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The logo consists of a blue square border containing the text 'NATIONAL COLLEGE CREATIVE INDUSTRIES' in a bold, black, sans-serif font, stacked in four lines.

**NATIONAL  
COLLEGE  
CREATIVE  
INDUSTRIES**

**SAFEGUARDING POLICY  
2019/20**

Approved by Governing Body October 2019

## **Policy Statement**

The National College of Creative Industries is fully committed to providing a working and learning environment that is free from abuse and harm. It will actively promote a free and safe culture within all of its work and learning environments by, clearly identifying and communicating the roles and responsibilities within the organisation for safeguarding, having clear audited procedures in place, training all staff in safeguarding procedures and by allocating sufficient resources to safeguarding, applying a zero tolerance to any form of abuse and harm. It expects all governors, staff and volunteers to share this commitment.

Our Safeguarding policy is written with due regard to the national guidance published by the Department for Education entitled "Keeping Children Safe in Education" for our 16-18 learners and will be reviewed each time any subsequent guidance is issued by the Secretary of State. It also compliments other relevant policies and should work alongside these to provide guidance for safeguarding learners.

Owing to the nature of the day-to-day relationship students have with staff; all adults working in the college are particularly well placed to notice any physical, emotional or behavioural signs that a child may be suffering significant harm. We understand that harm means the ill-treatment or impairment of a person's health and/or development, including that caused as a result of witnessing the ill-treatment of another person and we understand that not all people will choose to talk, but may communicate through different ways. We will always be aware of and alert to any possible indicators that someone is suffering harm. Furthermore, people with SEND are at significantly greater risk of physical, sexual and emotional abuse and neglect than non-SEND. All stakeholders need to share and build on existing knowledge and good practice and work together towards ensuring equal protection for SEND students. There is a need to:

- Raise awareness about the abuse of SEND students and challenge attitudes and assumptions that act as barriers to protection
- Promote safe and accessible support in college
- Raise SEND students' awareness of abuse and ability to seek help

## **Introduction**

Everybody has the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs. This means especially protecting children, young people and vulnerable adults from physical, financial, emotional or sexual abuse or neglect where abuse includes causing any kind of injury or suffering, persistent emotional ill-treatment, involvement of a child in sexual activity, including access to pornography, failure to meet basic physical and emotional needs and physical violence including domestic violence.

## **Definition**

A child is legally defined as 'any person who is under the age of 18 years'. The definition of a vulnerable adult is 'a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation.

This may include a person who:

- Has a mental illness
- Has a physical or sensory disability
- Has a learning disability

- Has a severe physical illness
- Is elderly and frail
- Is a substance misuser
- Is homeless
- Is a Looked After Child (LAC)
- Is a young carer

### **What is abuse?**

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a number of forms (as highlighted in Keeping Children Safe in Education):

- Physical abuse e.g. hitting, pushing, shaking, inappropriate restraint, neglect or abandonment
- Sexual abuse e.g. involvement in any sexual activity against his/her will, exposure to pornography, voyeurism and exhibitionism
- Emotional/psychological abuse e.g. intimidation, bullying or humiliation
- Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition

### **Safeguarding in specific circumstances**

#### **Preventing Radicalisation**

National College Creative Industries is clear that extremism and radicalisation should be viewed as safeguarding concerns. We value freedom of speech and the expression of beliefs and both pupils and adults have the right to speak freely and voice their opinions.

- Extremism is views and actions that promote: 1) violence against others 2) hatred towards others 3) undermining the rights of others
- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

From 1 July 2015 schools are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". We share this commitment and ensure staff are trained in this area accordingly, with direct links to Essex Police and appropriate risk assessments in place with liaison with SLT.

#### **Child Sexual Exploitation (CSE)**

We recognise that child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

We will consider the following CSE indicators:

- Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.
- The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.
- Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming.

However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. We have necessary referral protocols in place.

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

We recognise that there is a range of potential indicators that a girl or young woman may be at risk of FGM. We recognise that this is a mandatory reporting duty from October 2015, as per FGM Act 2003.

If staff have a concern, they should follow the college safeguarding procedures and local protocols for multi-agency liaison with police and children's social care. Further advice is available through Multi-Agency Practice Guidance. Professionals must make a report to the police if in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

### **Sexting**

If staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must be reported to the safeguarding team immediately.

Staff **must not**:

- View, download or share the imagery yourself or ask a learner to share or download it. If staff have already viewed the imagery by accident, this must be reported to the DSO.
- Delete the imagery or ask the learner to delete it
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSO's responsibility)
- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

## **Upskirting**

Recent changes to the Voyeurism (Offences) Act 2019 criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. College safeguarding procedures should take effect in this situation.

