<table>
<thead>
<tr>
<th><strong>Safeguarding Policy and Procedure</strong></th>
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<tbody>
<tr>
<td><strong>Version:</strong></td>
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<tr>
<td><strong>Author:</strong></td>
</tr>
<tr>
<td><strong>Date Issued:</strong></td>
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<tr>
<td><strong>Date Approved by SMT:</strong></td>
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<tr>
<td><strong>Impact Assessment Completed</strong></td>
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<tr>
<td><strong>Date of Next Review:</strong></td>
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</tbody>
</table>
### Equality Impact Assessment Form

The completion of the Equality Impact Assessment (EIA) will help us to ensure that our policies, procedures and practices do not discriminate or disadvantage people and also improve or promote equality.

<table>
<thead>
<tr>
<th>In relation to: disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Please explain if you identified any inequalities or possible discrimination in the policy, procedure or practice?</td>
</tr>
<tr>
<td>No inequalities identified.</td>
</tr>
<tr>
<td>The Safeguarding Policy and Procedure will help to ensure that all students, but in particular, young people and vulnerable adults, are safeguarded from actual or potential harm or abuse. The Policy and Procedure does not exclude any individual or group. In fact, all staff will ensure that any potential or actual harm or distress reported by students (or others) is acted upon swiftly and measures put in place to increase their safety, well being and opportunity to achieve.</td>
</tr>
<tr>
<td>2. If identified, how have you changed the policy, procedure or practice to remove or mitigate the inequality or discrimination?</td>
</tr>
<tr>
<td>Not applicable</td>
</tr>
<tr>
<td>3. Any follow up actions required?</td>
</tr>
<tr>
<td>None.</td>
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</tbody>
</table>
## TABLE OF CONTENTS

1. Purpose of policy and procedure
2. Scope
3. Categories of abuse
4. Principles
5. Responsibilities
6. Designated Lead for Safeguarding
7. Responsibility of Liaison Governors for Safeguarding
8. Dealing with Disclosure of Abuse
9. Support for students and Staff where there are Additional Concerning Factors
10. Students who may present a risk to other students, including sex offenders and violent offenders
11. Allegations of Peer on Peer Abuse
12. Forced Marriage
13. Female Genital Mutilation (FGM) - [and Breast Ironing]
14. Child Sexual Exploitation
15. Domestic Abuse
16. PREVENT
17. Safer Recruitment, Selection and Pre-employment Vetting
18. Whistle Blowing
19. Staff Awareness and Training
20. Links to External Guidance and Policies
21. Dealing with Allegations of Abuse against Members of Staff, Volunteers, Contractors and other Visiting Professionals
22. Enquiries and Investigations Following Allegations Against a Member of Staff
23. Suspension of Staff
24. Records
25. Investigating Allegations of Child Pornography
26. Internet Safety
27. Managing Student Behaviour
28. At Risk students
29. Missing Students
30. Young Carers and Young Parents
31. Helping Students to Keep Themselves Safe
32. Making a Referral
33. Removing a Student from College Premises and to a Place of Safety
34. Attendance at External Meetings
35. Students who may Pose a Risk to Others
36. Parents and Carers
37. Multi-agency Work
38. Students in Work
39. Trip, Visit or Residential
40. Maintaining a Safe Environment
41. Monitoring and Reporting
42. Location of Policy
43. Link to other College Policies

APPENDIX ONE: Prevent Strategy
APPENDIX TWO: Information Sharing with External Agencies
1. Purpose of policy and procedure

- This policy and procedure is written to help readers understand that safeguarding is the responsibility of all, including; staff, volunteers, managers, Senior Management Team (SMT), governors, students, subcontracting providers (non payroll staff) and visitors.

- Inform staff that they have particular responsibility for keeping students safe and report concerns related to possible harm or abuse of children, young people and/or vulnerable adults.

- Instill confidence in students and their parents or carer that Shipley College is a safe learning environment and that their concerns will be taken seriously and treated in a sensitive manner.

1.1 Guiding Principles

- The College will support anyone who, in good faith, reports his or her concerns that a child, young person or vulnerable adult is at risk of abuse or harm
- Ensure that all members of staff, volunteers, contractors and visiting professionals are aware of their responsibility to report safeguarding concerns
- Ensure college buildings are accessible and safe
- Take appropriate action to ensure that children, young people and vulnerable adults are kept safe, both away from and at the College
- Ensure staff receive appropriate safeguarding updates and training to promote student wellbeing and maintain a safe environment
- Establish procedures for reporting and dealing with allegations of abuse against members of staff, volunteers, contractors or other visitors to the College
- Ensure the safe recruitment of staff, contractors and volunteers
- Engage with employers where students are in work placement or work based learning to raise awareness of the employer’s responsibilities in relation to safeguarding and Health and Safety
- Promote to students to keep safe online and when using other digital media
- Work collaboratively with support agencies, including Bradford safeguarding children and adult boards
- Encourage students to stay safe
- Where appropriate, work collaboratively with parents or carer to keep students safe
- Instil in staff the attitude of “it could happen to our students” and therefore, be vigilant, take disclosures seriously and take appropriate action.

1.2 This Policy is based upon the following legislation and guidance:

- Children Act 1989
- Children Act 2004
- Care Act 2014
- Mental Capacity Act 2005
- Section 175 Education Act 2002
- Working Together to Safeguard Children Guidance 2015 (DCSF)
- Making Safeguarding Personal for Adults Guidance 2014/15
- Multi-Agency practice guidelines: Handling cases of forced marriage 2014
2. **Scope**

- This Policy and Procedure applies to the College workforce, governors, volunteers and visitors to the College, including subcontractors working on site or agency staff
- A ‘child’ is defined as a person aged up to 18
- ‘Looked After Children or Care Leavers’ and students with Special Educational Needs and Disabilities (SEND) up to age 25 may also require additional protection and/or consideration
- Students aged 14 - 16 enrolled at the College or those attending the College but on a school roll, for instance attending a taster session, are covered by all aspects of this policy. However, for those on a school roll, the School will be initially notified of the safeguarding concern prior to a referral being made to an external agency. Should there be an emergency and the College is unable to contact the appropriate school, the College will apply its referral procedures to the situation to ensure the child is safe
- Employers and training organisations will be asked to co-operate with the College in putting in place and subscribing to appropriate safeguards
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes (as set out in ‘Working together to safeguard children’ - A guide to inter-agency working to safeguard and promote the welfare of children, 2015)

2.1 Adult Safeguarding extends to adults who:

- Have needs for care and support
- Are experiencing, or are at risk of, abuse or neglect
- As a result of the needs are unable to protect themselves against significant harm or exploitation.

