



“Inspiring learning, developing character, building futures”

## **Student Support Policies and Procedures**

### **Safeguarding and child protection policy**

*Aim:*

- *To set out the college’s commitment to keeping children and young people safe from harm and how, in broad terms, the college will meet this commitment.*
- *To inform all adults working or volunteering in The Blackpool Sixth Form College of the regulations that must be followed in order to ensure safeguarding of children and young people.*
- *To clarify the procedures for reporting suspected wrongdoing or poor practice in respect of the protection of children and young people.*
- *To safeguard children from extremism and radicalisation and to support the government’s Prevent Strategy.*

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# 1. Safeguarding contact details

Role	Contact details
Designated Safeguarding Lead (DSL)	Gail Yeadon <a href="mailto:gail.yeadon@blackpoolsixth.ac.uk">gail.yeadon@blackpoolsixth.ac.uk</a>
<i>Deputy Designated Safeguarding Lead</i>	Stuart Ormson <a href="mailto:stuart.ormson@blackpoolsixth.ac.uk">stuart.ormson@blackpoolsixth.ac.uk</a> Tim Craven <a href="mailto:tim.craven@blackpoolsixth.ac.uk">tim.craven@blackpoolsixth.ac.uk</a>  Victoria Jackson <a href="mailto:victoria.jackson@blackpoolsixth.ac.uk">victoria.jackson@blackpoolsixth.ac.uk</a> Thomas Holland <a href="mailto:thomas.holland@blackpoolsixth.ac.uk">thomas.holland@blackpoolsixth.ac.uk</a>
<i>Early help team</i>	Alex Gardner <a href="mailto:alex.gardner@blackpoolsixth.ac.uk">alex.gardner@blackpoolsixth.ac.uk</a>
<i>Early help team</i>	Nicola Threlfall <a href="mailto:nicola.threlfall@blackpoolsixth.ac.uk">nicola.threlfall@blackpoolsixth.ac.uk</a>
<i>Early help team</i>	David Williams <a href="mailto:david.williams@blackpoolsixth.ac.uk">david.williams@blackpoolsixth.ac.uk</a>
<i>Early help team</i>	Carey Guite <a href="mailto:carey.guite@blackpoolsixth.ac.uk">carey.guite@blackpoolsixth.ac.uk</a>
<i>Early help team</i>	Sam Bailey <a href="mailto:sam.bailey@blackpoolsixth.ac.uk">sam.bailey@blackpoolsixth.ac.uk</a>
Nominated Director and contact details	Victoria Blakeman <a href="mailto:vblakeman5@gmail.com">vblakeman5@gmail.com</a>

## Key Contacts outside of the college:

Blackpool Council Social Care Team for immediate concerns:

Daytime Hours	01253 477299
Out of Hours	01253 477600

Local Authority Designated Officer (LADO): Ruth Lawton

Daytime Hours	01253 477541
Out of Hours	01253 477592
LADO@blackpool.gov.uk ruth.lawton@blackpool.gov.uk	

Lancashire County Council: Immediate Safeguarding Concern

8.00am - 8.00pm	0300 123 6720
Out of Hours	0300 123 6701

## Pan Lancashire Safeguarding Procedures

The procedures for the Pan Lancashire Consortium, which include those of the Children's Boards for Lancashire, Blackpool and Blackburn with Darwen can be found at:

<http://panlancshirescb.proceduresonline.com/>

## 2. Introduction

This policy is in line with the requirements of the two following key documents:

- a) Keeping Children Safe in Education – this statutory guidance from the Department for Education (September 2018).
- b) Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children (July 2018).

All references in this policy to children and young people refer to vulnerable adults.

### 2.1 Definition of safeguarding

Safeguarding and protecting the welfare of children and young people involves:

- protecting them from maltreatment, abuse and/or neglect. Information on specific types of abuse are defined in appendix A.
- preventing impairment of health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

As in the Children Acts 1989 and 2004, a **child** is defined as anyone who has not yet reached their 18<sup>th</sup> birthday.

A **vulnerable adult** is a person 18 years of age or over who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.

**Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; **development** means physical, intellectual, emotional, social or behavioural development; **health** includes physical and mental health; **ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical (Section 31.9 of the Children Act 1989 as amended by the Adoption and Children Act 2002).

### 2.2 College commitment

The college is committed to safeguarding and promoting the welfare of all of its children and young people. We recognise that children and young people who are abused or neglected may find it difficult to develop a sense of self worth and to view the world in a positive way. Whilst in education, their behaviour may be challenging. We recognise that some children and young people who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all of our students.

We recognise that because of the day-to-day contact with children and young people, college staff are well placed to observe the outward signs of abuse. Blackpool Sixth will therefore:

- a) establish and maintain an environment where children and young people feel secure, are encouraged to talk, and know that we will listen.
- b) ensure children and young people know that there are adults in the organisation they can approach if they are worried.
- c) include opportunities in the curriculum for students to develop the skills they need to recognise and stay safe from abuse.
- d) ensure we have a Designated Safeguarding Lead (DSL) for child protection who has been trained to Level 3 standard in safeguarding and is a member of the Senior Leadership Team

- (SLT). The DSL will undergo updated child protection training every two years. The Principal and all staff members will undergo annual refresher child protection training.
- e) ensure we have a nominated director responsible for the protection of children and young people.
  - f) ensure every member of staff, volunteer, director and frequent visitor knows the name of the DSL and other people responsible for child protection.
  - g) ensure that parents/carers have an understanding of the responsibility placed on the college and staff for child protection by setting out its obligations on the college website.
  - h) notify social care if there is an unexplained absence of more than two days for a student who has a child protection plan.
  - i) develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at case conferences.
  - j) keep records of concerns about children and young people, even where there is no need to refer the matter immediately.
  - k) ensure all records are kept securely and separate from the main student file.
  - l) follow procedures where an allegation is made against a member of staff, volunteer, director or frequent visitor.
  - m) ensure safe recruitment practices are always followed.
  - n) ensure there are appropriate whistleblowing procedures in place for concerns to be raised with the college's senior leadership team. Where a staff member feels unable to raise an issue with a senior manager or feels that their genuine concerns are not being addressed, then the NSPCC whistleblowing helpline is available as an alternative. Staff can call the helpline on 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

We recognise that children and young people who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. The college may be the only stable, secure and predictable element in the lives of children and young people at risk. When in education their behaviour may be challenging and defiant or they may be withdrawn. The college will endeavour to support the student through:

- a) the content of the curriculum.
- b) the college ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- c) the college positive behaviour policy and disciplinary procedures which will ensure that the student is made aware that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.
- d) liaison with other agencies that support the student such as social services, adult mental health services, education welfare service and educational psychology service.
- e) transition from the college; ensuring that, where a student with a child protection plan leaves, their information is transferred to the new school/college immediately and that the young person's social worker is informed.

### **2.3 Students who go missing from education**

Going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risks of them going missing in future.

The college monitors student attendance through registers at every lesson and poor or irregular attendance is followed up in line the student attendance policy.

### **2.4 Supporting the Government's Prevent Strategy**

All staff, volunteers and trainees must be aware of the organisation's duty in terms of safeguarding children and young people against radicalisation as identified in the Government's Prevent Strategy.

Everyone working, volunteering and training in the organisation is expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs. We believe that children and young people need to be given the opportunity to explore diversity and understand that Britain is a multi-cultural society and that everyone should be treated with respect whatever their race, gender, sexuality, religious belief, special need or disability.

