

SAFEGUARDING POLICY

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1. Introduction

At North Lancs Training Group safeguarding permeates all aspects of NLTG's Community and is everyone's responsibility; NLTG is part of a wider safeguarding system. In order to fulfil our responsibilities, we adopt a learner-centered approach. This means that:

- safeguarding systems and procedures are oriented around the wishes, feelings and best interests of learners
- we seek to give learners and the NLTG community a 'voice', listen to what they say, take them seriously and work collaboratively in order to meet their needs.

NLTG aims to provide a positive, stimulating, caring and safe environment which promotes the social, physical, emotional and moral development of each learner. We work hard to maintain a safeguarding ethos and culture whereby learners feel safe and are safe whilst in learning.

2 Scope

This policy sets out our arrangements for the safeguarding and welfare of all NLTG learners and staff and how this will be implemented by North Lancs Training Group Ltd. (This is over and above our statutory duty for safeguarding).

Safeguarding is everyone's responsibility and as such, this applies to all staff including volunteers, subcontractors, board members and visitors. Abuse may take place outside and inside of NLTG settings; everyone who is part of the NLTG community is responsible for safeguarding, promoting and protecting the welfare of learners and vulnerable adults.

NLTG's definition of learner in the context of this policy encompasses: Apprentices, Study Programme students, Traineeship students, Adult unemployed learners or any other party engaged in a learning activity.

3. Policy Intent

This policy outlines our commitment, arrangements and organisational responsibilities / procedures to safeguard and promote the welfare of young people, vulnerable adults and other parties associated with NLTG including all staff members.

Safeguarding and promoting the welfare of children, young people and adults at risk is **everyone's** responsibility, and **everyone** who comes into contact with such vulnerable groups has a role to play in identifying concerns, sharing information and taking prompt action that is at all times in the **best interest** of the child / young person / adult or associate of North Lancs Training Group.

This safeguarding policy:

- shows how NLTG intends to meet its safeguarding responsibilities
- promotes best practice within NLTG
- reflects the national context of safeguarding
- broadly describes the activities in which NLTG will be involved to meet its responsibilities
- sets a standard which NLTG will require all organisations / partnerships with which it does relevant business to adhere to / comply with
- operates a 'zero tolerance' policy to abuse and other harmful situations
- applies to all NLTG staff regardless of employment status, including volunteers, consultants and subcontractors
- complies with legislation.

4. Legislation / Legal Requirements

NLTG recognises it has a statutory duty and to fulfil this duty, regard has been taken of the guidance in:

- [Keeping Children Safe in Education](#)
- [Working Together to Safeguard Children](#)
- [Prevent Duty guidance for England and Wales](#)

(This list is not exhaustive).

5. Recruitment

5.1 Recruitment of Staff

NLTG will recruit all staff in line within its [Safer Recruitment Policy W0500](#) and [DBS Checks Policy](#) NL0500 s (iii)

Disclosure and Barring Service (DBS) checks are carried out on:

- new staff working in regulated activities (they will not be working unsupervised with any young person / adult at risk until the DBS is received and checked)
- existing staff transferring to a new job role defined on the Person Specification as being a Regulated Activity.

All existing staff working in regulated activities are DBS checked. A repeat DBS will only be carried out in instances where there has been a break in employment for 3 or more months or where there is a specific need, e.g. a request for an associated company NLTG is engaging with.

All NLTG Board members undertake an enhanced DBS check.

5.2 Recruitment of Learners

NLTG undertakes procedures to ensure as practicable as possible that learners are suitable to engage in an NLTG programme. It also reserves the right to refuse an application to any applicants whom it has a reasonable belief may pose a risk to anyone within the NLTG community.

Where it becomes apparent at any stage of the learner's recruitment or participation on any NLTG programmes of learning that the learner has been convicted / cautioned / has a caution pending for an offence that may conflict with their participation on the programmes, a risk assessment will be conducted. This will be carried out in conjunction with the learner and other relevant agencies, and may result in the withdrawal from the programme to safeguard the protection of themselves, other learners and staff.

