic or transphobic abuse.
- Gender-based violence/violence against women and girls.
- The impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography.
- Teenage relationship abuse.
- Substance misuse.
- Gang activity and youth violence**.**

Pastoral Support Mentors/House Monitors serve as trusted adults to support and provide a safe space for them to speak out and share their concerns.

For instances of child-on-child abuse including sexting and other types of abuse see Relational Behaviour Procedure.

8.3 Safeguarding concerns may also arise in the following circumstances:

Bullying

Bullying is persistent behaviour directed against an individual, which is intimidating, offensive or malicious and undermines the confidence and self-esteem of the recipient which may cause him or her to suffer stress. Bullying can take place by direct personal contact, or through digital communication such as mobile phones, social networking sites, email or gaming consoles.

Legitimate, constructive and fair criticism of someone's performance or behaviour in an educational environment is not regarded as bullying.

Mental Health

Mental health concerns may, in some circumstances, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should not attempt to diagnose mental health conditions but should use professional curiosity, record concerns and refer to the safeguarding team where there are safeguarding indicators, significant changes in presentation, self-harm, suicide risk, or concerns about immediate safety.

Professionals need to be able to recognise the signs that a child may be struggling. However, it's important to remember that some mental health issues may not have visible signs. There are also factors that might make it more difficult for a child or young person to ask for help.

Some children and young people may try to hide how they are feeling or what they are doing, this might be because they:

- worry they won't be taken seriously
- believe others won't understand
- have had a negative experience talking about their thoughts and feelings in the past
- feel that no one can help them
- fear being dismissed or labelled an attention seeker or 'crazy'

(Mental Health Foundation and Camelot Foundation, 2006).

Children and young people may not always have the language or ability to communicate how they feel. They may be unsure who to talk to and how to talk about their problems.

Some signs of mental health issues may also look like normal child behaviour. For example, teenagers keeping feelings to themselves.

Learner can become temporarily vulnerable due to mental health not just suicide concerns.

For further information visit the NSPCC website as well as Mental health and behaviour in schools Colleges may also wish to follow this guidance as best practice. Public Health England has produced a

range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See School Zone | Campaigns | Campaign Resource Centre for links to all materials and lesson plans.

Self-Harm

Self-harm is defined as self-poisoning or injury, irrespective of the apparent purpose of the act. Self-harm is an expression of personal distress, not an illness, and there are many varied reasons for a person to harm him or herself[1]. Most cases of self-harm do not result in suicide; however, self-harm is known to be a risk factor in suicidal behaviour.

Suicide

Suicide is the intentional and deliberate act of taking one's own life; youth suicide is a major global public health issue. While suicide rates are higher among 20–24-year-olds, suicidal behaviour that may precede suicide is established in the earlier years. Suicide consistently ranks as one of the leading causes of death for adolescents between 15 and 19 years of age[2]. Research suggests that certain situations put children and young people at more risk of suicide, including suffering loss or bereavement, relationship issues, experiencing bullying and/or racism, living in isolated areas and living in unhappy circumstances[3].

Eating Disorders

Eating Disorders include anorexia nervosa, bulimia nervosa, or other related (or 'atypical') eating disorders (mainly binge eating disorder). In general, eating disorders develop over time, sometimes over years, and often at a point when life brings fear and insecurity[4].

Radicalisation/ Extremism and Terrorism (Prevent):

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Students may be coerced into becoming involved with terrorist groups and gangs and be at risk of radicalisation including the vocal or active opposition to fundamental British values such as democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

The Group recognises its duty under the Terrorism and Security Act 2015 (The "Prevent Duty") to:

[1] National Institute for Health and Clinical Excellence – Self Harm Pathway 2004
[2] National Institute for Health and Clinical Excellence – Youth Suicide Prevention 2007
[3] NSPCC 2008

- disrupt the ability of people to travel abroad to engage in terrorist activity and then return to the UK
- enhance the ability of operational agencies to monitor and control the actions of those who pose a threat
- combat the underlying ideology that feeds, supports and sanctions terrorism

In a local context, *the Stockport Prevent agenda* focusses mainly on the threat from Right Wing Nationalist Groups rather than Islamic Extremist Groups.

There is no single factor to identify who is likely to be vulnerable to being drawn into terrorism.

Factors that indicate someone may be vulnerable include:

- Peer pressure
- Influenced from other people or via the internet
- Family tensions
- Recently moved to a new area
- Isolation (feeling of not belonging)
- Lack of self- esteem or identity
- Personal or political grievances
- Significant changes in appearance
- Bullying
- Victim of crime and/or involvement in crime
- Anti-social behaviour
- Race / hate crime

CONTEST is the Government's Counter Terrorism Strategy and **Prevent** is one of four elements of CONTEST.

Prevent aims to:

- Stop people becoming terrorists or supporting terrorism.
- Provides practical help to identify vulnerable people who may be at risk of being radicalised.
- Applies to / covers all forms of terrorism.
- Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour

The Group will:

- Liaise with the Channel Co-ordinator for expert advice and guidance regarding issues of violence extremism to share with Safeguarding Teams, senior managers and front-line professionals.
- Seek assistance from the Channel Co-ordinator to assess the nature and extent of vulnerability, need and risk around violent extremism.

Prevent Protocol

The Group is committed to supporting the Government's Prevent Strategy and to that end has engaged in employee training with regard to the Prevent Strategy as a whole and the Channel process in particular.

The Group's Safeguarding Teams and student tutors have an awareness of the Government Strategy and are able to make a referral via Channel, as appropriate.

- Any extremism or radicalisation concern will be considered as a safeguarding issue and treated accordingly.
- If we (Trafford & Stockport College Group) believe that someone is vulnerable to being exploited or radicalised, we will use the established Safeguarding Procedures to escalate our concerns to the appropriate Designated Safeguarding Officers, who will raise concern via the Channel Co-ordinator.
- The Channel Co-ordinator and Local Authority will initially screen referrals for suitability through a preliminary assessment.
- If suitable, the case will then be discussed at a Channel Panel of relevant partners to decide if support is necessary.
- The Group will engage with multi-agency panels to develop the most appropriate support package to safeguard the individual at risk.

