TMC Student Safeguarding Policy

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Student Safeguarding Policy – 2026/27

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Approved by LTE Group Board **Date:**

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Adult workforce concerns - Manchester Person in Positions of Trust: PiPoT Policy

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Manchester Children's Services Children's services | Manchester City Council
Manchester Adult Service Adult Safeguarding - Manchester Safeguarding Partnership

Emergency Duty Team (EDT): (out of office hours)
In an emergency Manchester City Council
- Social care (Social services) to report abuse, neglect or a vulnerable person at risk – 0161 234 5001
- Homelessness, if you have nowhere to stay at night - 0161 234 5001
  Immediate danger – call 999 or Civil emergency 0161 223 7222

Out of Hours Service – (evenings, weekends, holiday periods and college closure days) – Contact Child Action North West - **01254 244595** (for Senior Managers/Site Duty Manager)

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The Policy

1. Purpose

The Manchester College is committed to safeguarding and promoting the welfare of all students. We recognise our statutory responsibilities to protect children, young people and adults with care and support needs from abuse, neglect, exploitation and harm. Safeguarding is everyone's responsibility.

All members of staff, governors, volunteers, trainee/student teachers, contractors, agency staff, employer partners and visitors have a role to play in protecting students and creating an environment in which they feel safe, respected, valued and able to achieve their full potential.

The College adopts a student-centred approach to safeguarding and recognises that the welfare of the child is paramount. The wishes, feelings and lived experiences of children and young people will be considered when determining appropriate safeguarding action. This policy should be read in conjunction with:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2023
- The Care Act 2014
- Prevent Duty Guidance
- Manchester Safeguarding Partnership procedures
- LTE Group Safeguarding Framework

The College is committed to creating a culture of vigilance where concerns are identified early, shared appropriately and acted upon promptly.

2. Objectives

The College recognise that effective safeguarding processes are those which:

- Put the student's needs first
- Provide students with a voice
- Promote identification of early support and prevention
- Act in the best interests of the student
- Provide effective 'Family Help' and Prevention

This is achieved by The Manchester College:

- implementing statutory disclosure and barring service checks for all staff and governors, conducted prior to commencing employment with the organisation, and repeated every 5 years thereof.
- providing all staff, volunteers trainee/student teachers, contractors, agency staff, employer partners and visitors with the necessary information to enable them to meet their safeguarding responsibilities

- facilitating delivery and completion of safeguarding training to ensure staff, volunteers, trainee/student teachers, contractors agency staff, employer partners, visitors, governors and students are equipped to identify signs and/or declarations and take appropriate action.
- promoting consistent good practice
- demonstrating the College's commitment to safeguarding, with effective communication channels so students know who they can talk to
- establishing effective working relationships with parents, carers and colleagues from other agencies
- embed safeguarding education and prevention awareness as part of the Study Programme to help develop the student's personal growth, life skills and know how to keep themselves safe
- communicating ways in which the College promotes a safe learning environment and challenges inappropriate, poor and unsafe practice
- informing students that their course may require a statutory disclosure and barring service (DBS) check should they be in contact with children or vulnerable adults as part of their studies or workplace.

This Policy should be read in conjunction with detailed thematic guidance published in Keeping Children Safe in Education 2026 Keeping children safe in education 2026: September 2026

2.1 Definitions

a) Child:

A child is anyone who has not yet reached their eighteenth birthday.

b) Adult:

An adult is a person aged 18 years or over.

c) Adult with Care and Support Needs

An adult aged 18 or over who:

- Has needs for care and support.
- Is experiencing, or is at risk of, abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from abuse, neglect or exploitation.

Throughout this policy the term "students" includes children, young people and adults with care and support needs unless otherwise stated.

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to achieve the best outcomes.

Safeguarding Adults:

Every adult has the right to be safe and free from harm, abuse, and neglect. Some circumstances may result in a vulnerable adult student accepting levels of risk or potential abuse. It is vital the concerns are acted on and support offered appropriately to enable adult students to make safe decisions and choices.

Never assume safety or wellbeing because of capacity or consent issues.

Further guidance is provided in the TMC Safeguarding Adult Procedure and intervention framework.

2.2 The Care Act

The Care Act 2014 states that adult safeguarding duties apply to any person aged 18 years or older who:

- Has care and support needs.
- Is experiencing, or is at risk of, abuse or neglect.
- Is unable to protect themselves because of their care and support needs.

Throughout this Policy and Procedure, the term students is the encompassing term that includes children, young people, adults and vulnerable adults.

Safeguarding Culture

The Manchester College recognises that safeguarding is not limited to child protection. Effective safeguarding encompasses all aspects of student welfare and wellbeing.