3. **Categories of abuse**

Young people and adults can experience abuse in a variety of settings including at College, within the family home, within a personal relationship, in the community as well as whilst using online computer networks and phones.

The following categories of abuse are used in the Keeping Children Safe in Education (KCSiE) Guidance 2016.

- **Abuse**: a form of maltreatment of a child or adult. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or a child or children.

- **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. In addition for adults, it may include unlawful or inappropriate use of a restraint or physical interventions and/or unlawful deprivation of liberty is physical abuse.
• **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. In addition for adults this may include threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal from services or supportive networks.

• **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. In addition for adults, this may include rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent or was pressured into consenting. Sexual acts would include being made to watch sexual activity.

• **Neglect**: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. In addition for adults this includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

• **Modern slavery**: includes human trafficking, forced labour and domestic servitude. Traffickers and slave masters use the means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhuman treatment.

• **Discriminatory abuse**: includes - abuse based on a person’s race, sex, gender identity, age, disability, sexual orientation or religion; or other forms of harassment, slurs or similar treatment or hate crime/hate incident.
Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. It can result from situations that exploit a person’s vulnerability by treating the person in a way that excludes them from opportunities they should have as equal citizens, for example, education, health, justice and access to services and protection.

- **Financial or Material Abuse**: is a crime. For example, the use of a person’s property, assets, income, funds or any resources without their informed consent or authorisation. It includes: theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, such as wills, property, inheritance or financial transactions, exploitation or the misuse or misappropriation of property, possessions or benefits, the misuse of an enduring power of attorney or a lasting power of attorney, or appointeeship.

- **Domestic Abuse**: includes psychological, physical, sexual, financial, emotional abuse; as well as so called ‘honour’ based violence, forced marriage and female genital mutilation. Many people think that domestic abuse is about intimate partners, or abuse of women by men, but it may also be caused by wider family members, and committed by women towards men and in same sex relationships, as made clear in the Home Office definition: “An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse… by someone who is or has been an intimate partner or family member regardless of gender or sexuality.”

4. **Principles**

4.1 **Safeguarding Procedure for Staff and Volunteers**

All staff at College have a legal duty of care to identify any students who may be experiencing or at risk of experiencing, abuse or harm at College or elsewhere and take the relevant action to ensure their safety. This includes staff reporting allegations of abuse against another member of staff as set out in the Procedures.

The College acknowledges that education staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse or neglect at an early stage.

As a general principle, the College has a statutory responsibility to:

- Seek to create a safe environment for the entire college community
- Work collaboratively with external agencies to achieve the best safeguarding outcome for the student
- Comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Independent Safeguarding Authority and ‘Keeping Children Safe in Education’ - 2016
- Undertake Disclosure and Barring Checks, to ensure that all employees and workers under terms of engagement are suitable to work at the College
- Develop and implement procedures for identifying, reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service
- Educate students on how to maintain their safety and live healthy lives
- Consult with students in developing safeguarding policies and procedures
• Implement appropriate level of support for students with Special Educational Needs and Disabilities (SEND) to maintain their safety. Provide appropriate mandatory training and updates to staff, volunteers and governors.

5 Responsibilities

5.1 Staff Responsibility

Every member of staff, volunteer or regular contractor is responsible for reporting any suspected abuse or disclosure of any young person or vulnerable adult to one of the nominated staff.

5.2 Senior Designated Safeguarding Lead on SMT

• The Senior Designated Safeguarding Lead will ensure the College carries out its duties in relation to Safeguarding Children, Young People and Adults who may be at risk of harm and:
  • Ensure that all staff and volunteers receive safeguarding awareness training and are aware of the College Safeguarding procedures
  • Ensure the College deals with allegations in accordance with these procedures
  • Resolve any inter-agency issues and complaints
  • Liaise with the Corporation on safeguarding matters.

6. Designated Lead for Safeguarding

6.1 Head of Student Services has the lead responsibility for child protection and vulnerable adult issues. In undertaking this role, will:

• Report to the Senior Designated Safeguarding Lead on SMT
• Update Safeguarding Liaison Governor on any serious concerns
• Take the lead on ensuring College carries out its duties in relation to Safeguarding Children, Young People and Adults who may be at risk of harm.
• Undertake training in relation to Safeguarding
• Provide annual Safeguarding Report to the Governing Body and SMT
• Provide Safeguarding awareness training and updates for all staff and volunteers
• Maintain an oversight of safeguarding concerns raised and where appropriate, offer guidance and advice on dealing with the situation.
• Liaise closely with HR manager and Senior Designated Safeguarding Lead on concerns or allegations of abuse made against a member of staff concerning students.

In the absence of the Head of Student Services, a member of the the Safeguarding Team will deal with the situation.

6.2 The Designated Lead (Head of Student Services), together with the Safeguarding Team, will be responsible for the following in relation to any young person or vulnerable adult:

• Overseeing the referral of cases of suspected or alleged abuse towards a child, young person or vulnerable adult
• Providing advice and support to other staff on issues relating to child protection or vulnerable adult abuse
• Maintaining a proper record of any child protection referral, allegation, disclosure or concern (even where that concern does not lead to a referral)
• Promoting College’s safeguarding policy and procedure to all staff
- Liaising with the Local Authority and Local Safeguarding Children / Adult Board or other appropriate agencies
- Liaising with previous institution attended by the applicant/student to ensure that appropriate information is obtained and transition arrangements in place for students identified to be at risk
- Ensuring mandatory safeguarding training is in place for all staff
- In collaboration with the VP - Curriculum and HR Manager, deal with initial allegation of safeguarding concern raised against a staff member involving students.

