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# **PINC COLLEGE MIDLANDS**

## **CHILDREN & ADULTS AT RISK SAFEGUARDING POLICY**

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**Pinc  
College.**

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## **PURPOSE**

This policy provides guidance and instructions to all members of the College team, governors, sub-contractors, and contractors to ensure the commitment of Pinc College Midlands (The College) to safeguarding and promoting the welfare of young people and vulnerable adults. If any form of abuse is suspected or if a person is identified as being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken. The College requires all team members to share this commitment.

The College has several campuses that provide appropriate, challenging, and meaningful study programmes, to increase employability skills. This policy relates to safeguarding across all aspects of the work of the College and its campuses

Any reference to the College 'team' in this policy means all staff, governors, volunteers, visitors, and contractors to the organisation with direct contact with students, regardless of position, role or responsibilities. This policy is mandatory for all the afore stated.

## **SCOPE**

This policy deals with the protection of young people and all adults at risk. Throughout this policy reference is made to young people. This means all students aged 16-25 enrolled at the College.

A child is someone under the age of 18. An adult at risk is someone over the age of 18 and a person who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against harm or exploitation.

Students under the age of 18 attending the college are recognised as children, in line with Safeguarding children legislation. Students over the age of 18 are recognised as adults, in line with Safeguarding adults' legislation

## **OUR VALUES**

To be Respectful, Responsible, Safe and Kind, are at the core of our values. They are reflective of expected behaviours and set the foundation upon which the College builds its culture.

## **PRINCIPLES**

The College recognises that safeguarding and promoting the welfare of children and adults at risk is everyone's responsibility, and that the best interests of the student must be paramount. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of young people and adults at risk of harm in our care, but also a moral duty. We adopt a student-centred approach which operates in the best interests of each student. The policy and procedures focus on how we recruit and train our team, support our students, make referrals and deal effectively with allegations against any member of the College team. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of violent extremism.

To achieve this, the policy and procedure is reviewed annually to:

- Raise awareness of issues relating to the welfare of young people and adults at risk and the promotion of a safe environment for them to learn within the College
- Aid the identification of young people and adults at risk of significant harm, providing procedures for reporting concerns

- Establish procedures for reporting and dealing with allegations of abuse against members of the College team
- Respond to the safe recruitment to the team.

All of the College team will receive appropriate training in order to familiarise them with the College's Safeguarding Policy and Procedure, relevant statutory guidance, the safeguarding issues, and their responsibilities therein.

All team members undertake mandatory safeguarding and Prevent training (to include Keeping Children Safe in Education 2021) as part of their induction process and continual professional development (CPD) on an annual basis.

## **EQUALITY STATEMENT**

The College will make sure that all students have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity. The College is committed to anti-discriminatory practice and recognises the additional needs of young adults from minority ethnic groups and those with learning disabilities and/or difficulties and the barriers they may face, especially around communication.

## **RISK ASSESSMENT**

Should this policy and associated procedure be ignored or disregarded, the possible outcomes are:

- For children and adults at risk of abuse or neglect – they may be placed at further risk of harm and neglect
- For – may be subject to inquiry, investigation internally or externally for failing to take appropriate steps, internally may then be subject to a disciplinary process.
- For the Alerting Managers, the Campus Lead and Board of Governors – possible inquiry and report from regulators or recommendation from local authorities to regulators.
- For the College – possible risk of public scrutiny and ultimately risk of prosecution and/or additional inspections from regulators and ultimately deregistration.

All of the above can lead to negative media attention and damage to the reputation of the College.

## **OUTCOMES**

Because of this policy and its procedures being followed:

- Students at risk will be better protected from the impact of abuse or neglect
- all persons detailed in the 'scope' (above) will take the necessary steps to safeguard and protect the rights of adults with students at the College
- statutory agencies will be contacted where appropriate.

## **THE CARE ACT 2014**

The Care Act 2014 places specific safeguarding duties with regard to an adult who has need for care and support and is experiencing or at risk of abuse or neglect. Because of those needs the adult is unable to protect themselves from either the risk, or the experience, of abuse or neglect.

## STATUTORY FRAMEWORK

The College aims to meet all relevant legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the College to protect children and adults at risk.