6. Responsibilities

6.1 Named Persons

Role	Name	Contact Details
NLTG Designated Safeguarding Lead*	Gareth Lindsay	01254 397119
NLTG Safeguarding Officer*	Carl Morris	01254 300768
NLTG Safeguarding Officer (Deputy Lead)	Mark Taylor	07525 850796
Prevent Lead	Gareth Lindsay	01254 397119
Managing Director	Gareth Lindsay	01254 397119
NLTG Chairman	Matt Deighton	01204 368413
Operations Director	Collette Humphreys	01254 397119
Operations Manager	Robin Lindsay	01254 397119

*Designated Responsible persons

6.2 Companywide approach

NLTG takes its duty of care seriously and will be proactive in seeking to prevent learners and vulnerable adults becoming victims of abuse and neglect. It will do so in a number of ways:

- through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds
- by identifying, through the Managing Director / DSL, that he will lead and have overall responsibility for safeguarding of young people and vulnerable adults through designated team members (the safeguarding team). The team will have received training in this field and will act as a source of advice and support to all staff, learners etc, and in addition ensure all staff receive safeguarding updates (for example, via email, e-bulletins, team briefings and staff meetings) on a frequent basis
- by informing all learners and adults at risk, of their rights to be free from harm and encouraging them to talk to NLTG staff if they have any concerns
- promote the safe use of the internet to prevent cyber-bullying and protect from harmful and inappropriate online material e.g, sexting, in addition to ensuring sufficient firewall and monitoring systems are in place
- setting expectations through NLTG's Employee [Code of conduct](#) NL0500 e (xvii)
- ensuring staff understand that all staff should be prepared to identify individuals who would benefit from early help. This means providing support as soon as a problem emerges. Staff should discuss early help requirements with the designated responsible person.

All staff have a responsibility to immediately report any suspicion, allegation or incident re safeguarding, digital impropriety or Prevent to NLTG's Designated Responsible Person (DRP) who will invoke the necessary actions/procedure.

All cases are referred to the DRP who has been trained within the scope of this policy and will investigate suspected cases. NLTG is clear that it is not the responsibility of other NLTG staff to investigate unless agreed / directed otherwise.

In the event a person discloses alleged abuse to a third party e.g. their brother, friend etc., the disclosing person should be referred to the list of useful support agencies e.g. as listed on the NLTG website.

The NLTG DRP will monitor the policy and procedures and will give feedback to the Managing Director/DSL on issues of staff training and implementation.

NLTG will ensure that a process for the local early help assessment and the type and level of early help services, is available to all NLTG staff.

6.3 NLTG Board of Directors

NLTG Board of Directors will have regard to the current edition of guidance i.e. Keeping Children Safe in Education and ensure the effective governance and overall compliance of this policy and compliance with the law at all times.

The Managing Director / DSL will keep the NLTG Board of Directors informed of NLTG safeguarding arrangements, performance, and any pertinent changes / requirements on an ongoing basis, taking leadership responsibility for NLTG's safeguarding arrangements.

The Managing Director (DSL) will communicate / liaise with the Board specifically (in conjunction with the DSO's) on a frequent basis to ensure the following

- The Board are kept up-to-date with safeguarding responsibilities and relevant data
- The Board receive appropriate safeguarding training including Prevent on joining the board. This training should equip them with the knowledge to provide and put in place strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at NLTG are effective and support the delivery of a robust whole company approach to safeguarding with their training regularly update
- The Board receive Digital Safety training to ensure that they are fully aware of the responsibilities of NLTG to safeguarding learners ensuring the necessary resources are in place include filtering and monitoring applications
- The Board are aware of local multi-agency safeguarding arrangements
- The Board complete Equality and Diversity Training bi-annually
- The Board have read fully and understand the companies E and D Policy and Human Rights Statement and its obligations
- The Board will, based on risk assessment, ensure there is a sufficient number of trained and competent staff with designated responsibility for safeguarding (the 'safeguarding team').

The rationale behind the training is to develop a competent, vigilant management framework. In doing so, the protection of learners / vulnerable adults will not rely solely on the screening of staff through the DBS disclosure process but through a systematic approach to safeguarding.