Staff should explain that they need to report the incident and reassure the learner that they will receive support and help from the DSO.

We will ensure that we also raise awareness in other specific areas of safeguarding:

- Child Missing from Education
- Bullying including Cyber bullying
- Domestic Violence
- Use or abuse of drugs
- Fabricated or induced illness
- Faith abuse
- Forced Marriage
- Gangs and Youth Violence
- Mental Health
- Private Fostering
- Teenage relationship abuse
- Trafficking
- Peer on peer abuse
- Sexual Violence and Harassment
- Serious Violent Crime
- Serious Youth Violence

## **Contextual Safeguarding and Local Circumstances**

NCCI believes that all learners have the right to be able to access and enjoy a high-quality teaching, learning and assessment, with a rich learning experience that both enhances and increases their life chances. The college serves the needs of learners from a range of backgrounds, including higher proportions of:

- Learners from socio-economically deprived areas
- Learners with mental health needs
- LAC (liaison with Virtual School takes place to ensure support takes place)

We also recognise that exploitation could be a risk to all learners. Although the college is not situated in a high-risk area, we do have close proximity to London and various transport links, potentially making learners vulnerable to such maltreatment and manipulation from organised groups.

The college will ensure that it acknowledges the local context and safeguarding practices will reflect this.

## Statutory Framework

NCCI aims to meet legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the college to protect young people and adults at risk. This statutory framework includes:

- Keeping Children Safe in Education 2019
- Working Together to Safeguard Children 2018
- The Children Act 2014
- Prevent Duty Guidance 2015
- Vulnerable Groups Act 2006

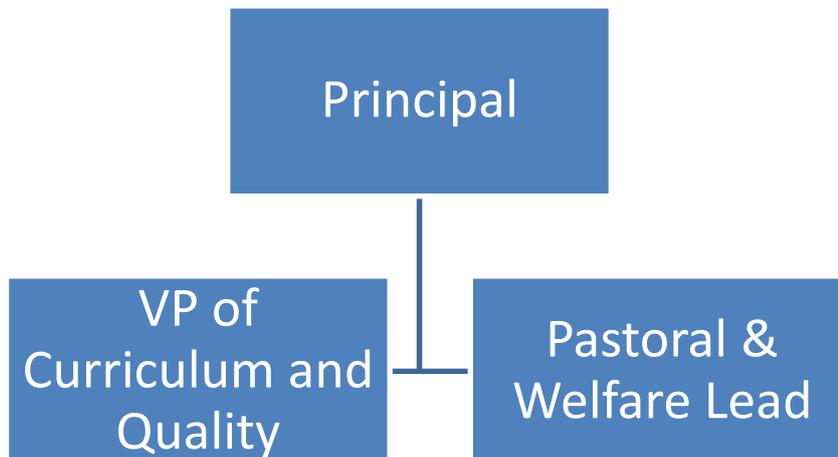
## Associated Policies

We have a range of policies in place that work in conjunction with our safeguarding policy, these include:

- Safer Recruitment
- Staff Code of Conduct
- Behaviour for Learning
- Anti-bullying
- Health and Safety
- Equality

## Organisation

### Safeguarding Management Structure



### Designated Safeguarding Officers (DWSO)

The National College of Creative Industries' Designated Safeguarding Officers are Luke Holland and Elaine Kelt.

## **Roles & Responsibilities**

### **Governors**

The Governing Body is responsible for setting policy and to ensure its effective implementation. Governors will approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:

- Maintaining awareness of progress across the College and/or issues relating to welfare of children, young people and adults at risk of harm
- Being reassured by the Principal and DSL that systems are in place and effective when identifying concerns and that procedures for reporting concerns are widely known
- Ensuring safe recruitment of staff and volunteers

Governors receive regular monitoring reports relating to safeguarding to ensure they are aware of concerns and key trends across the college.

In line with best practice the National College of Creative Industries has appointed a Lead Governor for Safeguarding, Ros Parker, for academic year 2019/20.

