



“Inspiring learning, developing character, building futures”

## **Student Support Policies and Procedures**

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

*Aim:*

- To embed a safeguarding culture and whole college approach to safeguarding which underpins all relevant aspects of process and policy development and ensures that all systems, policies and processes operate with the best interests of children and young people at heart.
- 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 give clear direction to staff, volunteers, visitors, students and parents/carers about expectations and our legal responsibility to safeguard and promote the welfare of all children and young people at college.
- To clarify the procedures for reporting suspected wrongdoing or bad practice in respect of the protection of children and young people at Blackpool Sixth.
- To support the development of safe environments for children and young people to learn and develop.
- 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)	Stuart Ormson <a href="mailto:stuart.ormson@blackpoolsixth.ac.uk">stuart.ormson@blackpoolsixth.ac.uk</a>
College Lead for Safeguarding and Behaviour	Tim Craven <a href="mailto:tim.craven@blackpoolsixth.ac.uk">tim.craven@blackpoolsixth.ac.uk</a>
<i>Deputy Designated Safeguarding Leads</i>	Ruth Atkinson <a href="mailto:ruth.atkinson@blackpoolsixth.ac.uk">ruth.atkinson@blackpoolsixth.ac.uk</a> Tom Holland <a href="mailto:tom.holland@blackpoolsixth.ac.uk">tom.holland@blackpoolsixth.ac.uk</a> Beth Leech <a href="mailto:elizabeth.leech@blackpoolsixth.ac.uk">elizabeth.leech@blackpoolsixth.ac.uk</a> David Williams <a href="mailto:david.williams@blackpoolsixth.ac.uk">david.williams@blackpoolsixth.ac.uk</a>
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Nominated Director and contact details	Jeremy Mannino <a href="mailto:Jeremy.Mannino@blackpool.gov.uk">Jeremy.Mannino@blackpool.gov.uk</a>

## Key Contacts outside of the college:

Blackpool Council Social Care Team for immediate concerns:

Daytime Hours	01253 477299
Out of Hours	01253 477600

Blackpool Local Authority Designated Officer (LADO):

Daytime Hours	01253 477541
Out of Hours	01253 477592
<a href="mailto:lado@blackpool.gov.uk">lado@blackpool.gov.uk</a>	

Lancashire County Council: Immediate Safeguarding Concern

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

Lancashire Local Authority Designated Officer (LADO):

Daytime Hours	01772 536 694
Out of Hours	0845 053 0009
<a href="mailto:LADO.Admin@lancashire.gov.uk">LADO.Admin@lancashire.gov.uk</a>	

NSPCC Whistleblowing helpline – 0800 028 0285.

Pan Lancashire Safeguarding Procedures - The procedures for the Pan Lancashire Consortium, which include those of Lancashire, Blackpool and Blackburn with Darwen can be found at:

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

From 29 September 2019, the arrangements for local safeguarding children boards ceased to exist and in their place is the 'Safeguarding Children Partnership Arrangements for Blackburn with Darwen, Blackpool and Lancashire'. <https://www.safeguardingpartnership.org.uk/>

## 2. Introduction

The Blackpool Sixth Form College is committed to safeguarding children and young people within our areas of responsibility and recognise the importance of ensuring that all adults working or volunteering in our organisations clearly understand their legal responsibilities, specific roles and the procedures to follow in order for this to happen.

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

- [Working Together to Safeguard Children](#)
- [Keeping children safe in education](#)
- [What to do if you're worried a child is being abused: advice for practitioners](#)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [Guidance for Safer Working Practice for professionals working in education settings](#)

This policy provides the procedures for staff, directors, volunteers and trainees to carry out in order to protect children and young people in our care and explains what to do when concerns about the safety and welfare of children and young people are identified or suspected. It outlines the procedure and support for managing any allegation made against person(s) working in or on behalf of Blackpool Sixth and provides guidance on the promotion of safer environments for our children and young people.

A culture of listening to young people and taking account of their views will be embedded in the college. All staff should be aware that children and young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff will, therefore, need to consider carefully how to build trusting relationships and how to facilitate effective communication.

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

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.