6.4 DSL / DSO

The DSL in conjunction with the DSO's will:

- Update the Board on a regular basis as to Safeguarding within NLTG whilst ensuring the Board are aware of their responsibilities and resources required
- Be committed to the safeguarding of Learners and Staff in NLTG
- Promote safeguarding to learners, staff and employers within NLTG community

- Ensure processes are in place to keep informed of current legislation, statutory and other guidance with regards to safeguarding, cascading the information accordingly
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies
- Attend all safeguarding related meetings, i.e., SG Team, DSL Meetings
- Ensure the SIRS system is maintained, accurate and secure with written records of concerns, cases, referrals etc
- Input into the design of safeguarding systems, policies and procedures

DSL Only:

- Refer to the Local Authority Designated Officer (LADO) team all child protection concerns which involve a member of staff
- Referrals to the Disclosure and Barring Service where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child

(See Prevent Policy for Prevent Lead Responsibilities)

6.5 DSO

DSO in addition to the above will:

- Keep informed of current legislation, statutory and other guidance with regards to safeguarding, child and adult protection, cascading the information accordingly
- Provide advice and guidance to Staff and Learners on any safeguarding related matters in a timely manner
- Familiarise and keep abreast of national and local safeguarding legislation and guidance, with procedures for referral to the local authority's children's or adult's services and police procedure for investigating abuse of children and vulnerable adults.
- Provide, collate and monitor regular, accurate and timely data on safeguarding and child protection incidents and outcomes
- Recognise, record and report allegations/disclosures of Safeguarding including concerns (re extremism and e-Safety) in line with NLTG Safeguarding procedures
- Inform NLTG Directors and Management team (via management review) of NLTG Safeguarding provision (i.e. performance, trends, progress on Safeguarding business plan.

6.6 Safeguarding Team

NLTG's safeguarding team will meet at least every 3 months to review safeguarding arrangements, best practice, developments / improvements. Safeguarding meeting actions and discussion points are recorded in the form of an Excel spreadsheet which contains sheets linking to previous meetings / actions. See [NL1507](#) for the team members.

6.7 NLTG Staff

NLTG is committed to protecting the safety of all its learners and staff by encouraging self-awareness, providing support and promoting clear lines of communication with its staff members. This is demonstrated through:

- bringing to the attention of all NLTG staff that there are recognised formal procedures to be followed when they become aware of an issue or concern

- providing clear operational guidelines for NLTG staff which state what action should be taken when there is concern
- providing and/or supporting training for all NLTG staff
- maintaining a rigorous policy on confidentiality, keeping relevant records in a secure location. NLTG have a clear policy about the handling of allegations of abuse by NLTG staff.
- ensuring that safeguarding concerns and referrals are handled sensitively and in line with NLTG recognised procedures
- maintaining pastoral arrangements where learners feel secure and are given opportunities to talk and be listened to
- being aware children and young people with special educational needs and disabilities can have additional barriers when recognising abuse and neglect. NLTG will not make negative assumptions based on the learner's behaviour, mood and injuries and recognise that these may in fact relate to safeguarding concerns
- ensuring learners are aware that there are adults they can approach if they are worried or in difficulty
- ensuring learners are made aware of the various types of abuse – emotional, physical, verbal and sexual and they are aware of the strategies available to them to ensure their own protection (not to criminalise them) and the importance of protecting others which includes awareness of peer on peer abuse
- ensuring the importance of understanding intra familial harms and any necessary support for siblings following incidents
- ensuring every effort is made to establish effective working relationships with parents/carers and employees from other agencies
- being vigilant in cases of suspected abuse and providing guidelines for NLTG staff in recognising the signs and symptoms of abuse
- contributing to an inter-agency approach to learner protection
- ensuring all learners are made aware of their responsibilities for safeguarding and Prevent including their need to communicate any concerns to appropriate persons via issue of Learner Handbook and induction. Additionally, learners complete online learning courses as part of their training programme including digital safety
- ensuring all employers are made aware of their responsibilities for safeguarding and via issue of Employer Handbook and the Employer Apprenticeship Agreement. All employers are signposted to links to free online training.

7 Training

All staff at NLTG undergo a mandatory induction which includes safeguarding training. NLTG's safeguarding policy and accompanying guidance, i.e. Code of Conduct is issued as part of their induction.

NLTG staff dependent on their job role, will complete the following during their employment:

- be issued on their first day at induction with part 1 of Keeping Children Safe in Education, which describes their responsibility for safeguarding*
- receive introductory safeguarding and Prevent training by the DSO on their first day of employment
- complete NSPCC safeguarding online training or Highfield online training within 2 weeks of start which is refreshed with relevant training bi-annually*
- undertake E and D Training every 2 years*
- undertake Prevent/Channel Training every 2 years
- undertake Mental Health Awareness and Mental Health at work training every 3 years
- undertake Safer Recruitment training every 3 years**
- DSL/DSO undertake specific safeguarding training as identified in their job description
- be informed that it is a criminal offence (under the Sexual Offences Act 2003) for a person over the age of 18, in a position of trust, to enter into a sexual relationship with any learner under 18 years old, even if the relationship is consensual.

