| | **Safeguarding Policy and Procedure** |
|---|---|
| Version: | Final |
| Author: | Head of Student Services |
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| Date Date Approved by C&Q: Date Approved by Corporation: | March 2021 |
| Impact Assessment Completed | Yes |
| Date of Next Review: | Feb 2022 |

# 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.

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

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### 1.    Purpose

● To affirm that the College understands that safeguarding is everyone's responsibility, including: staff, volunteers, managers, Senior Management Team (SMT), governors, learners, subcontracting providers (non payroll staff) and visitors.
● To define standards of behaviour for learners, staff and visitors.
● To develop staff awareness of the causes of abuse.
● To define how the College can contribute to the prevention of abuse by reporting concerns related to possible harm or abuse of children, young people and/or vulnerable adults at the earliest possible stage.
● To work in partnership with learners, parents, carers and agencies.
● To affirm that all children, young people and vulnerable adults have the right to be protected, feel safe and be confident that their concerns will be taken seriously and treated in a sensitive manner.
● To ensure all learners are treated as individuals, with respect and feel safe.
● To ensure 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, July 2018).

## 2.    Guiding Principles

2.1    The College acknowledges that staff have an important role to play in recognising indicators of possible abuse or neglect at an early stage and that all staff have a duty to take appropriate action to ensure the safety and wellbeing of learners.

2.2    **In particular the College will take responsibility to:**

● Follow up concerns when a child, young person or vulnerable adult is at risk of abuse or harm.
● Develop a safe culture for the entire college community.
● Ensure college buildings are accessible and safe.
● Establish procedures for reporting and dealing with allegations of abuse against members of staff, volunteers, contractors or other visitors to the College.
● Work collaboratively with external agencies to achieve the best safeguarding outcome for the learner.
● Where appropriate, work with parents or carers to keep learners safe.
● 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.
● Undertake Disclosure and Barring Checks, to ensure that all employees and workers under the terms of engagement are suitable to work at the College.
● Implement its 'Contractors Health and Safety Policy' and the 'Contractors Arrival at Reception Procedure' to ensure the College safeguarding procedure is adhered to and risks can be mitigated, as contractors and/or subcontractors working on College premises may not have a DBS check completed.
● Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
● Promote learner engagement in developing a safer college.
● Implement appropriate levels of support for learners with Special Educational Needs and Disabilities (SEND) to maintain their safety and wellbeing.
● Ensure staff, volunteers, non payroll staff and governors receive appropriate safeguarding training and updates to ensure they are aware of their responsibility to report safeguarding concerns and maintain a safe environment.
● Promote online safety to learners when using all types of digital/social media.

- Help learners to keep safe and improve wellbeing by taking responsibility for their own safety.

## 3.    Scope

- Policy and Procedure applies to the College workforce, governors, volunteers and visitors to the College, including contractors and subcontractors working on site and agency staff.
- The Governing body and staff at Shipley College take, as their first priority, the responsibility to safeguard and promote the welfare of learners, staff and visitors.
- Policy and Procedure minimise risk and ensure collaborative working with other agencies so rigorous arrangements are in place to identify, assess and support learners being harmed or at risk of harm.
- Safeguarding is fully incorporated into the College policies, procedures, practices and values.
- Safeguarding is underpinned in the curriculum, enrichment activities and physical environment of the College campus.
- Employers and training organisations will be asked to cooperate with the College in putting in place and subscribing to appropriate safeguards.

## 4.    Definitions

4.1    Child (hereinafter referred to as a child or young person).

4.2    A 'child' is defined as a person who is under the age of 18.

4.3    14-16 learners on a school roll, for instance attending a taster session, are also covered by all aspects of this policy and procedure. However, for those on a school roll, the school or their parents or carers will be initially notified of any safeguarding concern raised. Should there be an emergency and the College is unable to contact the appropriate school, the College will apply its referral procedures to ensure the young person is safe.

4.4    Vulnerable adult or an adult at risk is someone who:

- Is over 18 years old.
- Has needs for care and support.
- Is being abused or neglected, or is risk of being abused or neglected.
- As a result of the needs, are unable to protect themselves from being harmed or neglected.

4.5    In the College there are learners who will be considered to be 'Adults at Risk' and are likely to be in receipt of services and care packages overseen by Adult Social Care. This could be due to a disability, complex health needs or a mental health illness.

4.6    Children in care are referred to as 'Looked After Children'. A child is looked after if they are in the care of the local authority for more than 24 hours. Legally, this could be when they are:

- Living in accommodation provided by the local authority with the parents agreement.
- The subject of an interim or full care order.
- The subject of an emergency legal order to remove them from immediate danger.
- In a secure children's home, secure training centre or young offender institution.
- Unaccompanied asylum seeking children.

4.7 A young person will stop being looked after when they are either adopted, returned home or turn 18. The local authority will continue to support children leaving care at 18, until they reach 21.

4.8 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 the learner given the best opportunity to succeed.

4.9 Mental capacity - When someone has sufficient mental capacity this means they are able to make their own decisions. If someone does not have sufficient mental capacity then decisions need to be made in their best interest. It is usually down to a Social Worker or trained health professionals to make a formal assessment regarding whether or not someone lacks sufficient mental capacity.

4.10 If a learner does not meet the criteria for support from Adult Social Care and they present a safeguarding concern, in such circumstances staff must still follow this procedure. The intervention offered is likely to be limited and responsibility will remain with the adult to seek professional help, if they choose to do so.

4.11 Some scenarios where we may be involved in safeguarding adult learners:

● Learners who may be experiencing a mental health crisis or those who have a long term mental health condition where this means they could pose an immediate or ongoing risk to themselves or others.
● Learners who are victims of domestic abuse.
● Learners who disclose that they been victims of a crime (including historic offences) e.g. Female Genital Mutilation, sexual assault, physical assault, modern day slavery or human trafficking.
● Learners who are vulnerable due to their circumstances e.g. homelessness, or adults with substance or alcohol misuse issues.

4.12 Where an adult experiencing abuse is a parent of a child/children and therefore, we also have a duty of care to consider if that child or children are safe.

## 5. Responsibilities

5.1 **All staff Responsibility**

5.2 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 their Line Manager, appropriate member of staff or a Safeguarding Team member.

**All staff must:**

● Complete appropriate mandatory safeguarding training and updates.
● Read Part One of Keeping Children Safe in Education Statutory Guidance for Schools and Colleges Part one: September 2020.
● Be familiar with this Safeguarding Policy and Procedure, including issues of confidentiality.
● Remember that the learners' welfare and best interests must be the paramount consideration at all times.

- Never promise to keep a secret or confidentiality where a young person or vulnerable adult discloses abuse (or if it involves a young person or vulnerable adult).
- Staff should not take it upon themselves to investigate concerns or make judgements.
- Be alert to signs and indicators of possible abuse **See Appendix 1** for definitions of abuse and signs of harm.
- Promptly report a concern to a Safeguarding Team member of staff followed by a written account.
- Be appropriately involved in any ongoing monitoring and/or support of a Child In Need, Child Protection Plan or any other Care Plan.
- Be subject to Safer Recruitment processes and checks whether new or existing member of staff, supply staff, contractors, governors, volunteers etc.
- Behave in accordance with [Keeping children safe in education (2020) Statutory guidance for schools and colleges](#)

5.3    In a life threatening situation or someone suffering or at risk of suffering significant immediate harm, staff should not delay in contacting the appropriate emergency service on 999.