6.3 Designated Safeguarding staff responsibility - College Key Worker and Specialist Personal and Careers Adviser

- Work pro-actively with a caseload of vulnerable young people and adults where there is a concern
- Make appropriate referral of any suspected or reported abuse of a young person or vulnerable adult
- Available to provide advice and support to other staff on issues relating to child protection or vulnerable adult abuse
- Available to listen to young people and vulnerable adults studying at the College
- Deal with individual cases, but referring to the Head of Student Services as appropriate
- Maintain up to date records of disclosures and interventions made to support students
- Have received adequate child protection training and maintain refresher training

6.4 Safeguarding Team Responsibility

- In the absence of the Designated Safeguarding Lead, the Designated Safeguarding staff may call upon managers on the Designated Safeguarding Team for support or overseeing the referral of cases of suspected abuse or allegations to an external agency
- Make appropriate referral of any suspected or reported abuse of a young person or vulnerable adult
- Available to provide advice and support to other staff on issues relating to child protection or vulnerable adult abuse
- Available to listen and deal with concerns raised by a young person or vulnerable adult
- Deal with individual cases, referring to the Head of Student Services where appropriate
- Have received training in child protection issues and will receive refresher training.
Contact Details of Members of the Safeguarding Team

<table>
<thead>
<tr>
<th>Staff Member</th>
<th>Role</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shoeb Desai</td>
<td>Head of Student Services</td>
<td>327290</td>
</tr>
<tr>
<td></td>
<td>(Designated Safeguarding Lead)</td>
<td>07970705930</td>
</tr>
<tr>
<td>Mandy Child</td>
<td>College Key Worker</td>
<td>327302</td>
</tr>
<tr>
<td></td>
<td></td>
<td>327281</td>
</tr>
<tr>
<td>Chris Holgate</td>
<td>Specialist Personal / Careers Adviser</td>
<td>327300</td>
</tr>
<tr>
<td></td>
<td></td>
<td>327281</td>
</tr>
<tr>
<td>Lucy Veall</td>
<td>Head of Learning Support</td>
<td>327260</td>
</tr>
<tr>
<td></td>
<td></td>
<td>07958060684</td>
</tr>
<tr>
<td>Mark Harrison</td>
<td>Head of Sector for Care</td>
<td>327276</td>
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<tr>
<td></td>
<td></td>
<td>07958060674</td>
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<tr>
<td>Liz Barker</td>
<td>Head of Sector for Essential Skills</td>
<td>327310</td>
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<tr>
<td>Linda O'Donnell</td>
<td>Head of Business Development</td>
<td>327239</td>
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<tr>
<td></td>
<td></td>
<td>327400</td>
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<tr>
<td>Diane France</td>
<td>Health and Safety Officer</td>
<td>327219</td>
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<td></td>
<td></td>
<td>327222</td>
</tr>
<tr>
<td>Kate Hessey</td>
<td>HR Manager</td>
<td>327249</td>
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<td></td>
<td>327222</td>
</tr>
<tr>
<td>Ian Durham</td>
<td>Director of Physical Resources</td>
<td>327253</td>
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<tr>
<td></td>
<td></td>
<td>07958060664</td>
</tr>
<tr>
<td>Julie Bales</td>
<td>Vice Principal – Curriculum</td>
<td>327296</td>
</tr>
<tr>
<td></td>
<td>(Senior Designated Safeguarding Lead on SMT)</td>
<td>327207</td>
</tr>
</tbody>
</table>

6.5 In the unlikely event that the Head of Student Services or the Safeguarding Team are not available, deal with an emergency safeguarding concern requiring immediate action by the emergency services.

6.6 In a life threatening situation or someone suffering or at risk of suffering significant immediate harm, you may be required to call for an ambulance or the police on (9) 999.

6.7 Ensure you describe the situation accurately and be precise where you want the emergency services to arrive. Knowing street names and postcodes for the different buildings will be useful and stop any delays.

6.8 As soon as it is possible, report the safeguarding concern to the Head of Student Services, member of the Safeguarding Team, an SMT member or Line Manager.

7. Responsibility of Liaison Governors for Safeguarding

7.1 Maintain close links with the Principal and Head of Student Services on matters concerning safeguarding:

- Undertake relevant safeguarding training
- (As a member of the Governing Body) Approve the College’s Safeguarding Policy and Procedures and receive annual Safeguarding Report
- Challenge and request further information on issues relating to Safeguarding
- Support the Chair of Corporation in connection with any safeguarding allegations made against the Principal or any other senior post holder. This may involve liaison with external agencies, such as the police or Social Care Services.

8. Dealing with Disclosure of Abuse

8.1 Following disclosure of abuse or on noticing anything that is a cause for concern, a member of staff should do the following:
Find an appropriate place to listen
Listen carefully and stay calm
Listen patiently; try not to ask too many questions - Let the student take their time to explain
Reassure the student that they are doing the right thing in telling you - they have a right to be safe and protected
Assure the student that you will try to help, but explain that you have a duty to pass this information on to protect both them and possibly other members of the family or anyone else
Make brief notes, using the student's own words as far as possible, and check with the student that you have understood their concern. Include any questions you may have asked.
Do not add any opinions or interpretations.
If a referral is made to an external agency, record of the date, time, place, incident, etc. is critical
Inform the student that you will need to pass the information on, but it will be treated with the strictest confidence – employing a “need to know”
As soon as you can afterwards, contact Head of student Services or a member of the Safeguarding Team who will deal with the disclosure and will put in place measures to support the student in College.
If there is a serious risk of harm waste no time and speak to a designated person immediately
Inform the student that the Head of Student Services or the Safeguarding Team Member dealing with the matter will contact the student and may report the disclosure to Social Services or contact the appropriate external agency, parent or carer, particularly if the person concerned is aged 18 or under
Inform the student that they will be updated by the Head of Student Services or member of the Safeguarding team dealing with the disclosure.

8.2 Avoid the Following when Dealing with a Student Disclosure:

Offering confidentiality – making promises that information will not be shared with others
Making judgements
Putting words into the student's mouth
Making any comments about the alleged offender
Asking leading questions or unnecessarily eliciting further information – this will be followed up by member of the Safeguarding Team dealing with the concern or the external agency.
Taking the matter further yourself - always refer on, do not get overly involved with any safeguarding issues
Using your personal mobile phone to contact students or allow students to contact you outside working (college) hours
Visiting students in their home without a specific purpose and expressed permission of your line manager

8.3 All staff must be familiar with the following documentation and guidance in order to effectively carry out their safeguarding responsibility

- Safeguarding Team Contact List
- Safeguarding flow chart for staff_FV.pdf
- Safeguarding Flow Chart for students_FV.pdf
- ‘Keeping Children Safe in education’ - 2016 (located on Staff Intranet)
9. **Support for students and Staff where there are Additional Concerning Factors**

9.1 The College can refer students to specialist organisations who provide a range of specialist support, guidance and advice. There are confidential helplines such as ChildLine, Forced Marriage Unit and the Domestic Violence Helpline for students who do not want to talk to staff.