- undertake LGBTQ+ training to understand how to support learners as a trusted adult as and when required recognizing that the LGBTQ+ community can be more susceptible to forms of abuse.

*Board Members will receive appropriate training as per above.

** Managers/other staff with a responsibility for recruitment.

Certain NLTG staff, i.e. those deemed to be employed in environments where conflict could potentially occur, are trained in Conflict Management (see NLTG procedure for staff safer handling – [PF0012](#)). The provision of first aid is risk assessed with sufficient number of trained first aid persons and first aid equipment dependent on site / location. See [NL0500 h \(ii\)](#) Health and Safety Policy.

A central register of staff training competences and qualifications is held via NLTG's ESS system which is reviewed periodically as part of a training needs analysis process. See [NL1504](#) for the schedule of staff training for safeguarding.

8 Curriculum Delivery

Safeguarding arrangements are embedded into areas of curriculum delivery as detailed in the Quality Assurance of Teaching Learning and Assessment Policy [NL0500 t\(i\)](#). This ensures that learners are made aware of safeguarding issues such as online risks, and other specific safeguarding issues as detailed in Keeping Children Safe in Education.

All Study Programme (SP), Traineeship and Work Based Learning (WBL) learners undertake online safeguarding, Prevent, British Values and Equality and Diversity training as part of their induction to their programme. All other learners will be assigned training that is appropriate to the course duration and content, e.g. JCP and commercial courses.

All staff are kept topical with emerging/priority issues distributed by the safeguarding team. Staff can use such resources to provide relevant information, advice and guidance as part of our pastoral support to learners, employers and the wider community. A wide variety of resources are available to staff to use and disseminate via the NLTG Safeguarding SharePoint site, Safe Equal and Well (SEW), National Online Safety, National Online College and CPD/Learning Platforms.

SP learners attend personal and social development sessions to support their personal development

9 Work Experience/Traineeship and Work Based Placements

Where learners are undertaking work and/or industry placements, NLTG are required to take reasonable steps to assess the suitability of the placement and the effectiveness of the employer's risk management arrangements as per [NL0103](#) Health and Safety Appraisal.

It is the responsibility of all staff working with employers who provide training for our learners to report any concerns regarding their suitability as placement providers, regardless of the learner's age or mode of study. If the activity undertaken by the learner on work experience takes place in a 'specified place', such as a nursery, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children. In these cases, and where the learner undertaking the work experience is 16 years of age or over, NLTG in conjunction with the work experience provider should consider whether a DBS enhanced check should be requested for the learner in question. See [DBS Policy](#) [NL0500 s \(iii\)](#) for further information.

For learners under the age of 18, who either travel or require accommodation as part of their job role / apprenticeship, a risk assessment of travel and accommodation must be carried out. ([NL0538e](#))

10 Definitions

The following definitions apply throughout the safeguarding policy and associated procedures.

Child or Children

The Children Act 2004 defines a child as a person under the age of 18.

Vulnerable Adult or Adults

The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs
- a significant reduction in physical or mental capacity.

See Appendix 1 for a further list of safeguarding definitions.

11 Reporting a safeguarding concern

Anyone who is concerned about a learner or a vulnerable adult's welfare, or who believe that a learner or vulnerable adult may be at risk of abuse, should pass any information to the Line Manager / DSO / DSL as soon as possible and no longer than 24 hours after the initial concern.

[PF0093](#) details the safeguarding reporting procedure.

If an employee's Line Manager / DSO / DSL is not available, the individual should contact any member of the senior leadership team.

If a child or vulnerable adult is in immediate danger, the Police should be notified or if they are in need of urgent medical attention, an ambulance should be called.

For any concerns relating to Prevent, this should be managed in line with [NL1511](#).

For digital safety concerns / reporting see [PF0096](#) in conjunction with Digital Safety Policy [NL1502](#)
 For additional information, advice and guidance see Appendix 2.

12 Safeguarding Records

12.1 Recording

It is understood that information held in regard to learners/individuals can be defined within the scope of special category of personal data and is processed in line with the company's data protection policy. Data collected in relation to safeguarding of an individual is held securely and accessed by, and disclosed to, individuals only for the purposes of ensuring the safeguarding/wellbeing of the individual.