## 2.1 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 therefore ensure that:**

- All staff, volunteers and directors contribute to an ethos where children feel secure and safe.
- All staff understand the importance of recognising that extra familial harms can take a variety of different forms and young people can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- All children and young people have opportunities to communicate and know that they are listened to.
- All feelings and views of children and young people will be taken into account when decisions are being made about how to keep them safe.
- All children and young people know that they can communicate with any adult in college if they are worried or in difficulty.
- All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- All staff and volunteers will contribute to providing a curriculum and/or support which will equip children and young people with the skills they need to stay safe and be able to communicate when they do not feel safe
- All staff and volunteers will contribute to providing a curriculum and/or support which will help children and young people develop an attitude which will enable them to enter adulthood successfully and reach their full potential
- All staff, volunteers and directors will establish effective, supportive and positive relationships with parents, carers, students and other professionals

## 2.2 Scope of the policy

This policy applies to all staff, volunteers and trainees within The Blackpool Sixth Form College (including directly employed staff, those employed through an agency/third party, volunteers, Board of Directors, contractors and frequent visitors to the college). **Everybody working for, volunteering or training with Blackpool Sixth is responsible for the safeguarding of children and young people.**

Where services are provided (e.g. on-site lettings) by another body, the college will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place and that these meet the requirements set out in Keeping Children Safe in Education (including inspecting these as needed). This requirement will be agreed as a condition of use and failure to comply with this would lead to termination of the agreement. See [keeping children safe in out-of-school settings: code of practice](#) for more information.

For allegations relating to an incident where an individual or organisation was using the college's premises for running an activity for children, the college will adhere to our safeguarding policies and procedures, which include reporting the matter to the local authority designated officer (LADO), as we would with any safeguarding allegation.

## **2.3 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 mental or physical health and/or development.
- ensuring that they grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

## **2.4 Contextual safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the college. All staff 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/young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

## **2.5 Equality**

In accordance with the Equality Act 2010 (in relation to safeguarding) the college must :

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it;
- foster good relations between people who share a protected characteristic and people who do not share it;
- be conscious that students with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures;
- take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need.

When significant decisions are made or policies developed, specific consideration must be given to the equality implications of the protected characteristics, for example, the need to eliminate unlawful

behaviours that relate to sexual violence and sexual harassment, racism and misogyny/misandry (dislike of, contempt for, or ingrained prejudice against women/men).

For further information please see the Equality and Diversity (E&D) policy at <https://www.blackpoolsixth.ac.uk/information/policies/>

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

#### 3.1 General information

- a) It is the responsibility of everyone working, volunteering or training in college to ensure the safeguarding of children and young people. It is everyone's responsibility to familiarise themselves with this policy and to contribute to shaping its future development.
- b) All staff have an important part to play in supporting the mental health and wellbeing of children and young people. Poor mental health could be an indicator of abuse, neglect or exploitation. If staff have a mental health concern about a young person that is also a safeguarding concern, they should speak with a member of the safeguarding team.
- c) See guidance on [Mental health and behaviour in schools](#).
- d) All staff understand their expectations, roles and responsibilities around filtering and monitoring systems.
- e) 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.
- f) 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.
- g) All staff, volunteers and trainees must know the name of the 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.
- h) 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.
- i) All staff, volunteers and trainees have a responsibility to provide a safe environment in which children and young people can learn.
- j) 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.
- k) All staff, volunteers and trainees understand what domestic abuse is and the potential impact upon young people.
- l) All staff, volunteers and trainees must maintain an attitude of professional curiosity and 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.
- m) 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.
- n) 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.

- o) Any person working or training in or on behalf of the college has a duty to report any concern(s) they may have regarding another individual working in or on behalf of the college.
- p) All staff should feel comfortable to report matters both within, and where it is appropriate, outside of college (including online), which have implications for the safeguarding of children and young people.
- q) If an allegation against a member of staff is made, the procedures identified in section 8 will be instigated.

### **3.2 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/or has special educational needs (whether or not they have a statutory education, health and care plan).
- has a mental health need.
- is a young carer.
- is a child looked after and/or has returned home to their family from care.
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from care or home.
- is persistently absent from education, including persistent absences.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a family member in prison, or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- is a privately fostered child.
- has returned home to their family from care.
- is misusing drugs or alcohol.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or child marriage/forced marriage

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



### 3.3. Actions to follow when there are concerns about the wellbeing of a child or young person

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.

### 3.4 Reporting safeguarding concerns

Staff must 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 may be suffering from mental health problems (which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation)
- 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).

Blackpool Sixth has an online system (MyConcern) for reporting and recording Safeguarding concerns. This system provides an important timeline record of reported concerns, incidents and subsequent responses.