10. **Students who may present a risk to other students, including sex offenders and violent offenders**

10.1 If a College staff member becomes aware or is concerned that a student who is enrolling or already attending College may have been involved in sexual or violent offences this information needs passing immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will have the responsibility to contact outside agencies to request further information on a 'need to know' basis and liaise with appropriate staff about the action to be taken. The College has a role in rehabilitation of offenders but will assess the risks to other students before making any decisions.

11. **Allegations of Peer on Peer Abuse**

11.1 If a student has reported being abused by another student, the Head of Student Services or the appropriate Head of Sector should be contacted immediately. In some circumstances the Head of Student Services or SMT member may contact the Police especially if the student reporting the abuse is vulnerable. If the student is under 18 years (or a vulnerable adult living at home) their parents/carer is likely to be contacted (unless there are exceptional circumstances not to do so). The College recognises that the welfare of the alleged victim will be the paramount concern. However, it also recognises that hasty or ill-informed decisions can irreparably damage a student's reputation, confidence and/or opportunity to achieve. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful and measured way. It is possible that during a College investigation suspension of the alleged abuser may take place. If the decision is taken not to suspend the student who is the subject of the allegation, a risk assessment plan put into place. If the police or Children’s Social Care or the Adult Protection Unit are undertaking an investigation, the College will wait for the outcome before undertaking a College internal investigation.

12. **Forced Marriage**

12.1 Forced marriage is different from and should not be confused with, arranged marriage. A student who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse such as physical, psychological, financial, sexual and emotional pressure. The Government has produced guidelines for schools, colleges and universities in how to respond to this situation.

12.2 If there are concerns that a student may be in this situation, they can be offered support and advice locally as well as details of the Forced Marriage Unit who can offer specialist advice. Confidentiality is extremely important in these circumstances. Whilst establishing the student's situation, staff should try to ascertain the immediate risk the student is in. In all cases, staff must consult with Designated Safeguarding Lead or member of the Safeguarding Team, either
to take action to safeguard or to provide information and advice, given the student's age and understanding. If the student is going overseas imminently it is important to contact the Designated Safeguarding Lead or member of the Safeguarding Team immediately and to gather as much information as possible from the student.

12.3 The student's family should not under any circumstances be contacted without consultation with the Designated Safeguarding Lead and student. Confidentiality within College is also essential.

12.4 College staff should report students that go missing from education, particularly on repeat occasions, to the Head of Student Services or their HoS in order to implement a plan of action to minimise the risk of them going missing in future.

13. **Female Genital Mutilation (FGM) - [and Breast Ironing]**

13.1 There is a mandatory duty in law for professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

13.2 All professionals have a duty to act to safeguard girls at risk of FGM with four key issues to consider:

- An illegal act being performed on a female, regardless of age
- The need to safeguard girls and young women at risk of FGM
- The risk to girls and young women where a relative has undergone FGM
- Situations where a girl may be removed from the country to undergo FGM.

13.3 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 significant risk. Victims of FGM are likely to come from a community that is known to practice 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. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines:

Link to documents - [Female genital mutilation: multi-agency practice guidelines](#)

NSPCC - [Female genital mutilation (FGM) What is FGM](#)

“Breast Ironing” - also known as “Breast Flattening” is the process whereby young pubescent girls breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education.

Much like Female FGM, Breast Ironing is a harmful cultural practice and is child abuse. Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing.
Similarly to Female Genital Mutilation (FGM), breast ironing is classified as physical abuse therefore Concerns raised must follow the safeguarding procedure.

13.4 Designated Safeguarding Lead or member of the Safeguarding Team dealing with the concern will use local protocols for multi-agency liaison with police and children’s social care.

14. **Child Sexual Exploitation**

14.1 Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they’re in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

14.2 If staff become aware of any concerns, this needs to be reported to the Designated Safeguarding Lead or member of the Safeguarding team to refer concerns to the relevant agency.

15. **Domestic Abuse**

15.1 The Home Office definition includes: Any incident or pattern of incidents of Controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

15.2 Domestic abuse can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional
- Coercion

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

15.4 ‘Coercive behavior’ is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten a victim. This definition includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

16. **PREVENT**

16.1 All FE / HE providers in relation to the Counter Terrorism and Security Act 2015 have a duty to ensure all students, staff and volunteers are advised on how to keep safe and remain within the law. The Prevent Duty Section 26 contained
within this legislation does not prevent students and staff from having political or religious views and concerns, but contains details on how they might use these concerns or act on them in non-extremist ways.

16.2 Prevent is one of the Government’s counter terrorism strategy and it aims to stop young people becoming terrorists or supporting terrorism.

16.3 The Prevent Strategy (refer to Appendix One for further details)

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

16.4 The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

16.5 The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

16.6 The Home Office uses a range of measures to challenge extremism in the UK, including:

- Where necessary, preventing supporters for terrorism and extremism from travelling to this country.
- Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist views.
- Funding a specialist police unit which works to remove online content that breaches terrorist legislation.
- Supporting community based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences.

16.7 Supporting people who are at risk of being drawn into terrorist activity through the Channel Process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

16.8 The College is committed to supporting vulnerable students through its Safeguarding agenda in order to prevent potential radicalisation. The College has engaged positively with the Workshop to Raise Awareness of Prevent (WRAP) to ensure all staff have the skills and knowledge to refer any concerns appropriately. All concerns should be referred to the Designated Safeguarding Lead or member of the Safeguarding Team.

16.9 14-16 Year Old Students. Where there are students who are under 16 years old and are also enrolled with a secondary school including the Pupil Referral Unit (PRU), the College must liaise with the school to ensure appropriate arrangements are in place to safeguard the child/young person. Where there is a
child protection concern the Designated Safeguarding Lead or member of the Safeguarding Team will liaise with the school’s Designated Safeguarding Lead.

17. Safer Recruitment, Selection and Pre-employment Vetting

17.1 The College pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in part three of Keeping Children Safe in Education (2015)

17.2 The College will maintain a Single Central Record which demonstrates the relevant vetting checks required including: a barred list check, Disclosure and Barring Service (DBS) check at the correct level, identity, qualifications, prohibition order and right to work in the UK

17.3 All recruitment materials will include reference to the College’s commitment to safeguarding and promoting the wellbeing of students

17.4 The College will ensure that recruitment panels are aware of safer recruitment practices

17.5 The College recruitment and selection procedures apply to all staff and volunteers who may work with young people and vulnerable adults and will take into account the following:

- The post or role is clearly defined
- There is a requirement in the specification for understanding the importance of, and commitment to, safeguarding young people and vulnerable adults
- Probing questions are asked in interview into motives, attitudes and behaviours for applying for post
- Documentary evidence of academic and vocational qualifications are scrutinised and gaps in any part of the history are checked
- References are required

18. Whistle Blowing

18.1 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection and the protection of vulnerable adults, which may include the attitude or actions of colleagues

19. Staff Awareness and Training

19.1 Safeguarding is included in induction for all new staff, including volunteers

19.2 The College provides appropriate mandatory training that will allow all staff/individuals working with students, in line with their role, to be fully aware of their responsibility to safeguard, and promote the welfare of children, young people and vulnerable adults.