The College will:

a) Maintain a culture of vigilance.
b) Promote professional curiosity.
c) Encourage students to share concerns.
d) Respond promptly to safeguarding concerns.
e) Work effectively with partner agencies.
f) Ensure students know how to access help.

g) Foster a culture of respect and inclusion.

h) Challenge inappropriate behaviours.

i) Promote online safety.

j) Promote digital resilience and critical thinking to support students in identifying misinformation, manipulated media, deepfakes and AI-generated content.

k) Act to reduce barriers to reporting concerns.

The College recognises that safeguarding incidents and behaviours may occur both inside and outside of education settings and online.

3. Scope

3.1 Our Safeguarding principles

- The welfare of all students is paramount
- Safeguarding and promoting welfare is everyone's responsibility
- All students regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to effective safeguarding arrangements
- All staff, volunteers, employer partners and governors have an equal responsibility to act on any suspicion or disclosure that may suggest a student is at risk of harm
- Students, staff and volunteers involved in safeguarding and protection issues will receive appropriate support

The Manchester College recognises the importance of young people's voice, wishes and feeling in the provision of effective safeguarding arrangements. Therefore, the college respects the following statements as part of safeguarding and promoting the welfare of young people.

1. **vigilance:** to have adults notice when things are troubling them
2. **understanding and action**: to understand what is happening; to be heard and understood; and to have that understanding acted upon
3. **stability**: to be able to develop an ongoing stable relationship of trust with those helping them
4. **respect**: to be treated with the expectation that they are competent rather than not
5. **information and engagement:** to be informed about, and involved in procedures, decisions, concerns and plans
6. **explanation:** to be informed of the outcome of assessments, and decisions and reasons when their views have not met with a positive response

7. **support:** to be provided with support in their own right as well as a member of their family
8. **advocacy:** to be provided with advocacy to assist them in putting forward their views
9. **protection:** to be protected against all forms of abuse, exploitation, and discrimination, and the right to special protection and help if a refugee

3.2 Prevention, Protection and Support

The working practices that encompass safeguarding measures are categorised by:
(i) **Prevention:** The Manchester College is committed to recognising and implementing early intervention measures that include collaboration with external agencies who provide specialist welfare support.
(ii) **Protection:** All staff, volunteers and employer partners are trained to recognise and respond to abuse and neglect. All staff and volunteers are expected to be vigilant and must act quickly when they suspect a student is suffering, or is likely to suffer, harm
(iii) **Support:** Staff, volunteers and employer partners are trained to be aware of the safeguarding arrangements, conducive to the sensitivities and complexities of each case, to provide adequate support to those at risk of harm.

In pursuit of these aims, the Corporation Board will approve and annually review this Policy with the aim of:

- Raising awareness of issues relating to the welfare of students and the promotion of a safe environment for learning within the College
- Supporting and validating robust processes and training to prevent risk of significant harm
- Supporting and validating the Human Resources process for reporting and investigating allegations of abuse against members of staff or volunteers and taking appropriate action.

What college staff should do if they have a safeguarding concern or an allegation about another staff member

All staff have a duty to report concerns relating to anyone working in college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors that 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 he or she 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.

All concerns must be shared with the Designated Safeguarding Lead without delay.

3.3 Children Potentially at Greater Risk of Harm

Any child may benefit from early help; however, staff should be particularly alert to the potential need for additional support where a child:

- Has special educational needs and/or disabilities (SEND).
- Is a looked-after child or previously looked-after child.
- Is subject to a Child Protection Plan or Child in Need Plan.
- Has experienced abuse, neglect or trauma.
- Is a young carer.
- Is affected by parental offending.
- Is affected by domestic abuse.
- Has mental health concerns.
- Is vulnerable to exploitation.
- Is vulnerable to radicalisation.
- Is missing or absent from education.
- Is experiencing homelessness.
- Is affected by substance misuse.
- Has family members in custody.
- Is at risk of serious violence.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from college and in Alternative Provision or a Pupil Referral Unit
- Has experienced discrimination, prejudice or hate-related incidents.
- Is subject to online harassment, image-based abuse, deepfake content, impersonation or malicious online communications may experience significant emotional, psychological, social and reputational harm and should be considered for safeguarding intervention and support.

3.4 Young People Excluded or Frequently Missing Education

The Manchester College has an important statutory role to ensure students are safe and not exposed to risk. Children and Young People 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 the college's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, 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.