Incel

Incel is an abbreviation of "involuntary celibate". Incels are an online community built around sexuality whose members are mostly men who wish to, but do not, have sexual relations with women. Members of the community share a sense of being both sexually and romantically undesirable, which leads to a self-definition as victims of women and society, and hatred towards an online imagined community/community of practice who wish to, but do not, have sexual relations with women. Owing to this identity, they view themselves as non-normative within broader society and see women and societal standards of masculinity as the cause of their problems.

The college will seek advice and support from Channel where there are appropriate concerns about vulnerability to or interest in Incel in line with local safeguarding procedures. For guidance on making a Prevent referral see Here

9. Modern Slavery Statement

Trafford & Stockport College Group is committed to meeting obligations under section 54 of The Modern Slavery Act 2015 and to ensuring all its operations, collaborations and business relationships are carried out with integrity and ethically.

TSCG will implement systems and controls to ensure any form of exploitation of an individuals' liberty and freedoms by another person for commercial gain is not taking place within any business operations. The Anti-Slavery and Human Trafficking Statement is published on the website.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in Statutory Guidance Here

10. Child-on-Child (Peer-on-Peer) Abuse (Including Harassment and Violence)

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Signs of child sexual exploitation include the child or young person:

- Going missing for periods of time or regularly returning home late
- Skipping college or being disruptive in class
- Appearing with unexplained gifts or possessions that can't be accounted for
- Experiencing health problems that may indicate a sexually transmitted infection
- Having mood swings and changes in temperament
- Using drugs and/or alcohol
- Displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")
- Increasing their screen time or showing unusual use of online platforms, such as websites, social media, apps or games
- They may also show signs of unexplained physical harm, such as bruising and cigarette burns

It is essential that all staff understand the importance of challenging inappropriate behaviours between young people that are abusive in nature. Examples of which are; Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

See the NHS website for more information.

Lucy Faithfull Foundation's Shore Space offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Gov UK have advice and guidance on sharing nudes and semi-nudes and how to respond.

11. Child Criminal Exploitation (CCE)

Children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

Further information about CCE including definitions and indicators is included in Annex B

12. Serious Violence

All employees should be aware of the indicators, which may signal that students are at risk from, or are involved with serious violent crime. These may include 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 students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

A fuller list of risk factors can be found in the Home Office's Strategy Here

Professionals should also be aware that violence can often peak in the hours just before or just after college, when pupils are travelling to and from college. These times can be particularly risky for young people involved in serious violence. Further information on the criminal exploitation of children and vulnerable adults can be found here

Trafford and Stockport College Group Safeguarding Team works in collaboration with the VRU (Violence Reduction Unit)

13. Antisemitism

Trafford & Stockport College Group is committed to providing a safe, inclusive and respectful environment in which all learners and staff, regardless of their faith, belief, ethnicity or background, are treated with dignity and respect.

The Group recognises that antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

The Group also recognises that manifestations might include the targeting of the state of Israel, conceived as a Jewish collectively. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for "why things go wrong." It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

TSCG will not tolerate antisemitism, hate or discrimination. Staff should remain professionally curious and alert to behaviour, language or online activity that may indicate prejudice, harassment, hate or a

safeguarding concern. Concerns relating to the safety or welfare of a learner must be recorded and reported through the Group's established safeguarding procedures.

Our response will seek to safeguard and support those affected, challenge prejudice and discriminatory behaviour, and promote a college culture in which learners feel safe, respected, valued and that they belong.

Further information, advice and guidance can be found in the International Holocaust Remembrance Alliance (IHRA) working definition.

14. Anti-Muslim Hostility

Trafford & Stockport College Group is committed to providing a safe, inclusive and respectful environment in which all learners and staff, regardless of their faith, belief, ethnicity or background, are treated with dignity and respect.

The Group recognises that anti-Muslim hostility, prejudice, discrimination and hate can have a significant impact on the safety, wellbeing and sense of belonging of Muslim learners and staff. Such hostility may occur in person or online and can include harassment, abuse, intimidation, discriminatory behaviour, stereotyping, threats, damage to property or other forms of hate-related behaviour.

The Group also recognises that anti-Muslim hostility can affect people who are perceived to be Muslim, irrespective of their actual religion or belief. Individuals from a range of ethnic, racial, cultural and religious backgrounds may therefore experience hostility because assumptions are made about their identity, beliefs or background.

TSCG will not tolerate anti-Muslim hostility, hate or discrimination. Staff should remain professionally curious and alert to behaviour, language or online activity that may indicate prejudice, harassment, hate or a safeguarding concern. Concerns relating to the safety or welfare of a learner must be recorded and reported through the Group's established safeguarding procedures.

Our response will seek to safeguard and support those affected, challenge prejudice and discriminatory behaviour, and promote a college culture in which learners feel safe, respected, valued and that they belong.

Further information, advice and guidance can be found in the Government guidance on Anti-Muslin Hostility.

15. Further Information

Further details on specific forms of abuse and safeguarding issues are outlined in Annex A of Keeping Children Safe in Education Part 1 (September 2026).

This detail includes:

- Children and the court system
- Child abduction and Community Safety Incidents. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org KCSIE 26 UPDATE

- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Cybercrime. Additional advice can be found at: Cyber Choices here KCSIE 26 UPDATE
- Domestic abuse
- Homelessness The following factsheets usefully summarise the new duties: Homelessness Reduction Act: policy factsheets - GOV.UK. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. Homelessness Reduction Act: policy factsheets - GOV.UK KCSIE UPDATE
- So-called 'honour-based' violence
- Preventing radicalisation
- Child on Child (Peer on Peer) abuse
- Sexual violence and sexual harassment between children in schools and colleges (incl. 'up skirting').

16. Children who are Lesbian, Gay, Bisexual, or Gender Questioning.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. Families/carers should be encouraged to seek clinical help and advice when making decisions about support for gender questioning children.

