

# **ShIPLEY College**

## **Safeguarding Policy and Procedure**

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## 1. Purpose

- To offer assurance that the College understands that safeguarding is everyone's responsibility, including governors, Senior Management Leadership (SLT), managers, staff, students, volunteers, agency staff, other non-payroll staff, visitors or contractors on site.
- To set out standards of behaviour for students and staff.
- To develop staff awareness and understanding of student vulnerability and 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 collaboratively with students, parents/carers and external agencies to create a safer college.
- To ensure that all children, young people and vulnerable adults are protected, feel safe, and be confident that their concerns will be taken seriously and treated sensitively.
- To ensure all students are treated as individuals, with respect and dignity.
- To ensure that young people grow up in circumstances consistent with the provision of safe and effective care and to take action to enable all to have the best outcomes (as set out in '[Working together to safeguard children 2023: statutory guidance](#)').

## 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 must take appropriate action to ensure the safety and wellbeing of students.

### 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 safe and accessible.
- Establish procedures for reporting and dealing with allegations of abuse against members of staff, volunteers, employers of apprentices and placement providers, contractors or other visitors to the College.
- Work collaboratively with external agencies to achieve the best safeguarding outcome(s) for the student.
- Work with parents/carers to keep students 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, workers and volunteers under the terms of engagement are suitable to work at the College.
- Implement the '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.
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
- Promote student voice and engagement in developing a safer college.
- Implement appropriate levels of support for students with Special Educational Needs or Disability (SEND) to maintain their safety and wellbeing.
- Ensure staff, volunteers, non-payroll staff, governors, employers of apprentices and placement providers 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 students when using all types of digital or social media.
- Help students take responsibility and care for their safety and wellbeing.

### **3. Scope**

- This Policy and Procedure applies to the College workforce, governors, employers of apprentices or placement providers, 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 a priority, the responsibility to safeguard and promote the welfare of students, staff and visitors.
- This policy and procedure helps to minimise risk and ensure collaborative working with other agencies so rigorous arrangements are in place to identify, assess and support students 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 the physical environment of the College campus.
- Employers providing work experience will be supported by the College to put in place appropriate safeguards for students.

### **4. Definitions**

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

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

4.3 14-16 year olds on a school roll on College premises are also covered by this policy and procedure. However, for those on a school roll, the school or their parents/carers will be initially notified of any safeguarding concerns raised. Should there be an emergency and the College is unable to contact the appropriate school, the College will apply its procedures to ensure the young person is safe.

4.4 A 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 at risk of being abused or neglected.
- As a result of their needs, they are unable to protect themselves from being harmed or neglected.

4.5 At the College, some students will be considered to be 'Adults at Risk' and are likely to receive services or care overseen by Adult Social Care, due to disability, physical health needs or mental health.

4.6 Mental capacity - When someone has sufficient mental capacity this means they can 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.

4.7 If a student does not meet the criteria for support from Adult Social Care and 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.

#### 4.8 Situations where the College may intervene in safeguarding adult students:

- Experiencing a mental health crisis or those who have a long-term mental health condition and may pose an immediate or ongoing risk to themselves or others.
- Victim of domestic abuse.
- Disclosure that they are a victim of a crime (including historic offences).
- Students who are vulnerable due to their circumstances, for example, homelessness, or adults with substance or alcohol misuse issues.

4.9 Where an adult reports domestic abuse and children reside in the household, we have a duty of care to consider the safety of the children, and make a referral to Social Services, if appropriate.

#### 4.10 Looked After Children:

4.11 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 parent's 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.

4.12 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.

4.13 The Local Authority has responsibility for Looked After Children and young people leaving care. Any issues raised at College will be brought to the attention of the Social Worker or Foster Carer.

4.14 The College works closely with the Virtual School for Looked After Children who plays a strategic role in making sure the corporate parenting responsibilities of the Local Authority, concerning the education of Looked After Children, are met. The Virtual School aims to promote achievement, raise attainment and ensure equality of opportunity to enhance the life chances of all Looked After Children.

## 5. Responsibilities

### 5.1 Staff Responsibility

5.2 All staff are responsible for reporting any suspected abuse or disclosure of any young person or vulnerable adult to their line manager, appropriate manager, Designated Safeguarding Lead, Student Services wellbeing and safeguarding staff, or a member of the SLT.