There are a number of indicators, which may signal students are at risk from, or are involved with, serious violent, criminality, exploitation and neglect. These include:

- increased absence from college or work placement
- a significant decline in performance and avoiding lessons
- having been frequently absent, suspended or permanently excluded from college

Further Information and Guidance is available via the Manchester Safeguarding Partnership website MSP Children or MSP Adults.

Online Safety, Digital Technology and Artificial Intelligence

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Students 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. Students can also abuse other students online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, 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.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. It is essential that students are safeguarded from potentially harmful and inappropriate online material. An effective whole-college approach to online safety empowers protection from harm and

preventative education for students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Students increasingly access online services, social media, digital communications and artificial intelligence (AI) technologies as part of everyday life. While these technologies offer significant educational benefits, they can also introduce safeguarding risks.

The College will take reasonable steps to protect students from:

- Online grooming.
- Sexual exploitation.
- Cyberbullying.
- Harassment.
- Harmful content.
- Radicalisation.
- Extremist material.
- Fraud and financial exploitation.
- Disinformation and misinformation.
- Conspiracy theories.
- Deepfake images and videos.
- AI-generated harmful content.
- Cybercrime recruitment.
- Online coercion and manipulation.

Appropriate filtering and monitoring systems will be implemented in accordance with statutory requirements.

Students will receive online safety education through induction, tutorial programmes, personal development activities and curriculum learning opportunities.

Images may be taken by the child themselves (sometimes referred to as ‘self-generated imagery’) or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as ‘deepfakes’ or ‘deep nudes’.

Online safety risk is considerable and ever evolving, but can be categorised into four areas:

1. content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

2. contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer

3. conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying

4. commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College recognises that advances in artificial intelligence have increased the risk of students being subjected to, or creating, manipulated digital content including deepfake images, videos, audio recordings and synthetic media. Deepfakes may be used to:

- Facilitate bullying, harassment and intimidation.
- Create sexually explicit images without consent.
- Exploit, blackmail or extort students.
- Damage reputations and wellbeing.
- Facilitate fraud, impersonation and financial exploitation.
- Spread misinformation, extremist narratives or harmful content.

The College will treat the creation, possession or distribution of harmful deepfake content involving students as a safeguarding concern and will respond proportionately through safeguarding, disciplinary and, where appropriate, criminal justice processes.

Students Requiring Mental Health Support

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, college staff, have an important role to play.

a) promoting good mental wellbeing and preventing the onset of mental illness
b) observing students and identifying early those who may be experiencing mental health problems or being at risk of developing one
c) ensuring early targeted support is provided
d) liaison with/referral to specialist services where needed.

Where support is needed, the designated safeguarding lead (or a deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Students Questioning their Gender

Some young people may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is not the role of the college to initiate any action in this area. As a college community it is important to support students to take time to understand the thoughts and feelings of questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

All staff must remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Considering Requests for Support with Social Transition

Members of staff should not adopt any changes relating to social transition unless a decision has been made by the college Principal and a child's parents or carers. When considering any request for support with social transition, the colleges will ensure that decision-making about supporting social transition complies with the obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the students and the college community. The college has a statutory duty to safeguard and promote the welfare of all children and young people.

This means that the first step when considering a request for support with social transition will be to consider what is in the best interests of the individual and other students, and a decision relating to social transition may not be the same as a young person's wishes.

The college will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

Regulations and safeguarding requirements relating to college premises

Toilets:

The College will not allow students into toilets designated for the opposite biological sex. This includes any degree of social transition for students who are questioning their gender.

Changing Rooms and Showers:

The college will ensure that facilities are available and ensure that students do not undress in front of a child of the opposite biological sex. When responding to a request to support any degree of social transition, the changing and showering facilities will not allow students access to changing rooms designated for the opposite sex.

3.5 Information Sharing

No single practitioner can have a full picture of a student's needs and circumstances. Therefore, effective sharing of information between practitioners, local organisations and agencies is essential for early identification of need, assessment, and service provision to keep students safe. Information sharing is also essential for the identification of patterns of behaviour when a child or young person is at risk.

3.6 Information Seeking

Practitioners are proactive and will seek out relevant information from other practitioners and agencies or organisations to build an accurate picture of a student and family's life. Effective information seeking enables pieces of information to be shared, gathered, and triangulated across agencies or organisations working with a family.

College Safeguarding Practitioners should be professionally curious about the information they hold, and the information other practitioners may hold about a student. This may involve checking with agencies to build a fuller understanding of a family's context or the risks of harm.