All staff, volunteers and trainees must be aware of the indicators of vulnerability that may put children/young people at risk of radicalisation and be prepared to identify any concerns about individuals/groups to the DSL.

All staff, volunteers and trainees must be aware that numerous factors can contribute to, and influence, the range of behaviours that define violent extremism but that this does not necessarily mean that children/young people become involved in extremist action. Appropriate interventions may not, therefore, relate to the threat of radicalisation but to other issues, for example, mental health, relationship and/or abuse of drugs and alcohol etc.

If there is a Prevent referral for a member of staff and/or a significant incident or pattern of incidents that undermine the promotion of British values the college has a responsibility to and will notify the DfE.

See appendix A for more details about radicalisation and extremism.

### **3. Scope**

This policy applies to all staff, volunteers and trainees at The Blackpool Sixth Form College (including directly employed staff, those employed through an agency/third party, volunteers, Directors, self-employed contractors and frequent visitors to college.

## **4. Safeguarding information that all staff, volunteers and trainees need to know**

- a) It is the responsibility of everyone working, volunteering or training in college to ensure the safeguarding of children and young people. We are in a position to identify concerns early and have a duty to prevent these from escalating and provide support to children and young people when required.
- b) All staff, volunteers and trainees should be prepared to identify children and young people who may benefit from early help i.e. by providing support as soon as the problem emerges at any point in that child/young person's life.
- c) All staff, volunteers and trainees will receive the appropriate level of safeguarding awareness as part of their induction to the organisation. This will include a summary of the college's safeguarding policy and procedures.
- d) All staff, volunteers and trainees must know the name of their DSL and members of the safeguarding team and how to contact them should it become necessary to raise any concerns about the health and wellbeing of a child or young person.
- e) All staff need to be aware of the different types of abuse and specific safeguarding issues as outlined in appendix A and be prepared to report any suspected cases of abuse, neglect or bad practice to the safeguarding team.
- f) All staff, volunteers and trainees working in our organisations have a responsibility to provide a safe environment in which children and young people can learn. This is a legal duty of care in accordance with the Department for Education (DfE) statutory guidance 'Keeping Children Safe in Education'. Training will be provided to staff, volunteers and trainees in how they can

fulfil this responsibility.

- g) All staff, volunteers and trainees need to recognise that some children and young people may be especially vulnerable to abuse, for example, those with Special Educational Needs and those living in adverse circumstances and to be mindful of this as part of their working practice.
- h) All staff, volunteers and trainees must maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child or young person, staff, volunteers or trainees must always act in the best interests of the child or young person.
- i) Staff, volunteers and trainees must be aware that failure to act in accordance with their duty of care to safeguard children (the law, professional guidelines or organisational policies and procedures) may result in criminal and/or for staff disciplinary action up to and including dismissal being taken.
- j) All staff, volunteers and trainees are responsible for their own actions and behaviour and must avoid any conduct which would lead any reasonable person to question their motives or intentions. See staff code of conduct.
- k) If an allegation against a member of staff is made, the procedures identified in section 8 will be instigated.
- l) If, as a result of a disciplinary investigation, a member of staff is dismissed, or removed from working in a regulated activity with children and young people because it is believed that they harmed or pose a risk of harm to a child/young person under the age of 18 through their action or inaction or received a caution or conviction for a relevant offence the organisation, has a legal duty to refer that individual to the disclosure and barring service (DBS) for them to consider whether or not that person will be listed on the DBS's children's or adults' barred lists, preventing them from engaging in regulated activity with children, vulnerable adults or both in the future. The DBS must be informed immediately if a person has been dismissed or removed due to safeguarding concerns, or would have if they had not resigned. This is a legal duty and failure to do so is a criminal offence.

*The above points are based on; Keeping Children Safe in Education DfE 2018*

## **5. Providing a safe and supportive environment**

### **5.1 Safe recruitment and selection**

All recruitment and selection must be carried out in accordance with the college's recruitment and selection policy. As part of this process, DBS checks are undertaken on all staff accepting employment. It is a condition of employment, and, generally, the DBS will be completed and received prior to the start of employment. For the majority of appointments, an enhanced DBS check with barred list information will be required, as staff will be providing regulated activity. Anyone who is appointed to carry out teaching will also be checked to ensure they are not prohibited from teaching.

In certain exceptional circumstances e.g. where it may not be possible for educational provision to be maintained, it may be necessary for employment to start prior to receipt of the DBS disclosure and in such instances a risk assessment should be completed to ensure sufficient control measures are in place.

DBS checks are carried out every 5 years for all existing members of staff. The college also ensures that individuals are not disqualified from working with children and young people under the childcare (disqualification) regulations 2009.

Regulations also apply in terms of the employment of casual and temporary employees and volunteers including agency workers, caterers, work placements, PGCE students, regular visitors,

contractors, directors and other volunteers depending on the nature of the work and potential contact with students. All directors will be DBS checked and this is reviewed every 5 years.

All recruitment materials make reference to the college's commitment to safeguarding and promoting the welfare of its students.

Members of the Leadership Team involved in recruitment and selection are trained on safer recruitment and this is updated every three years.

All staff members must undergo safeguarding and child protection training at induction. The training is regularly updated at least annually. Induction and training is in line with any published local multi-agency safeguarding arrangements.

## **5.2 Safe working practice**

The college has adopted the Department for Education (DfE) "Guidance for safe working practice for the protection of children and staff in education settings" and has delivered training to ensure that staff are safe and aware of behaviours which should be avoided. The college will ensure that the training is regularly updated.

Safe working practices ensure that students are safe and that all staff:

- are responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- work in an open and transparent way.
- discuss and/or take advice from management over any incident which may give rise to concern;
- record any incidents or decisions made.
- apply the same professional standards regardless of ethnicity, faith, gender or sexuality.
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

Staff and volunteers should be able to raise concerns about poor and unsafe practice and potential failures within the college's safeguarding regimen. Any concerns should be raised initially with the DSL and then with the principal. If a member of staff or a volunteer feels unable to raise the issue within their organisation or feels that their concern is being overlooked, they should then report the matter to the nominated director (contact details on page 2).

## **5.3 Safeguarding information for students**

The college is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. We inform students of whom they might talk to, both in and out of the college, their right to be listened to and heard and what steps can be taken to protect them from harm. The tutorial (Life Links) programme has a strong emphasis on helping students learn how to keep safe.

A wide range of information is made available to students both on the college website and on posters around buildings which advertise the help offered by appropriate agencies and services.

The college consults with and listens to students through various methods, including the student council, pastoral mentor reps meetings, pastoral mentor one-to-one tutorials, annual student survey and other student focus groups.

We make students aware of these arrangements by information on the weekly notices, on posters around college and in pastoral mentor sessions.

## 5.4 Partnership with parents and carers

The college shares a purpose with parents/carers to keep children and young people safe from harm and to have their welfare promoted.

We are committed to working with parents and carers positively, openly and honestly and to treating everyone with respect, dignity and courtesy. We will be as open and honest as possible with parents/carers about any concerns. However, we **WILL NOT** discuss concerns with parents/carers in the following circumstances:

- suspected sexual abuse or sexual exploitation of the young person from within the family.
- where fabricated or induced illness (previously known as Munchausen Syndrome by proxy) is suspected.
- where female genital mutilation is suspected.
- in cases of suspected forced marriage.
- in cases where a child/young person is suspected of being subjected to radicalism and/or extremism within the family.
- where contacting parents/carers would place a child, young person, or others at immediate risk.