When supporting a gender questioning child, we take a cautious approach and consider the broad range of the individual's needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Reference should be made to the Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where young people lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

17. Children who are Absent from Education.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that staff are responsive to students with unexplainable and/or persistent absences from education by identifying such abuse, and in the case

of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The college will hold two emergency contacts for all learners. See TCSG Attendance Procedure for further details.

Further information and support, includes:

- Statutory Guidance on school attendance Working together to improve school attendance sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns. including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges - GOV.UK (www.gov.uk)

- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy - Missing Children and Adults strategy - GOV.UK (www.gov.uk).

Children and the court system

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. See Here Young witness booklet for 12 to 17 year olds - GOV.UK

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

Transitional Safeguarding

Transitional Safeguarding is a term used to highlight the need to improve the safeguarding response to older teenagers and young adults in a way that recognises their developmental needs. There are several reasons why a more fluid and transitional safeguarding approach is needed for young people entering adulthood. These are summarised as:

- Adolescents may experience a range of distinct risks and harms and so may require a distinctive safeguarding response.
- Harm, and its effects, do not stop at the age of 18.
- Many of the environmental and structural factors that increase a child's vulnerability persist into adulthood, resulting in unmet needs and costly later interventions.
- The children's and adults' safeguarding systems are conceptually and procedurally different, and governed by different statutory frameworks, which can make the transition to adulthood harder for young people facing ongoing risk and arguably harder for the professionals who are

trying to navigate an effective approach to helping them.

Young people entering adulthood can experience a 'cliff-edge' in terms of support, exacerbated by the notable differences between thresholds / eligibility criteria of children's and adults' safeguarding. Effective safeguarding and identifying abuse requires the use of **professional curiosity;** which is described as 'applying critical evaluation to any information received and maintaining an open mind'. Manchester Safeguarding Partnership disseminate local learning following Serious Case Reviews to improve practice using 7-minute briefings. The Safeguarding Team use the short briefings to likewise reflect on current practice and knowledge. Please see here

18. Procedures for Dealing with a Disclosure of Abuse

The welfare of the individual is paramount. Do remember that they have chosen you, the place and the time at which to tell you. The following principles must therefore be followed:

- If a student tells you that abuse is taking place, acknowledged this, take it seriously and listen to the student. It is important not to ask too many or leading questions, but if you do, ask open questions.
- Write down the details in the student's own words including dates.
- Try to reassure the student.
- Explain to the student that you may have a legal obligation to pass this information on, to protect both them and possibly other members of the family and public.
- Get help and pass on the details and your record to the relevant Safeguarding Officer who will treat the information with the utmost confidence – the "need to know" principle will be employed. It is their responsibility to decide what further action should take place.
- Keep the student informed of what you have done and what will happen next.
- Get help for yourself if you feel upset by any disclosure.

See Appendix H for a flow chart outlining the internal procedure of reporting safeguarding concerns.

Remember that in any group or class there may be a victim of abuse so sensitivity at all times is important.

Do Not:

- Make promises you cannot keep.
- Promise confidentiality.
- Take the matter further yourself (ensure that you know your boundaries).
- Contact the student's parents.
- Contact any other agencies.

In terms of C/VA with SEN and disabilities, do not assume that changes to behaviour, demeanour or signs of distress are due to their SEN or disability. These could be signs of abuse and you should consider these changes as cause for concern.
The designated safeguarding officer will establish the main area of concern and contact as appropriate:

- Relevant local authority multi agency team
- The Student's current case/support worker.
- The Student's GP.

- The Accident and Emergency dept. of the nearest local hospital and the police as appropriate.
- Channel.

The safeguarding officer will note all actions undertaken, including any information shared and the record should be forwarded to the Personal Assistant to the Assistant Principal Student Support, Safeguarding and Inclusion.

This procedure must not delay the protection of the student. The designated safeguarding officer, if there is a serious disclosure, should notify First Response on 0161 912 5125 (Trafford) / MASHH on 0161 217 6028 (Stockport). If the student does not live in Trafford or Stockport, the safeguarding officer notify the relevant Child Protection Team/Vulnerable Adult Protection Team:

Manchester	Salford	Warrington
0161 2345001	0161 794 4711	01925443322

Or NSPCC helpline 0808 800 5000

Trafford Adult Protection Line (normal working hours) 0161 912 5135.

Stockport Adult Protection Line (normal working hours) 0161 2176029.

In cases of suspected/alleged bullying by a peer the Group's Bullying Procedure must be followed. In cases of suspected/alleged Child on Child (Peer on Peer) abuse the above arrangements will apply.

All staff should be aware of the process for making referrals to local authority children's social care 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.

For Guidance on when to call the Police see here

Report child abuse to a local council - GOV.UK This online tool Report child abuse to your local council directs to the relevant local authority children's social care contact details.

19. Out of Hours Procedures

A Designated Safeguarding Officer will be accessible during the Group's opening times. Outside of these hours, contact Emergency Duty Team Control Room. Ask for Duty Social Worker (works from home and will take time to contact you back). Trafford 0161 912 2020. Stockport 0161 718 2118.

Manchester - the standard Manchester number of 0161 234 5001 is a 24-hour helpline. Staff will deal with all enquires.

Salford outside the normal working hours of 8:30am – 4:30pm, contact Emergency Duty and Investigation team on 0161 7948888.

Warrington outside the normal working hours of 8:30am – 4:30pm, contact Emergency Duty and Investigation team on 01925 444400.

20. Risk Assessments

Where a student is identified as presenting a potential risk to themselves and/or others, the College may require a risk assessment to be completed and implemented as a condition of continued enrolment. The decision to require a risk assessment will be made by the Safeguarding Team in consultation with the relevant Centre Manager.

Where the level of risk is assessed as high, the risk assessment will be escalated to a High Risk Panel for review. The Panel will consider the identified risks and proposed control measures and will determine whether these are sufficient to enable the student to continue their studies safely.

The High Risk Panel will normally comprise a representative of the Safeguarding Team, the Centre Manager, the Director of Curriculum, and an Assistant Principal. Additional internal staff or external professionals may be invited to attend where appropriate, depending on the nature and complexity of the identified risks.