19.3 All staff, volunteers and governors will be asked to read the guidance - ‘Keeping children safe in education’ - Part one

19.4 This document is written by the DfE for schools and colleges in order to assist the Governing Body, managers and all staff to understand and carry out their duties to safeguard and promote the welfare of children. The documentation contains information on what schools and colleges should do and sets out the
legal duties with which schools and colleges must comply.

20. **Links to External Guidance and Policies**

- [Keeping children safe in education: for school and college staff (part 1)](#)
- [Keeping Children Safe in Education – Statutory guidance for schools and colleges, July 2016](#)
- [Working Together to Safeguard Children, March 2015 (Statutory guidance)](#)
- [Statutory guidance on children who run away or go missing from home or care – January 2014](#)
- [What to do if you’re worried a child is being abused – March 2015](#)
- [Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers March 2015](#)
- [Bradford Safeguarding Children Board](#)
- [Prevent Duty Guidance: for further education](#)
- [Female Genital Mutilation Act 2003](#)
- [Serious Crime Act 2015](#)

21. **Dealing with Allegations of Abuse against Members of Staff, Volunteers, Contractors and other Visiting Professionals**

21.1 If an allegation is made against a member of staff involving a student at the College, the HR Manager or the Head of Student Services must be informed immediately. The matter will be investigated in accordance with the Staff Disciplinary procedure and Code of Conduct. Depending on the severity of the allegation(s) the Local Authority Designated Officer (LADO) may be consulted for advice.

21.2 The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers, contractors and visitors.

21.3 The College recognises that the welfare of the child, young person or vulnerable adult is of paramount concern. It is also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful and measured way.

21.4 The Staff Code of Conduct Policy provides a framework and guidance for all employees of Shipley College on acceptable standards of behaviour and aims to support the College’s shared vision, purpose, values and behaviours. It is expected that staff will adhere to this Code both during working time and also at any social events related to work, even where these take place outside working hours and whether they take place on or off College premises. The Code incorporates the Codes of Professional Conduct of any other Professional Bodies of which staff are members. The Code makes it explicit that Staff are not permitted to enter into any romantic/sexual relationship with a student, whatever their age, and breach of this requirement may be regarded as gross misconduct. It is a criminal offence under the Sexual Offenders Act 2003 for a person over 18 to have a sexual relationship with a child under the age of 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This relates to all staff in the College as students may consider any member of staff of the College to be trustworthy due to the fact that they work at the College.
21.5 A member of staff who receives an allegation about another member of staff or who may observe something that gives them a cause for concern, should:

(a) Contact the HR Manager or Head of Student Services and describe the Concern with as much factual detail as possible.

(b) On no account should the concern be discussed with any other people or with the member of staff against whom the allegation is made.

(c) If the victim is a student, Student Services will liaise with the student and their family or carer, and offer support and advocacy role.

22. Enquiries and Investigations Following Allegations Against a Member of Staff

22.1 Child protection enquiries by Children and Young People’s Social Care or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures.

22.3 The College may suspend its internal enquiries while the formal police or Social Care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform to the existing staff disciplinary procedures.

22.4 If there is an investigation by an external agency, for example the police, the Principal (or nominated senior manager), HR manager, Designated Safeguarding Lead should normally be involved and contribute to the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the College gives every assistance with the agency’s enquiries.

22.5 Subject to objections from the police or other investigating agencies, the Principal (or nominated senior manager/HR Manager/Safeguarding Lead) shall:

- Inform the child/young person, vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve
- Ensure that the parents/carers of the person making the allegation have been informed that the allegation has been made and what the likely process will involve. Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- Inform the Chair of Governors and/or the designated governor of the allegation and the investigation
- HR Manager will keep a written record of the action taken in connection with the allegation.

23. Suspension of Staff

23.1 Suspension should not be automatic, but can be considered at any stage of the investigation.

23.2 Suspension should only occur for a good reason. For example:

- Where a student is at risk
• Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct
• Where necessary for the good and efficient conduct of the investigation
• The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted.

23.3 If a person resigns, this should not prevent the allegation being followed up in accordance with these procedures.

23.4 False allegations may be indicative of problems of abuse elsewhere. A record should be kept and matter discussed with Social Care services or the Local Authority Designated Officer (LADO).

24. Records

24.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff’s personal and confidential file.

24.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College’s statutory duty to inform the Secretary of State for Education under the DBS procedures.

25. Investigating Allegations of Child Pornography

25.1 The guidelines provided are set out to protect members of staff from any potential compromising situation and to ensure that any subsequent police investigation is not inadvertently jeopardised.

25.2 The taking or making of an indecent photograph of a child is a Criminal offence. ‘Making’ includes not only the process of downloading an image from the Internet, but also knowingly creating an electronic copy of this file.

25.3 The basic rule is to NEVER make a copy during the course of any investigation and only ever view such material as a very last resort. If you become aware of the creation, downloading, distribution or copying of pornographic images of children you must immediately contact the IT Network Manager and the Head of Student Services, HR Manager or member of SMT. The IT Network Manager will take action to remove the PC to a designated secure place pending an investigation.

26. Internet Safety

26.1 The internet provides students with access to a wide range of content, some of which can be harmful. People intending to exploit young and vulnerable adults use the internet, including social media, to groom and exploit vulnerability. The College understands the risks posed to students and in particular to young people and vulnerable adults.