**To report a safeguarding concern, staff should complete an online referral using MyConcern.**

**If a member of staff suspects that a child or young person is at immediate risk of harm they must go to The Link and discuss their concerns with the member of the safeguarding team on duty or any other member of the safeguarding team. If there are no members of the safeguarding team available, staff should go to reception - the reception team will contact the duty DSL.**

**If staff members are unsure what to do they must always seek advice from the DSL, a deputy DSL or other member of the safeguarding team.**

**In exceptional circumstances, such as in an emergency, staff members should speak directly to the Police or Children's Social Care.**

A MyConcern referral must be completed as soon as possible and must:

- state clearly who is at risk.
- state what the risk is - be precise and concise
- identify what action has already been taken.
- identify the urgency of response required.

### **3.5 Responding to disclosures/concerns**

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 using MyConcern.

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 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.

### **3.6 Action by a member of the safeguarding team following a referral**

Following any information raising a safeguarding concern, the DSL/deputy DSL/other member of the safeguarding team will consider:

- any urgent medical needs of the child or young person.

- making an enquiry to see if the child or 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 or 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.

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

The DSL, Deputy DSL or other member of the safeguarding 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.

## **3.7 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 other 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 initial step will be to discuss and provide an overview/chronology of the case to date and subsequent actions that have occurred to the College Lead for Safeguarding and Student Standards.

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 College Lead for Safeguarding and Student Standards
Step 2	Escalate the case to the Designated Safeguarding Lead
Step 3	Escalate the case to the Principal
Step 4	Escalate the case to the college director responsible for safeguarding

In reviewing the 'escalated' case, differences 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.

#### **4. Recording and monitoring**

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded and kept confidential and stored securely in MyConcern. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

All safeguarding and child protection documents will be retained, separate from the child or young person's main file. A chronology of concerns, referrals, action, timescales and social care responses will be maintained.

Safeguarding records will only be accessible by the DSL and Deputy DSLs. 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 the attention of DSL'. Original copies will be retained until the young person's 30th birthday.

## **5. 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. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people.
- 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 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 should, therefore, share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child or young person. The information should be shared in a timely manner.
- e) 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.
- f) 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.
- g) 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.
- h) 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.

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

### **6.1 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. The college will notify shortlisted candidates that online searches may be conducted as part of pre-recruitment checks.

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. This training will include online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Training is in line with any published local multi-agency safeguarding arrangements.

### **6.2 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).

### **6.3 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.

### **6.4 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 child or 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.

## **6.5 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.

## **6.6 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)
- online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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.

### **d) Directors**



All Directors will have appropriate safeguarding/child protection training, which should be distinct from the training provided to all staff. This should happen both at induction and in an ongoing manner with annual updates. The training should equip Directors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the college are effective and support the delivery of whole-college safeguarding.

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

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

## **6.8 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 details of doctor's surgery.
- any factors which may impact on the safety and welfare of the child/young person.

## **6.9 Students who go missing from education or who are absent from education on repeat occasions or for prolonged periods**

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.

Students being absent from education for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The college's response to persistently absent students supports identifying such risks and helps prevent the risk of them becoming a young person missing education in the future.

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 in line with the college's student attendance policy. The reasons for a student's absence is sought as early as possible. Children's Social Care and/or the Police will be informed if there are any concerns of potential abuse, neglect, exploitation or other significant harm. See the Student Attendance Policy at <https://www.blackpoolsixth.ac.uk/information/policies/> for details of the college's response when students are absent from education.

## **6.10 Child-on-child (peer-on-peer) abuse**

The Keeping Children Safe in Education guidance refers to child-on-child abuse. Due to the older age range of students at college, mainly 16 to 19, this term includes peer-on-peer abuse for those students who are over 18.

All staff, volunteers and trainees should recognise that children are capable of abusing their peers.

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

Staff, volunteers and trainees need to be aware that sexual violence and sexual harassment can take place within intimate personal relationships between children and also be aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

Child-on-child can take a number of different forms including sexual violence and harassment, including rape and sexual assault; causing someone to engage in sexual activity without consent; physical abuse such as hitting, biting or causing physical harm through any other means; sexting (sharing of nude and semi-nude images); upskirting; initiating/hazing type violence and rituals (used as a way of initiating a person into a group).