The Manchester College's Safeguarding Team operate within a framework of information sharing including 'The Seven Golden Rules for Sharing Information' (including personal information)

4. Roles and Responsibilities

4.1 All staff (including Governors)

All staff have a responsibility to safeguard and promote the welfare of children.
The College will ensure:

- All staff read and understand Part One of Keeping Children Safe in Education 2026.
- All staff receive safeguarding and child protection training at induction.
- All staff receive safeguarding updates at least annually.
- Staff understand local safeguarding procedures.

- Staff know how to recognise abuse, neglect and exploitation.
- Staff understand how to report concerns immediately.
- Staff understand whistleblowing procedures.
- Staff know how to escalate concerns where they believe action has not been taken.

All staff should maintain an attitude of "it could happen here" where safeguarding concerns are identified.

4.2 The Corporation Board

The Corporation Board will ensure that:

- The college complies with their duties under relevant legislation
- Ensures strong, joined-up leadership and clear accountability
- All staff, volunteers and Governors have a mandatory obligation to complete safeguarding training (including online E-safety) at induction and at a minimum every 2 to 3 years' dependent upon their role
- All staff, volunteers and employers receive an annual update and refresh for key safeguarding matters
- All senior leaders and staff working directly with students have a mandatory obligation to read Part One of 'Keeping Children Safe in Education' 2026
- This Safeguarding Policy is consistent with local requirements, reviewed and updated annually and made available publicly on the college website
- Safeguarding training commissioned and/or delivered internally is in line with advice from the Department for Education, and other governing and professional bodies
- Ensure a robust safeguarding and safer recruitment Policy is in place in line with part three of Keeping Children Safe in Education and the Disclosure and Barring Service (DBS) guidance
- There are procedures for dealing with allegations of abuse made against members of staff including allegations made against members of the Leadership Team and a nominated person identified to liaise with the appropriate Local Area Designated Officer (LADO). For abuse against a vulnerable adult, the DSL will consult with Manchester Safeguarding Adult PiPoT (Person in Positions of Trust) policy - **PiPoT Policy**
- Policies adopted are disseminated, followed and understood by all staff
- They appoint a member of the Senior Leadership Team to the statutory role of Designated Safeguarding Lead (DSL)
- Students are taught about safeguarding (including online E-safety) through teaching and learning opportunities, as part of providing a broad and balanced

personal development curriculum and preparation for independence and employment

- Students will receive age-appropriate education regarding artificial intelligence and emerging technologies including:
    a) Recognising deepfakes and manipulated media.
    b) Online consent and image-based abuse.
    c) Sextortion and digital blackmail.
    d) Critical evaluation of online information.
    e) Safe, ethical and lawful use of artificial intelligence.
    f) Reporting concerns relating to AI-generated content.

- There are written recruitment and selection procedures that include the requirement for appropriate pre-employment checks and at least one person on any appointment panel has undertaken safer recruitment training
- Procedures are in place to handle allegations of peer on peer (Child on Child) abuse
- Concerns regarding sexual harm or sexual violence are responded to immediately in line with Child Protection guidelines and Keeping Children Safe in Education 2026.
- There are appropriate safeguarding responses to students who go missing from education, particularly on repeated occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in the future
- The student's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individuals through ensuring there are systems in place for students to express their views and give feedback
- They recognise the importance of information sharing between professionals and the local authority
- Strong multi-agency and multi-disciplinary working is embedded within practice and is in line with published expectations described in Working Together to Safeguard Children (2023)
- They appoint a Designated Teacher to promote the educational achievement of students who are looked after and this person has appropriate training
- Ensure the College ICT policy addresses the safety of students in mistakenly or intentionally accessing inappropriate material when using the internet and that appropriate filtering and monitoring systems are in place
- Emerging online risks, including artificial intelligence, deepfake technology, image-based abuse and online exploitation are reflected within safeguarding training,

curriculum planning, filtering and monitoring arrangements and annual safeguarding reporting.

The Board must ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge, to test and assure themselves that the safeguarding policies and procedures in place are effective, and support the delivery of a robust, whole college approach to safeguarding.