26.2 If you are concerned about a student regarding the information they are accessing or their communication on the internet, obtain whatever information you can, and then immediately report your concern using the College’s normal
Safeguarding Procedure. Below are some examples of inappropriate use of IT which should alert safeguarding concern:

- Exposure to age-inappropriate material
- Exposure to inaccurate or misleading information
- Exposure to socially unacceptable material, such as that inciting violence, hate or intolerance, including extremism and radicalisation
- Exposure to illegal material, such as images of child abuse
- Grooming using communication technologies, potentially leading to sexual assault and/or child prostitution
- Bullying via websites, mobile phones or other forms of communication device
- Gambling sites

26.3 The College has an Acceptable Use Policy (AUP) for IT which students are made aware of and sign up to at induction and forms the basis of awareness raising in relation to Internet safety. The College has in place the following mechanisms to ensure that students remain safe from; bullying, grooming, radicalisation, violent extremism (and non-violent extremism which can create an atmosphere conducive to terrorism) or any other potential abuse to young people and vulnerable adults:

- Internet usage is logged, and if necessary, College email accounts may be accessed by the IT Network Manager with the prior permission of an SMT member
- Appropriate staff, including the IT Network Manager, are able to monitor any aspects of computing facilities that are made available to staff, students, guests and governors
- All unusual or suspicious events, and any breaches of security are reported to Head of Student Services or SMT via the normal safeguarding reporting procedure for investigation and immediate action
- Established Firewalls will block inappropriate materials from being accessed and an alert raised to the IT department. Safeguarding concerns raised will be investigated and dealt with promptly
- Safeguarding procedure will be implemented, including making a Channel referral if appropriate
- Any instances of misuse of the internet or college sites are dealt with using the College Positive Behaviour and Disciplinary Procedures and/or helping students on the dangers of online misuse or exploitation
- Google Safesearch is activated across the College (no monitoring required) and will block inappropriate content from being accessed through Google Search results pages
- Lan School provides additional protection by allowing teaching staff to monitor classroom activity and identify any suspicious materials or potential risks to students
- It is the responsibility of all staff to ensure that, within the duty of care for students, the signs of vulnerability or concerns, in particular, around extremism or radicalisation are promptly followed up via the safeguarding reporting procedure
- The College is aware that students may use mobile phones without accessing College Wifi, and is alert to the need for vigilance

27. Managing student Behaviour

27.1 The College promotes and encourages positive behaviour and provides a framework which ensures a safe and supportive environment which is free from
bullying, including cyber bullying, harassment or offence. Any disciplinary concern of this nature is investigated to establish the evidence in detail and to establish whether formal disciplinary action is to be taken and at what level.

27.2 Training is offered to staff in dealing with challenging behaviour, to help diffuse potentially difficult and disruptive situations and avoid confrontation. Teaching staff and managers can suspend a student for up to a day if behaviour is disruptive or causing a risk to others. This should be reported to the Course Coordinator immediately afterwards with full written details of the incident.

27.3 Staff are encouraged to deal with student misconduct on an informal basis wherever possible, in an effort to improve behaviour. Students are made aware of what is expected of them, such as regular attendance, showing respect to others etc, through student induction, individual tutorials, Positive Behaviour Plan, etc.

27.4 Where a student is demonstrating concerns, the Course Coordinator will formulate a Positive Behaviour Plan with SMART targets to ensure improvement and, dependent on age, may involve parent or carer.

28. At Risk Students

28.1 Managing punctuality and attendance effectively is an important factor in maximising student success, as well as ensuring students’ safety and well-being. Students are monitored through the absence line reporting system and registers at the start of lesson. Unauthorised or poor attendance is addressed by the Course Coordinator and by Personal Tutors or Learning Coaches in one to one tutorials. Any concerns are highlighted and if appropriate, support offered to ensure full attendance.

28.2 Looked After Children (LAC) and students supported by Leaving Care Team are particularly vulnerable and are identified, monitored and supported throughout their time in college.

28.3 LAC and Care Leavers are overseen by Student Services. The College liaises closely with the Local Authority to support Looked After Children and young people leaving care. Any difficulties or issues are addressed with the named Social Worker or Foster Carer to ensure problems are addressed and student given the best opportunity to succeed.

29. Missing Students

29.1 If a student is reported missing to the College by a family member, police or external agency then the details must be passed on to either the Head of Student Services or relevant HoS or Course Coordinator at the College. No details must be passed on by the member of staff receiving the telephone call without seeking advice from Head of student Services or their Line Manager. The appropriate member of staff will then make contact with the person making the report and verify identity before providing information which may be required. Care must be taken not to disclose information to a family member where the student may have left home due to difficulties in the home e.g. domestic abuse, forced marriage, etc.
30. **Young Carers and Young Parents**

30.1 Shipley College understands that young carers and young parents benefit from extra support and will ensure they are supported and do not face unnecessary barriers to education.

31. **Helping Students to Keep Themselves Safe**

31.1 Students will be advised about college procedures in relation to safeguarding as part of their induction into the College and reminded to read information placed on the Student Intranet for their safety.

31.2 Students will be advised about health and safety procedures to ensure that they know how to stay safe within the College environment, whilst undertaking practical activities and when on work experience or placement.

31.3 Students will be provided with guidelines about keeping themselves safe online as part of their induction into using the College’s IT devices and the Acceptable Usage Policy (AUP) for IT use.

31.4 Through group tutorials and themed days offered as part of the College’s enrichment programme, students will attend and participate in activities designed to raise awareness of issues and concerns which may impact on their ability to keep themselves safe. These include e-safety, extremism and radicalisation, sexual health and sexual exploitation, drugs and alcohol awareness, domestic violence, crime, road safety, anti-bullying, equality and diversity and hate crime.

32. **Making a Referral**

32.1 If you are concerned that a young person or vulnerable adult may be at risk or has disclosed that they are being harmed, you should contact the Head of Student Services or the Student Services pastoral support staff who will assess the concerns to determine whether an external referral to Social Services or the police needs to take place, or can be addressed via the College’s internal procedures.

32.2 Where a referral is to be made externally, the safeguarding team member will report the matter to Social Services and/or to the police.

33. **Removing a Student from College Premises and to a Place of Safety**

33.1 If a student discloses domestic violence / abuse, or threat of forced marriage and declares that they would like to be taken to a place of safety, you need to be aware that:

- You must report immediately to designated safeguarding staff in Student Services or contact the Head of Student Services
- Appropriate external agencies will be contacted and if appropriate and possible, arrangements will be made to remove the student from college to a safe place (this might be local or out of area)
- The student may be removed on the same day or within a very short period of time after disclosure depending on the urgency of the case.
● The student should not return to the domestic residence to collect belongings in cases of high risk. This can be done at a later time under police escort.
● Under no circumstances should the student's family / carers be contacted.
● The Designated Safeguarding staff dealing with the incident or the Safeguarding Lead will inform the police of the situation.
● If a child is involved, the Designated Safeguarding Lead or member of the safeguarding team will contact Children's Social Care Initial Contact Point - 01274 437500.
● If the family members / carers contact the College they should be referred to the Designated Safeguarding Lead. No information should be shared with the caller about whether the student is or is not attending college.