The decision not to discuss concerns with parents/carers will not be taken in isolation, parents/carers are therefore advised to contact the DSL or a deputy DSL for further information.

We encourage parents/carers to discuss any concerns they may have with either the young person's pastoral mentor or pastoral lead.

We make parents aware of our policy and guidance through the college prospectus and on the college website. Parents/carers can view this policy on request.

## 5.5 Partnerships with others

The college recognises that it is essential to establish positive and effective working relationships with other agencies in order to effectively share information, signpost people to appropriate guidance and to support vulnerable children and young people as necessary. These include local authorities, social and health care agencies, the police and appropriate voluntary, community and faith sector organisations.

## 5.6 Training and staff induction

### a) Staff and trainees

Staff with designated responsibility for child protection will undertake safeguarding training up to level 3 every two years and refresher training annually. All other staff, including non-teaching staff, will undertake appropriate training to equip them to carry out their responsibilities for child protection effectively. This is kept up to date by annual refresher training.

All staff (including temporary staff) and directors are provided with the college's safeguarding and child protection policy and informed of child protection arrangements on induction. This will include:

- the safeguarding and child protection policy
- the positive behaviour policy and disciplinary procedures
- the staff code of conduct
- the safeguarding response to children who go missing from education
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies and early help team)

The college will record, store and maintain accurate and up to date records of staff attendance at safeguarding training.

#### **b) Volunteers and visitors - regular**

Regular volunteers and visitors who visit the college frequently (once a week or more often, or on 4 or more days in a 30 day period) and have regular unsupervised access to students will be required to either have a DBS statement from their employer or have a DBS check undertaken by the college. Regular volunteers and regular visitors will complete child protection training on appointment, and then every 2 years. This will include:

- the safeguarding and child protection policy
- the positive behaviour policy and disciplinary procedures
- the staff code of conduct
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies and early help team)

#### **c) Volunteers and visitors - non-regular**

Non-regular volunteers and visitors will be given an overview of the college's safeguarding policy and procedures prior to any engagement with students. This will include clear guidance on the signs of abuse and how to report safeguarding concerns.

### **5.7 Support, advice and guidance for staff**

Staff will be supported by the DSL Deputy DSLs, Human Resources and other members of the safeguarding team.

### **5.8 Student details**

The college recognises the importance of keeping accurate and up to date information, including:

- names and contact details of parents/carers.
- emergency contact details of a minimum of two adults (may include the above).
- name and contact detail of doctor's surgery.
- any factors which may impact on the safety and welfare of the child/young person.

## **6. Roles and responsibilities**

### **6.1 Board of directors**

The board of directors will:

- a) ensure the college has effective policies and procedures in place and monitors compliance with them.
- b) ensure that at least one DSL is in place and this is a member of the senior leadership team.
- c) ensure that all staff undertake appropriate training.
- d) remedy, without delay, any deficiencies or weaknesses regarding child protection arrangements.
- e) nominate a director to be responsible for liaising with partner agencies in the event of allegations of abuse being made against the Principal.
- f) seek assurance that, where services or activities are provided on the college premises by another body, the body concerned has appropriate policies and procedures in place in terms of safeguarding and child protection and liaises with the college on these matters where appropriate.
- g) review the safeguarding and child protection policy and procedures annually, ensuring arrangements take into account procedures and practices of local safeguarding partners, formerly known as local safeguarding children boards (LSCBs).

- h) ensure that the college contributes to inter-agency working in line with statutory requirements and national guidance.
- i) ensure that appropriate filters and monitoring systems are in place to protect children and young people from potentially harmful and inappropriate online material.

## **6.2 Nominated director for safeguarding**

The nominated director for safeguarding will:

- a) Liaise with the Designated Safeguarding Lead (DSL) on a regular basis to keep abreast of safeguarding priorities at the college.
- b) Periodically attend FCAT Safeguarding Board meetings (a minimum of 2 of 5 per year) to learn about good practice at other academies and to support the DSL in raising any issues for the college.
- c) Contribute to discussions to inform the development of safeguarding plans and strategies for the college and FCAT, including the annual revision of the FCAT Safeguarding and Child Protection Policy.
- d) Take a lead role in holding senior leaders to account on the implementation of safeguarding procedures at the college during academy council/corporation meetings.
- e) Take a lead role in challenging senior leaders on the use of resources to maintain safeguarding of children and young people on the site, including the allocation of staff and training to meet specific safeguarding needs, at academy council/corporation meetings.
- f) Have a broad overview of the FCAT Safeguarding and Child Protection Policy and 'Keeping Children Safe in Education', the Government's key guidance document in this area.
- g) Evaluate safer recruitment practices and participate in safeguarding training as required.
- h) Meet at least once per term with the DSL to audit the safeguarding areas outlined below, to discuss any wider concerns and to subsequently report the outcome of this meeting to the Academy Council

## **6.3 Principal**

The principal will:

- a) ensure that the policies and procedures adopted by the board of directors are fully implemented, and followed by all staff.
- b) ensure that sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities.
- c) ensure that all staff, volunteers, directors and frequent visitors feel able to raise concerns about poor or unsafe practice in regard to children and young people, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed whistle-blowing procedures.

## **6.4 Designated Safeguarding Lead (DSL)**

The DSL:

- a) is the senior officer with responsibility for safeguarding across the organisation.
- b) ensures that all staff have access to and understand the college's safeguarding and child protection policy.
- c) works with staff and students in preventing children and young people from suffering harm.
- d) provides a source of support, advice and expertise to staff on safeguarding matters.
- e) provides support and advice on safer recruitment procedures.
- f) support the principal in safer recruitment practices including in the referral of cases to the DBS and the police where a person is dismissed or leaves due to risk/harm to a child/young person.
- g) ensures that all new staff receive safeguarding training at induction.
- h) ensures that all staff receive refresher training as appropriate.

- i) ensures that detailed accurate secure records are kept separately from the main student file.
- j) ensures that, when children/young people leave the college, records are promptly transferred to the appropriate organisation.
- k) ensure the college has details of the local authority personal advisor that has been appointed to guide and support any care leavers.
- l) quality assure the work of colleagues in relation to safeguarding and child protection.
- m) attends updated level 3 safeguarding training every two years as a minimum.
- n) keeps abreast of developments in the field of safeguarding and child protection by liaising with relevant bodies and reading relevant publications.
- o) ensures the safeguarding and child protection policy is updated and reviewed annually and works with the board of directors to do this.
- p) ensures parents/carers and other members of the public have access to the safeguarding and child protection policy as required.
- q) helps to create a climate within the organisation whereby children and young people are encouraged to come forward to disclose incidents of abuse.
- r) ensures that children and young people who are victims of abuse are supported appropriately and sensitively and that all actions are successfully carried out and monitored.
- s) ensures that, if, at any point, there is a risk of serious harm to a child, a referral is made to children's social care immediately, and to the police where a crime may have been committed.