There is a zero-tolerance approach to child-on-child abuse. It is essential that all staff challenge inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and young people and, in worst case scenarios, lead to a culture that normalises abuse leading to children and young people accepting it as normal and not coming forward to report it.

child-on-child abuse can happen both inside and outside of school or college and online. Even if there are no reported cases of child-on-child abuse, this doesn't mean it's not happening within the college. It is important that staff report any concerns about child-on-child abuse using MyConcern.

Blackpool Sixth has procedures in place to monitor, investigate and address child-on-child abuse - see the Anti-bullying policy at <https://www.blackpoolsixth.ac.uk/information/policies/>.

All staff have appropriate knowledge of part 5 (Child on child sexual violence and sexual harassment) of the 'Keeping Children Safe in Education' statutory guidance.

Work to prevent sexual harassment, online sexual abuse and sexual violence operates through a culture-led, whole-college approach that includes an effective behaviour policies, pastoral support and a carefully planned relationships, sex and health education curriculum.

Students are supported to report concerns about harmful sexual behaviour and all concerns are taken seriously and dealt with swiftly and appropriately and that pupils are confident that this is case

When dealing with reports of child-on-child sexual harassment, sexual violence and sexual abuse:

- all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- staff never promise confidentiality as it is extremely likely that a concern of sexual harassment or abuse will have to be shared further.
- all reports/concerns of child-on-child sexual harassment, sexual violence and sexual abuse are recorded on MyConcern.
- a member of the safeguarding team makes an immediate risk assessment and assessment of need to consider the victim, especially their protection and support, and takes any immediate actions that are appropriate to protect them.
- the wishes of the victim are always given high priority in terms of how they want to proceed and any support provided. Victims are given as much control as is reasonably possible over decisions. Although, ultimately, we have to balance the victim's wishes against our duty to protect the victim and other children.

- the alleged perpetrator is provided with support as appropriate and any appropriate disciplinary action taken.
- parents or carers are normally informed (unless this would put the victim at greater risk).
- if the victim does not give consent to share information, staff may still lawfully share it to protect children from harm and to promote the welfare of children.
- where a report is going to be made to children's social care and/or the police, then, as a general rule, a member of the safeguarding team will discuss next steps with the agency to agree how the alleged perpetrator will be informed of the allegations or concern.
- where a report of rape, assault by penetration or sexual assault is made, the starting point is referral to the police.
- all discussions, actions, decisions and reasons for decisions should be recorded.

## 6.11 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 has appropriate procedures in place to ensure online safety, including systems we have in place to filter and monitor online use - see the online safety policy at <https://www.blackpoolsixth.ac.uk/information/policies/> for further information.

The online safety policy will be reviewed annually to keep up with developments in technology, risks and harms.

Where students are asked to learn online at home we will follow the advice provided by the DfE in the [safeguarding and remote education](#) guidance.

## 6.12 Looked After Children, young people in care and care leavers

The college has a designated member of staff, with appropriate training, qualifications and experience, to promote the educational achievement of Looked After Children, young people in care and care leavers.

The designated member of staff works with local authorities, including virtual school heads, and other agencies to ensure the young people are safeguarded. The [statutory guidance](#) gives a summary of the roles and responsibilities of the designated member of staff.

## 7. Supporting the Government's Prevent Strategy

The college recognises its key responsibilities in fulfilling the Prevent Duty (Jun 2015) to protect young people from being drawn into extremism or terrorism by:

- assessing the risk of radicalisation across the organisation and developing a Prevent Action Plan that sets out the actions the college will take to mitigate any risks;
- identifying young people susceptible to extremist ideology and/or radicalisation;
- building resilience in young people to radicalisation;
- reporting any risks or concerns;
- promoting and exemplify British values;
- implementing robust ICT policies including the use filtering as a means of restricting access to harmful content;
- training staff to have an understanding of the factors that make people susceptible to being drawn into terrorism, to be able to recognise this vulnerability and be aware of

what action to take in response.

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 report any concerns about individuals/groups to the safeguarding team. See appendix A for more details about radicalisation and extremism.

## **8. 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.

Further advice can be found in [Use of Reasonable Force in Schools](#).

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

### **9.1 Managing cases of allegations that might indicate a person would pose a risk of harm**

These procedures should be applied when there is an allegation that a person who works with a child/young person, including supply teachers, volunteers and contractors, has:

- behaved in a way that has harmed, or may have harmed a child/young person and/or;
- possibly committed a criminal offence against or related to a child/young person and/or;
- 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 and/or;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people. This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children.

Where such an allegation is made against any person working in or on behalf of the college, or are using your college premises for running an activity for children, 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 DSL.