● The Designated Safeguarding Lead or member of the Safeguarding Team dealing with the incident will inform Security as appropriate to ensure the safety of all concerned on the College campus.
● The College will ensure appropriate measures are in place to maximise the safety of the student entering and leaving college.

34 Attendance at External Meetings

34.1 At times Curriculum staff are contacted by external agencies with requests for attendance at external meetings e.g. case reviews, Looked After Children (LAC) reviews, Child In Need Review.

34.2 Curriculum staff should refer to Head of Student Services, Student Services staff or their Line Manager for advice.

34.3 Arrangements should be made for the attendance at external meetings by a member of the safeguarding team where possible.

35. Students who may Pose a Risk to Others

35.1 Where a student's history or information is shared to indicate that they pose a risk to other students or staff, a risk assessment will be completed by the Head of Student Services and the appropriate Head of Sector. The Risk Assessment will establish whether the College is an appropriate environment for the student to enrol or continue with their programme of study and, if so, what arrangements can be put in place to ensure the safety of others and themselves.

36. Parents and Carers

36.1 Safeguarding and the promotion of the welfare of young people, protecting them from significant harm, depends on joint working between the College, other agencies and parents or carer. It is made clear to young people living with parents or carer when they enrol at the College that there will be contact with parents or carer if a safeguarding or well being concern is raised.

36.2 In general the College will discuss concerns with parents or carer before approaching an external agency. However, this may depend on the circumstances and information provided by the student. On occasions, the College may contact an external agency before informing parents or carer, if contacting parents or carer may be detrimental to the student or increases the risk of harm.
37. **Multi-agency Work**

37.1 The College will work in partnership with other agencies in the best interest of the student. Referrals will be made by the Head of Student Services or member of the Safeguarding Team. The College will cooperate with Social Work Services where they are conducting child or adult protection investigation or conference and, where necessary, will attend meetings or provide reports as required. Where a student is subject to an inter-agency child protection plan or a multi-agency Risk Assessment Conference (MARAC) meeting, the College will contribute to the preparation, implementation and review of the plan, as appropriate.

38. **Students in Work**

38.1 The College ensures, when students are undertaking a period of work placement or work-based learning, that the environment is safe and risks are minimised or removed.

38.2 All organisations employing an apprentice have a valid Health & Safety check which includes risk assessments, effective supervision and training to ensure it is a safe and healthy working environment.

38.3 A Safeguarding risk assessment is considered in the following situations:

- Regular lone working with an employer over long periods
- Placements located in particularly isolated environments with 1:1 working
- Work placements involving a high degree of travelling on a 1:1 basis
- Work placements which includes a residential element
- Safeguarding disclosure is made

39. **Trip, Visit or Residential**

39.1 If a disclosure is made by a student on a trip, visit or residential, the senior member of staff responsible will initially deal with disclosure and contact a member of the Safeguarding team for advice. Guidance will be offered on how best to deal with the concern.

40. **Maintaining a Safe Environment**

40.1 Shipley College aims to ensure that all buildings used by the College for teaching and learning are accessible and provide a safe environment for students to study and staff to work.

40.2 Access to buildings is controlled and restricted as far as is reasonably practicable to legitimate users only. All such users are required to wear and display identification which provides an immediate visual indication of their status e.g. student, staff, visitor, Governor, etc.

40.3 All safety, health and welfare matters will be treated as a management responsibility equal to that of any other managerial function.

40.4 Shipley College is committed to continuous improvement in health and safety and to attaining the highest possible practice standards throughout the college.
40.5 Details of all accidents are kept and Health & Safety Officer reports are submitted to the Health and Safety Committee on a termly basis and to the Corporation annually, noting any trends and actions to prevent or reduce health and safety issues.

40.6 The Head of Learning Support is responsible for assessing the needs of students with Special Educational Needs in relation to students who have physical and/or medical requirements and sensory impairment and put in place Personal Emergency Evacuation Plans (PEEP).

40.7 It is the responsibility of all staff and students to ensure the appropriateness of printed and/or online materials both in or around college. Students to report any concerns they have regarding any material (e.g. radicalisation, grooming, etc) to a member of staff or report directly to Student Services. College staff must report any concerns to their line Manager or Head of Student Services. If anyone is in doubt about the appropriateness of any communication, they can refer this to the Head of Marketing, Head of Student Services or Director of Physical Resources who will liaise with SMT. Any Safeguarding concerns raised will be followed up via the normal safeguarding procedure.

41. Monitoring and Reporting

41.1 The SMT and Governing Body will annually consider and approve the Safeguarding Policy and Procedure and review its implementation.

42 Location of Policy

42.1 This policy will be held on the College intranet, accessible to staff and students, and will be available from Student Services on request to parent/carers or other external parties as required, and if possible, converted to other formats if requested.

43. Link to other College Policies

- Safeguarding Procedure
- Health and Safety and Safeguarding for Students in the Workplace
- Student Positive Behaviour Policy
- Admissions Policy
- Acceptable Use Policy (AUP) for IT
- Policy and Procedures for Events involving External Speakers Recruitment of Ex-Offenders Policy
- Recruitment and Selection Policy and Procedure
- Dealing with Bullying and Harassment Policy and Procedure
- Disclosure and Barring Service (DBS) Check Policy
- Whistleblowing Policy and Procedure
- Staff Code of Conduct Policy
- Health and Safety Policies and Procedures
- Guidance for Personal Consent required regarding the Use of Digital Photography and/or Video Recording
- Visitors Policy
- Freedom of Expression Policy
APPENDIX ONE: Prevent Strategy

Prevent is part of the Government’s initiative to develop a robust counter terrorism Programme entitled ‘CONTEST’.

The UK faces a range of terrorist threats. Terrorist groups who pose a threat seek to radicalise and recruit people to their cause.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical - an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The threat level from international terrorism in the UK in the recent past has fluctuated between severe and moderate.

Further Education colleges are major education and training providers for the 16 – 25 year age group, particularly young people from ethnically diverse, and socially and economically disadvantaged areas. The age and profile of our students make it crucial to be involved in the Prevent strategy. Colleges have a part to play in fostering shared values and promoting cohesion. Colleges should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings.

For the purposes of this strategy, violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.