## **6.5 Members of the safeguarding team**

The deputy DSLs and early help team:

- a) support the DSL in their role.
- b) act as a source of support, advice and expertise to staff on matters of safety and safeguarding.
- c) facilitate the development of a climate within the organisation whereby children and young people are encouraged to come forward to disclose incidents of abuse.
- d) keep abreast of developments in the field of safeguarding/child protection.
- e) liaise with the safeguarding partners (formerly known as LSCB) and outside agencies, attending relevant training or events and reading relevant bulletins and publications.
- f) work directly with young people in need and their families in order to prevent young people suffering significant harm.
- g) work with outside agencies in line with 'working together to safeguard children'.
- h) respond appropriately to all safeguarding concerns in line with safeguarding partners (formerly known as LSCB) procedures and refer all cases of abuse or suspected abuse to the local authority children's social care and to the police where a crime may have been committed.
- i) liaise with the DSL of issues, especially ongoing enquiries under section 47 of the children act 1989 and police investigations.
- j) ensure that students who are victims of abuse are supported appropriately and sensitively and that all actions are successfully carried out.
- k) receive Level 3 safeguarding training every two years in order to carry out the role and regular updates to maintain currency of knowledge.
- l) maintain accurate, confidential and up to date documentation on all cases.

## **6.6 All staff, volunteers, directors and frequent visitors**

All staff, volunteers, directors and frequent visitors:

- a) will fully comply with the college's safeguarding policies and procedures.
- b) attend appropriate training.
- c) ensure that children and young people are protected from potentially harmful and inappropriate online material and are taught online safety.
- d) inform the deputy head of student services or a member of the safeguarding team/the DSL

of any concerns, or, if none are available and there is a risk of immediate serious harm to a child, make a referral to children's social care immediately. Anybody can make a referral.

- e) should understand that failure to comply with the above may result in investigation in accordance with college's disciplinary policy and procedure, which may lead to disciplinary action up to and including dismissal being taken, and referral to the DBS. Individuals are, therefore, encouraged to discuss any questions they may have about this policy with their DSL/Deputy DSL.

## 7. Identifying children and young people who may be suffering significant harm

Teachers and other adults in the college are well placed to observe any physical, emotional or behavioural signs which could give rise to concerns that a child/young person/vulnerable adult may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or college staff being alerted to concerns.

All staff need to be aware of the different types of abuse and specific safeguarding issues as outlined in appendix A and be prepared to report any suspected cases of abuse, neglect or bad practice to their DSL using the college safeguarding procedures.

Any child or young person may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health and care plan).
- is a child looked after and/or has returned home to their family from care.
- is a young carer.
- is frequently missing/goes missing from care or home.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is misusing drugs or alcohol.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child;

Any early help provision should be coordinated by the DSL or other member of safeguarding team in liaison with external agencies as appropriate.

## 8. College procedures

All staff follow the pan Lancashire procedures at <http://panlancashirescb.proceduresonline.com> which are consistent with guidance in 'keeping children safe in education' and 'working together to safeguard children'.

It is **not** the responsibility of the college staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, do have a duty to recognise concerns and maintain an open mind. Accordingly all concerns regarding the welfare of students will be recorded and referred to the safeguarding team.

## 8.1 Staff will immediately report:

- any suspicion that a child/young person is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- any explanation given which appears inconsistent or suspicious.
- any behaviours which give rise to suspicions that a child/young person may have suffered harm.
- any concerns that a child/young person may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- any concerns that a child/young person is presenting signs or symptoms known to be indicators of abuse or neglect.
- any significant changes in a child/young person's presentation, including non-attendance.
- any hint or disclosure of abuse from any person.
- any concerns regarding person(s) who may pose a risk to children/young people (e.g. living in a household with children/young people present).

**To make a referral, staff should complete an online referral using MyConcern and take any written record to the Student Finance Office and discuss their concerns with the Deputy Head of Student Services or a Deputy DSL/member of the early help team, if the Deputy Head of Student Services is not available.**

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL, a deputy DSL or a member of the early help team. In exceptional circumstances, such as in an emergency staff members should speak directly to Children's Social Care.

## 8.2 Responding to disclosures/concern

Disclosures or information may be received from students, parents or other members of the public. The college recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity and the college will make specific arrangements to ensure that students with communication difficulties are enabled to express themselves to an appropriate member of staff.

Such information cannot remain confidential and staff will make a written record and immediately communicate what they have been told to the DSL/deputy DSL or member of the early help team.

### Principles

Staff will not investigate but will, wherever possible, elicit and clarify enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next.

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children or young people should consider whether wider environmental factors are present in a child's or young person's life that are a threat to their safety and/or welfare.

Staff will:

- listen to what students say or any disclosure that a child/young person may be at risk of harm.
- take their views seriously and ensure appropriate staff at college work with them and their families collaboratively when deciding how to support their needs.
- try to ensure that the person disclosing does not have to speak to another member of college staff.
- clarify the information.

- try to keep questions to a minimum and of an 'open' nature e.g. 'can you tell me what happened?' rather than 'did x hit you?'
- try not to show signs of shock, horror or surprise.
- not express feelings or judgements regarding any person alleged to have harmed the child/young person.
- explain sensitively to the person that they have a responsibility to refer the information to a member of the safeguarding team.
- reassure and support the person as far as possible.
- explain that only those who 'need to know' will be told.
- explain what will happen next and that the person will be involved as appropriate.

### **8.3 Action by the DSL/deputy DSL/early help team**

Following any information raising concern, the DSL/deputy DSL/early help team will consider:

- any urgent medical needs of the child/young person.
- making an enquiry to see if the child/young person has a child protection plan.
- discussing the matter with other agencies involved with the family.
- consulting with appropriate persons e.g. social care, previous school/college, etc.
- the child/young person's wishes in light of their age and understanding.

Then decide:

- wherever possible, to talk to parents, unless to do so may place a child/young person at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- whether to manage any support for the child or young person internally via the college's own pastoral support processes or complete an early help assessment.
- whether or not to make a formal referral to social care (and if appropriate the police) and if this needs to be undertaken immediately because a child/young person may be at immediate risk.
- if further monitoring is necessary.
- if it would be appropriate to make a referral for other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to social care will be accompanied by a standard referral form.

### **8.4 Action following a child protection referral**

The DSL Deputy DSL or member of the early help team will:

- make regular contact with social care.
- wherever possible, contribute to a strategy discussion.
- provide a report for, attend and contribute to any subsequent child protection conference.
- if the child/young person or children/young people are placed on the child protection register, contribute to the child protection plan and attend core group meetings and review child protection conferences and provide a chronology.
- where possible, share all reports with parents prior to meetings.
- where in disagreement with a decision made e.g. not to apply child protection procedures or not to convene a child protection conference, discuss this with a senior member of staff or primary welfare officer to agree how to proceed.

### **8.5 Recording and monitoring**

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information

given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All child protection documents will be retained, separate from the child's main file. This will be locked away and only accessible to two nominated members of the Safeguarding Team. These records will be copied and transferred to any school/college or setting the child or young person moves to, clearly marked 'child protection, confidential, for attention of DSL. Original copies will be retained until the young person's 30th birthday.

A chronology of concerns, referrals, action, timescales and social care responses will be maintained.