**Staff must:**

- Complete mandatory safeguarding training, read safeguarding updates and [Keeping Children Safe in Education \(KCSiE\)](#).
  - Become familiar with the Safeguarding Policy and Procedure.
  - Ensure that student welfare and safety must be the paramount consideration at all times.
  - Not withhold safeguarding information
  - 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 - If related to a student, speak to a member of the Student Services safeguarding and wellbeing Team. However, if related to Staff, report to the Designated Safeguarding Lead, HR Manager or a member of the SLT.
  - Offer support to the member of staff dealing with the safeguarding situation.
  - Comply with Safer Recruitment processes and checks.
  - Behave in accordance with [Keeping Children Safe in Education Statutory guidance for schools and colleges](#)
- 5.3 In a life threatening situation or if someone is at risk of suffering immediate harm, staff should contact the appropriate emergency service on 999 without delay.
- 5.4 Describe the situation accurately and be precise about where you want the emergency services to arrive - street name, postcode for the building, etc.
- 5.5 As soon as it is possible, report the safeguarding concern to either the Designated Safeguarding Lead (Head of Student Services), Senior Safeguarding Lead (Vice Principal Curriculum and Quality), a member of the Safeguarding Team, an SLT member or your Line Manager.
- 5.6 **Designated Lead For Safeguarding (DSL)**
- 5.7 Head of Student Services is the DSL and, in undertaking this role, will:
- Report to the Senior Designated Safeguarding Lead.
  - Inform the Safeguarding Liaison Governor of any serious concerns.
  - Take the lead on ensuring the College carries out its duties to safeguarding young people and vulnerable adults.
  - Undertake appropriate training and keep up to date with new government legislation, duties or guidance on safeguarding.
  - Produce annual Safeguarding Report to the Governing Body.
  - Provide monthly safeguarding updates to SLT.
  - Provide Safeguarding advice, training, information and updates to staff and governors.
  - Provide information to students to help them keep safe.
  - Maintain an oversight of all safeguarding 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 and advice.
  - 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 or attend case conference meetings.
  - Liaise closely with the HR manager and Senior Designated Safeguarding Lead related to complaints or allegations of abuse made against a member of staff related to a student, particularly a young person or vulnerable adult.
  - Report to the Local Authority Designated Officer (LADO) a complaint or allegations of abuse made against a member of staff, particularly if the alleged victim is a young person or a 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.
  - Ensure accurate records of all safeguarding concerns raised and actions taken to support students are recorded on CPOMS (Safeguarding Software System for schools and colleges).
- 5.8 In the absence of the Head of Student Services, a member of the Safeguarding Team or, if appropriate, the Vice Principal - Curriculum and Quality will deal with the safeguarding concern raised.
- 5.9 **Senior Designated Safeguarding Lead (Vice Principal Curriculum and Quality)**
- 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 concerning safeguarding young people and vulnerable adults at risk of harm.
  - Oversee that all staff, including non-paid staff, receive safeguarding training and have awareness of the College’s Safeguarding Policy and Procedures.
  - Ensure the College deals with allegations per College and external procedures.
  - Oversee any inter-agency issues and complaints.
  - Be the safeguarding representative on the SLT and the Corporation on safeguarding matters.
  - Receive appropriate training and keep up to date with safeguarding legislation or guidance published.
  - Work closely with the Designated Safeguarding Lead and other managers to ensure student safety and safeguarding concerns are dealt with promptly.
- 5.11 **Safeguarding Team**
- 5.12 If necessary, a member of the Safeguarding Team may be required to:
- Assist in dealing with or overseeing any cases of suspected or alleged abuse towards a young person or vulnerable adult.
  - Be available to listen and/or offer advice to staff on safeguarding concerns raised by students or staff.
  - Refer staff to specific aspects of the College’s Safeguarding Policy and Procedure, if further guidance or information is requested.
  - Liaise with appropriate external agencies.
  - In the absence of the Designated Safeguarding Lead, update the Senior Designated Safeguarding Lead and HR Manager if an allegation of safeguarding concern is raised against a staff member, employer or placement provider regarding 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**
- Click [HERE](#) for contact details for members of the safeguarding team.
- 5.14 **Student Wellbeing & Safeguarding Officer and the Specialist Personal and Careers Adviser**

- Support a caseload of young people or vulnerable adults where there is a wellbeing or safeguarding concern raised or the student has self referred.
- Accurately maintain up to date records on CPOMS of safeguarding concerns raised and action taken to support students.
- Bring to the attention of the Designated Safeguarding Lead and, if appropriate, make referral to Social Services of suspected or reported abuse against a young person or vulnerable adult.
- Provide guidance to staff related to student wellbeing and safeguarding.
- Keep Designated Safeguarding Lead updated on concerns raised and action taken to safeguard students.
- Attend Child Protection case conferences, Child In Need meetings, Personal Education Plan (PEP) meetings, etc.
- Keep up to date with appropriate safeguarding training and maintain refresher training.
- Share relevant safeguarding and wellbeing information with students and staff to promote safety, safeguarding and wellbeing of students.