### **Principal**

The principal will:

- Allocate senior manager responsibility for Safeguarding
- Ensure Senior Managers understand their responsibilities and accountability with respect to Safeguarding
- Make Safeguarding a standing agenda item at Senior Management team meetings
- Ensure regular SMT meetings take place
- Ensure the Safeguarding policy is regularly reviewed and reports are made to the Governing Body

### **Director of Curriculum and Quality**

The Director of C&Q will:

- Be responsible for ensuring there are current Safeguarding policies and procedures in place
- Undertake regular review of Safeguarding policy and procedures
- Monitor legislative, regulatory and funding compliance requirements and ensure the Safeguarding policy and procedures are compliant with the needs of all stakeholders
- Ensure Safeguarding policies and procedures are communicated to all staff to ensure they have a clear understanding of their roles and responsibilities with respect to Safeguarding
- Ensure staff they manage have undertaken Safeguarding training and demonstrated their understanding.
- Ensure all Safeguarding incidents are investigated control measures implemented to prevent any recurrence

### **Designated Safeguarding Officer**

The DSO will:

- Ensure that all policies affecting staff are referred to in the Employee Handbook and that these meet legal and regulatory compliance requirements
- Maintain records of all Safeguarding training undertaken by staff and advise line managers of staff who have not completed Safeguarding training
- Provide additional training where required
- Work with identified individuals at Thurrock Council to ensure compliance with their procedures
- Work with the VP to maintain and update Safeguarding policy and procedures
- Work with SLT to undertake DBS checks of all staff as they join the company and maintain a record of these
- Liaise with external agencies as required in dealing with Safeguarding incidents
- Work with the VP to ensure all staff have a clear understanding of their roles and responsibilities with respect to Safeguarding
- Act as first line point of contact for dealing with safeguarding incidents

## **Staff**

Safeguarding is everybody's responsibility. All staff working with children, young people and vulnerable adults will receive annual training adequate to familiarise them with safeguarding issues and responsibilities and NCCI procedures and policies.

All staff will:

- Promote a safe learning environment
- Immediately report to their line manager any concerns they may have concerning the vulnerability, safety or welfare of any individual
- Adhere at all times to company policy and procedures relating to Safeguarding
- Undertake training as required for their role

## **Safeguarding Procedures**

### **Safer Recruitment**

The National College of Creative Industries follow a safer recruitment policy, and this will be adhered to in the appointment of all staff. No new member of staff must be allowed to work with learners on their own until they have been fully vetted in accordance with NCCI recruitment policy. NCCI follows the statutory guidance for schools and colleges on safeguarding children and safer recruitment (Keeping Children Safe in Education) and includes, for example, the completion of an enhanced DBS check where required. All new staff will complete an online safeguarding course within their probationary period. A Single Central Record (SCR) holds information to this respect.

### **Pre-induction workplace risk assessment**

All workplaces that will host a learner (e.g. Apprentices) will be risk assessed in accordance with the company's Health & Safety Policy and Procedures.

### **Induction**

At induction, all new learners will receive a summary of the policies and procedures in place to protect them whilst in our learning centres or out on work placements via the learner handbook. A full copy is

available on request. The handbook highlights safeguarding procedures, as well as key contacts within the college. All learners are given an ID badge which they must wear and be visible for safeguarding purposes.

### **On programme**

All staff should report any learners they consider to be at risk to the Designated Safeguarding Officer or the Deputy Safeguarding Officer. Additional support should be provided to these learners to ensure their progression and to confirm their health wellbeing and safety. We will promote online safety within the college and encourage learners to use the internet correctly and report any concerns. Learners will receive regular reviews to highlight any welfare concerns.

NCCI encourages learners to gain valuable work experience within the industry, through linking with key employers. With this, a risk assessment of the workplace with undertaken for any learner on a work experience programme, along with a visit by a member of staff to ensure the environment is safe and relevant procedures are in place to safeguard the learner. Key contacts are given at each end to ensure issues and/or concerns can be relayed to the college and employer.

### **Apprentices**

Apprentices are based with employers as part of their programme. As part of the on-boarding process, an employer and provider induction takes place, which includes key safeguarding information being relayed to the learner and any welfare issues being discussed. With this, a risk assessment is undertaken, along with key health and safety information and points of contact. Employers have a duty of care towards apprentices, including providing necessary support and guidance, and should have policies and procedures in place to deal with concerns. If such concerns arise, these should be fed back to the college for investigation by a DSO and the apprentice supported through the process using NCCI's safeguarding procedures. Welfare checks will take place and liaison with key people and agencies will take place if necessary.

As part of the apprenticeship programme, apprentices receive regular reviews with Industry Practitioners, which includes a welfare check on each visit. Any concerns and/or disclosures made are highlighted using the procedures that are in place. Also, within the delivery schedule, apprentices are given the opportunity to explore British Values, Safeguarding and Prevent to raise awareness, as well as following codes of conduct set by employers.