21. Information Sharing

The duty to share information arises from:

- Children Act 1989
- Children Act 2004 Section 11
- Duty to make arrangements to ensure their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- Data protection legislation include the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025, where applicable.

'Safeguarding of children and individuals at risk' allows practitioners to share information without consent. When children are suffering or may be a risk of suffering significant harm, concerns must always be shared with children's social care or the police. Schools and colleges have a general duty to share, hold and use information with other agencies where they have safeguarding concerns. However, consent should be sought directly from parents on a case-by-case basis. It is good practice that schools and colleges should work in partnership with parents and carers. This means that in general schools and colleges should share information with other agencies with the parents knowledge and consent. If parents do not consent, the duty to refer overrides this, as the safety of the child is paramount.

Seeking consent is not required, if to do so would:

- Place a person at increased risk of harm (usually the child, but also a family member or another person).
- Prejudice the prevention, detection or prosecution of a serious crime or
- Lead to an unjustifiable delay in making enquiries.

College will share with parents any concerns we may have about their child and of any referrals to be made to Children's Social Care unless to do so may place a child at risk of harm. In such cases the Designated Safeguarding Lead will seek advice from Children's Social Care. We encourage parents to discuss any concerns they may have with a member of the Safeguarding Team.

The college seeks permission from all students to share safeguarding information with parents or main contacts, when staff feel it is in the best interests of the student, regardless of the age of the student.

The data protection laws do not prevent the sharing of information for the purposes of keeping young people 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 young people.

Where young people leave the school or college, the designated safeguarding leads ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the young person arrives. The designated safeguarding leads ensure secure transit, and confirmation of receipt.

In addition to the child protection file, the designated safeguarding leads also consider if it would be appropriate to share any information with the new school or college in advance of a young person leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. For example, information that would allow the new school or college to continue supporting young people who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the young person arrives or incidents that may indicate concerns about serious violence or harmful behaviours.

For advice on Information sharing for safeguarding practitioners see here

22. Retention of Records - Relating to Allegations of Abuse

All records relating to allegations and safeguarding issues will be retained:

- For lower-level safeguarding concerns, we will keep them for 5-7 years after last contact
- For more serious safeguarding or child protection records, we'll keep them until the individual reaches 25

This information can only be accessed by the relevant Safeguarding Officers/members of staff.

For allegations relating to abuse against an employee, a reference note to this must also be kept on the personnel file held by the Human Resources Department for an equivalent period.

Reporting and Dealing with Allegations of Abuse Against TSCG Staff, Agency Workers, Trainee Teachers, Volunteers and Contractors

The procedures apply to all employees, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

The Group recognises that an allegation of abuse made against an employee may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

Although it is rare for employees in educational institutions to be found responsible for the abuse of a student, due to their continued contact with students, staff may have allegations of abuse made against them.

The Group is committed to ensuring the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career.

When dealing with such allegations, the Group will do so with sensitivity, will act in a careful and measured way and will act in accordance with "Keeping Children Safe in Education (September 2026) Part Four: Allegations of Abuse Made Against Teachers and Other Staff".

Where a concern or allegation relates to a trainee teacher, the same safeguarding expectations and reporting procedures apply, including consideration of referral to the LADO where the harm threshold may be met.

23. Low Level Concerns

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or behalf of the College may have acted in a way that is inconsistent with our code of conduct. This could include inappropriate behaviour outside of work.

A low-level concern may not meet the 'harm threshold' for referral to the Local Authority Designated Officer. The harm threshold is an allegation that means that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Examples of low-level behaviour would include, but is not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of a child on a personal mobile phone
- Engaging with a child on a one-to-one basis in a secluded area
- Humiliating the individual

See "Guidance on raising Low Level Concerns".

24. Receiving an Allegation Against a TSCG staff, Agency Workers, Volunteers and Contractors

An employee who receives an allegation about another employee should follow the guidelines in Appendix B for dealing with an allegation.

The allegation should be reported immediately to the Principal unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Designated Senior Staff Member for Safeguarding or the Designated Governor. The Principal (or designated person if the allegation is against the Principal) should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. (The written details should be countersigned and dated by the Principal or designated person).
- Record information about times, dates, locations and names of potential witnesses.

Parents / Carers must be made aware of their duty of confidentiality about allegations against employees whilst investigations are ongoing, in particular the role of social media in potentially breaching this legal requirement.

25. Initial Assessment by the Principal (or Designated Person)

The Principal (or designated person) should make an initial assessment of the allegation, consulting with the Senior Designated Staff Member with responsibility for safeguarding and the Designated Governor.

Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Local Authority Designated Officer (LADO).

Allegations of harm or inappropriate behaviour made against employees, either paid or unpaid are serious and the LADO must be advised; the LADO is a professional independent person who has been appointed by the Local Safeguarding Board.
The LADO's role includes:

- The management and oversight of individual cases.
- Providing advice and guidance to employers and voluntary organisations.
- Liaising with the police and other agencies.
- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO has the ability to access other records.

It is important that the Principal (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation. Where the allegation is made against an agency worker the agency will be informed. Where the allegation is made against a third party or self-employed contractor the Group will take appropriate action.

Potential outcomes are:

- The allegation can be shown to be false because the facts alleged could not possibly be true and no further action is taken.
- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the C/VA. The matter would be considered in accordance with the Group's Disciplinary Procedures.
- The allegation represents abuse which is gross misconduct by the employee. The matter would be considered in accordance with the Group's Disciplinary Procedures and could lead to a disciplinary investigation and can lead to dismissal.

For further details of all actions relating to Reporting and Dealing with Allegations of Abuse against Members of Staff consult Appendix B.

26. Use of Subcontractors

In the case of any subcontracted provision, Trafford & Stockport College Group policies and procedures must be adhered to in the event of any safeguarding issues/occurrences. The Group will confirm through service level agreements and/or contracts that appropriate arrangements are in place to safeguard students. The senior officer staff member with lead responsibility for safeguarding at the Group should be contacted as soon as possible following an incident and the Group's records will be updated.

27. Informing the Disclosure and Barring Service

Where the Group has dismissed or removed an employee / worker from working in regulated activity, following harm to a child or an adult at risk or where the Group has concerns that a person has caused harm, or poses a future risk of harm to adults at risk or children, a referral will be made to the Disclosure and Barring Service.