As a general principle, the College has a statutory responsibility to:

- At all times, and by all means, seek to create a safe environment for the entire college community
- Operate the policy to specifically encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable
- Acknowledge that abuse may take many forms; physical, sexual, financial and material, emotional, neglect, Female Genital Mutilation (FGM), forced marriage, hate crime, radicalisation and risk to self and/or others.
- Work with external agencies, in particular, Police Prevent Team, Hate Crime, Bradford Children’s Safeguarding Board and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken.
This strategy should be used in conjunction with the following:

- Safeguarding Policy and Procedure
- Positive Behaviour Policy and Student Disciplinary Procedure
- Staff Code of Conduct
- Acceptable Use Policy for IT
- Health and Safety Procedures

**KEY OBJECTIVES (embedded in British Values)**

- To promote and reinforce shared values; to create space for free and open debate; and to listen and support the student voice.
- To break down segregation among different student communities including supporting inter-faith and intercultural dialogue and understanding, and to engage all students in playing a full and active role with wider engagement in society.
- To ensure student safety and that the College is free from bullying, harassment and discrimination.
- To provide support for students who may be at risk and develop appropriate sources of advice and guidance.
- To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation.

**PRINCIPLES**

This strategy is not directed at any specific ideology, religion, religious group or religious faith, or at the proponents of any other sets of beliefs. Its principal aim is to ensure that the College is able to monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent extremism in the name of ideology or belief.

The strategy commits the College to the promotion of cohesive and inclusive College community relations which do not allow any particular individual or group of individuals to be marginalised, stigmatised or excluded from College life.

**Leadership and Values**

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, student voice and participation
- Building staff and student understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies
Teaching and Learning
To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology and supporting the student voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- Adapting curriculum to recognise local needs, challenge extremist narratives and promote universal rights
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro social values
- Use of external programmes or groups to support learning while ensuring that the input supports college goals and values
- Encouraging active citizenship and student voice

Student Support
To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Maintaining strong and effective student support services which have thorough understanding of the Prevent agenda
- Establish robust external links with Local Authority Prevent team, Prevent Community Police Officer and Prevent FE Co-ordinator
- Observe what is happening in the College and the community
- Implement anti-bullying strategies and challenging discriminatory behaviour
- Helping students and staff know how to access support in College and or through community partners
- Supporting at risk students through safeguarding and crime prevention processes

Managing Risks and Responding to Events
To ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding and managing potential risks of the threat from violent extremism and how this may impact directly or indirectly on the College
- Responding appropriately to events in local, national or international news that may impact on students and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the College
- Ensuring plans are in place to respond appropriately to a threat or incident within the College
- Developing effective ICT security and responsible user policies
- Promoting awareness across the whole college community
- Responding swiftly to signals that a young person is At Risk

Referral process for Concerns involving Terrorism or Radicalisation (this follows the normal College safeguarding referral process)

- Report your concern directly to the Head of Student Services or member of the safeguarding team
- Appropriate action will be decided and taken. If necessary, external agencies will be contacted
- Unless it is an emergency or life threatening situation staff do not call the police or other external services. This will be done by the Head of Student Services or the member of Safeguarding staff dealing with the situation
• Appropriate information will be shared with relevant staff

Referral Process

1. If any staff member observes or has concerns that could be terrorist related, refer the incident as a safeguarding concern to Head of Student Services or member of the Safeguarding Team.

2. If a member of staff is seriously concerned about an issue involving terrorism or radicalisation, and either, is unable to speak to the Head of Student Services, or a manager, and feels the matter cannot wait until the next working day, the staff member can call the “Anti-Terrorist Emergency” number – 0800 789 321, 01274 376215 or ring 101 and report the incident. The member of staff would then need to report the incident to the Head of Student Services or Vice Principal - Curriculum at the earliest point.
APPENDIX TWO: Information Sharing with External Agencies

Information sharing is vital to safeguarding and promoting the welfare of children, young people and vulnerable adults.

The main purpose of sharing information by organisations, such as colleges, Connexions, Social Services, the Police, schools, Pupil Referral Units (PRUs), Child and Mental Health Services, (CAMHs), Local Authority, Leaving Care Service, Youth Offending Team, Health Workers, GP service and other established support services, is to work together to protect children, young people and vulnerable adults from harm and help them achieve successful outcomes. In addition, the sharing of information between agencies will enable the College to be better placed to discharge its responsibility of student wellbeing and safeguarding of students.

Government advice

This guidance is based on HM Government document “Information sharing: advice for practitioners providing safeguarding services”, produced to support all frontline practitioners in the decisions they take when sharing information to reduce the risk of harm to children and young people. Equally for College, the advice is also helpful for staff working with adult students responsible for children who may be in need.

Sharing Information

Sharing information is an intrinsic part of any frontline practitioners’ job when working with children and young people. The decisions about how much information to share, with whom and when, can have a profound impact on individuals’ lives. It could ensure that an individual receives the right services at the right time and prevent a need from becoming more acute and difficult to meet. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.

Related Government guidance

- Information sharing: advice for practitioners providing safeguarding services
- Keeping Children Safe in Education (2015)
The Seven Golden Rules to Sharing Information

1. **Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing**, but provide a framework to ensure that personal information is shared appropriately.

2. **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.

3. **Seek advice** from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case.

5. **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.

6. **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.

7. **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.

**Principles**

The most important consideration is whether sharing information is likely to safeguard and protect a child.

**Necessary and proportionate** - When taking decisions about what information to share, you should consider how much information you need to release. The Data Protection Act 1998 requires you to consider the impact of disclosing information on the information subject and any third parties. Any information shared must be proportionate to the need and level of risk.

**Relevant** - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.

**Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

**Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
**Timely** - Information should be shared in a timely fashion to reduce the risk of harm. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore harm to a child. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

**Secure** - Wherever possible, information should be shared in an appropriate and secure way, including, where possible use:

- Named contact person or Central Contact point for agency to send information.
- Secure trusted emails - including securing the document with a password.
- Recorded postal delivery if sending confidential information in the post.

**Record** - If the decision is to share, reasons should be cited including what information has been shared and with whom. If the decision is not to share, it is good practice to record the reasons.
Flowchart of key questions for sharing information
(whether you are asked to share information or wish to share information).

Share information:
- Identify how much information to share.
- Distinguish fact from opinion.
- Ensure that you are giving the right information to the right individual.
- Ensure where possible, you are sharing the information securely.
- Inform the individual that the information has been shared if they were not aware of this as long as this would not create or increase risk of harm.

Record the information sharing decision and your reasons in line with your organisation or local procedures.

If there are concerns that a child is suffering or likely to suffer harm then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

(Flowchart from HM Government *Information Sharing: Guidance for practitioners and managers*)