This statutory framework includes:

- Keeping Children Safe in Education 2021, Working Together to Safeguarding Children 2018, the Safeguarding Vulnerable Groups Act 2006, The Protections of Freedom Act 2012 and the Prevent Duty Guidance are the key documents upon which this policy is based
- Prevent Duty Guidance for Further Education Institutions in England and Wales July 2015
- The Children Act 2004, which is fundamental to professionals working with children and young people in the UK
- The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children
- The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people
- The Sexual Offences Act 2003 makes it is an offence for a person over 18 (e.g. a lecturer/teacher or other member of the College team ) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach
- The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to children and adults at risk for which employers and individuals will be subject
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check
- The Equality Act 2015
- The Mental Capacity Act 2005
- SEN Code of Practice 2015

## VULNERABLE STUDENT

A vulnerable student may be identified as a person who:

- Is a Looked After Child
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse
- Has suffered from domestic violence
- Has social or emotional developmental needs
- Has a criminal conviction
- Has a language barrier.

All students attending the College are classed as vulnerable students. Most students aged 16-18 and all students over the age of 19 have an EHC Plan which sets out their education, health, and care needs.

## **DEFINITIONS**

### ***Safeguarding***

The term 'safeguarding young people and adults at risk' covers both reactive adult/child protection and a preventative approach to keeping young people and adults at risk safe.

Safeguarding and promoting the welfare of children is defined as: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

**Safeguarding Adults at risk of abuse or neglect:** means protecting an adult's right to live in safety, free from abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

### ***Abuse***

Abuse is the misuse of power, trust, respect, control and/or authority; it is a violation of a person's human and civil rights by any other person or persons.

### ***Physical Abuse***

This may involve hitting, shaking, throwing, poisoning, burning, scalding, misuse of medication, inappropriate use of restraint, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

A child or adult at risk going missing from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with children and adults at risk that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

### ***Neglect***

Neglect is the persistent or severe failure to meet a child, or adult at risk's physical and/or psychological needs which can result in serious impairment of the health or development of the individual. It may also include neglect of, or unresponsiveness to, a child or adult at risk's basic emotional needs

### ***Self-Neglect***

- a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them.

### ***Sexual Abuse and Exploitation***

Sexual abuse involves a child, or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the child or adult at risk to be aware that the activity

is sexual, and the apparent consent of the child or adult at risk is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

### ***Emotional Abuse***

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child and adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

### ***Financial Abuse***

Where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

### ***Significant Harm***

Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act 2014 section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

### ***Honour-based Violence***

Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

### ***FGM mandatory reporting duty***

From October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Professionals must make a report to the police, if, in the course of their duties:

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

### ***Forced Marriage***

Forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

### ***Peer on Peer Abuse***

Peer on peer abuse is a significant issue. It must never be tolerated, dismissed or ignored. Whilst it is clear that peer on peer abuse disproportionately affects females and the College has appropriate support mechanisms in place. However, males, LGBTQ and SEND students will also be affected by this issue and team members must be aware of this and prepared to act

accordingly. Peer on peer abuse will be minimised through the vigilance and awareness of the team to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment.

## PREVENT DUTY

In line with the Prevent Duty Guidance for Further Education Institutions in England and Wales (2015), protecting students from the risk of radicalisation is part of the Colleges' wider safeguarding duties and is similar in nature to protecting children and adults at risk from other forms of harm and abuse. Students may be identified as vulnerable to radicalisation at any time during their programme of study based on behaviour. The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friend's involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Statutory Prevent Guidance for Further Education (2015) summarises the requirements in terms of the following key areas:

- external speakers and events
- partnerships
- risk assessment and action plan
- College team and student training
- welfare and pastoral care and IT Policies.

**Radicalisation** refers to the process by which a person comes to support terrorism or other forms of extremism.

**Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

The College will work in partnership with the Prevent Programme Co-ordinators in each of the Local Authorities where a campus is located, to ensure it is responding to this duty and their guidance.

All College team members, visitors contractors and students on placement, are required to be able to identify and report instances where they believe a student may be at risk of harm or neglect



including any harm through extremism or radicalisation to the Designated or Deputy Safeguarding Lead (DSL). All students will be given information about radicalisation and extremism, they will have a safe place to discuss the risk relating to their communities and they will know where to go to ask for help.

Under the Prevent Duty, safeguarding leads will be trained to recognise when it is appropriate to make a referral to the Channel Programme to support students who may be vulnerable to such influences and where we believe a student is being directly influenced by extremist materials or influences. It is unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to violent extremism or terrorism or which is intended to annoy, harass, or intimidate another person. This also applies to use of social media systems accessed from College systems. The College has systems for assessing and rating risks. Risk assessments are carried out for planned events, including off site events, external visitors and speakers to mitigate any risk and clearly set out what is required for any event to proceed.