28. GDPR/Data Protection

To enable Trafford & Stockport College Group to comply with its statutory obligations under the Data Protection Act (2018) and UK GDPR it is necessary for us to collect, store and process sensitive personal data. The Group is committed to full compliance with the applicable data protection legislation. This Policy should be read in conjunction with the Group's Data Protection Policy and Information Security Policy. These policies provide more detailed guidance on the correct handling of personal data including sensitive personal data. In the collection, storage and processing of personal data for equality and diversity monitoring purposes we will comply with the following principles:

- We will process personal data lawfully, fairly and in a transparent manner.
- We will collect personal data for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes.
- We will keep accurate and up to date personal data and take reasonable steps to delete or correct inaccurate personal data without delay
- We will keep personal data in a form which permits identification of data subjects for no longer than is necessary.

We will take appropriate technical and organisational measures to ensure the security of personal data and protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Data protection should not however pose a barrier to raising concerns or making safeguarding referrals.

29. Use of school or college premises for non-school or non-college activities

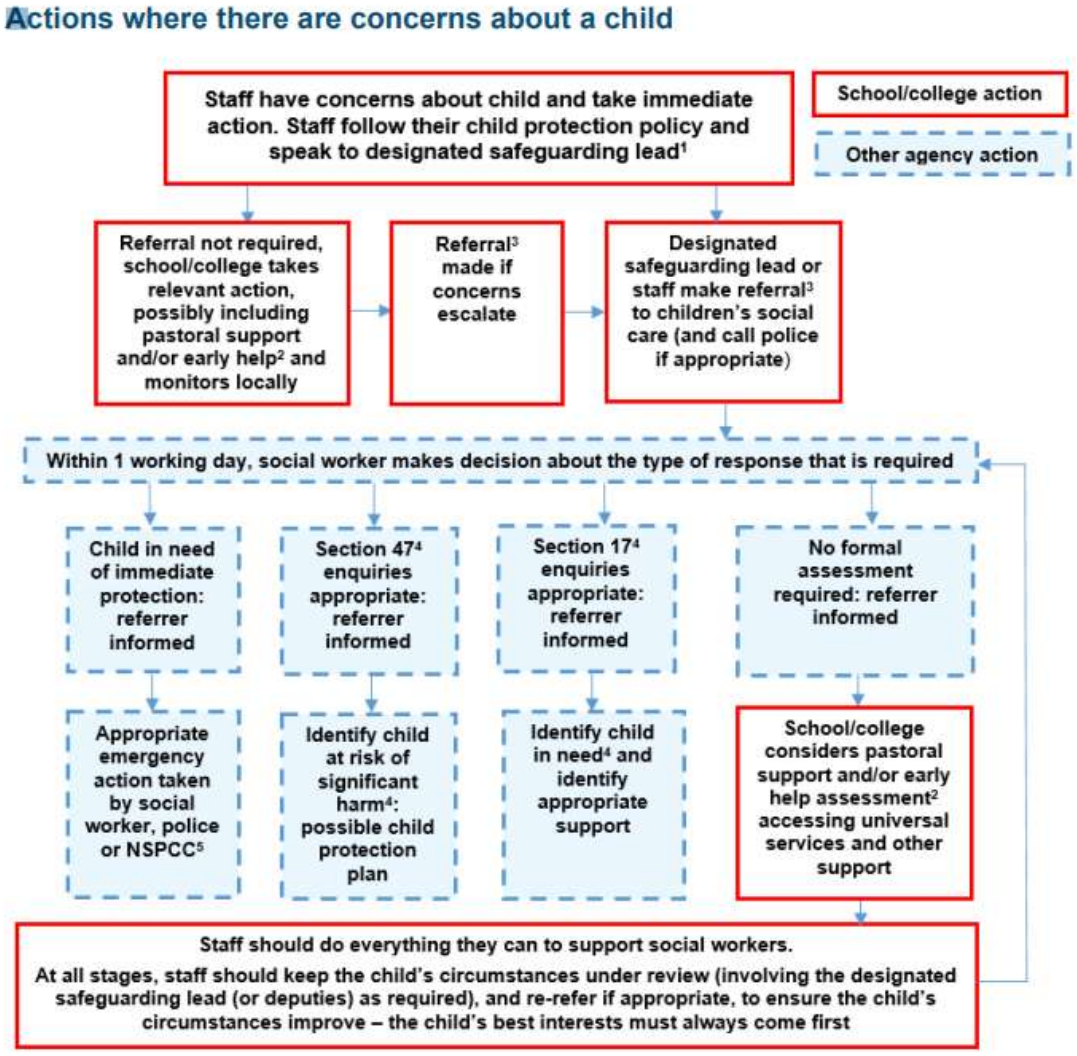
Where TSCG premises are used by external organisations or third parties, the Group will seek

assurance that appropriate safeguarding arrangements are in place. Any safeguarding concerns arising from activities delivered on college premises must be reported in line with TSCG safeguarding procedures.

Appendix A: Dealing with a Disclosure of Abuse in Respect of a Child or Vulnerable Adult

TRAFFORD & STOCKPORT COLLEGE GROUP

Dealing with a Disclosure of Abuse in Respect of a Child or Vulnerable Adult



Appendix B: Guidelines for Reporting and Dealing with Allegations of Abuse Against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description. Where the allegation is made against an agency worker the agency will be informed. Where the allegation is made against a third party or self-employed contractor the Group will take appropriate action. The actions taken will be in accordance with "Keeping Children Safe in Education (September 2026), Part Four: Allegations of Abuse Made Against Teachers and Other Staff".

1. Introduction

The Group recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

Staff in educational institutions found responsible for the abuse of a student are rare and because of their frequent contact with this cohort, staff may have allegations of abuse made against them.

The Group recognises that in 'Keeping Children Safe in Education' and also in 'No Secrets' the welfare of students is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the Group will do so with sensitivity and will act in a careful, measured way.