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. Any allegations which are proven to be false, unsubstantiated or malicious will not be referred to in employer references unless they relate to misconduct or consistent poor performance.

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.

#### **9.1.1 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 Managing low level concerns/allegations that do not meet the harm threshold**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the threshold set out in section 9.1.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with students;
- showing favouritism;
- taking photographs of students on their mobile phone;
- using inappropriate sexualised, intimidating or offensive language;
- humiliating students.



Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent/carer; other adult; or as a result of vetting checks undertaken.

## **Procedures**

Any low-level concerns should be reported to either the DSL or Head of HR.

Staff are encouraged to self-refer if they have found themselves in a situation which might be misinterpreted or might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

The Head of HR and DSL will take steps, where necessary, to secure the immediate safety of children/young people.

A member of the leadership team will have an initial conversation with the member of staff about the low level concern. The purpose of the conversation is to establish a fair and balanced view of the facts relating to any concern before determining what further action may need to be taken.

Any low-level concerns will be responded to in a sensitive and proportionate way - on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst also protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

The Head of HR and DSL will discuss the concern and the information gathered by the member of the leadership team with the Principal and a decision will be made whether or not the concern meets the threshold of harm. The Head of HR and DSL may need to clarify any information regarding the allegation, however no person will be interviewed at this stage.

The DSL and Head of HR will review the information and determine whether the behaviour is entirely consistent with the college's code of conduct, constitutes a low-level concern or is serious enough to consider a referral to the LADO. Where there is any doubt whatsoever, the DSL will seek advice from the LADO on a no-names basis which, depending on the advice provided, may result in a full investigation being undertaken by the DSL and Head of HR or their designate. Concerns meeting the threshold of harm will be dealt with by following the procedures detailed in section 9.1.1.

Low level concerns which are shared about supply staff and contractors will be notified to their employers/agency.

Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Others may be appropriately dealt with by means of management guidance and/or training.

Any low-level concerns that raise issues of misconduct or poor performance will be dealt with in accordance with the staff disciplinary policy.

All low-level concerns will be recorded by the Head of HR as part of the single central record (SCR). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.



Records of low-level concerns will be kept confidential, held securely so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. These details will remain on the SCR for the duration of the staff member's employment and any notes will be kept for the same duration.

Where a pattern of such behaviour is identified, the Head of HR will discuss this with the DSL who will decide on a course of action. Where a pattern of behaviour moves from a concern to meeting the harm threshold, it will be referred to the LADO.

The central record of low-level concerns will be reviewed termly as part of the single central record audit. Consideration will be given to whether there are wider cultural issues within the college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Low-level concerns will not be referred to in employer references unless they relate to misconduct or consistent poor performance.

### **9.3 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, the 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 Assistant Head of Student Services (Student Finance), who makes an initial assessment of whether the record is relevant or not
- c) Where the criminal record is considered a risk then the Assistant Head of Student Services (Student Finance) undertakes an initial risk assessment and informs the DSL.

- 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 Assistant Head of Student Services (Student Finance, 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, depending 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. Domestic Abuse and Operation Encompass

**Domestic abuse (DA)** is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected"

The abuse can encompass, but is not limited to:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse;
- psychological, emotional or other abuse.

Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child or young person may blame themselves for the abuse or may have had to leave the family home as a result.

The college is a full participant in Operation Encompass, which seeks to protect children and young people from the impact of domestic abuse. As part of Operation Encompass the DSL will: -

- Ensure that the college has suitably trained Key Adults in order to fulfil its obligations under Operation Encompass. The Key Adults at Blackpool Sixth are the DSL and the Deputy DSLs.
- Ensure that the college's commitment to Operation Encompass is known throughout the college community via the means of staff training, parental letters, posters and the college website.
- provide an overview of Operation Encompass with the names of the Op Encompass leads and a link to the Op Encompass website (<https://www.operationencompass.org/>).

The National Domestic Abuse Helpline, can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

## **12 Use of college premises for non-college activities**

Where the college hires out college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children and young people safe.

When services or activities are provided under the direct supervision or management of college staff, the college's arrangements for safeguarding and child protection will apply.

Where services or activities are provided separately by another body the college will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure that there are arrangements in place to liaise with the college on these matters of concern, where appropriate.

The college will also ensure that safeguarding requirements are included in any lease or hire agreement as a condition of use of the premises and that failure to comply with this would lead to termination of the agreement.