Inappropriate access or disclosure of such data constitutes a data breach and should be reported in accordance with the NLTG's Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under NLTG's disciplinary policy and procedure (NL0500e(xiii)).

All records relating to the Data Protection Policy will be maintained in a safe and secure location Safeguarding Incident Reporting System(SIRS) upholding confidentiality for a period of no less than 7 years from the date of closing the case as per [NL0614](#).

12.2 Information sharing (external)

NLTG adopts the information sharing protocols recommended in local and national guidance. Any requests for information sharing will be considered by the Designated Safeguarding Lead / Officers who will comply with relevant guidance, policies and procedures. [PF0095](#) details the specific procedures for the sharing of information (both NLTG invoked sharing and sharing requested by external organisations). As detailed in chapter one of Working Together to Safeguard Children, data sharing or not data sharing should not come before the safeguarding of a child.

All decisions will be based on the importance of information sharing between other education providers, safeguarding partners, other agencies, organisations and practitioners whilst remaining in line with relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

12.3 Record analysis

NLTG analyses safeguarding concerns via the Annual SIRS Summary report. This identifies trends across our provision to verify staff understanding of reporting arrangements and to identify emerging issues that can be incorporated into delivery of provision to endeavor to reduce recurrence amongst existing and future learners.

Board members and attendees of the business reviewing meetings receive an annual report for the previous year at the first board meeting of the academic year. This is available throughout year on request from any stakeholder. NLTG staff are also updated at the first team briefing of the academic year in addition to receiving ongoing general updates.

From 2023/24, the report will be adapted from the previous year to clearly demonstrate trend analysis over previous years, as opposed to a single “snapshot” of the year and a written description.

13 Allegations (SOFA – Senior Officer for Allegations)

Any allegation or concern that an employee, volunteer or contractor has behaved, or may have behaved, in a way that has hurt/harmed, or potentially harmed, a child, young person or vulnerable adult, must be taken seriously and dealt with sensitively and promptly, regardless of where the alleged incident took place.

Where an initial allegation is received by a member of staff the reporting mechanism should be as per Appendix 3 which will normally be the MD/DSL (SOFA)* which will be assessed as a high-level or low-level concern. This process is displayed in all appropriate areas to ensure the correct person is contacted as quickly as possible to avoid any further distress to the caller.

(Refer to KCSIE 2023, Part 4 Section 2 for further details regarding the definition of what does and does not meet the threshold).

*Where an allegation is made against the MD / DSL, the point of contact should be the NLTG Chairman as detailed in the Appendix 3.

13.1 Low Level Concern

The term ‘low-level concern’ does not mean that it is insignificant. 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 on behalf of NLTG may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

Examples of such behaviour could include, but are not limited to:

- being over friendly with learners and having favourites
- taking photographs of learners on their mobile phone, contrary to NLTG policy; and or engaging with a learner on a one-to-one basis in a secluded area or behind a closed door, or humiliating learners.

Any low-level concerns should be raised with the DSL/DSO/SMT or a member of Management. On acknowledgement, the concern should be raised with the DSL who will decide on the appropriate action to take and by whom.

Where an investigation is recorded, the contents of such including the actions must be formally documented with the outcome clearly stated which should be agreed with the DSL finalising. Once finalised the document should be provided to a DSO who will upload it onto the SIRS system where it will be held until such point as the employee remains in service with NLTG. It is noted that the name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Where a file note is required, this will be also be recorded within the employee's personal records (ESS/People inc System)

Any concerns regarding a contractor should be relayed to the relevant employer for them to record / investigate / identify any patterns of behaviour.

If the DSL / SMT / DSO are in any doubt as to whether the information which has been shared about a member of staff / volunteer contractor as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

13.2 High Level Concern

An allegation against a member of staff, volunteer or contractor that is deemed to be a high-level concern must be reported within 24 hours to the County LADO Service, by the MD/DSL/SOFA. This referral will determine whether the allegation reaches the harm threshold to justify involvement from a LADO in the management of the allegation.

An allegation implies that a member of staff, volunteer or contractor may have:

- behaved in a way which has harmed or may have harmed a young person or vulnerable adult
- possibly committed a criminal offence against or related to a young person or vulnerable adult
- behaved in a way towards a young person or vulnerable adult that indicates they may pose a risk of harm to the persons they work with.