2. Receiving an Allegation against a Member of Staff

A member of staff who receives an allegation about another member of staff should follow the guidelines in Section 11 and 12 for dealing with an allegation.

The allegation should be reported immediately to the Principal, unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Designated Senior Lead Officer for Safeguarding or the Designated Governor. The Principal (or designated person if the allegation is against the Principal) should:

Obtain written details of the allegation from the person who received it, that are signed and dated. (The written details should be countersigned and dated by the Principal or designated person).
Record information about times, dates, locations and names of potential witnesses.

3. Initial Assessment by the Principal (or designated person)

The Principal (or designated person) should make an initial assessment of the allegation, consulting with the Senior Designated Staff Member with the responsibility for safeguarding and the Designated Governor.

Allegations of harm or inappropriate behaviour made against staff, either paid or unpaid, are serious and the Local Authority Designated Officer (LADO) must be advised; the LADO is a professional independent person of the College who has been appointed by the Local Safeguarding Board.

The LADO must be alerted immediately of all cases where it is alleged that a person who works with children has behaved in a way that may (including where the Group believes the allegation is unfounded or malicious):

- Have harmed or may harm a child.
- Possibly have committed an offence against children.
- Behaved towards a child or children in a way that indicates they may pose a risk or harm to children.

The LADO's role includes:

- The management and oversight of individual cases.
- Providing advice and guidance to employers and voluntary organisations.
- Liaising with the police and other agencies.
- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO has the ability to access other records.

It is important that the Principal (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation. Where the allegation is made against an agency worker the agency will be informed. Where the allegation is made against a third party or self-employed contractor the Group will take appropriate action.

Potential outcomes are:

- The allegation can be shown to be false because the facts alleged could not possibly be true and no further action is taken.
- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the student. The matter would be considered in accordance with the Group's Disciplinary Procedures.
- The allegation represents abuse which is gross misconduct by the employee. The matter would be considered in accordance with the Group's Disciplinary Procedures and could lead to a disciplinary investigation and potentially dismissal.

4. Enquiries and Investigations

Child protection and safeguarding enquiries made by Children's or Adults' Social Care are not to be confused with internal, disciplinary enquiries by the Group. The Group may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the Group would assist the agencies with their enquiries.

The Group shall hold in abeyance its own internal enquiries while the formal police or Children's or Adults' Social Care proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Principal (or designated senior lead officer) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or designated senior lead officer) is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or designated senior lead officer) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

The Principal (or designated senior lead officer) will consult with the police, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Chair of Governors (and/or the designated governor) of the allegation and the investigation.
- The Principal (or designated person) shall keep a written record of the action taken in connection with the allegation.

Parents / Carers must be made aware of their duty of confidentiality about allegations against staff whilst investigations are ongoing, in particular the role of social media in potentially breaching this legal requirement.

5. Suspension of Staff

Suspension should not be automatic; suspension can only be carried out by the Principal or staff with designated responsibilities as detailed in the Staff Disciplinary Procedure. In respect of the Principal or other members of the Leadership Team, suspension can only be carried out by the Chair of Governors (or in his/her absence, the deputy chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where students are at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.
- Where the member of is in custody or on police bail for an extended criminal investigation.

For further guidance in relation to suspension refer to the Group's Staff Disciplinary Procedure.

In the event of suspension related to child protection/safeguarding:

- The Chair of Governors should be informed of the suspension in writing.
- The Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal.
- Where the Principal has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the Group.
- The parents/carers of the student making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension.
- Senior staff who need to know of the reason for the suspension should be informed.
- Depending on the nature of the allegation, the Principal should consider (with the nominated Governor) whether a statement to the students of the Group and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the Group's Disciplinary Procedures.

6. The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- The disciplinary charge against him/her.
- His/her entitlement to be accompanied or represented by a trade union representative or work colleague.
- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
- Students making the allegation and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return of the member of staff (if suspended).
- The Principal (or designated person) should give consideration to what information should be made available to the general population of the Group.

7. Allegations without Foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the local social care department or agency as determined by local arrangements in order that other agencies may act upon the information.

In consultation with the designated senior member of staff (and/or the designated Governor), the Principal shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection/safeguarding action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a student other than the alleged victim, consideration to be given to informing the parents/carers of that student.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Malicious allegations will be expunged from the personal record of the accused member of staff and in all cases a 'clear and comprehensive' summary of the allegation be included in their file.

8. Employee Resignation

The requirement to report the case to the LADO will still apply if the member of staff resigns and in no circumstances will the Group enter into a settlement agreement with a member of staff facing an allegation of abuse.

9. Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the Group's statutory duty to inform the Disclosure and Barring Service.

10. Monitoring Effectiveness

Where an allegation has been made against a member of staff, the nominated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the LSCB. Consideration should also be given to the training needs of staff.

11. Human Resource Responsibilities

It is a statutory requirement to inform the Disclosure and Barring Service in the following circumstances:

- Where a dismissal occurs for misconduct relating to a child / vulnerable adult.
- Where a resignation occurs prior to disciplinary action is likely to have resulted in dismissal.
- Where compromise agreements have been brokered in order to avoid disciplinary action.
- Where a person is considered unsuitable to work with children / vulnerable adults, whether an employee, agency worker or volunteer.
- Where a medical condition raises a possibility of risk to the safety or welfare of a child / vulnerable adult

12. Poor or Unsafe Practice

If TSCG employees wish to raise concerns regarding poor or unsafe practice and potential failures in the TSCG safeguarding regime, they should refer to the Whistleblowing Policy and Procedure.

Appendix C: Definition of a Vulnerable Adult (Vulnerabilities: Applying all our Health, DfE 2022)

The NHS defines vulnerable adults as any adult (person over the age of 18) unable to take care of themselves or protect themselves from exploitation.

Many factors can influence adult vulnerability, experiences of vulnerability in childhood may negatively impact adults in later life – particularly if someone has fewer protective factors in place, such as a supportive family or a stable household income.