## 8.6 Information sharing

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. The golden rules of information sharing\* are:

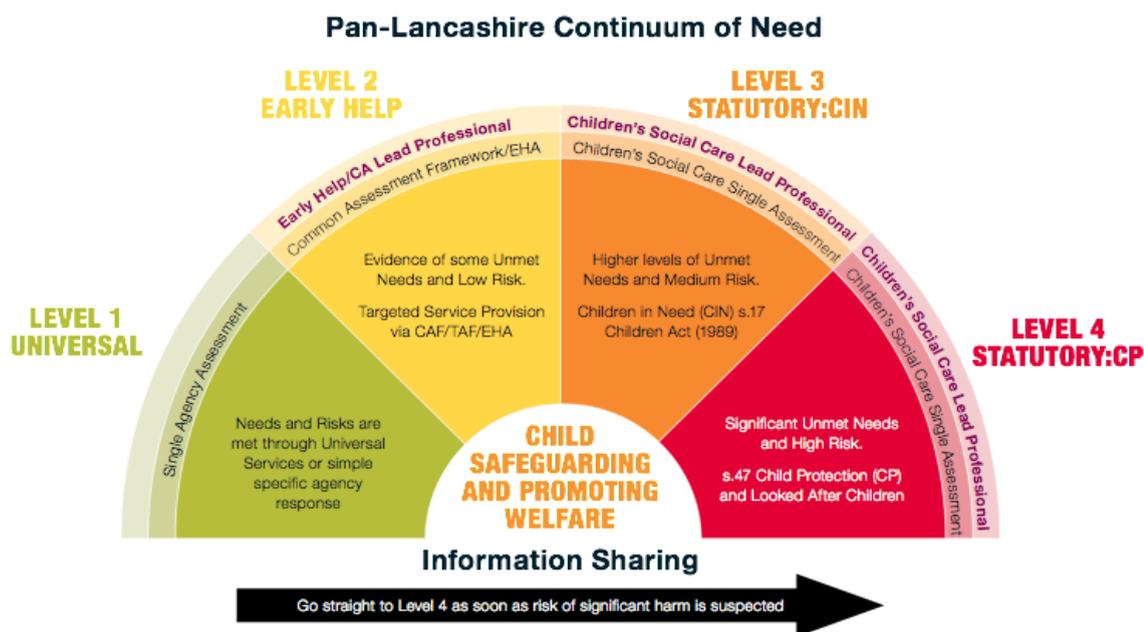
- a) Remember that the Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- b) Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- c) Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- d) Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- e) Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- f) Necessary, proportionate, relevant, adequate, accurate, timely and secure - ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- g) Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

\* Taken from Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, HM Government, July 2018

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## 8.7 The continuum of need

An assessment of a young person’s positive resilient factors and risk indicators will allow a decision to be made as to where they sit on the continuum of need and the level and type of service provision that they will receive.



## 8.8 Pan-Lancashire assessment of need and response

An assessment of a young person’s positive resilient factors and risk indicators will allow a decision to be made as to where they sit on the continuum of need and the level and type of service provision that they will receive.

Level 1: UNIVERSAL	
Definition	Needs and negligible risks are met through universal services which include schools/colleges, health care, housing and other easily accessed services
Response	Offer information and advice as necessary. Signposting/referring to appropriate universal services and support either in college or out of college.
Who will help?	Any member of staff in college.
Information sharing	Informed and explicit consent required.

<b>Level 2: EARLY HELP</b>	
Definition	Evidence of some unmet need(s) and low risk
Response	Targeted service provision and/ or multi-agency response to ensure that the child maintains the capacity and protective factors to sustain satisfactory development
Who will help?	Members of the college safeguarding. <b>Blackpool:</b> Duty and Assessment team Tel: (01253) 477299 will offer advice and guidance <b>Lancashire:</b> Refer to Children's Social Care 0300 123 6720 for advice.
Assessment	<b>Blackpool:</b> Early Help Assessment and Early Help Meeting Record <b>Lancashire:</b> CAF. Team Around the Family (TAF)
Information sharing	Informed and explicit consent required.

<b>Level 3: CHILD IN NEED (CIN) - STATUTORY</b>	
Definition	A child in need (Section 17 of the Children Act 1989) is defined as "unlikely to maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services; or a child who is disabled"
Response	Child in need, section 17 Children Act 1989: a concerted multi-agency support assessed by a social worker to respond to serious problems and avoid them becoming entrenched
Who will help?	<b>Blackpool:</b> Refer to Duty and Assessment Team by sending Early Help Assessment and Multi-agency Referral Form to <a href="mailto:duty.assessment@blackpool.gov.uk">duty.assessment@blackpool.gov.uk</a> <b>Lancashire:</b> Refer to Childrens Social Care by sending CSC Referral form to <a href="mailto:cypreferrals@lancashire.gov.uk">cypreferrals@lancashire.gov.uk</a>
Assessment	Children's social care statutory assessment
Information sharing	Informed and explicit consent required. Where consent is refused for multi-agency information sharing parents/ carers should be informed that services will be limited to single agency provision and where high risk indicators become apparent it may result in information sharing legitimately without consent

<b>Level 4: CHILD PROTECTION (CP) - STATUTORY</b>	
Definition	A child protection response is required (Section 47 of the Children Act 1989) when there is “reasonable cause to suspect that a child... is suffering, or likely to suffer, significant harm”
Response	Child Protection response through Children’s Social Care
Who will help?	<p><b>Blackpool:</b> Telephone the Duty and Assessment team on 01253 477299 or out of hours on 01253 477600, prior to the submission of a Multi-agency Referral Form to <a href="mailto:duty.assessment@blackpool.gov.uk">duty.assessment@blackpool.gov.uk</a></p> <p><b>Lancashire:</b> Refer to Children’s Social Care 0300 123 6720 or out of hours 0300 123 6722 and send CSC Referral form to <a href="mailto:cypreferrals@lancashire.gov.uk">cypreferrals@lancashire.gov.uk</a></p>
Assessment	Children’s social care statutory assessment
Information sharing	<p>Best practice is to share information with informed and explicit consent</p> <p>To overrule this requires a judgement that seeking consent may place the child at risk or further risk of harm, prejudices the detection of crime, or leads to an unjustified delay in making enquiries</p> <p>Where consent has not been obtained or refused, case notes must clearly provide evidence of one, or more, of the above reasons</p>

## 8.9 Safeguarding escalation procedures

The safeguarding escalation procedure is a formal way of ensuring a live safeguarding case can be reviewed, permitting professional dialogue between colleagues, agencies and other organisations involved with the case.

Safeguarding escalation procedures should be used when all normal channels of requesting further support or action have been exhausted and in situations such as:

- a member of staff has made a referral and is concerned that the outcome does not sufficiently safeguard the young person.
- the young person’s situation does not appear to be improving.
- the referrer or others members of the safeguarding team feel that a young person’s safeguarding case is ‘stuck’ and is not seen to be progressing despite there being a perceived need.
- a member of staff feels safeguarding concerns regarding a young person are not being addressed.
- one member of the safeguarding team disagrees with the actions of another.

In all situations where an escalation has been initiated the first step will be to provide an overview and chronology of the case to date and subsequent actions that have occurred to the deputy head of student services

Individual cases will be reviewed by the safeguarding team member responsible for the case, the safeguarding team member to whom the case has been escalated (where different) and the person at the next step in the table below:

Step 1	Escalate the case to the deputy head of student services
Step 2	Escalate the case to the college lead for safeguarding and student standards
Step 3	Escalate the case to the deputy designated safeguarding lead
Step 4	Escalate the case to the designated safeguarding lead
Step 5	Escalate the case to the principal
Step 6	Escalate the case to the college director responsible for safeguarding

In reviewing the 'escalated' case, difference of opinion should be discussed in order to achieve a shared understanding and agree a resolution. Possible outcomes are:

- it may be that no further action is required. This is to be recorded as an outcome of the escalation process.
- where further action is required this is to be recorded and become the responsibility of an identified member of the safeguarding team.
- areas for improvement in practice should be shared directly with the member of the safeguarding team who was originally responsible for the case and anonymously with the safeguarding team as "lessons learned".