We will ensure this through our vision, values, rules, diverse curriculum, and teaching, promoting tolerance and respect for all cultures, faiths and lifestyles.

We will also ensure that:

- Staff understand the issues of radicalisation, can recognise the signs of vulnerability or radicalisation and know how to refer their concerns
- Staff respond to preventing radicalisation on a day-to-day basis
- All staff conduct is consistent with preventing radicalisation We work with partners, including local authority and police and make referrals where appropriate to agencies regarding concerns about radicalisation
- The College curriculum and teaching staff address the issues involved in radicalisation.

## **SPECIFIC SAFEGUARDING ISSUES**

Together with the above, all team members should have awareness of the following specific safeguarding issues and of the legislative duty in relation to these concerns:

All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL. These will be included in the termly Safeguarding Report for the College Board to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Cases of students hurting other students will be managed in line with the following policies:

- Anti-Bullying Policy
- Positive Student Behaviour and Management Policy

Safeguarding Policy and Procedures take precedent where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put students at the College at risk
- involves students being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

Risks of peer-on-peer abuse will be managed by:

- challenging any derogatory or sexualised language or behaviour, including requesting or sending sexual images
- being vigilant to issues that particularly affect different genders
- direct instruction within the curriculum to develop understanding of appropriate behaviour and consent
- ensuring students know they can talk to any team member confidentially
- ensuring the team are trained to understand that a student harming a student could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy.

**Sexting** - if any team members are aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), they must report it to the DSL immediately. Staff must not

- view, download or share the imagery, or ask a student to share or download it
- delete the imagery or ask the student to delete it
- ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- share information about the incident with other members of the team, the student(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

The College team member should explain that they need to report the incident and reassure the student that they will receive support and help from the DSL.

### ***Child on child sexual violence and sexual harassment***

Where any reports are made of child on child sexual violence or sexual harassment these must be dealt with seriously and quickly. Where such an allegation is made, the DSL will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support
- The alleged perpetrator: and
- All the other students (and, if appropriate, team members) at the College, especially any actions that are appropriate to protect them.

Allegations and the investigation will be recorded. Any subsequent risk assessment will be communicated to all team members that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the College on a case by case basis.

### ***Consensual and non-consensual sharing of indecent images and videos***

The College will ensure that the team are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the College community, including understanding motivations, assessing risks posed to learners depicted in the images, and how and when to report instances of this behaviour. Staff will be aware that creating, possessing, and distributing indecent imagery of learners is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that learners are not unnecessarily criminalised. Where a member of staff becomes aware of an

incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL/DSO as soon as possible. Where a student confides in a team member about the circulation of indecent imagery, depicting them or someone else, the team member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the student that the incident will need to be reported.
- Respond positively to the student without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL. The DSL will attempt to understand what the image contains without viewing it and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:
  - Aggravated: incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of students, including where there is an adult involved, where there is an intent to harm the student depicted, or where the images are used recklessly.
  - Experimental: incidents involving the creation and distribution of indecent images of students where there is no adult involvement or apparent intent to cause harm or embarrassment to the student. For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:
    - The only way to decide about whether to involve other agencies because it is not possible to establish the facts, e.g., the contents of the imagery, from the student(s) involved.
    - Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the student or their parent in making a report.
    - Unavoidable because the student has presented the image directly to a staff member or the image has been found on a college device or your College network.
- Where it is necessary to view the imagery, e.g., if this is the only way to decide about whether to inform other agencies, the DSL should:
  - Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
  - Discuss the decision with the Executive College Lead or Campus Lead.
  - Make sure viewing is undertaken by the DSL or a deputy DSL with delegated authority from the Executive College Lead.
  - Make sure viewing takes place with another member of staff present in the room, ideally the Executive College Lead or Campus Lead. This staff member does not need to view the images.
  - Wherever possible, make sure viewing takes place on the college premises, ideally in the Executive College Lead's office or Campus Lead's office.

- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the student in the images.

Record how and why the decision was made to view the imagery in the safeguarding records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Where the incident is categorised as 'aggravated', the situation will be managed in line with the college's Peer-on-peer Abuse Policy.

Where the incident is categorised as 'experimental', the learners involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a learner, the DSL escalates the incident to Adult Social Services. Where indecent imagery of a learner has been shared publicly, the DSL will work with the learner to report imagery to sites on which it has been shared and will reassure them of the support available.