A vulnerable adult is a person who is aged 18 years or older and:

- Is living in residential accommodation, such as a care home or a residential special school.
- Is living in sheltered housing.
- Is receiving domiciliary care in his or her own home.
- Is receiving any form of health care.
- Is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999.
- Is in contact with probation services.
- Is receiving a welfare service of a description to be prescribed in regulations.
- Is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity).
- Is receiving direct payments from a local authority/HSS body in lieu of social care services; and
- Requires assistance in the conduct of his or her own affairs.

Appendix D: Safeguarding Record Card

Safeguarding Record Card

Staff name recording the referral.	
Student name.	
Student number.	
Address.	
DoB/Age.	
Campus.	
Student Contact Number.	
Name/s and age of any siblings:	

Narrative in student's own words:

Do not ask leading questions. Ask if they have told anyone else.

What action/s has been taken so far?

Appendix E: Safeguarding Training

Trafford & Stockport College Group is committed to creating a safe environment for all learners. To meet this commitment and comply with prevailing legislation, all staff must complete mandatory training related to Safeguarding, security and data protection including refresher training. In addition, in response to localised concerns the safeguarding team will deliver additional recommended sessions to enable staff to maintain currency in their safeguarding knowledge.

Please refer to the tables below for an overview of the mandatory and recommended training sessions. For any queries, please speak to your line manager in the first instance.

For colleagues who do not have access to TSCG systems there are alternative versions of the training available. Please contact peopleandculture@tscg.ac.uk for more information.

Mandatory Safeguarding Training

Training	Method	Refresher Interval	Who	Completion
Safer Recruitment	iHasco online training	NA	HR & staff involved in recruitment	Mandatory
Keeping Children Safe in Education 2026	iHasco online training and sent via PDF to new starters	12 months (updated every September)	All staff and Governors	Mandatory
Session 1: Attachment Aware and Trauma Informed and Relational Practice Introduction.	Belong SharePoint site.	Upon Induction/ following significant updates	All staff	Mandatory
		Upon appointment/ following significant updates	Governors	
Safeguarding and Prevent training **OR** Safeguarding Children Level 2	Video training by Safeguarding Team (Hub) and quiz **OR**	3 years	All staff and Governors (iHasco training only)	Mandatory
	iHasco online training	3 years		

Recommended Safeguarding Training

Training	Method	Refresher Interval	Who	Completion
Sexual Harassment Training	Video on the Safeguarding Hub	Communicated via Global email/Safeguarding Bulletin	All Staff	Strongly recommended
Operational Safeguarding Training TSCG	Videos on the Safeguarding Hub	Communicated via Global email/Safeguarding Bulletin	All Staff	Strongly recommended

Designated Safeguarding Officers

Training	Method	Refresher interval	Who	Completion
Safeguarding Children Level 3	iHasco online training	2 years	Designated Safeguarding Officers	Mandatory
TSCG Designated Safeguarding Officer Training	Training delivered by safeguarding team (Hub) OR external training provider	2 years	Designated Safeguarding Officers	Mandatory

Security/Data Protection training

Training	Method	Refresher interval	Who	Completion
ACT (Action Counters Terrorism)	Online training and test (Gov.UK)	NA	All Staff	Strongly recommended
Cyber Security Awareness	iHasco online training	2 years	All staff	Mandatory
GDPR UK - Essentials	iHasco online training	2 years	All staff	Mandatory

Appendix F: Filtering and Monitoring Guidelines for Staff

- Filtering – preventing access to websites, online resources that are deemed not suitable.
- Monitoring – monitoring of college devices for any inappropriate or unsafe digital behaviour by students.

The following technologies are in place for filtering content at TSCG

Type	Technology	Method	Procurement Responsible Person(s)	Operation Responsible Person (S)
Web Filtering at Altrincham, Stretford and Stockport Campuses	Sophos - Sophos XG Firewall	Website categorization used to block inappropriate sites. Ability to whitelist/blacklist sites as required. Access is linked to the student login	Director of IT	ICT Infrastructure Manager IT Infrastructure Analyst
Web Filtering at Cheadle & Marple Campuses	Fortinet – Fortiguard Web Filtering	Website categorization used to block inappropriate sites. Ability to whitelist/blacklist sites as required. Access is linked to the student login	Pre-existing solution at Cheadle & Marple	IT Infrastructure Analyst
Web Filtering for student BYOD whilst on campus	As above (Sophos and Fortinet) with Guest WiFi VLAN	Strictly locked down categories for guest devices including blocking of Social Media category (Not currently linked to student login – to be developed over summer 23)		ICT Infrastructure Manager IT Infrastructure Analyst IT Infrastructure Analyst
Email Filtering / Teams	Microsoft Defender	Feature rich solution including • Anti-spam • Safe attachments • Safelinks See feature matrix below Microsoft Defender for Office 365 Features service description - Service Descriptions | Microsoft Learn	Director of IT (Dave Fitton)	ICT Infrastructure Manager 365 Development & Admin Officer

Monitoring

The following technologies are in place for monitoring college owned devices for any activity.

Type	Technology	Method	Procurement Responsible Person(s)	Safeguarding/ Monitoring Responsible Person(s)	Operation Responsible Person (S)
Classroom Management and device monitoring	Impero Education Pro (4000 device license)	Feature rich agent-based solution to capture all activity on college devices, provide classroom management for teachers, flag up safeguarding concerns to the Safeguarding team. See feature matrix below Education Pro | Impero Classroom Management Software (imperosoftware.com)	Director of IT	Safeguarding Team / Pastoral support Team	ICT Infrastructure Manager IT Infrastructure Analyst 365 Development & Admin Officer

- Annual training on Impero Monitoring system provided by IT team to Safeguarding Leads.
- Requests for derestricting submitted to IT helpdesk and approved by AP SES.
- Half termly testing of filtering by safeguarding team with concerns shared via IT helpdesk system - Test Your Internet Filter | SWGfL Test Filtering.
- Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: "appropriate" filtering and monitoring" Appropriate Filtering and Monitoring - UK Safer Internet Centre.
- Any concerns are reported to the safeguarding team.