Escalation should start at "Step 1" and progress through the steps only where required; it is expected that the escalation process should be used until a satisfactory conclusion is achieved.

Once an escalation has been initiated notification of intention to proceed or otherwise will be provided within 1 working day of the initial request by the member of the safeguarding team to whom it has been escalated.

The matter will be resolved or progressed as far as is required to ensure satisfaction that it is being appropriately responded to within 3 working days.

## 8.10 Physical restraint

The college has a number of staff specifically trained in the use of reasonable force. Training is regularly updated. These staff are those who are more likely to be involved/required to support in an incident requiring the use of physical restraint.

These staff are located in the departments of Estates, Student Services, Additional Learning Support, Admissions, Liaison and Marketing, FYi/Futures and Sport, Tourism and Public Services.

If there is a situation where restraint is needed then Estates will be contacted immediately and they will raise a "code red" situation.

Physical restraint will:

- be a last resort after other agreed calming strategies have been exhausted
- be a planned action undertaken by trained staff - a child/young person will be told what will happen if the misbehaviour does not stop
- include continued communication with the child/young person throughout the incident
- not be used as a punishment
- only include approved holds from training
- be followed by a record of what took place and by whom, communication with the child/young person's parents/carers and restorative action to help the child/young person better manage their emotions or behaviour
- be preceded by risk assessments for children/young people with special educational needs and disabilities, recognising the vulnerability of these groups and it will take into account our duties under the Public Sector Equality Duty and the Equality Act 2010 in relation to making reasonable adjustments.

## **9. Managing allegations regarding person(s) working in or on behalf of the college**

These procedures should be applied when there is an allegation that a person who works with a child/young person has:

- a. behaved in a way that has harmed, or may have harmed a child/young person.
- b. possibly committed a criminal offence against or related to a child/young person.
- c. behaved towards a child/young person or children/young people in a way that indicates they may pose a risk of harm to children/young people whilst in connection with their employment or voluntary activity (directly through the employer or via an agency) or voluntary activity.

Where such an allegation is made against any person working in or on behalf of the college, we will apply the same principles as in the rest of this document and we will always follow the pan Lancashire safeguarding procedures. Detailed records will be made to include decisions, actions taken, and reasons for these. All records regarding allegations against staff will be retained securely by human resources. Records of support provided to students as a result of any allegations against staff will be retained securely by the deputy head of student services.

Whilst we acknowledge such allegations (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

It is possible for an allegation to be made against a person working with a child or young person from a fellow colleague, a child or young person, anonymous call/email, the local authority designated officer (LADO), the police, the individual themselves.

Any person working in, or on behalf of the college has a legal duty to report any concern(s) that they may have regarding another individual working in, or on behalf of the college. It is understood that this may be difficult as it may relate to a colleague or a person may feel that the concern is not serious enough. However, all concerns should be reported to the DSL and any individual that does raise a concern will be supported in doing so.

### **9.1 Action to be taken if there is a concern or allegation**

If a person has a concern or receives an allegation regarding person(s) working in or on behalf of college the following actions should be followed:

- a) Ensure that where necessary, the child/young person receives appropriate medical attention or support.

- b) The person who has received an allegation or witnessed an event will immediately inform the DSL and make a record.
- c) The person whom the concern or allegation has been made against will not be approached at this stage, unless it is necessary to address the immediate safety of children/young people.
- d) Parents or carers of the child/children or young person/people involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.
- e) The DSL will discuss the concern or allegation with the head of human resources.
- f) The DSL may need to clarify any information regarding the allegation such as previous history, whether the child/young person or their family have made similar allegations previously and about the individual's current contact with children/young people. However no person will be interviewed at this stage.
- g) The DSL with the support of human resources will hold an initial discussion with the LADO in order to determine whether the concern or allegation(s) will need to be investigated externally via social services or the police.
- h) The DSL will discuss with human resources whether the concern or allegation(s) will be investigated internally in accordance with the staff disciplinary procedures. An internal investigation may proceed where it is alleged that an individual has harmed or poses a risk of harm to a child or young person under the age of 18 through their action or inaction or received a caution or conviction for a relevant offence, even in the event that the LADO determines that no external investigation via social services or the police will take place.
- i) In circumstances, such as the nature or complexity of the allegation, the allegation may require an independent investigator.
- j) If a decision is taken to investigate the allegation internally and/or externally the individual will need to be informed of the allegation and a decision made regarding any restriction which may need to be placed on the individual in the workplace, including suspension. The college will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children/young people at the college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. This will be undertaken in accordance with the college staff disciplinary procedures and following discussion and advice from human resources and must be confirmed in writing to the individual.
- k) The DSL and head of human resources may be invited and must attend any strategy discussion meeting at which either the police and/or LADO may be in attendance. This will be to determine and agree the process and timescales of internal/external investigations.
- l) The individual must be informed by the college of the outcome of any internal investigation. Please be aware that in some cases an internal investigation in accordance with the staff disciplinary procedures may and can be concluded before any external investigation.
- m) Following any internal investigation, a decision will be taken as to whether there is any evidence to support the allegation(s) and if so, whether the allegation(s) will be considered further at a disciplinary hearing where disciplinary action up to and including dismissal may be taken.

The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation;

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
  - False: there is sufficient evidence to disprove the allegation;
  - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
  - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegations being made.
- n) If an allegation is determined to be unsubstantiated or malicious, the DSL should refer the matter to the children's social care services to determine whether the child/young person concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether any disciplinary action is appropriate against the pupil/student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil/student.
- o) If an employee is dismissed or removed from working with children or young people permanently as a result of the internal disciplinary investigation for an allegation that they have harmed or pose a risk of harm to a child or young person under the age of 18 through their action or inaction or received a caution or conviction for a relevant offence this may result in a referral to the DBS for their consideration whether the person will be listed on the DBS Children's or Adult's Barred Lists. The referral would be conducted by the head of human resources with the input of the DSL.
- p) In the event that an individual resigns from their employment or ceases to provide their services prior to the conclusion of the disciplinary investigation, the investigation process and any hearing must continue and a conclusion reached. This is necessary due to the requirement of the college to consider whether the allegation(s) are proven, and if so to satisfy their legal duty to refer to the DBS. The DSL must consider whether to refer the case to the Secretary of State as required by the Education Act 2002.
- q) Consideration will be given throughout to the support and information needs of students, parents/carers and staff. It is important to ensure that appropriate communication is maintained with these parties throughout, whilst ensuring confidentiality is upheld. Parents or carers should also be kept informed about the progress of the case, and told the outcome.

## **9.2 Allegations against the DSL or Principal**

In the event that an allegation is made against the DSL the matter will be reported to the Principal who will proceed as the 'DSL' as from Step 3 above. If an allegation is made about the Principal this will be reported directly to the Chair of the Board of Directors or in her/his absence the Nominated Director for Safeguarding.

## **10. Students who are subject to criminal investigations**

The college understands the power of education in improving the life chances of all young people including those who may have been involved in early criminal activity.

Where a student is subject to a criminal investigation, college may suspend the student until the criminal investigation and legal proceedings have concluded. However, this does not automatically preclude college from progressing its own disciplinary action. Parents/carers will be kept informed verbally and in writing of any action taken and will be included in all meetings/risk assessments, where appropriate.