4.4 Chief Finance Officer

The Chief Finance Officer (with lead responsibility for the People and Talent and Information Systems Teams) will:

- Ensure that the Safer Recruitment Policy and Process is in place (in line with part three of Keeping Children Safe in Education and the DBS guidance), communicated to all hiring managers and its implementation monitored
- Provide training on Safer Recruitment procedures and processes to all hiring managers and ensure at least one person on any appointment panel has undertaken safer recruitment training
- Ensure that all right to work documentation is correct and in place prior to offer of employment
- Ensure that the DBS Policy and Procedures for Safer Recruitment are followed and any disclosures are referred to the panel for approval and actioned accordingly
- Ensure that the Single Central Record is suitable and is audited annually
- Ensure that any safeguarding or abuse allegations raised about members of staff raised are dealt with appropriately, thoroughly and follow policy and process, including referral to the DSL to enable reporting to the LADO, DBS and the Police (where required) according to the LTE Group's statutory duty to report
- Ensure that any referrals to LADO or DBS are recorded and tracked
- Ensure that safer recruitment procedures are in place, followed and monitored when hiring agency staff members and any disclosures are referred to the panel for approval and actioned accordingly.
- Ensure that the LTE Group IT policies in place for the College addresses the safety of students in mistakenly or intentionally accessing inappropriate material when using the internet and that appropriate filtering, monitoring and reporting systems are in place.

4.5 The College Principal

The College Principal:

- Ensures this Policy and associated Procedures are implemented and followed by all staff
- Demonstrates strong, joined-up leadership and clear accountability across the college
- Ensure the Designated Safeguarding Lead fulfils the role and duties published in Annex B of Keeping Children Safe in Education 2026.
- Provides effective leadership for the DSL, minimising delays and decision making when managing risk and support interventions. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- Challenges college attendance concerns and exclusions for vulnerable students
- Allocates sufficient time and resources to enable the DSL and any deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary professional meetings
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
- Ensures that the safety and welfare of students is addressed through the curriculum and Personal Development offer
- Provides a signed copy of the College's Safeguarding Annual report to the Corporation Board

4.6 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) responsibilities:

The DSL fulfils the role of Designated Safeguarding Lead as described in Annex B of Keeping Children Safe in Education 2026.

4.6(a) Managing Referrals: The Designated Safeguarding Lead (DSL) is expected to:

- Refer cases of suspected abuse to the local authority children's/ adult social care as required
- Refer cases to the Channel Panel where there is a radicalisation concern as required

- Maintain oversight of emerging safeguarding risks arising from artificial intelligence, including deepfake technology, online impersonation, synthetic media and image-based abuse. The DSL will ensure incidents are recorded, analysed for trends and used to inform preventative education, staff training, filtering and monitoring arrangements
- Support staff who make referrals to the local authority and the Channel Panel, the support mechanism for vulnerable persons subjected to radicalisation https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance
- Refer cases where a person is dismissed or left due to risk/harm to a young people to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the police as required
- Work with other safeguarding agencies
- Liaise with the Principal to inform of ongoing enquires under section 47 of the Children Act and police investigations
- As required liaise with the LADO or PiPoT for all cases involving a staff member
- Liaise with staff on matters of safety and safeguarding when deciding whether to refer by liaising with relevant agencies. Acting as a source of support, advice and expertise for staff

4.6(b) Training:

The DSL (and any nominated deputies) should undergo training that provides them with the knowledge and skills required to carry out the role. This training should be updated at least bi-annually. They must also undertake Prevent awareness training.

DSLs skills and knowledge should be refreshed at regular intervals but at least annually and this can involve e-bulletins, meeting other DSLs or simply taking the time to read and digest safeguarding materials.

4.6(c) The Designated Safeguarding Lead must:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities' conduct child protection case conferences and child protection review conferences and be able to attend and contribute to these effectively when required to do so
- Ensure all staff have access to and understands the College's Safeguarding Policy and Procedure, with process in place for new staff
- Be alert to the specific needs of student identified having additional vulnerabilities

- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Understand and support the College with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to students and taking account of their wishes and feelings, amongst all staff, in any measures the college may put in place to protect them. However, without delaying referrals or interventions where students are experiencing serious harm or abuse

4.6(d) Raising Awareness: The Designated Safeguarding Lead is expected to:

- Ensure the College's policies are known, understood and used appropriately
- Ensure this Policy is reviewed annually, procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this
- Ensure this Policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made
- Link with the local safeguarding partnership arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where 16-18 students leave the College ensure their safeguarding file is transferred to the new college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

4.6(e) Availability

During term time the Designated Safeguarding Lead (or a deputy) will always be available (during college hours) for staff in the College to discuss any safeguarding concerns.

Deputy Designated Safeguarding Leads

Any deputies should be trained to the same standard as the Designated Safeguarding Lead (DSL). Whilst the activities of the DSL can be delegated to appropriately trained deputies and nominated people, the ultimate lead responsibility for child protection, as set out in Annex B of Keeping Children Safe in Education, remains with the designated safeguarding lead, this lead responsibility must not be delegated.

4.7 Children Looked After (CLA) and Previously Looked-After

4.7(a) The most common reason for becoming looked after is as a result of abuse and/or neglect. A student who is looked after by a local authority means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority.