Not Suitable for Students - all the below categories are blocked for students:

- Anonymizers - Sites offering Online translation of URLs. These sites access the URL to be translated in a way that bypasses the proxy server, potentially allowing unauthorized access
- Controlled substances
- Criminal Activity
- Extreme - Sites featuring or promoting violence or bodily harm, including self-inflicted harm; or that gratuitously displaying images of death, gore, or injury; or featuring images or descriptions that are grotesque or frightening and of no redeeming value. These do not include news, historical, or press incidents that may include the above criteria
- Gambling
- Hunting & Fishing
- Image Search - This category includes URLs that provide Image Search
- Intellectual Piracy
- Intolerance & Hate
- Legal highs
- Live audio - Websites that broadcast radio or TV communications over the Internet.
- Live video - Sites offering live video streaming of events or other programming.
- Marijuana

- Militancy & Extremist
- Nudity
- Personals & Dating
- Phishing & Fraud
- Plagiarism
- Pro-Suicide & Self-Harm
- Sexually Explicit
- Spam URLs - This category includes URLs that arrive in unsolicited Spam emails. Spam URL content ranges from product marketing to potentially offensive or fraudulent sites.
- Swimwear & Lingerie
- Video hosting - This category includes URLs that provide video search.
- Weapons
- Risky Downloads - Downloads of Shareware, Freeware, Executable, System files
- Suspicious - Spyware and Malware

Appendix G: Learner Safeguarding Disclosures and Training

Disclosures

Learners have access to a QR code on the back of their ID Badge allowing them to report safeguarding concerns. In addition, learners can make a referral from the intranet homepage; further information, advice and guidance on key safeguarding concerns can be found on the Learner Services HUB. Alternatively, learners can approach any member of staff to make a disclosure; all staff have received safeguarding training and are able to handle these referrals appropriately.

Training

All Learners receive training on Safeguarding and Prevent through the Tutorial Programme and Assemblies at the start of the academic year. Additional sessions can be provided subject to risk; these are identified through the at-risk process or centrally in Safeguarding Committee.

College plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the College's Relational behaviour policy and pastoral support system, as well as by a planned programme of Tutorials delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Appendix H Alternative Provision

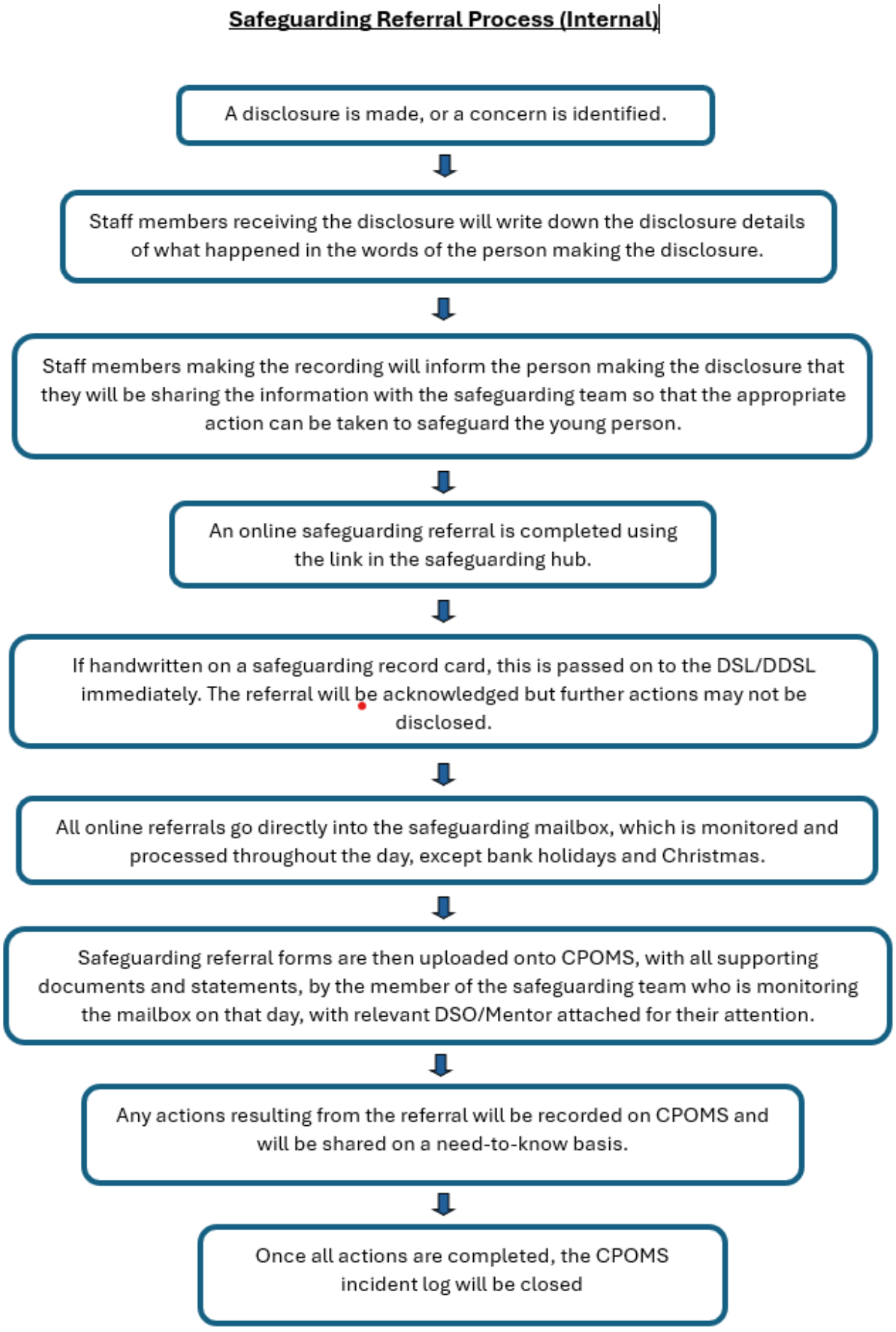
Where college places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.

College should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

College should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard: Alternative provision - GOV.UK and Education for children with health needs who cannot attend school - GOV.UK

Appendix I: Safeguarding Reporting Procedure



Student Safeguarding, Bullying, Harassment and Sexual Misconduct Reporting Process