The student and parents/carers should be reminded that whilst criminal investigations are underway they are obliged to keep the head of student support or the college lead for safeguarding and student standards informed of any progress and/or change in status regarding his/her case.

Where the nature of the alleged offence suggests that there may be risk to the safety of others, or where the student accused of the offence may be at risk of harm, the head of student support or the college lead for safeguarding and students' standards, will undertake a risk assessment, This may result in action as follows:

- a) As a first step the student may be required to comply with specific conditions, for example agreeing not to contact another student or students.
- b) The student may be suspended or excluded, until such a time as any criminal proceedings have concluded. A precautionary suspension or exclusion should not be regarded as a penalty, and does not indicate that the student is presumed guilty of any offence. Suspensions will normally be carried out by the head of student support or the college lead for safeguarding and students' standards.
- c) The decision to temporarily suspend and/or exclude the student and the reasons why this action is being taken may be communicated verbally in the first instance and followed up in writing within 1 working day.
- d) During the suspension continuation of learning will be supported by the provision and marking of work. The head of student support or the college lead for safeguarding and students' standards will be the designated contact.
- e) The student may appeal against the decision to suspend and/or exclude in writing stating the reason for the appeal to the deputy principal within five working days of the date issued on the notice of the exclusion.
- f) Whilst the precautionary suspension and/or exclusion is in place, the student may request a review if there is a relevant change to his/her circumstances. This request should be made in writing to the deputy principal, who will respond within ten days of the receipt of the letter.
- g) The head of student support or the college lead for safeguarding and students' standards will review the case on a weekly basis and will make recommendations to the deputy principal if any further action is required during this review period.
- h) Where criminal proceedings (including bail conditions, period of time spent on remand, period of time served in custody following conviction) result in a student being absent from their study for a period of less than 4 weeks it will normally be the case that the student's place at college will be suspended for this period.

Procedures for when criminal proceedings have concluded, and the student is no longer a member of the college:

- a) Where criminal proceedings (including bail conditions, period of time spent on remand, period of time served in custody following conviction) result in a student being absent from his/her study for a period in excess of 4 weeks, the student will be deemed withdrawn from the college. The student may then reapply for admission and, as part of the standard admissions process, will be required to declare criminal convictions to be considered prior to a decision regarding an offer of a place.
- b) Where the student has been acquitted the college will take into account the decision of the court.
- c) When criminal proceedings have concluded, and the student is still a member of the college, the head of student support or the college lead for safeguarding and students' standards will decide whether the college should instigate disciplinary action, taking into account the following guidance:
  - o The conviction in a criminal court shall be taken as conclusive evidence that the alleged offence has occurred.

- o Where a criminal conviction has been made, the focus of the disciplinary proceedings may include an assessment of the risk posed to staff and/or students and an assessment of the impact caused by reputational damage to the college.
- o Where, following initial investigation, a decision has been taken not to proceed to a criminal trial, this does not preclude the college from conducting further investigations and/or instigating disciplinary proceedings in respect of outstanding matters of concern that have not been addressed through criminal proceedings.

#### Admission procedure for student in process of criminal proceedings

- a) All applicants are asked on the application form if they have a criminal record or ongoing criminal proceedings. Those answering 'yes' are asked to complete a supplementary form giving details.
- b) The supplementary forms are screened by the Deputy Head of Student Services, who makes an initial assessment of whether the record is relevant or not
- c) Where the criminal record is considered a risk then the Deputy Head of Student Services undertakes an initial risk assessment and informs the deputy principal
- d) The college may seek advice and information from other agencies involved with the applicant, or arrange for the student and parents/carers to be interviewed to collect further information or to clarify or confirm information.
- e) The Deputy Head of Student Services, will inform the applicant of the outcome.
- f) The head of student support or the college lead for safeguarding and students' standards will inform any staff who need to know if a student is admitted to the course with conditions for managing risk or particular support needs. Otherwise information on the criminal record is not passed on.

#### Failure to declare criminal proceedings

- a) Where it is revealed that a student has not disclosed criminal proceedings or an unspent criminal conviction, the head of student support or the college lead for safeguarding and students' standards will consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.
- b) Failing to disclose a minor issue which does not pose any risk to the college community or impact on the student's ability to complete the course successfully will be deemed serious misconduct and will result in a formal disciplinary hearing.
- c) Failing to disclose a significant issue which might pose a risk to the college community or impact on the student's ability to complete the course will be deemed gross misconduct and the student's place at college may be withdrawn following investigation and a formal disciplinary hearing. College may suspend the student until a thorough investigation and risk assessment has been conducted.

#### Confidentiality

- a) The college will deal with all matters relating to declarations of convictions or criminal proceedings in a confidential manner and details will be held securely and separately from other information the college holds.
- b) Information will only be shared with colleagues or other organisations on a 'need to know' basis and only to ensure the safety of all members of the college.

## 11. Other related policies

- Anti-bullying policy
- Acceptable use of computers policy
- Student attendance policy

- Data protection policy
- Equality policy
- Fitness to study policy
- Health and safety policy
- Online safety policy
- Positive behaviour policy and disciplinary procedures
- Recruitment procedures and policies
- Staff code of conduct
- Substance misuse policy
- Visits and residential policy
- Whistleblowing procedure

## 12. References

- Keeping Children Safe in Education 2018 – this statutory guidance from the Department for Education was issued under Section 175 of the Education Act 2002  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children (July 2018).  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Teachers' Standards; Guidance for school leaders, school staff and governing bodies. Department for Education July 2011. Introduction updated June 2013.  
<https://www.gov.uk/government/publications/teachers-standards>
- Prevent Duty Guidance  
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- Guidance for safer working practice for those working with children and young people in education settings  
<http://www.safeguardingschools.co.uk/wp-content/uploads/2015/10/Guidance-for-Safer-Working-Practices-2015-final1.pdf>

# Appendix A: Types of abuse and specific safeguarding issues

## 1. Types of abuse and neglect

All staff should be aware that abuse, neglect and other safeguarding issues are rarely standalone events. In most cases multiple issues will overlap with one another.

### 1.1 Abuse

Abuse is a form of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child/young person or children/young people.

#### 1.1.1 Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/young person.

#### 1.1.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and adverse effects on his or her emotional development. It may involve conveying to a child/young person 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/young person 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/young people. These may include interactions that are beyond a child/young person's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child/young person 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/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people. Some level of emotional abuse is involved in all types of maltreatment of a child/young person, although it may occur alone.

#### 1.1.3 Sexual abuse

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/young person 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/young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/young people to behave in sexually inappropriate ways, or grooming a child/young person 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/young people.

## 1.2. Neglect

Neglect is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter for a child/young person (including exclusion from home or abandonment); protect a child/young person 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/young person's basic emotional needs.

## 2. Other specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk). Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- child criminal exploitation (county lines) - see information below
- child sexual exploitation (CSE) - see information below
- children missing from education - see information below
- children missing from home or care
- children looked after (CLA) - see information below
- cyberbullying - see information below
- domestic violence
- drug abuse
- fabricated or induced illness
- faith abuse - see information below
- female genital mutilation (FGM) - see information below
- forced marriage - see information below
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- online safety - see information below
- peer on peer abuse - see information below
- private fostering - see information below
- radicalisation - see information below
- sexting
- so called honour based violence - see information below
- trafficking

### 2.1 Child criminal exploitation - county lines

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;

- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

For more information see

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

## 2.2 Child criminal exploitation - Child sexual exploitation

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

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex.
- can still be abuse even if the sexual activity appears consensual.
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity.
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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.