4.7(b) The College Corporation Board should ensure that staff have the skills, knowledge and understanding necessary to keep looked after and previously looked after children safe.

4.7 (c) In particular, they should ensure that the Designated Safeguarding Lead has the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the young person's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the social worker and the name of the head of the 'virtual school' in the authority that looks after the young person.

4.8 The Prevent Duty

Young People and Adults may be susceptible to radicalisation into terrorism. Similar to protecting students from other forms of harms and abuse, protecting from the risk of radicalisation is embedded within our safeguarding approach.

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.

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.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in behaviour, which could indicate that students may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy).

The Prevent Lead for The College is the Assistant Principal Student Support and Foundation Learning – College Designated Safeguarding Lead.

4.9 Peer on Peer (also known as Child on Child)

All staff within the College need to be aware and alert that students can abuse other students (often referred to as child-on-child or peer on peer abuse), and that it can happen both inside and outside of college and online. The Manchester College expects all staff to be vigilant and follow guidance set out in the Safeguarding Procedure; recognising the important role everyone has in preventing it and responding where they believe a child may be at risk from peer-on-peer abuse.

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)
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Creating, possessing, sharing or threatening to share AI-generated, manipulated or deepfake images or videos of another student without their consent, including sexually explicit deepfake content, digitally altered images and synthetic media intended to cause distress, humiliation, coercion, exploitation or reputational damage.
- 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

- 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).

  It is vital that all staff and volunteers understand that even if there are no reports made at college, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to The College's Designated Safeguarding Lead (or a deputy).

  It is essential that all staff understand the importance of challenging inappropriate behaviours between students (detailed in the Safeguarding Procedure) that are abusive in nature, as downplaying certain behaviours, for example dismissing sexual harassment as "just banter "can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

4.10 Information for Volunteers, trainee/student teachers, contractors, agency staff, employer partners and visitors

The Manchester College is committed to the safety and wellbeing of our students and expect all of our visitors to share this commitment. Therefore, we will work with you to maintain a safe environment, being mindful of behaviours and situations that could compromise you whilst visiting the campus.

Visitors should safeguard our students and support us by:

- Respecting professional boundaries and standards – maintaining the purpose of their visit
- Considering your behaviours in relation to students
- Alerting a member of staff if you witness a student in distress
- Wearing the visitor ID at all times
- Do not put yourself in a vulnerable situation and contact reception if you feel uncomfortable or compromised whilst visiting the College.

Concerns

Any concerns regarding student behaviour should be:

- Reported immediately to a member of reception staff
- Visitors must not intervene or attempt to comfort or support a distressed student
- Any concerns once a visitor/contractor has left the College campus, please contact safeguarding@TMC.ac.uk

Definitions of a visitor:

- Parent or carer
- A Volunteer
- Professional representing a service provider or agency – e.g. the police or a college Nurse
- A visiting or guest lecturer including employers.
- A speaker at an internal or external event including employers
- People visiting our specific facilities i.e. awards evening, open and sport events, performances etc.

Visitors

Students and staff benefit from different types of visitors, those with a professional role i.e., Physical/Mental Health professionals, Social Workers etc. and those connected with the building, grounds maintenance, relatives, or other visitors attending an activity at the College or providing educational services.

All Visitors must sign in (complying with the Visual Identification Policy for the particular site), wear a visitors' badge in addition to their own company ID (where applicable) accept the Health and Safety and Safeguarding Expectations and be supervised at all times.

Events held that involve visitors as outlined above (i.e. awards evening, open and sport events, performances etc) require a risk assessment to be completed by the responsible manager. This will include an assessment and management of safeguarding risk.

Regular Visitors (i.e. Consultant teachers)

Anyone who visits one of the sites frequently (once a week or more often, or on four or more days in a 30 day period) and has regular unsupervised access to students, learners & apprentices is considered to be a regular visitor and would therefore be required to either have a DBS statement from their employer, where self-employed have signed up to the online DBS checker or complete a DBS with the college. Hiring managers must complete the non-employed form in iTrent to alert HRSS to perform the checks and ensure that the Single Central Record is complete. All regular visitors must comply with the Visual Identification Policy for the particular site and accept the Health and Safety and Safeguarding Expectations.