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

5.5    As soon as possible, report the safeguarding concern to either (in this order of preference) the Designated Safeguarding Lead (Head of Student Services), Senior Safeguarding Lead (Vice Principal Curriculum), a member of the Safeguarding Team, an SMT member or your Line Manager.

5.6    **Designated Lead For Safeguarding (Head of Student Services)**

5.7    Head of Student Services is the Designated Safeguarding Lead and, in undertaking this role, will:

- Report to the Senior Designated Safeguarding Lead.
- Have update meetings with the Safeguarding Liaison Governor and inform of any serious concerns.
- Take the lead on ensuring the College carries out its duties in relation to Safeguarding Young People and Vulnerable adults.
- Undertake appropriate training and keep up to date with new government legislation, duties or guidance on safeguarding.
- Provide annual Safeguarding Report to the Governing Body and SMT.
- Provide Safeguarding training and updates.
- Maintain an oversight of all safeguarding concerns raised and, when necessary, deal with or offer guidance and support to staff to deal with the concerns raised.
- Where the College has concerns about a young person or vulnerable adult, the Designated Safeguarding Lead will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral.
- Ensure all cases of suspected or actual abuse to young people or vulnerable adults are referred to Children's Social Services or Adult Social Care.
- Contribute to and/or attend Child Protection Plan case conferences or a Child In Need meetings organised by the local authority.

- Liaise closely with HR manager and Senior Designated Safeguarding Lead on concerns or allegations of abuse made against a member of staff related to a learner, particularly a young person or vulnerable adult.
- Promptly report to the Local Authority Designated Officer (LADO) concerns or allegations of abuse made against a member of staff, particularly if the alleged victim is a young person or vulnerable adult.
- Ensure the College's Safeguarding Policy and Procedure is reviewed annually and shared with staff.
- Ensure the Safeguarding Policy and Procedure is published on the College website.
- Accurately maintain up to date records of any safeguarding concerns raised and record actions taken to support learners using the secure online CPOMs system.

5.8     In the absence of the Head of Student Services, a member of the Safeguarding Team or, if appropriate, the Senior Designated Safeguarding Lead will deal with the safeguarding concern raised.

5.9     **Senior Designated Safeguarding Lead (Vice Principal Curriculum)**

5.10    Vice Principal Curriculum is the Senior Designated Safeguarding Lead and, in undertaking this role, will:

- Oversee that the College carries out its duties in relation to Safeguarding young people and Vulnerable adults risk of harm.
- Oversee that all staff, including non paid staff, receive safeguarding awareness training and are aware of the College Safeguarding Policy and Procedures.
- Ensure the College deals with allegations in accordance with College and external procedures.
- Oversee any inter-agency issues and complaints.
- Be the safeguarding representative on the SMT and the Corporation on safeguarding matters.
- Receive appropriate training and keep up to date with new Safeguarding legislation or guidance published.
- Work closely with the Designated Safeguarding Lead and other managers to oversee that all learners feel safe and safeguarding concerns are dealt with successfully.

5.11    **Safeguarding Team**

5.12    If necessary, an appropriate member of the Safeguarding Team may be responsible for the following:

- To assist in dealing with or overseeing any cases of suspected or alleged abuse towards a young person or vulnerable adult.
- To be available to listen and/or offer advice to staff on any safeguarding concerns raised by learners or staff.
- To maintain a written record of any child protection referral, allegation, disclosure or concern (even where that concern does not lead to a referral).
- To signpost staff to the College's Safeguarding Policy and Procedure, if further guidance or information is requested.
- To liaise with the Local Authority, Bradford Partnership, previous educational institution attended by the learner or other appropriate external agencies, if necessary, to obtain relevant information.
- In the absence of the Designated Safeguarding Lead, to update Senior Designated Safeguarding Lead and HR Manager if an allegation of safeguarding concern is raised against a staff member involving a young person or vulnerable adult.
- To receive appropriate safeguarding training and maintain refresher training.

## 5.13  Contact Details of Members of the Designated Safeguarding Team

| Staff Member | Role | Contact Details | |
|---|---|---|---|
| Shoeb Desai | Designated Safeguarding Lead (Head of Student Services) | 327290 | 327281 |
| Diana Bird | Senior Designated Safeguarding Lead (Vice Principal Curriculum) | 327296 | 327207 |
| Tara Phillips | Student Wellbeing and Safeguarding Officer | 327302 | 327281 |
| Chris Holgate | Specialist Personal / Careers Adviser | 327300 | 327281 |
| Lucy Smith | Head of Learning Support | 327260 | 327222 |
| Mark Harrison | Head of Sector for Care | 327276 | 327222 |
| Liz Barker | Head of Sector for Essential Skills | 327310 | 32731 |
| Linda O'Donnell | Head of Business Development | 327239 | 327400 |
| Diane France | Health and Safety Manager | 327271 | 327222 |
| Jennifer Birtwistle | HR Manager | 327249 | 327207 |
| Ian Durham | Director of Physical Resources | 327253 | 327222 |

5.14  **Student Wellbeing and Safeguarding Officer and Specialist Personal and Careers Adviser**

- Work with a caseload of young people or vulnerable adults where there is a safeguarding concern.
- Accurately maintain up to date records of any safeguarding concerns raised and record actions taken to support learners using the secure online CPOMs system.
- Bring to the attention of the Designated Safeguarding Lead or, in the absence of the Designated Safeguarding Lead, make appropriate referral to Social Services of suspected or reported abuse against a young person or vulnerable adult.
- Provide guidance to staff on issues relating to child protection or vulnerable adult abuse or concerns.
- Meet with Designated Safeguarding Lead for weekly safeguarding update meetings to review ongoing learner concerns and actions taken to support learners.
- If required, contribute to and/or attend a Child Protection case conference or a Child In Need meeting organised by the local authority.
- Keep up to date with appropriate safeguarding training/information and maintain refresher training.
- Resource any appropriate safeguarding information to share with learners and staff to promote improved safety, safeguarding and wellbeing.

5.15  **Liaison Governor for Safeguarding**

5.16  A member of the Corporation will take on the position of Safeguarding Lead and, in undertaking this role, will:

- Meet with the Designated Safeguarding Lead and / or attend the College Safeguarding Management Group meetings to receive updates on the strategic overview of the actions taken to maintain a safe college for learners, staff and other people on site.
- Where appropriate, meet with the Principal, Senior Designated Safeguarding Lead or Designated Safeguarding Lead over matters regarding serious safeguarding concerns.
- As a member of the Corporation, approve the College's Safeguarding Policy and Procedure and receive an annual Safeguarding Report.
- Assist the Chair of Corporation in connection with any safeguarding allegation made against the Principal or any other senior post holder.
- Along with the Governing Body, undertake appropriate safeguarding training and provide appropriate challenge and support to progress areas of weakness or development in the College's safeguarding arrangements.