Depending on the outcome of the LADO referral, appropriate next steps may involve:

- the police investigating a possible criminal offence
- your local child protection services making enquiries and/or assessing whether a young person or vulnerable adult is in need of support
- NLTG following the relevant disciplinary procedures with individuals concerned.

13.3 Reporting cases to the disclosure and barring service

Any member of staff who becomes barred from a 'regulated' activity whilst in the employment of NLTG, will be immediately suspended from their duties, pending investigation, due to the company being at risk of a criminal offence for contravening a Statutory Enactment. Following investigation NLTG will decide on the reasonableness of the employee's future employment within NLTG.

NLTG has a statutory duty to make reports, and provide relevant information to the Disclosure & Barring Service (DBS) where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct.

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

See [NLE1500](#) for DBS referral form and guidance.

13.4 Resignations

If an NLTG employee in a regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned the NLTG Managing Director (or in his absence the NLTG Chairman) must inform the Disclosure and Barring Service as via their referral system ([NLE1500](#)).

13.5 Allegations of abuse against other learners

Should a learner make an allegation against other learner, this will be dealt with / investigated in line with our behaviour, disciplinary and safeguarding practices.

14 Partnerships

NLTG work with local organisations to support this policy. These organisations include the Safeguarding Children Partnership, Young People's Services, Social Services and the local Prevent Team. Where appropriate the NLTG Designated Responsible person will contact / report to the appropriate services in the locality in which the learner lives.

The Safeguarding Children Partnership details can be accessed at: [Children's Safeguarding Assurance Partnership - Safeguarding information, advice & guidance \(safeguardingpartnership.org.uk\)](#)

Where applicable NLTG will verify with other organisations that they carry out DBS checks on their staff (including self-employed persons) that deliver training under regulated activity to NLTG learners.

Where it is identified learner(s) have or are:

- offending
- misusing drugs or alcohol self-harming
- gone missing
- at risk of radicalisation, being sexually exploited
- exposed to domestic violence.

NLTG may, except if it is identified that it is a potential child protection issue, inform the learner's parents / carers and where relevant, other external agencies.

Periodically NLTG use external speakers for supporting curriculum delivery. All such activities will be assessed for risk via [NL1513](#) Freedom of Expression in conjunction with the External Speakers Policy [NL1513a](#) and be carried out in the presence of an NLTG employee to monitor / intervene if content delivery or activity becomes inappropriate to the audience, e.g. related to safeguarding or radicalisation concerns etc.

NLTG will raise employer awareness of safeguarding, Digital impropriety and the Prevent Strategy via distribution of information, health and safety appraisals, learner induction, social media, e-shots and appropriate in-house training, i.e. Local Prevent Coordinator.

15 Support for Staff

NLTG is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with their Line Manager and / or the DSO / DSL in addition to the Employee Assistance Programme.

16 Whistleblowing

NLTG has an established Whistleblowing procedure [NL0500 e \(xii\)](#) to enable staff to share, in confidence with a Designated Person, concerns they may have about instances of suspected malpractice within the business, which include concerns around the protection of children or vulnerable adults.

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

17 Monitoring and review

Quality assurance of this policy and supporting procedures will be reviewed on a regular basis by the DSO/SG Team.

Appendix 1 - Definitions

Child Looked After – CLA

The term 'Child Looked After' in the Children Act 1989 refers to all children and young people being looked after by a local authority, namely:

- those subject to care orders or interim care orders (under sections 31 and 38 of the 1989 Act)
- those children who have been placed, or are authorised to be placed, with prospective adopters by a local authority (section 18(3) of the Adoption and Children Act 2002)
- those who are voluntarily accommodated under section 20 of the 1989 Act, including unaccompanied asylum-seeking children (where children are accommodated under this provision, parental responsibility remains with the parents)
- those who are subject to court orders with residence requirements (e.g. secure remand or remand to local authority accommodation), in accordance with section 21 of the 1989 Act.

Where any of the above apply, a member of the safeguarding team will review the learner / programme and take the appropriate action to ensure the learner receives additional support where necessary.