Specific Safeguarding issues also include the following:

- bullying including cyber-bullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- Faith abuse
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate crimes
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- trafficking
- peer-on-peer abuse
- stalking

## **SELF HARM**

Self-harm is when someone intentionally causes damage to their own body or health.

Most people would associate this with people cutting themselves with a sharp object such as a razor blade, however it can also include burns, bruises and scratches. In some cases, an individual might punch a wall or bang their head against it, pull out their own hair or intentionally cause a fall and/or break their own bones. Eating disorders or drug/alcohol abuse can also fall under the category of self-harm.

There are no fixed rules about why people self-harm. For some people, it can be linked to specific experiences and be a way of dealing with something that is happening now or that happened in the past.

Difficult experiences can cause someone to self harm. Common causes include:

- Bullying
- Sexual, physical, domestic or emotional abuse
- Relationships
- Stress related to attendance at college and exams
- Bereavement
- Illness
- Confusion about feelings and sexuality

Self-harm can become a habit or addiction and can escalate in an attempt to increase the “rush” felt by doing it.

If you are approached by someone wanting to talk about their self-harming, the situation will require very careful handling. If they are made to feel ashamed or stupid for self-harming it could increase the likelihood of them doing it again.

This includes having injuries treated immediately and without blame. For younger people, hospitals should be able to offer a consultation with a member of the [Child and Adolescent Mental Health Service \(CAMHS\)](#) team.

If you have concerns regarding a student that you think is self-harming discuss your concerns with the DSL or Campus Lead

## **ON-LINE SAFETY**

The College will endeavour to both filter all internet use to ensure and maintain the safety of its team and students.

Team members and students must have read the Distance Learning and E-Safety Policy and the ICT Acceptable Use Policy.

## **DISTANCE LEARNING and ACCEPTABLE CONTACT ON SOCIAL MEDIA**

The usual operational practice of the College involves students attending a campus or work placement to undertake and complete their study programme.

However, there may be times when it is not possible for a student to attend their campus, such as:

- A period of significant anxiety or mental ill health
- Public transport strikes
- Illness

Where an illness or episode of anxiety or mental ill health mean that it would not be possible to participate in education and training, the student or their parent/carer should report their absence to their campus via the campus landline or College mobile.

In some circumstances, the student will not be able to leave their house but will be able to participate in an online lesson or tutorial. On enrolment with the College, all students are required to sign a consent form confirming they are happy to participate in on-line lessons. Where students are under the age of 19, their parent/carer is also required to sign the consent form

## **PASTORAL CARE**

There may be times when it is necessary for a member of the team to contact a student when they are absent from College. This may be when an absence has not been reported or when a student is away for a period of time due to illness or an episode of anxiety and mental ill health.

It may also be necessary to visit a student at their home to carry out an initial assessment, prior to College enrolment, where a young person has extreme anxiety.

All calls to a parent/carer or a student should be made during College hours and from either the College landline or the College mobile phone.

Members of the team making pastoral calls must set key boundaries, including a time limit, and giving an endpoint to the call. Notes of actions will be to seek further advice rather than offering direct support. Always stick to the agreed timescales of the calls e.g. weekly calls.

Where the student is aged 16-18 the first point of contact must always be with their parent or carer. If, following the conversation, the team member has concerns, they should make a record of the call and the DSL should be contacted to determine a way forward.

If no contact can be made with the parent/carer or the student, then a risk assessment must be carried out. If other agencies and services are involved with the student, the College should contact them to ensure a triangulated holistic approach to safeguarding is carried out. This may result in a co-ordinated home visit/well-being check, taking place on the third consecutive day of absence. Safeguarding protocols must be followed at all times.

## **ROLES AND RESPONSIBILITIES**

### ***Board of Governors***

The Board of Governors (the Board) instruct the Campus Lead to:

- ensure there is an effective Safeguarding Policy in place
- provide a safe environment for young people and adults at risk of harm
- identify those that are suffering, or are likely to suffer significant harm or who are at risk of radicalisation
- ensure appropriate IT filters and monitoring systems are in place to ensure online safety
- ensure disclosures of potential abuse are reported appropriately
- have a system for identifying concerns in relation to abuse of children and adults at risk of harm and effective methods of responding to disclosures
- refer concerns to appropriate referral agents within social care
- work effectively with others as required by Keeping Children Safe in Education 2019
- listen to the voice of the student and always act in the interest of the student
- ensure appropriate safeguarding responses for students who go missing from College
- understand that additional barriers can exist for students with special educational needs (SEN) and disabilities when recognising abuse and neglect in this group.