Regular Visitors (i.e. Consultant teachers) who are delivering/mentoring online frequently (once a week or more often, or on four or more days in a 30 day period) and has regular access to students, learners & apprentices is considered to be a regular visitor and would therefore be required to either have a DBS statement from their employer, have signed up to the online DBS checker or complete a DBS with the college. Hiring managers must complete the non-employed form in iTrent to alert HRSS to perform the checks and

ensure that the Single Central Record is complete. All online regular visitors must be provided with and accept the Safeguarding

Trainee/Student Teachers All trainee teachers are treated in the same way as non-employed colleagues. All trainee teachers must have either a DBS check or a letter from their place of study confirming that a DBS check has been undertaken and is deemed satisfactory. If they do not have this, hiring managers must complete the non-employed form in the HR system to alert HRSS to perform the checks and ensure that the Single Central Record is complete. The organisation may take a decision not to provide a placement dependent upon the outcome of the check. They will not be allowed to commence teaching or attend site or have access to student records systems until the applicable check has been completed and a satisfactory disclosure received. Their details will be held on the Single Central Register. All Trainee Teachers must comply with the Visual Identification Policy for the particular site.

Volunteers

Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.
Whilst volunteers play an important role and are often seen by students as being safe and trustworthy adults, the nature of voluntary roles varies. The College responsible manager will undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.

Volunteers are treated in the same way as non-employed colleagues; if they are age 16 or over and will be engaging in regulated activity, we require an enhanced DBS check with the relevant barred list information. If they are going to be based at a site which is exclusively or mainly for the provision of education to children (or will regularly visit such a site) we require an enhanced DBS check. They will not be allowed to commence voluntary work or attend site until the applicable check has been completed, and a satisfactory disclosure received. Their details will be held on the Single Central Register. All Volunteers must sign in (complying with the Visual Identification Policy for the particular site).

Responsible Manager

The Responsible Manager is the TMC or LTE Group member of staff that has agreed for a visitor or volunteer to attend the College. The Responsible Manager must share the College Safeguarding Policy and Procedure with the visiting organisation/individual, outlining the arrangements for individuals coming onto their premises, which may include an assessment of the educational value, the age appropriateness of what is going to be delivered through the External Speaker, Organisation, Event and Literature Policy will be required. The responsible manager will collect the visitor at reception and adopt the protocols set out in the safeguarding policy.

Parents and Carers

Parents/carers must sign in at reception and wear the College visitor ID and lanyard The responsible manager will collect the visitor at reception and accompany them at all times whilst on campus.

Guest Speakers

When arranging for a guest speaker for students then the responsible manager must follow the External Speaker, Organisation, Event and Literature Policy and complete the relevant risk assessment against the appropriateness of the content of delivery and send completed paper work to guestspeaker@tmc.ac.uk
Guest speakers must sign in at reception and wear the College visitor ID and lanyard. The responsible manager will collect the visitor at reception and accompany them at all times whilst on campus.

Professional Visitors and DBS Checks

For visitors who are attending the College in a professional capacity attending a TMC location, the responsible manager must check professional identification or an assurance statement and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks) in line with the LTE Group's Safer Recruitment Policy. Professional Visitors must sign in at reception and wear the College visitor ID and lanyard, as well as their organisation's ID. The responsible manager must check that the person presenting themselves for work is the same person on whom the checks have been made.

The College will obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the college would otherwise perform on any individual who will be working at the college (or who will be providing education on college's behalf, including through online delivery.

Contractors

Primary Contractors: Where a primary contractor is employed, the contractor must provide written confirmation of their DBS clearance procedures for all their employees before any contractor commences work on campus which includes enhanced DBS (with child barring lists) check. All primary contractors must comply with the Visual Identification Policy for that particular site and wear a primary contractors visitors' badge. All contractors must complete the contractor induction process. An annual audit will be conducted with each primary contractor.

Responsive contractors (not a primary contractor)

Where a responsive contractor is employed, the contractor must provide written confirmation of their DBS clearance procedures before any contractor commences work on campus. Where enhanced DBS checks (without child barring lists) are completed, contractors will need to show a copy of this when signing in. Where a contractor does not complete enhanced (without child barring list) DBS checks they will be treated as a visitor and must be supervised at all times. All contractors must sign in (complying with the visual Identification Policy for the particular site) wear a responsive contractors visitors' badge, complete the contractor induction process

In the absence of a contract (i.e. an emergency response), any contractor on site will be deemed to be a visitor and should be accompanied at all times.

Agency staff

Non-Employed Agency Workers: where an Agency worker is used by the College, the Agency must provide written confirmation of the DBS clearance before the Agency worker commences work at the level appropriate for the role and business unit. Hiring managers must complete the non-employed form in iTrent to alert HRSS to perform the checks and ensure that the Single Central Record is OBJAll Agency workers must comply with the Visual Identification Policy for the particular site and accept the Health and Safety and Safeguarding Expectations.