Those identified as at greater risk:

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

- Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- NLTG has a safeguarding reporting system in place to document any such situations and points of contact, i.e. a social worker to engage where necessary to support the CIN or CP.
- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- Children requiring mental health support

*The below definitions have been taken from Keeping Children Safe in Education September 2022

*Types of abuse and neglect

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

*Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

*Physical Abuse

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

***Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

***Sexual Abuse**

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

***Neglect**

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

Prevent

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

Definitions:

***Terrorism** is defined by the Terrorism Act 2000 as:

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

***Extremism** is defined in the national Counter-Extremism Strategy as:

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

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

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

***Child Sexual Exploitation CSE and Child Criminal Exploitation CCE**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children and adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

***So called ‘Honour Based’ violence and abuse**

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead / officer. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Forced Marriage

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

If you have any concerns that a student is at risk of Forced Marriage or is already the victim of Forced Marriage, please refer to a member of the safeguarding team immediately:

DO NOT:

- treat such allegations merely as a domestic issue and send the learner back to the family home
- ignore what the learner has told you or dismiss out of hand the need for immediate protection.
- decide that it is not your responsibility to follow-up the allegation
- approach the learner’s family or those with influence within the community, without the express consent of the learner, as this will alert them to your concerns and may place the learner in danger
- contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children’s social care, either by telephone or letter
- share information outside information sharing protocols without the express consent of the learner
- attempt to be a mediator or encourage mediation, reconciliation, arbitration or family counselling.

*Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

It will be rare for staff to see visual evidence, and they should not be examining learners, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should also still consider and discuss any such case with NLTG’s designated safeguarding lead who should involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the member of staff does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

****Below is taken from KCSIE 2022 and Domestic Abuse Act 2021**

****Domestic Abuse**

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.

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

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.”

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

Private fostering

Private fostering is different to the fostering organised by a Local Authority. It is arranged by the carer or the child themselves.

Under the Children Act 2004, all professionals have a duty to identify and notify NLTG of private fostering arrangements. In every single case, there is a legal duty to notify.

If you have any concerns that a learner has been private fostered please inform a member of the safeguarding team immediately.

Child on Child abuse (Formerly called Peer on Peer abuse)

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

Serious Violence

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

All staff should be aware of the associated risks and understand the measures in place to manage these.

***For the below please refer to Part 5 of KCSIE 2023

***Child on child sexual violence and sexual harassment

- Sexual violence and sexual harassment can occur between two children or young people of any age or sex.
- It can occur through a group of children/young people sexually assaulting or sexually harassing and an individual or a group of children.
- Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally).
- All staff are advised to maintain an attitude of '**it could happen here**'.

Mental Health

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, particularly within the Study Programme and JCP, are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these learners' experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken, following the safeguarding policy and speaking to the designated safeguarding lead or officer.

Other types of safeguarding issues

- Bullying including online bullying
- Children missing from education
- Missing from home or care
- Substance misuse
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate crime

- Mental health
- Relationship abuse
- Sexting
- Human trafficking and modern slavery.

Appendix 2 - Additional support and guidance

Abuse

[Supporting practice in tackling child sexual abuse - CSA Centre](#) Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

[What to do if you're worried a child is being abused](#) – DfE advice

[Domestic abuse: Various Information/Guidance](#) - Home Office (HO)

[Faith based abuse: National Action Plan](#) - DfE advice

[Disrespect NoBody campaign - GOV.UK](#) - Home Office website

[Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper

[Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

[Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

[Children missing education](#) - DfE statutory guidance

[Child missing from home or care](#) - DfE statutory guidance

[Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

[National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

[Trafficking: safeguarding children](#) - DfE and Home Office guidance

[Care of unaccompanied and trafficked children](#) – DfE statutory guidance

[Modern slavery: how to identify and support victims](#) – HO statutory guidance

[Child exploitation disruption toolkit](#) - HO statutory guidance

[County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

Confidentiality

[Gillick competency Fraser guidelines](#) - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

Drugs

[Drug strategy 2021](#) - Home Office strategy

[Information and advice on drugs](#) - Talk to Frank website

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

(so called) “Honour Based Abuse” including FGM and forced marriage

[Female genital mutilation: information and resources-](#) Home Office guidance

[Female genital mutilation: multi agency statutory guidance](#) - DfE, Department for Health, and Home Office

[Forced marriage](#) - Forced Marriage Unit (FMU) resources

[Forced marriage](#) - Government multi-agency practice guidelines and multi-agency statutory guidance