Some of the following signs may be indicators of child sexual exploitation:

- children/young people who appear with unexplained gifts or new possessions.
- children/young people who associate with other young people involved in exploitation.
- children/young people who have older boyfriends or girlfriends.
- children/young people who suffer from sexually transmitted infections or become pregnant.
- children/young people who suffer from changes in emotional well-being.
- children/young people who misuse drugs and alcohol.
- children/young people who go missing for periods of time or regularly come home late.
- children/young people who regularly miss school or education or do not take part in education.

### 2.3 Children missing from education

Going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risks of them going missing in future.

The college monitors student attendance at every session and poor or irregular attendance is investigated. The reasons for a student's absence is sought as early as possible. Children's Social Care will be informed if there are any concerns about a student's welfare.

### 2.4 Children looked after (CLA)

The college has a duty to promote the educational achievement of children who are looked after and to ensure that staff have the skills, knowledge and understanding necessary to keeping children looked after safe.

The college assign a designated member of staff, with appropriate training, qualifications and experience, to support the educational achievement of children looked after and previously looked after children, recognising that these are particularly vulnerable groups of children/young people and the importance of working with other agencies to ensure they are safeguarded.

### 2.5 Cyberbullying

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children/young people may know who's bullying them online – it may be an extension of offline peer bullying - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of engaging in bullying behaviour. Cyberbullying can happen at any time or anywhere - a child or young person can be bullied when they are alone in their bedroom - so it can feel like there's no escape. (Definition from <http://www.nspcc.org.uk>)

### 2.6 Faith abuse

Faith abuse includes certain kinds of child abuse linked to faith or belief. This includes:

- belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

This is not an exhaustive list and there will be other examples of beliefs held by children, families, carers and religious leaders that evil forces have entered the child or young person. Abuse may occur when an attempt is made to 'exorcise' the child or young person.

Faith abuse does not include child abuse within culture or faith contexts in general. So it does include female genital mutilation, forced marriage or child abuse in religious or faith settings which are incidental to the abuse, for example, sexual abuse by paedophiles within a religious community.

### 2.7 Female genital mutilation

All staff, volunteers, trainees and frequent visitors need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child

or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Whilst all staff should speak to the DSL (or deputy DSL) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers if, in the course of their work in the profession, they discover that an act of FGM appears to have been carried out on a girl under the age of 18, to report this to the police. For further details see <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

## 2.8 Forced marriage

A forced marriage, unlike an arranged marriage, is a marriage conducted without the valid consent of one or both parties where duress is a factor. Duress may take the form of emotional, financial, physical and sexual threats and abuse. Early or child marriage refers to any marriage of a child younger than 18 years old. The UN recognises it as a forced marriage because minors are deemed incapable of giving informed consent. Girls are the majority of the victims and hence are disproportionately affected. Forced marriage occurs within many cultures and classes. A person at risk of a forced marriage may suffer a range of abuses including emotional and physical abuse, unlawful imprisonment, abduction, rape, forced pregnancy or enforced abortion. Both women and men may be victims of forced marriage. (Definition from [End the Fear.co.uk](http://EndtheFear.co.uk) Greater Manchester against domestic abuse campaign – linked to NSPCC website).

## 2.9 Online safety

The use of technology has become a significant component of many safeguarding issues. In terms of child sexual exploitation; radicalisation and sexual predation technology often provides the platform that facilitates harm.

The college will ensure an effective approach to online safety to protect and educate the whole college community in their use of technology and establish mechanisms to identify, intervene in and escalate any incident where appropriate.

The college is mindful of the content that students may be exposed to online and will ensure that they are not able to access illegal, inappropriate or harmful material whilst using technology at college through appropriate filters and monitoring systems.

Training will be provided to ensure that staff and students conduct themselves appropriately when using technology in their settings in order to reduce the likelihood of harm. See guidance: <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

## 2.10 Peer on peer abuse

All staff, volunteers and trainees should recognise that children are capable of abusing their peers. This can take a number of different forms including sexual violence and harassment; physical abuse such as hitting, biting or causing physical harm through any other means; sexting, upskirting, initiating/hazing type violence and rituals.

Staff, volunteers and trainees need to recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously.

Procedures are in place to monitor, investigate and address peer on peer abuse. In the case of sexual or physical abuse, the DSL or Deputy DSL may be called on to work with the police and/or social care services to provide appropriate support to the victim and the perpetrator.

The college will ensure that students and staff, volunteers and trainees are aware that peer on peer abuse should never be tolerated or passed off as 'banter', 'having a laugh' or 'part of growing up'.

For more information see

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

## 2.11 Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Private fostering arrangements may come to the attention of staff through the normal course of their interaction, and promotion of learning activities, with children and young people. Where a member of staff or volunteer at college identifies that a private fostering arrangement is planned, or is in place, this should be raised as a safeguarding concern. The DSL or a Deputy DSL college will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child/young person.

## 2.12 Radicalisation and extremism

Radicalisation is defined as causing someone to become an advocate of radical political or social reform by supporting terrorism and violent extremism. Radicalisation of children and young people may include encouraging them to undertake violent activities on the grounds of religious belief. This may include attacks on others including suicide attacks. Children and young people may be exposed to messages about terrorism through a family member or friend, a religious group, or through social media or the Internet. This creates risk of a child or young person being drawn into criminal activity and exposure to significant harm.

Extremism is the demonstration of unacceptable behaviour by using any means or medium to express views which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - seek to provoke others to terrorist acts;
  - encourage other serious criminal activity or seek to provoke others to serious criminal acts;
- or
- foster hatred which might lead to inter-community violence in the UK.
- (Definition from the Crown Prosecution Service).

Extremism is defined by the Government in the Prevent Strategy as vocal or active opposition to fundamental British values, including;

- democracy
- the rule of law

- individual liberty
- mutual respect and tolerance of different faiths and beliefs.
- calls for the death of members of our armed forces, whether in this country or overseas

Students may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that all our staff, volunteers and trainees are able to recognise these vulnerabilities.

Indicators of vulnerability include:

- Identity crisis – the child/young person is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis – the child/young person may be experiencing family tensions, a sense of isolation and low esteem. They may have disassociated from their existing friendship group and become involved with a new and different groups of friends. They may be searching for answers to questions about identity, faith and belonging.
- Personal circumstances – migration, local community tensions and events affecting the child/young person’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations – the child/young person may have perceptions of injustice, a feeling of failure, rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups, imprisonment and poor resettlement/reintegration.
- Special educational need – children/young people may experience difficulties with social interaction, empathy with others and awareness of the motivations of others.

This is not an exhaustive list and more critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social media networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in identify/personal crisis. (Indicators taken from Blackpool Safeguarding Children Board Guidelines)

For more information see <https://www.gov.uk/government/publications/prevent-duty-guidance>

The Government website ‘Educate Against hate’ at <http://educateagainsthate.com/> has useful resources to help staff address raise awareness of extremism and radicalisation.

## 2.13 So called honour based violence

So called Honour Based Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family or community and include FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse, regardless of the motivation, and should be handled and escalated as such. Professionals in all agencies need to be alert to a child being at risk of HBV or having suffered HBV.