### **Dealing with incidents**

Any incidence or alleged incidence of abuse whatever the nature must be immediately reported to the Designated Safeguarding Officer who will put in place preventative measures to stop any possible abuse from continuing. The Designated Safeguarding Officer will ask that an incident report form is completed, where possible (**See appendix 1**). The DWSO or Deputy DWSO will undertake an immediate formal review and put in place actions to resolve the issue in the long term.

If a staff member has been told about an allegation of abuse in confidence, they should advise the person making the allegation that they are required to report the matter to the Designated Safeguarding Officer or Deputy DWSO. (**See appendix 2**)

Once an incident has been reported to the Designated Safeguarding Officer, this person will arrange a meeting with the person making the allegation. The DWSO will determine:

- The scale of the abuse

- The risk of harm to others
- The capacity or competency of the learner to understand the issues of abuse and consent

If there is any doubt about whether or not to report an issue to Social Services the Designated Safeguarding Officer will do so following the specified actions (*see appendix 3*) and consult with Thurrock MASH Team on 01375 652 802 or [thurrockmash@thurrock.gcsx.gov.uk](mailto:thurrockmash@thurrock.gcsx.gov.uk). Referrals will be made using the prescribed Thurrock CAF. If concerns are related to an allegation against a member of staff, if necessary, the LADO will be contact. The LADO for Thurrock can be contacted on 01375 652 732.

In emergency situations (e.g. where there is the risk or occurrence or severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the Designated Safeguarding Officer will contact the emergency services.

Where a crime is taking place, has just occurred or is suspected, the Designated Safeguarding Officer will contact the police immediately.

### **Allegations against staff**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff posing a risk of harm, speak to the DSO. If the concerns/allegations are about the DSO, speak to the Principal. The college will consult the Local Area Designated Officer (LADO) regarding allegations against staff. This is to consider the nature, content and context of the allegations and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.

If an allegation is against a senior post holder, the Chair of Governors would investigate the allegation whilst consulting with the Safeguarding Link Governor. The steps as above would be taken through the LADO process within the Local Authority.

### **Confidentiality**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that they safety of the learner is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The learner must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need to know basis. Fears of sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of learners.

National College Creative Industries is committed to protecting the rights and privacy of individuals, including learners, staff and others, in accordance to the General Data Protection Regulation (GDPR) May 2018 and complies with the requirements of the Data Protection Act 1998 that allows for disclosure of personal data where this is necessary to protect the vital interests of learners.

## Contacts

Designated Safeguarding Officers can be contacted via the college on 020 3675 6750. Alternatively, a dedicated email is in place should you have any queries – [safeguarding@creativeindustries.ac.uk](mailto:safeguarding@creativeindustries.ac.uk). For more information on safeguarding at NCCI, please visit our dedicated page at <http://creativeindustries.ac.uk/our-courses/admissions/safeguarding>

### Other useful contacts

Samaritans 08457 909090

Victim Support 0845 3030900

Childline 0800 1111

NSPCC 0808 800 5000

**This policy will be updated annually and will reflect changes in statutory guidance and legislation**

## Appendix 1

# Safeguarding Incident Report Form

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**Name:** \_\_\_\_\_ **Age:** \_\_\_\_\_

**Course:** \_\_\_\_\_

**Name of person completing Form:** \_\_\_\_\_

**Role (e.g. tutor)** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Description

Briefly describe what happened including dates and times. Continue overleaf if necessary.

**Names and contacts of witnesses:**

**Name:** \_\_\_\_\_ **Phone no.:** \_\_\_\_\_

**Name:** \_\_\_\_\_ **Phone no.:** \_\_\_\_\_

**Action taken**

**Staff signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Appendix 2**

**Dealing With Disclosure of Abuse**

## Procedure for Reporting Concerns

If a child, young person or vulnerable adult tells a member of staff about possible abuse:

- Inform the individual that you must pass the information on, but that only those that need to know about it will be told.
- Inform them who you will report the matter to.
- Listen carefully and stay calm.
- Do not interview the individual, but question normally and without pressure, in order to be sure that you understand what they are telling you.
- Do not put words into the individual's mouth or ask leading questions.
- Reassure the individual that by telling you, they have done the right thing.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the individual said, did and your questions etc.
- Report the issue as a matter of urgency to The Lead Safeguarding Officer (contact details are provided for out of normal working hours support), providing them with a copy of any notes you have made.

## Appendix 3

### Actions when concerns are raised

The following flowchart has been taken from 'Keeping Children Safe in Education.' It outlines actions taken when concerns are raised:

**Actions where there are concerns about a child**