## 6.    Information for staff when dealing with a safeguarding concern

6.1    Following disclosure of abuse or on noticing anything that is a cause for concern, a member of staff is required to 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 learner take their time to explain.
- Reassure the learner that they are doing the right thing in telling you - they have a right to be safe and protected.
- Assure the learner 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 learner's own words as far as possible, and check with the learner that you have understood their concern.  Include any questions you may have asked.
- Do not add any opinions or interpretations.
- Inform the learner that you will need to pass the information on, but it will be treated with the strictest confidence.
- If emailing or passing on sensitive written communication, only use initials.  Do not include information which may identify the learner.
- As soon as you can afterwards, contact the Head of Student Services or a member of the Safeguarding Team who will deal with the disclosure and will put in place support for the learner.
- If there is a serious risk of harm, waste no time and speak to a designated safeguarding member of staff immediately or your Line Manager.
- Inform the learner that the Head of Student Services or the Safeguarding Team Member dealing with the matter will contact the learner and may contact parent or carer, particularly if the person concerned is aged under 18.  If the concern raises serious safeguarding concern, a referral to an external agency, such as Social Services, may also be made.
- Let the learner know that they will be kept updated by the member of the Safeguarding team dealing with the disclosure.

6.2    **Avoid the following when dealing with a disclosure:**

- Offering confidentiality – making promises that information will not be shared with others.
- Making judgements.
- Putting words into the learner's mouth.
- Making any comments about the alleged offender.
- Asking leading questions or unnecessarily eliciting further information – this will be followed up by a 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 learners or allow learners to contact you outside working (college) hours.
- Visiting learners outside of College without a specific purpose and permission of your line manager.

## 7.    College information when dealing with safeguarding concerns

7.1    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
- Safeguarding Flow Chart for students

## 8.    Legislation and guidance

8.1    This Policy is based upon the following legislation and guidance.  The College will fulfil local and national responsibilities as laid out in the following documents:

- Keeping children safe in education (2020) Statutory guidance for schools and colleges
- Working Together to Safeguard Children)
- Statutory guidance on children who run away or go missing from home or  care – January 2014
- Children Missing Education – Statutory guidance for local authorities (DfE
-  September 2016)
- What to do if you're worried a child is being abused – March 2015
- Information sharing - Advice for practitioners providing safeguarding Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- SAFER BRADFORD Helping to create a safer district for everyone
- Children Act 1989 (as amended 2004 Section 52)
- Education Act 2002 s175
- The Teachers Standards
- Prevent duty guidance: for further education institutions in England and Wales
- http://bradfordscb.org.uk/?page_id=113
- Multi-Agency practice guidelines: Handling cases of forced marriage 2013
- Mental Capacity Act 2005

**9. Offering support to young people and adults with additional needs**

9.1     The College recognises that some learners may be more vulnerable to abuse e.g. those with a disability or special educational needs, those living with abuse, violence or drug/alcohol dependency, Looked After Children, homelessness, etc.

9.2     When the College is considering excluding a vulnerable learner and/or a learner who is either subject to a Child Protection Plan or there is an existing multi agency work, the College will consult with relevant agencies involved prior to making the decision to exclude.

9.3     The College will follow Bradford SAFER BRADFORD / PARTNERSHIP GROUP / online multi-agency procedures and will, where necessary, follow the guidance on protocols on sharing information with external agencies (See **Appendix 3**):

- Child sexual exploitation (CSE)
- Bullying, including online (Peer on Peer Abuse)
- Sexual violence and sexual harassment between children in the College
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Mental health
- Private fostering
- Preventing radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking
- County Lines; increasingly drug networks or gangs groom and criminally exploit children, young people and vulnerable adults to carry drugs and money from 'Area A' to distribute drugs in 'Area B'.  Staff should maintain vigilance and in particular raise concerns about a learner regularly missing from College, carrying multiple mobiles, owning possessions which may seem beyond their financial means, etc. Typically, criminal gangs are known to target vulnerable young people to take drugs from urban areas to suburban and rural areas, market and seaside towns.

9.4     For further information on the specific forms of abuse and safeguarding issues refer to pages 82 - 96: Keeping children safe in education (2020) Statutory guidance for schools and colleges Update - January 2021 (Post EU Exit) )

**10.   Missing learners**

10.1   Managing punctuality and attendance effectively is an important factor in ensuring learner safety and wellbeing.  Learners on full time programmes are monitored through the absence line reporting system and register checks at the start of lessons. Unauthorised absence is followed up by the Attendance Officers, Learning Coach and addressed by the Course Coordinator.  Any concerns are addressed and, if appropriate, parents/carers contacted.

10.2  If a learner is aged under 18, is a vulnerable adult or a concern is raised about their safety and they cannot be contacted, then the parent/carer must be contacted to inform them of the College's concern.

10.3  If a learner is reported missing to the College by next of kin, police or an external agency then the details must be passed on to the Student Services Team, relevant HoS and Course Coordinator at the College.  Care must be taken not to disclose information to a family member, especially over the phone, in case the learner has left home due to personal difficulties or safeguarding concerns at home.

## 11.    Peer on Peer Abuse

11.1  The College recognises that young people are capable of abusing their peers and that peer on peer abuse can manifest in many different ways, including online bullying, sexting, and inappropriate/harmful sexualised behaviours.

11.2  Where young people have exhibited inappropriate/harmful sexualised behaviour and/or exhibited inappropriate/harmful sexualised behaviours towards others, contact should be made with Children's Social Work Service, if appropriate  Good practice dictates that there should be a coordinated multi-agency approach to respond to their needs, which will include parent/carers, youth justice (where appropriate), children's / adults social work service.

11.3  If a learner has reported being abused by another learner, the Head of Student Services or the appropriate Head of Sector should be contacted immediately. If the learner is aged under 18 or a vulnerable adult living at home then parents/carers need 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 learner's reputation, confidence and/or opportunity to achieve. Therefore, those dealing with such allegations within the College will do so sensitively and will act in a careful and measured way.

11.4  It is possible that, during a College investigation, suspension of the alleged perpetrator may take place.  If the decision is taken not to suspend the learner who is the subject of the allegation, a risk management plan is put in place by the Head of Student Services.

11.5  If the police or Children's / Adult Social Services are undertaking an investigation, where appropriate, the College will await the outcome before making their own final decision on the learner's exclusion from the College.

## 12.    Upskirting

12.1  Staff should know that on 12 April 2019 a new law banning the invasive practice of 'upskirting' came into force across England and Wales and offenders can now be arrested and sent to prison.  The criminal offence of 'upskirting' was created under the Voyeurism Act in February 2019 - 'Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.  It is now a criminal offence'.

12.2  Police and prosecutors have now updated their guidance to ensure the law is properly enforced – with offenders facing up to 2 years in jail and being placed on the sex offenders register.

## 13. Forced Marriage

13.1 Forced marriage is different from, and should not be confused with, arranged marriage. A learner who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse, whether physical, psychological, financial, sexual or emotional pressure.

13.2 If there are concerns that a learner 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 learner's situation, staff should try to ascertain the immediate risk the learner is in. In all cases, staff must consult with Designated Safeguarding Lead or Student Services staff, either to take action to safeguard or to provide information and advice. If the learner is going overseas imminently it is crucial to gather as much information as possible from them.

13.3 The learner's family should not under any circumstances be contacted without consultation with the Designated Safeguarding Lead. Confidentiality within the College is also essential, as other learners may know the family and information may be leaked out of the College.

13.4 College staff should report learners that go missing from education, particularly on repeat occasions, to the Head of Student Services or their HoS in order to minimise the risk of any harm happening to them.

## 14. Female Genital Mutilation (FGM)

14.1 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.

14.2 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.

14.3 There are a range of potential indicators that a young person or vulnerable adult may be at risk of FGM. 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. Click on the links below for further information:

14.4 Female genital mutilation (FGM) - NHS

14.5 NSPCC - Female genital mutilation (FGM) What is FGM

## 15.  Breast Ironing

15.1  "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.