Subcontracting

Where the College enters a subcontract partnership with another provider the lead college manager should follow the LTE Group's Safer Recruitment Policy and ensure the contract in place has been authorised through the LTE Group's Legal and Governance Team. The standards and expectations of safeguarding requirements should be explicit in the contract between the organisation and the College. It is the responsibility of the subcontracted provider to complete all the necessary safer recruitment checks and the lead college manager to check and confirm that these are in place.

All staff under a sub-contractor will be recorded on the LTE Group's single central record.

If the subcontracted staff are to deliver provision on college campuses and access college systems and are contracted for more than 4 weeks, then the college's mandatory training modules need to be completed.

If sub-contractor staff attend campus, they must sign in at reception on their first day and be collected by the responsible manager. Subcontracted staff must wear the relevant coloured lanyard and ID at all times.

Employers

Where students attend a work placement - all employers will complete the work placement Risk Assessment and processes which includes checking of Insurance, Health and Safety and Safeguarding in the workplace. Through this process the College's Safeguarding Policy, procedures and Part 1 of KCSIE 2025 will be shared with all employers. Employers are expected to refer to their dedicated TMC staff member as outlined in the employer guide if they have any safeguarding concerns. Students through their employability/KSB hour are informed of safe working practices in the workplace and how to raise a concern when they are at the work placement. If an employer is attending campus, they will be identified as a visitor and will be required to follow the visitor process outlined above.

The Prevent Duty:

In line with the HM Government Guidance and College Policy and Procedure, the College expects that all speakers are checked appropriately, to reduce the likelihood that visiting speakers or organisations might seek to promote extremist views or attempt to radicalise students and staff. In addition, the College Policy seeks to reduce or eliminate any risks of disruption or poor behaviour for example, as the result of a controversial or popular speaker's presence in College with opposing views to the College Values.

A checklist is available for all managers who commission or approve speakers at events, performances – both internally and for the use of college buildings.

4.11 Monitoring and Reviewing

Quarterly monitoring will be undertaken by the Assistant Principal – Student Support and Foundation Learning (College DSL).

This policy will be reviewed annually.

The policy will also be reviewed immediately following:

- Changes to legislation.
- Updates to statutory safeguarding guidance.
- Changes to local safeguarding partnership arrangements.
- Serious safeguarding incidents.
- Learning arising from local or national safeguarding reviews.

The Corporation Board will receive regular safeguarding assurance reports to ensure effective oversight of safeguarding arrangements across the College.

4.12 Related Policies/Procedures

- Safeguarding and Child Protection Procedure
- Safeguarding Adults Procedure and Intervention Framework
- Staff Code of Conduct Policy
- Staff Disciplinary Policy
- TMC At Risk Policy
- Student Attendance and Punctuality Policy
- Student Disciplinary Policy and Procedure
- Positive Behaviour Policy
- E-Safety Policy
- LTE Group Safe and Fair Recruitment Policy
- LTE Group Safeguarding Framework
- LTE Group Social Media Policy
- LTE Group Acceptable Use Policy - Artificial Intelligence (AI) - Colleagues
- Equality Diversity and Inclusivity Policy (Students)
- Multi-Faith, No Faith and Sanctuary Rooms Policy
- The LTE Group Slavery and Human Trafficking Statement
- Staff Disciplinary Policy
- The Deal
- Whistleblowing Policy
- Information Sharing Protocol
- LTE Group Data Protection Policy
- Freedom of Information Policy
- Complaints and Compliments Policy
- Health and Safety Policy
- Learner Criminal Convictions Disclosure Policy & Procedure
- Disclosure and Barring Service (DBS) Student Policy and Procedure
- Work Placement Risk Assessment and Procedures

5. Management Responsibility

The management responsibility is with the Assistant Principal – Student Support and Foundation Learning (The College DSL).

6. Equality Impact Assessment

Are there concerns that this policy could have an adverse impact on any of these protected is action required?		If Yes, is action required?
Age	No	
Disability	No	
Gender reassignment	No	
Marriage or civil partnership	No	
Pregnancy and maternity	No	
Race	No	
Religion	No	
Sex	No	
Sexual orientation	No	
EIA Summary		
Person responsible for EIA	Marie Stock, Vice Principal	
EIA Outcome & statement		
The Manchester College is committed to the promotion of equality, diversity and inclusion, providing a supportive environment for all members of our community. Our commitment means that this policy has been reviewed to ensure that it does not discriminate (either intentionally or unintentionally) any of the protected characteristics of age, disability, gender (including gender identity), race, religion or sexual orientation and meets our obligations under the Equality Act 2010.		