The Board will approve and annually review policies and procedures. They will receive termly safeguarding reports to:

- maintain awareness of progress across the College and/or issues relating to the welfare of young people and adults at risk of harm
- be reassured by the DSL that systems are in place and are effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known
- ensure effective procedures for reporting and dealing with allegations of abuse by members of the team or others who come into contact with students are in place including referral to the relevant Local Authority Designated Officer (LADO) for each campus location
- ensure safe recruitment of team members
- ensure all of the team are appropriately trained to discharge their duties in relation to safeguarding and Prevent
- ensure procedures are in place to make referrals to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been if they had not resigned.

The Board will ensure there is a dedicated member of the Board with safeguarding responsibility.

In developing policies and procedures, the Board will take account of guidance issued by the Department for Education, OFSTED and other relevant bodies and groups. The College recognises its duty under the Counterterrorism and Security Act (2015) to have due regard to the need to prevent people from being drawn into terrorism.

### ***Designated Safeguarding Lead***

The DSL will ensure appropriate and robust systems are in place that will co-ordinate reporting, monitoring, referral, and support procedures. The DSL has a key duty for raising awareness across all of the team of issues relating to the welfare of young people and adults at risk studying within the College. The DSL will undertake relevant safeguarding training, including inter-agency working. The DSL will receive refresher training every two years and keep updated annually on safeguarding information and knowledge.

The DSL is responsible for

- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- providing advice and support to other team members on issues relating to safeguarding
- providing all of the College team with regular updates on safeguarding at least annually
- maintaining a proper record of any child protection referral, complaint, or concern (even where that concern does not lead to a referral)
- ensuring Safeguarding Policy is updated and reviewed annually and approved by the Board
- ensuring that parents/carers are aware of the College's Safeguarding Policy on induction
- developing effective working relationships with other agencies: Police, Social Services, Health Authority and Safeguarding Partners: local authorities and clinical commissioning groups,
- liaising with partner agencies offering placements to students

- ensuring that team members who are liaising with employers and training organisations that receive students from the College on placements put appropriate risk assessments and safeguards in place
- ensuring safe recruitment practices by implementing enhanced checks on all new and existing team members in accordance with the DBS, obtaining references and recruitment in accordance with DfE guidance
- providing tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help students develop self-esteem and resilience
- ensuring all of the team receive basic training in Safeguarding and Prevent issues appropriate to their roles and are aware of the College safeguarding procedures
- ensuring that the College consults with the LADO regarding allegations against any member of the College team
- ensuring Health and Safety procedures are in place for students, including off site
- providing termly safeguarding reports to the Board.

### ***College Team: Duty of Care***

Members of the College team are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect students from discrimination and avoidable harm. Staff should develop respectful, caring, and professional relationships between all members of the College community. Team behaviour should demonstrate integrity, maturity and good judgement and comply with the College Team Code of Conduct at all times.

### ***Wearing of ID Passes***

All of the College team, students and visitors must visibly wear ID badges on site.

### **PROCEDURE**

If you have any concerns about the health and safety of a student at this college or feel that something may be troubling them, you should share this information with the DSL or Campus Lead straight away.

However, if you think the matter is very serious and may be related to a student protection concern, where the student has been harmed or is at risk of harm e.g. physical, sexual, emotional abuse or neglect, you must talk to the DSL or Campus Lead immediately. Do not delay. If you are unable to contact them, you can ask the college office staff to find them and ask them to speak to you straight away about a confidential and urgent matter.

As well as the verbal contact, immediately after raising a concern, staff must also make a detailed written account of what they have seen or heard. The recording must be a clear, precise, factual account of the observations. The member of staff must record information regarding the concerns on the same day on a College Safeguarding Disclosure Form – see the section on record keeping below. The member of staff or volunteer who noted and raised the concern is known as the alerter; adult social care or the police may wish to speak to the alerter at some point.