15.2  Much like Female FGM, Breast Ironing is a harmful cultural practice and is child abuse. Similar to Female Genital Mutilation (FGM), breast ironing is classified as physical abuse therefore concerns must follow the Safeguarding Procedure.

## 16.  Child Sexual Exploitation

16.1  Child sexual exploitation (CSE) is a type of sexual abuse in which young people are sexually exploited for money, power or status.  Young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some 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.

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

## 17.  Domestic Abuse

17.1  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.

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

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

17.3 '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.

17.4 '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.

## 18.  Radicalisation

18.1  Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. The process of radicalisation is different for every individual and is a process.  For some it can take place over an extended period or within a very short time frame. It is important tha2 staff are able to recognise possible signs and indicators of radicalisation.

18.2  Young people and vulnerable adults may be at risk of exposure to or involvement with groups or individuals who advocate violence as a means to a political or ideological end.

18.3  Young people and vulnerable adults can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members, groups and organisations or, increasingly, through the internet, including through social media sites. This can put young people and vulnerable adults at risk of being drawn into criminal activity and has the potential to cause significant harm.

18.4  Examples of extremist causes that have used violence to achieve their ends include the far right groups, such as National Action (UK) and Britain First, and international terrorist organisations such as Al Qaeda and Daesh.

18.5  Potential indicators identified include:

- Use of inappropriate language
- Possession of violent extremist literature
- Changes in behaviour, language, clothing or appearance
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

## 19.  PREVENT

19.1  Prevent is part of the UK's counter terrorism strategy. It focuses on supporting and protecting vulnerable individuals who may be at risk of being exploited by those looking to radicalise and subsequently drawn into terrorist related activity. PREVENT is not about race, religion or ethnicity, the programme is to prevent the exploitation of vulnerable people and to keep everyone safe.

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

19.3  The Prevent Strategy (refer to **Appendix 2**)

- 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.

19.4  The government's Channel Process supports people who are at risk of being drawn into terrorist activity.  It takes on a multi agency approach and offers individuals

access to services such as health, education, specialist mentoring and other diversionary activities to prevent someone getting involved in terrorism.

19.5    The College will arrange to deliver 'Workshop to Raise Awareness of Prevent' (WRAP) training to staff and also provides other related mandatory training for staff to highlight the risks, indicators of risk and reporting of concerns.

## 20.    Internet Safety

20.1    The internet provides learners and staff 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 learners and in particular to young people and vulnerable adults.

20.2    If you are concerned about a learner 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 safeguarding procedure.  Below are some examples of inappropriate use of IT which should alert safeguarding concerns:

- Age-inappropriate material
- Inaccurate or misleading information of an extremist nature
- Socially unacceptable material, such as that inciting violence, hate or intolerance, including extremism and radicalisation
- Access to illegal material, images, etc
- Grooming; potentially leading to acts of violence.

20.3    The College has an Acceptable Use Policy (AUP) for IT which learners 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 learners 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 account and activity monitored by the IT Manager.
- Appropriate staff, including the IT Manager, are able to monitor any aspects of computing facilities used by staff, learners, guests and governors.
- Any breaches of IT security by learners is checked by the Head of Student Services and staff use by the Director of Physical Resources.  Any safeguarding concerns is reported to and routinely reviewed by SMT for further investigation and/or action.
- Established Firewalls will block inappropriate materials from being accessed and an alert raised to the IT department. Staff concerns are investigated and dealt with by the Director of Physical Resources and similarly, student concerns dealt with by the Head of Students Services, the Designated Safeguarding Lead.  Issues are followed up by appropriate managers or staff and update logged for SMT review.
- Any instances of misuse of the internet or college sites are dealt with using the College Positive Behaviour and Disciplinary Procedures and/or helping learners 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 (Local Area Network is a system by which a group of computers and other mobile devices use a connection to share resources such as a printer or

network storage) provides additional protection by allowing teaching staff to monitor classroom activity and identify any suspicious materials or potential risks to learners,

- It is the responsibility of all staff to ensure that, within the duty of care for learners, 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 learners may use mobile phones without accessing College Wifi, and is alert to the need for vigilance.

## 21. Supporting Learners to Keep Safe

21.1 Learners are informed about safeguarding at onboarding / induction and information placed on the student portal to promote learner safety and wellbeing.

21.2 Learners complete Health & Safety at induction to ensure they know how to stay safe on and around the College campus or when completing work based learning.

21.3 Learners are provided with information on online safety at the Onboarding / induction stage. There is a detailed Online Policy & Procedure to support staff who are guiding learners on the acceptable use of the College's IT devices and WIFI use.

21.4 Activities designed to raise awareness of safeguarding and wellbeing will be delivered to full time learners through Onboarding, group tutorial and enrichment programme. For part time Learners and apprentices, this will be covered at the Induction stage.

21.5 Learners are encouraged to take responsibility for their own safety and wellbeing and not put themselves at risk. This includes their behaviour and interactions with staff which must never compromise professional boundaries.

21.6 Learners are advised to report any concerns they have to a member of staff or Student Services regarding any materials found in the College or online.

## 22. Maintaining a Safe Environment

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

22.2 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. learner, staff, visitor, Governor, etc.

22.3 Dynamic lockdown may occur in response to a threat. The College will promptly restrict access and egress to a site or building (or part of) through physical measures. Three short blasts of fire alarm will initially signal the implementation of the lockdown process. Lockdown is to prevent learners, staff or visitors moving into danger areas and to prevent or slow down attackers accessing College buildings (or part of). For information on the College Lockdown procedure, refer to: ANNEXE Ja - Business Continuity - Dynamic Lockdown Procedure.

22.4 Shipley College is committed to continuous improvement in Health & Safety and to attaining the highest possible practice standards throughout the College.

22.5    Details of all accidents are kept and Health & Safety Manager reports are submitted to the Health & Safety Committee on a termly basis and to the Corporation annually, noting any trends and actions to prevent or reduce Health & Safety issues.

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

22.7    It is the responsibility of all staff and learners to ensure the appropriateness of printed and/or online materials both in or around the College.  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.

## 23.    Management of Learner Behaviour

23.1    It is important that learners feel safe and learn within a positive environment. Inappropriate behaviour that causes distress or puts others at risk is challenged and stopped.

23.2    The College promotes and encourages positive behaviour which ensures a safe and supportive environment, free from bullying, including cyber bullying, and the safety of all learners.

23.3    Learner behaviour in breach of the 'Positive Behaviour Policy and Student Disciplinary Procedure' is always investigated and action taken.

23.4    Guidance is offered to staff in dealing with challenging behaviour to help defuse potentially difficult and disruptive situations.

23.5    Staff are encouraged to deal with learner misconduct on an informal basis wherever possible, in an effort to improve behaviour in the first instance.

23.6    Where a learner is demonstrating concerns, the Course Coordinator will formulate a Positive Behaviour Plan with SMART targets to ensure improvement and, dependent on age, may involve parents / carers.

## 24.    Removing a learner from College Premises and to a Place of Safety

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

- You must report immediately to 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 learner from college to a safe place (this might be local or out of the area).
- The learner 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 learner should be advised not to 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 learner's family / carers be contacted.