[FGM resource pack](#) – HM Government guidance

Health and Well-being

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
[Supporting pupils at schools with medical conditions](#) - DfE statutory guidance
[Mental health and behaviour in schools](#) - DfE advice
[Overview - Fabricated or induced illness](#) - NHS advice

Homelessness

[Homelessness code of guidance for local authorities](#) – Department for Levelling Up, Housing and Communities guidance

Information Sharing

[Government information sharing advice](#) - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.
[Information Commissioner's Office: Data sharing information hub](#) - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

Online safety-advice

[Childnet](#) provide guidance for schools on cyberbullying
[Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
[London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
[NSPCC E-safety for schools](#) provides advice, templates, and tools on all aspects of a school or college's online safety arrangements
[Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
[Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
[South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
[Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
[Online Safety Audit Tool](#) from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring
[Online safety guidance if you own or manage an online platform](#) DCMS advice
[A business guide for protecting children on your online platform](#) DCMS advice
[UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online

Online safety-remote education, virtual lessons and live streaming

[Guidance Get help with remote education](#) resources and support for teachers and school leaders on educating pupils and students
[Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
[London Grid for Learning](#) guidance, including platform specific advice
[National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
[UK Safer Internet Centre](#) guidance on safe remote learning

Online safety-support for children

[Childline](#) for free and confidential advice
[UK Safer Internet Centre](#) to report and remove harmful online content
[CEOP](#) for advice on making a report about online abuse

Online safety-parental support

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support
[Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
[Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
[Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world
[How Can I Help My Child?](#) Marie Collins Foundation – Sexual Abuse Online
[Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
[London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
[National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online
[Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
[Parentzone](#) provides help for parents and carers on how to keep their children safe online
[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children's Commissioner's parent guide on talking to your children about online sexual harassment
[#Ask the awkward](#) – Child Exploitation and Online Protection Centre guidance to parents to talk to their children about online relationships

Private fostering

[Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

[Prevent duty guidance](#)-Home Office guidance
[Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
[Educate Against Hate website](#) - DfE and Home Office advice
[Prevent for FE and Training](#) - Education and Training Foundation (ETF)
[Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid Learning

Serious Violence

[Serious violence strategy](#) - Home Office Strategy
[Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
[Youth Endowment Fund](#) – Home Office
[Gangs and youth violence: for schools and colleges](#) - Home Office advice
[Tackling violence against women and girls strategy](#)- Home Office strategy
[Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance

Sexual violence and sexual harassment specialist organisations

[Barnardo's](#) - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

[Lucy Faithful Foundation](#) - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

[Marie Collins Foundation](#) – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

[NSPCC](#) - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

[Rape Crisis](#) - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

[UK Safer Internet Centre](#) - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

[Rape Crisis \(England & Wales\)](#) or [The Survivors Trust](#) for information, advice, and details of local specialist sexual violence organisations.

[NICE guidance](#) contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

[HSB toolkit](#) The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

[NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#)- free and independent advice about HSB.

[Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for victims

[Anti-Bullying Alliance](#) - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

[Rape Crisis](#) - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

[The Survivors Trust](#)- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

[Victim Support](#) - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

[Childline](#) provides free and confidential advice for children and young people.

Toolkits

[ask AVA](#) - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.

[NSPCC](#) - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

[NSPCC](#) - Resources which help adults respond to children disclosing abuse.

NSPCC also provides free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) - Peer- on- Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

[Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.

[Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

[Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.

Sharing nudes and semi-nudes

[London Grid for Learning-collection of advice](#) - Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Appendix 3 - Allegations against a member of staff

If any caller enquires about who they can speak to concerning an allegation of abuse involving a member of our staff in relation to Safeguarding or Child Protection, the correct response is:-

Gareth Lindsay – Managing Director (Senior Officer For Allegations – SOFA)*

1.

On receipt of a call, the person should be forwarded to:

Gareth Lindsay

01254 397119 – Ext 231 – Direct Dial 733



2.

In the absence of the SOFA, the next point of contact is:

Collette Humphreys / Robin Lindsay

01254 397119 – Ext 208 / 209 – Direct Dial 772 / 630



3.

If any of the above parties are not available, then the call should be forwarded to the next available Senior Manager

Should the caller wish to make an allegation against NLTG's SOFA, (Gareth Lindsay), the caller should be directed to: NLTG Chairman – Matt Deighton – C/O Saxon Furniture, Bolton – 01204 368413