**The keeping of accurate and prompt records is fundamental to effective safeguarding and all staff and volunteers have a responsibility to ensure all concerns are recorded appropriately. This requires those who raise concerns to make a written record, wherever possible, within two hours of raising any concerns.**



This record of raising a concern should include;

- Who they have concerns about (name of child or adult at risk)
- In the view of the staff member does the child or adult at risk have the capacity to understand the concerns and that they may have been abused
- What has been shared with the child or adult at risk about the concerns and what response have they made
- If the child or adult at risk has capacity to understand the involvement of other agencies, what have they said about this
- Date and time, they are making the record
- Date and time the incident occurred (if this is known)
- What was observed, heard, or noted that led to the concern being raised
- Source of information (if the concern was not directly observed i.e., a parent informs a member of staff that he/ she has seen abuse indicators)
- Behavioural observations (noting that this is one of the most likely ways in which a member of staff is likely to note concerns)
- If a child or adult at risk has made an allegation, then what was said
- Which senior manager within the college has it been reported to (in line with these procedures) and what initial actions were agreed
- This record must be signed and time/dated by the person making the recording and the DSL/Campus Lead.

## **ALLEGATIONS AGAINST TEAM MEMBERS**

If you have concerns about a member of the College team, or an allegation is made about a team member posing a risk of harm to students, speak to the DSL.

If the concerns/allegations are about the DSL, speak to the Governor with overall responsibility for Safeguarding. The College will consult with the LADO regarding allegations against team members. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.

***Where an allegation is about the DSL, the Governor and not the DSL, will carry out the actions below.***

The DSL will inform the accused individual that there are concerns or allegations and of the likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary).

Where the police and/or social care services are involved, the DSL will only share such information with the individual as has been agreed with those agencies. The DSL will liaise with the LADO, police, and/or social care to carefully consider whether suspension of the individual from contact with students at the College is required or whether alternative arrangements can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate. If immediate suspension is considered necessary, the rationale for this will be agreed by the DSL. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the College and their contact details.

If it is agreed by the LADO, police, or social care that no further action is to be taken in regard to the subject of the allegation or concern, the DSL will record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, The DSL will take steps as agreed with the LADO to initiate the appropriate action in the College and/or liaise with the police and/or social care services as appropriate.

Relevant support will be provided for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

The DSL will inform the parents or carers of the student involved about the allegation as soon as possible if they do not already know (following agreement with social care services and/or the police, if applicable).

The DSL will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against a team member while investigations are ongoing.

Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a member of a team member will be advised to seek legal advice.

The DSL will keep the parents or carers of the student involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

## **NOTIFYING DBS IF THE ABUSE RELATES TO A MEMBER OF STAFF**

The College will refer to the DBS, anyone who has harmed a child or adult at risk or poses a risk of harm to a child or adult at risk , or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

## **CONFIDENTIALITY**

Confidentiality and trust should be maintained as far as possible, but team members must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The student must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate member of the team and any discussion must be private and shared on a need to know basis. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students. The College is committed to protecting the rights and privacy of individuals, including students, the team and others, in accordance with the General Data Protection Regulations (GDPR) set out in the Data Protection Act 2018 that allows for disclosure of personal data where this is necessary to protect the vital interests of students. Please refer to the College suite of data policies.

## **SAFEGUARDING RECORDING**

All safeguarding concerns are either identified by, or referred through to, the DSL by members of the team, students, (either self-referring or bringing concerns about peers), parents/carers, employers, or volunteers.

The DSL will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.

The DSL will take advice from the Governor responsible for Safeguarding or, where appropriate, the entire Board.

All cases are recorded on a College Safeguarding Disclosure form which is uploaded to the central register and the student file. Any hard copy documentation is stored securely in a locked cabinet and cannot be taken off site without the express written permission of the DSL. . Access to these records will be strictly limited on a need to know basis and controlled by the Alerting Managers (Safeguarding Leads) and the chair of governors.

Termly and annual Safeguarding Reports are provided to the Board with detailed analysis of safeguarding disclosures which feeds into planning for training needs and preventative work with students. The annual report will also include a review of the current safeguarding policy and procedures.

## **PARTNERSHIP AND INFORMATION SHARING**

New safeguarding partners arrangements were put in place in September 2019. The College will work in conjunction with the three local safeguarding partners (the local authority, the clinical commissioning group and the Chief Officer of Police), together with appropriate relevant agencies to ensure information is passed appropriately where there are safeguarding concerns and information sharing protocols are well established.

The Government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information and is used by the College to support members of the team who have to make decisions about sharing information. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, supports team members who must make decisions about sharing information.

The Counter-Terrorism and Securities Act (2015) places additional responsibilities on Further Education Colleges to include working with multi-agencies as part of the Channel process. Although not a Further Education College, we agree to abide by these processes.

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