- The Designated Safeguarding staff dealing with the incident or the Safeguarding Lead will contact the police, Social Services or any other relevant organisation.
- 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 learner is or is not attending college.
- The Designated Safeguarding Lead or member of the Safeguarding Team dealing with the incident will update the Security Support Officers, as appropriate, to ensure the safety of the student and others on College campus.

## 25. Learners who may Present a Risk to Others, including Sex and Violent Offenders

25.1  Where a learner's history or information is shared to indicate that they may pose a risk to learners or staff, a risk assessment will be completed by the Head of Student Services and the appropriate Head of Sector or Director. The Risk Assessment will establish whether the College is an appropriate environment for the person to enrol or continue with their programme of study. If the decision is taken that the person can enrol at the College, any appropriate arrangements required will be put in place to mitigate risks to learners and staff.

25.2  The College has a role in the rehabilitation of offenders but will assess the risks to other learners before making any decisions.

## 26. Attendance at External Meetings

26.1  At times, Curriculum staff may be contacted by external agencies with requests for attendance at external meetings e.g. case reviews, Looked After Children (LAC) reviews, Child In Need Review. Curriculum staff should refer the request to the Head of Student Services, Student Services staff or their Line Manager for advice.

26.2  Arrangements should be made for the attendance at external meetings by a member of the safeguarding team where possible or in some cases, Head of Sector.

## 27. Working with Parents, Carers and Other Agencies to Protect Children and Vulnerable Adults

27.1  This policy and procedure makes it clear that the College will take any reasonable action to safeguard the welfare of learners. In cases where the College has reason to be concerned that a young person or vulnerable adult may be suffering significant harm, ill treatment or neglect or other forms of harm, staff have no alternative but to follow the Safeguarding Procedure and contact Social Services for advice or report concerns.

27.2  In general, the College will discuss concerns with parents/carers before approaching other agencies and will seek consent or inform parents/carers when making a referral to another agency. Appropriate staff will approach parents/carers after discussion with the Designated Safeguarding Lead. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the learner.

## 28. Multi-agency Work

28.1  The College will work in partnership with other agencies in the best interest of the learner. Referrals will be made by the Head of Student Services or the appropriate

member of the Safeguarding Team.  The College will cooperate with Social Services where they are conducting a child or adult protection investigation or conference and, where necessary, will attend meetings or provide reports as required.  Where a learner 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.

28.2   More specifically:

28.3   The College will work in partnership with other agencies in the best interest of the learner. Therefore will, where appropriate, liaise with schools, Social Services, Youth Offending Team, Police or other statutory agencies offering support to the young person or vulnerable adult.

28.4   Reporting of a safeguarding concern to Social Services should be made by the Safeguarding Designated Staff to Children's Social Services Duty Team, on Bradford 01274 437500. Where a young person or vulnerable adult already has a Social Worker assigned, the College will contact the social worker involved.

28.5   The College will ensure representation at appropriate inter-agency meetings such as Initial and Review Child Protection Conferences and Planning and Core Group meetings, as well as Family Support Meetings.

28.6   The College will provide reports, as required, for these meetings. If no one from the College is able to attend, a written report will be sent.

28.7   Where a young person in College is subject to a Child Protection Plan or any multi-agency risk management plan, relevant college staff will contribute to the preparation, implementation and review of the plan, as appropriate.

## 29.   Apprentices and Learners on Work Placement

29.1   All organisations employing an apprentice and/or learner on work placement have a valid Health & Safety check which includes questions about risk assessments, supervision and training to ensure it is a safe and healthy working environment.

29.2   The College ensures, when learners are undertaking work placement or work based learning, that the environment is safe and risks are minimised or removed.

29.3   Prior to starting work placement, learners must be informed by the course team on how to identify and report safeguarding concerns, either concerning themselves or service users.  Learners are required to follow the placement provider's safeguarding policy and inform the appropriate member of staff at work. The learner must also inform their Course Coordinator or tutor.  If this is not possible, the learner can contact Student Services on 01274 327281.  Follow the procedure set out in Point 29 below.

29.4   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.

**30. Procedure to follow in the event that a Shipley College learner on work placement reports a safeguarding concern about a child/young person/vulnerable adult who is a service user.**

30.1   This covers a range of possibilities from minor to major risks e.g.:

- Behaviour that might leave a child/young person/vulnerable adult feeling unsafe
- Behaviour towards a child/young person/vulnerable adult in a way that indicates a risk of harm to the child/young person/vulnerable adult
- Behaviour which may have actually harmed a child/young person/vulnerable adult
- Behaviour which may be a criminal offence against, or related to, a child/young person/vulnerable adult.

30.2 The following steps must be followed by the College member of staff:

- Reassure the learner that it is important to report safeguarding concerns and that it will be followed up. Take a written account of the concerns raised by the learner and include as much detail as possible, including names, times, location, witnesses, etc. Check if the learner spoke to anyone in the workplace about their concern and note what response (if any) was given.
- Clarify with the learner anything that needs further information and write down the questions asked and the responses given.
- When the learner finishes their account of the safeguarding concern, read it back to them, ask them to confirm it is an accurate account and to sign and date it.
- Inform the learner that they will not return to the workplace without the prior permission of the Head of Sector.
- If the learner is under 18 and resides with parents/carers, inform the learner that parent/carer will be contacted by the Safeguarding Lead. If the learner is 18 or over, ask if they wish parents/carers to be contacted.
- Remind the learner, where appropriate, that they have signed a confidentiality agreement and that they should not discuss this matter with anyone unless directed to do so by the Designated Safeguarding Lead, member of the Safeguarding Team, Head of Sector or their tutor.
- The staff member must immediately pass on the written report to the Designated Safeguarding Lead (Head of Student Services) or the Senior Designated Safeguarding Lead (Vice Principal Curriculum) or their Head of Sector to follow up.

30.3   In the first instance, the Designated Safeguarding Lead or the Senior Safeguarding Lead will deal with the incident. However, in their absence, a member of the Safeguarding Team will take responsibility for follow up action.

30.4   The first thing to do will be to make a judgment on the level of seriousness of the alleged incident. For instance:

30.4.1 If the incident is deemed to be a minor risk and requires, say, no more than increased awareness by the Third Party, then the Third Party should be contacted and the matter discussed directly with them by the Safeguarding Lead or relevant Head of Sector.

30.4.2 If, on the other hand, there is a credible reason to believe that a young person or vulnerable adult is at IMMEDIATE RISK OF HARM, then the Police should be contacted on 999.

30.5   In all other instances, if a young person is at risk, the Designated Safeguarding Lead or an appropriate member of staff will Get in touch with Children's Services Contact

30.6 If the safeguarding concern is related to a vulnerable adult, then the incident will be reported via Report a safeguarding adults concern or using the online reporting form Multi-Agency Safeguarding Hub (MASH) Adult at Risk Form

30.7 Social Services should be asked for advice on whether they believe it appropriate for the College to contact the Third Party directly. If they say yes, then the Third Party should be contacted along the lines of the advice received and a reminder given to the Third Party that the College has an obligation in these cases to contact Social Services as part of standard safeguarding procedures. Naturally, if Social Services advise that no communication with the Third Party about the incident should be made, then that advice must be followed. (see paragraphs 30.10 and 30.11 below).

30.8 The College member of staff dealing with the safeguarding concern will contact the parent/carer of the learner if they are under 18, or with their consent if 18 and over, to explain the situation. Under no circumstances should any information be disclosed regarding the details of the safeguarding reported or names of the services user or workplace staff.

30.9 The College strives to maintain the highest level of trust and cooperation with Third Parties who offer work placement for College learners. An allegation of safeguarding misconduct may cause tension in that relationship, not least in terms of the timing of communication from the College. If, for example, communication is almost immediate as envisaged in paragraph 30.4.1, then there is a reasonable expectation that matters can be resolved quickly and amicably.

30.10 If, on the other hand, Social Services are involved and that involvement prohibits the College from direct contact, then possible tensions might arise: the Third Party might contact the College to ask why they were not informed directly or, positively, they may apologise that the College has had to become involved in this allegation. In these cases, the College should apologise for not communicating directly but stress that it had no option, under safeguarding procedures, to report the matter to Social Services and to follow all the advice given to the College by Social Services. The College should always suggest that they are very willing to discuss the incident with the Third Party once they are allowed to do so.

## 31. Trip, Visit or Residential

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

## 32. Safer Recruitment, Selection and Pre employment Vetting

32.1 The College pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures, as outlined in Part Three, Page 30 - Keeping children safe in education (2020) Statutory guidance for schools and colleges Update - January 2021 (Post EU Exit) .

32.2 The College will maintain a single central record which evidences the relevant vetting checks required including: DBS check at the correct level inclusive of Barred List check, identity, qualifications, prohibition order and right to work in the UK.

32.3 All recruitment materials will include reference to the College's commitment to safeguarding and promoting the wellbeing of learners.

32.4 The College will ensure that all recruitment panels include at least one person that has undertaken safer recruitment training.

32.5 The College will ensure that a person who is prohibited from teaching will not be appointed to undertake teaching work in the College.

32.6 The College will ensure that, where relevant, employed individuals have not been disqualified under the Childcare (Disqualification) Regulations 2009.

32.7 The College will ensure that appropriate DBS risk assessments will be undertaken, as required through the College HR department.

## 33. Whistle Blowing

*33.1 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.  For further information refer to the College's Whistleblowing Policy & Procedure.

33.2 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call:
0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday and Email: help@nspcc.org.uk

## 34. Staff Update and Training

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

34.2 The College provides appropriate mandatory training, regular/timely updates and monitors completion of training to ensure staff are aware of their responsibility to safeguard and promote the wellbeing of young people and vulnerable adults.

34.3 All staff, volunteers and governors will be asked to read the guidance - 'Keeping children safe in education' - Part One.

34.4 This document is provided 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.

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

35.1 If an allegation is made against a member of staff involving a learner 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.

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

35.3 The College recognises that the welfare of the 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.

35.4 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 the 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 learner, 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 learners may consider any member of staff of the College to be trustworthy due to the fact that they work at the College.

35.5 College staff must maintain professional boundaries at all times when using electronic/social media. Staff should always avoid personal social media contact with learners and their parent/carer, initiated by either party, to ensure relationships remain within professional boundaries and do not breach the College Staff Code of Conduct.

35.6 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 learner, Student Services will liaise with the learner and their family or carer, and offer support and an advocacy role.

## 36. Enquiries and Investigations Following Allegations Against a Member of Staff

36.1 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.

36.2 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.

36.3 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.

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

● Inform the 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.
● Ensure HR Manager keeps a written record of the actions taken in connection with the allegation.

## 37. Suspension of Staff

37.1 Suspension should not be automatic, but can be considered at any stage of the investigation.  Suspension is not an indication of "guilt" or a disciplinary sanction and is only used to mitigate risk or to ensure an impartial investigation can proceed.

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

● Where a learner 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, if deemed appropriate.

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

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

## 38. Records

38.1 It is important that only the relevant documents relating to an investigation are retained. These should be stored 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 personnel file in line with the College's retention and disposal procedures. Any information related to the learner will be recorded on CPOMs.

38.2 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 relevant agencies under the DBS procedures.

## 39. Investigating Allegations of Child Pornography

39.1 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.

39.2 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 it.

39.3 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.

## 40. Location of Policy

40.1 This Policy will be held on the staff portal and College intranet. Student Services will provide copy, on request to learners, parents/carers or other external parties.

## 41. Links to other related College Policies and Procedures /documents

Health and Safety and Safeguarding for Full Time and Apprenticeship Learners in the Workplace
Health and Safety Policies and Procedures
ANNEXE J Business Continuity - Dynamic Lockdown Procedure
Student Positive Behaviour Policy
Admissions Policy and Procedure
Student Wellbeing and Fitness to Study Procedure
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
Disciplinary policy
Guidance for Personal Consent required regarding the Use of Digital Photography and/or Video Recording
Visitors Policy
Freedom of Expression Policy
Prevent Risk Assessment and Action Plan
Safeguarding Policy and Procedure - Appendix 4 - COVID19 remote working arrangements for Safeguarding
Online learning policy and procedure
Policy and Procedure for Events Involving External Speakers

## 42. Monitoring and Reporting

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

## APPENDIX 1 - Definitions and indicators of abuse

**Neglect** is 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)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Examples which may indicate neglect**:

- Constant tiredness or listlessness
- Poor concentration
- Dirty or unkempt
- Poorly or inappropriately dressed for the weather
- Poor attendance or often late
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or searching for food or other basic necessities
- Failure to achieve developmental milestones, for example, intellectually or social development, weight

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

**Examples which may indicate physical abuse:**

- Patterns of bruising or injuries; inconsistent account of how bruising or injuries occurred - finger, hand or nail marks, black eyes, bite marks, burns, scalds Lacerations, fractures, bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

**Sexual abuse** involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts, including, 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).

**Examples which may indicate sexual abuse:**

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Eating disorders, for example anorexia nervosa and bulimia
- Self harming, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour
- Touching others inappropriately
- Depression, withdrawal, isolation from peer group

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Examples which may indicate emotional abuse:**

- Over reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away / going missing
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia

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

**Children with Disabilities**

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing
- Unwillingness to try to learn a child's means of communication
- Misappropriation of a child's finances
- Invasive procedures

**Self-harm**

Self-harm describes any behaviour where someone causes harm to themselves, usually as a way to help cope with difficult or distressing thoughts and feelings. It most frequently takes the form of cutting, burning or non lethal overdoses.

Self-harm usually starts as a way to relieve the build up of pressure from distressing thoughts and feelings. This might give temporary relief from the emotional pain the person is feeling. It is important to know that this relief is only temporary because the underlying reasons still remain. Soon after, feelings of guilt and shame might follow, which can continue the cycle.  Learning new coping strategies to deal with these difficulties can make it easier to break the cycle of self-harm in the long term.

While it is true that anyone can be affected by self-harm, some people are more at risk of self-harm than others.

Some factors that might make someone more at risk are:

- Experience of a mental health disorders, depression, anxiety
- Difficulties at home,
- Transitions and changes
- Arguments or problems with friends
- Bullying
- Alcohol and drug use.

Further information or support is available through the websites and contact details below:

- http://www.harmless.org.uk/
- www.selfharm.co.uk
- www.youngminds.org.uk
- www.lifesigns.org.uk
- https://www.samaritans.org/
- www.b-eat.co.uk
- Student Wellbeing & Mental Health Page - Student Portal

**Adult Safeguarding**

In terms of an adult qualifying for support from Adult Social Care an 'adult at risk' as being someone who is aged 18+ who:

- Has need for care and support,
- Is experiencing, or is at risk of abuse or neglect, and
- As a result of their need for care and support is unable to protect him or herself against the abuse, or neglect or risk of it.

The abuse could: happen once, be repeated, be a deliberate act, be unintentional (perhaps due to a lack of understanding) or the abuse could be a crime. Abuse can be caused by anyone: a partner, relative, friend, neighbour, a paid or volunteer carer, other service users, someone in a position of trust (e.g. college staff) or a stranger.

**Different Kinds Of Abuse Which An Vulnerable Adult May Experience**

- **Physical abuse** – being hit, kicked, locked in a room or inappropriate restraint
- **Sexual abuse** – such as being made to take part in a sexual activity when the adult has not given or is not able to give consent.
- **Psychological abuse** – such as being shouted at, ridiculed, bullied or being made to feel frightened.
- **Financial or material abuse** – such as theft, fraud, exploitation, pressure in connection with financial matters or misuse of someone else's finances.
- **Neglect** – involves the failure to provide care or support that results in someone being harmed.
- **Discriminatory abuse** – involves treatment or harassment based on age, gender, sexuality, disability, race or religious belief.
- **Modern slavery** – includes human trafficking and forced labour.
- **Organisational abuse** – if these forms of abuse are caused by an organisation then this may be called organisational abuse.
- **Domestic violence and abuse** - when the abuse occurs between partners or a family member.
- **Self-neglect** – is when an adult declines essential support with their care and support needs, and this is having a substantial impact on their overall wellbeing.

## APPENDIX 2 - 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 learners 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 learner voice.
● To break down segregation among different learner communities including supporting interfaith and intercultural dialogue and understanding, and to engage all learners in playing a full and active role with wider engagement in society.
● To ensure learner safety and that the College is free from bullying, harassment and discrimination.
● To provide support for learners who may be at risk and develop appropriate sources of advice and guidance.
● To ensure that learners 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 learners, 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, learner voice and participation
● Building staff and learner 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 learners, by undermining extremist ideology and supporting the learner 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 learner voice

**Learner 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 learner support services which have thorough understanding of the Prevent agenda
- Maintaining links with key external agencies; Local Authority, Social Services, Local Authority Designated Officer (LADO), Police, Prevent Regional HE/FE Coordinator
- Carefully observing and being vigilant about what is happening in the College and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping learners and staff know how to access support in the College and/or through community partners
- Supporting learners through safeguarding and knife crime & youth violence prevention activities

**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 learners 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 or vulnerable adult 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 the Head of Student Services or a member of the Safeguarding Team.

2. If a member of staff is **seriously** concerned about an issue involving terrorism or radicalisation, 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 national police Prevent advice line 0800 011 3764, in confidence, to share your concerns with specially trained Prevent officers. and report the incident.  For more information refer to Act Early, Prevent radicalisation website

3. The member of staff must then report the incident to the Head of Student Services or Vice Principal Curriculum at the earliest point.

**APPENDIX 3 - Protocol on Sharing Information with External Agencies**

**Information Sharing**

Sharing information is an intrinsic part of any frontline practitioner's 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.

When there is a concern that a child is at risk of significant harm, all relevant information held by the establishment must be shared with third parties such as Social Care Services, police and health professionals. Section 47 of the Children Act 1989 and sections 10 and 11 of the Children Act 2004 empower all agencies to share information in these circumstances.

On occasions when safeguarding concerns exist for a child (or vulnerable adults) in the context of a family situation and siblings attend other educational establishments or the children are known to other agencies, it may be appropriate for the designated safeguarding staff to consult with, on a confidential basis, their counterpart from other establishments or other agencies to share and jointly consider concerns.

In accordance with section 29 of the Data Protection Act, the police are allowed access to college records in certain circumstances such as criminal investigations.

It is good practice to seek consent from the child or vulnerable adult or their parent/care before sharing information. Children over the age of 12 years are considered to have the capacity to give or withhold consent to share their information, unless there is evidence to the contrary; therefore it is good practice to seek their views. If the learner is over 16, they should be involved in decision-making about information sharing, unless they do not have the capacity to give consent.

However, consent is not always a condition for sharing and sometimes we do not inform the child or family that their information will be shared, if in doing so it would:

● Place a person (the child, family or another person) at risk of significant harm, if a child, or serious harm, if an adult; or
● Prejudice the prevention, detection or prosecution of a crime; or
● Lead to unjustified delay in making enquiries about allegations of significant harm to a child or serious harm to an adult.

**Related Government guidance**

● [Information sharing: advice for practitioners providing safeguarding services](#)
● [Working Together to Safeguard Children (updated 2018)](#)

# Flowchart of key questions for sharing information (whether you are asked to share information or wish to share information).



You are asked to share information

Is there a clear and legitimate purpose for sharing information? → **No**

**Yes**

Does the information enable an individual to be identified? → **No**

**Yes**

Is the information confidential? → **No**

Not sure → Seek Advice

**Yes**

Do you have consent? → **Yes**

**No**

Is there another reason to share information such as to fulfil a public function or to protect the vital interests of the information subject? → **Yes** → You can share

**No** → Do not share

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*)

**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** and retaining 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 the 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 wellbeing:** Base your information sharing decisions on considerations of the safety and wellbeing 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 young person or vulnerable adult.

**Necessary and proportionate -** When making 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 young person or vulnerable adult. 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 the 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.

**APPENDIX 4 - COVID-19 Remote Working Arrangements for Safeguarding**

**1.     Context**

This addendum contains information about what procedures need to be followed with regards to safeguarding vulnerable young people during the period of COVID-19 College closure remote learning.

**2.     Key safeguarding contact details during lockdown**

| Role | Staff Member | Contact details |
|---|---|---|
| Vice Principal Curriculum (Senior Designated Safeguarding Lead) | Diana Bird | dbird@shipley.ac.uk |
| Head of Student Services (Designated Safeguarding Lead) | Shoeb Desai | sdesai@shipley.ac.uk |
| Student Wellbeing and Safeguarding Officer | Tara Phillips | tphillips@shipley.ac.uk |
| Specialist Personal / Careers Adviser | Chris Holgate | cholgate@shipley.ac.uk |
| Head of Learning Support | Lucy Smith | lsmith@shipley.ac.uk |
| Head of Sector for Care | Mark Harrison | mharrison@shipley.ac.uk |
| Head of Sector for Essential Skills | Liz Barker | ebarker@shipley.ac.uk |
| Head of Business Development | Linda O'Donnell | lo'donnell@shipley.ac.uk |
| Health and Safety Manager | Diane France | dfrance@shipley.ac.uk |
| HR Manager | Jennifer Birtwistle | jbirtwistle@shipley.ac.uk |
| Director of Physical Resources | Ian Durham | idurham@shipley.ac.uk |

**3.     Designated Safeguarding Lead (DSL)**

The DSL will be available to be contacted via phone, email or Google Meet.  Where a DSL cannot be contacted, another member of the Safeguarding Team will assume responsibility for coordinating safeguarding.

The DSL will continue to engage with social workers, and attend multi-agency meetings remotely.

The DSL will ensure that operational staff with designated safeguarding responsibilities will continue to undertake their role in offering support to vulnerable young people.

**4.     Reporting a concern**

Staff are reminded of the need to report any concern immediately and without delay.

Where staff have a concern about a young person or vulnerable adult, they should continue to follow the process outlined in the Safeguarding Policy and Procedure.

Designated safeguarding team members will follow up concern and enter on the electronic safeguarding system, CPOMS, which can be done remotely.

Where a member of staff is concerned about an adult working with a young person or vulnerable adult remotely, they should immediately contact the Designated Safeguarding Lead, the Senior Designated Safeguarding Lead or HR Manager.

Concerns about an adult working in a position of trust with children or young people will be reported to the Bradford Local Authority Designated Officer (LADO). The contact details for the LADO in Bradford are 01274 434343 or cpuduty@bradford.gov.uk

## 5. External key safeguarding contacts:

**Safeguarding Children**

During office hours call Children's Social Care Initial Contact Point on 01274 435600 (8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday)

At all other times, Social Services Emergency Duty Team - 01274 431010 (outside office hours)

**Safeguarding Adults At Risk**

Contact 01274 431077 to speak to a member of the Multi Agency Safeguarding Hub (MASH) who will provide support, advice and guidance to report concerns
(8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday)

Out of hours Emergency Duty Team - Telephone: 01274 431010 (outside office hours)

Note: If there is a young person or vulnerable adult is in immediate danger, contact the Police by dialling 999 for urgent assistance

## 6. Safeguarding the most vulnerable young people

The following will be in place to ensure the safety of the most vulnerable young people:

● Maintain a weekly review of our most vulnerable young people
● Safeguarding messages on the College website and Student Portal pages.
● Where appropriate, liaise with social workers and other professionals to help protect all vulnerable young people. This includes students with an EHCP, Looked After Children, previously Looked After Children, identified as Child In Need, included within a Child Protection Plan or identified by College as a safeguarding risk.
● Where parents/carers raise a concern about the risk of the young person or vulnerable adult contracting COVID-19, Shipley College staff will follow this up by offering help/support in line with the advice set out by Public Health England.
● All staff who interact with young people or vulnerable adults, including online, continue to look out for signs a young person or vulnerable adult may be at risk. Any such concerns should be dealt with in accordance with the College's Safeguarding Policy and Procedure and, where appropriate, referrals should still be made to Children's or Adult Social Care, or the Police, if required.

- Students and parents/carers will have access to the College's online [Wellbeing and Mental Health](#) resources, via the student portal.
- Students will receive regular contact from the curriculum team, Learning Coach, SEND Team Leaders and pastoral support staff.
- Vulnerable young people will access online learning. This will be monitored regularly and followed up, if not engaging with online learning activities. Where appropriate vulnerable learners will be supported to study online from College campus.

## 7. Mental health and wellbeing

Shipley College recognises that the current exceptional circumstances may negatively affect the mental health and well-being of young people in different ways. The College will ensure that all students have regular contact with staff, have access to online resources and receive emails on online activities.

Where we have previously offered additional pastoral support to young people identified as requiring support or concerns raised about their mental health, the support will continue during the period of remote learning, offered online or by a telephone call or text messages.

We understand that the home life for all young people is not always a positive environment, and that COVID-19 is likely to compound anxiety and stress, especially if members of the family become ill during the pandemic.

Shipley College will continue to ensure that there is a plan in place for supporting young people, especially the most vulnerable, and obtaining support services as appropriate. Other useful information is found on the [Student Wellbeing & Mental Health](#) page, and contacts/web links below:

- Child line: 0800 1111 www.childline.org.uk
- www.nhs.uk
- www.mind.org.uk and www.mindmate.org.uk (for children & young people)
- www.gov.uk/government/publications/covid-19-guidance-for-the-public-on-mental-health-and-wellbeing
- www.nhs.uk/oneyou/every-mind-matters/coronavirus-covid-19-staying-at-home-tips
- www.mentalhealth.org.uk/publications/looking-after-your-mental-health-during-coronavirus-outbreak
- www.nhs.uk/conditions/stress-anxiety-depression/talking-to-children-about-feelings/
- https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing

## 8. Creating a safe learning environment for young people

The College will continue to provide a safe online learning environment via the Google education platform.

Online teaching should follow the same principles as set out in the ILT Services – Acceptable Use Policy (AUP) and Online learning policy and procedure to ensure student safety.

The College will ensure that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Staff should continue to follow all college policies, with particular reference to Safeguarding, Code of Conduct, Acceptable Use (IT), Equality & Diversity, Teaching, Learning & Assessment and Positive Behaviour.

**Key guidelines when working online:**

The Online Learning Policy and Procedure sets out guidelines for staff when they are managing online Teaching, Learning & Assessment (TLA) or providing online support to students.  This Policy and Procedure applies to all Shipley College academic staff, trainers and assessors. Online Learning refers to all aspects of distance and remote learning, including flexible and blended learning.

**Safeguarding for Students whilst Working Online**

The College's Safeguarding procedure applies equally to students studying online as it does to being on premises.

● Any safeguarding concerns must be reported in line with the College procedure by contacting Student Services or the Head of Student Services.
● Appropriate advice and guidance should be offered to the member of staff reporting the safeguarding concern, and as appropriate, the student will be contacted and supported by a member of the Safeguarding Team.  If appropriate, parents/carers may also be contacted.
● As online learning may raise additional safeguarding concerns, protecting the most vulnerable students is important.  Staff should be extra vigilant for signs of peer on peer abuse or bullying, students' state of mental health and students who go missing as there could be more serious concerns regarding sexual or criminal exploitation related to County Lines or Youth Crime.
● All staff must be familiar with the College's Safeguarding Procedure and Keeping Children Safe in Education - Part One (this is part of mandatory safeguarding training for all staff).
● The online learning experience of students should continue to be enriched by input from external speakers and organisations.  However, tutors/trainers must ensure that all safeguarding concerns, including PREVENT, are considered when inviting speakers to the College's online platforms. Tutors/trainers must seek to reduce the likelihood that external speakers or organisations might seek to promote extremist views or attempt to radicalise students and staff. For further information and guidance please refer to the External Speakers & Events Policy & Procedure.
● It is important for staff to regularly remind students about "Staying Safe Online" and the information provided to them.  For further information refer to the Online Safety page on the Student Portal which contains links, information and video clips to help students navigate online platforms safely

For more specific information on support and guidance for Staff refer to the Shipley College **Online Learning Policy & Procedure 20/21.**

9. **Attendance monitoring**

All students will be expected to engage with remote learning and support offered by the College.  Staff will follow up on any student that fails to engage when they were expected to attend online.

Academic staff, Learning Coaches and Attendance Officers will continue to record relevant information on the student's ILP, which staff can access remotely.

If no contact is made and a concern is raised, the College will contact the parent/carer or named Social Worker, if appropriate.

## 10. Safeguarding training and updates

All Shipley College staff to complete safeguarding training, read [Keeping Children Safe in Education Statutory Guidance for Schools and Colleges Part one: September 2020](#) and up to date with any new guidance or updates shared with staff.

## 11. Safer recruitment

When recruiting new staff, Shipley College will continue to follow safer recruitment processes, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2020) (KCSIE). This is to ensure that any person who is unsuitable does not gain employment at Shipley College.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking, to minimise the need for face-to-face contact. https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines.

If in certain circumstances a new member of staff or volunteer is unable to actually bring in the original form of ID to be copied/verified, the check may take place online. The person checking the material must be able to clearly see all relevant aspects of the required documentation over the video link. The person providing the information must then scan images of the paperwork. However, as soon as the member of staff is able to attend College premises, they must produce the original version of the documents to HR.

Also, where a new member of staff is unable to complete their staff induction in person, the College will ensure the safeguarding processes are followed, including the online safeguarding induction for new staff.