### 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, as required:

- Attend the College Safeguarding Management Group meetings.
- Where appropriate, meet with the Principal, Senior Designated Safeguarding Lead or Designated Safeguarding Lead over matters regarding any serious safeguarding concerns.
- As a member of the Corporation, approve the College's Safeguarding Policy and Procedure and receive the annual Safeguarding Report.
- Assist the Chair of the 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.
- Provide appropriate challenge and support to strengthen the College's safeguarding arrangements.

## **6. Dealing with safeguarding a concern**

6.1 On noticing a cause for concern or following a safeguarding disclosure a member of staff should follow the guidelines below:

- Allow the student to take their time to explain - listen attentively, be patient and do not ask too many questions.
- Reassure the student that they have done the right thing to share the concern with you.
- Help the student to feel safe.
- Explain to the student that you will need to pass on the information to the appropriate staff in the College so that they can get the help required.
- The information will be treated in confidence and only shared with the staff who need to know.
- If brief notes are made, check with the student that they are accurate.
- If emailing sensitive student information, use initials and student ID. Avoid using the student's name, address, etc.
- If the safeguarding concern is about a student, contact Student Services safeguarding staff or the Head of Student Services.

- If the concern is related to a member of staff, speak to the Head of Student Services, HR manager or member of the SLT.
- If there is a risk of harm, ensure you get immediate help. Ensure they are accompanied at all times until you have passed on the concern to an appropriate member of staff or manager.

## 6.2 Staff must avoid the following:

- Promising that information can be kept secret.
- Eliciting information – the concern will be followed up appropriately by the relevant person dealing with the concern.
- Getting overly involved with the situation or taking things into your own hands.
- Contacting students or allowing students to contact you outside working (College) hours.
- Visiting students outside of College without specific permission of your line manager DSL or SLT.

## 7. Key information

### 7.1 All staff should be familiar with the following information

- [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 2023: Statutory guidance for schools and colleges on safeguarding children and safer recruitment](#)
- [Working Together to Safeguard Children 2023 - Statutory guidance on multi-agency working to help, protect and promote the welfare of children.](#)
- [Statutory guidance on children who run away or go missing from home or care](#)
- [Children missing education: statutory guidance for local authorities](#)
- [What to do if you're worried a child is being abused: advice for practitioners](#)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [Children Act 2004](#)
- [Education Act 2002](#)
- [Teachers' standards](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- [Counter-Terrorism and Security Act 2015](#) - Section 26 of 'the Counter-Terrorism and Security Act 2015' places a duty on certain bodies, including Further and Higher Education establishments, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". The duty also requires bodies to 'actively promote' the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- [The right to choose: government guidance on forced marriage](#)
- [Mental Capacity Act 2005](#)
- [Review of sexual abuse in schools and colleges - Ofsted's findings and recommendations on sexual harassment and sexual violence, including online sexual abuse.](#)

- [Guidance: Sharing nudes and semi-nudes: how to respond to an incident \(overview\) 2020](#) - provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.
- [Female Genital Mutilation Act 2003](#)
- [Education Inspection Framework for Further Education and Skills](#)

## **9. Support for young people and adults with additional needs**

- 9.1 The College recognises that some students may be more vulnerable to abuse, such as students with special educational needs or disability, those living with abuse, violence or drug/alcohol dependency, Looked After Children, homeless, etc.
- 9.2 If the College is considering excluding a student who is vulnerable, is supported by Social Services or there is a multi-agency team working with the student, the College will ensure key agencies are updated on decisions leading to possible exclusion.
- 9.3 The College will follow Bradford SAFER BRADFORD online multi-agency procedures and will, where necessary, follow the guidance on protocols for sharing information with external agencies (See **Appendix 3**):
- 9.4 For further information on the specific forms of abuse and safeguarding issues refer to [Keeping children safe in education 2023 - Statutory guidance for schools and colleges](#) Annex B: Further information, pages 140 - 162.

## **10. Missing students**

- 10.1 Managing punctuality and attendance effectively is an important factor in ensuring student safety and wellbeing. Students 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. Any concerns are followed up and, if appropriate, parents/carers are contacted by Learning Coaches, Course Leader or Student Services as appropriate.
- 10.2 If a student 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. However, this must not take place in circumstances where informing the parent/carer puts the student at risk.
- 10.3 If a student 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 HoD and Course Leader at the College. Care must be taken not to disclose information to a family member, especially over the phone, in case the student has left home due to personal difficulties or safeguarding concerns at home.
- 10.4 If a vulnerable student or a student who is identified as an "at risk student" is missing from College, the attendance officer or Learning Coach will immediately report the student missing to Student Services. A member of the Student Services safeguarding team will contact the student, the next of kin (unless there are circumstances not to do so) and supporting agency(ies) working with the student or family. The Head of Student Services or the member of the Student Services safeguarding team will decide whether to contact the police to report the student missing. The decision will be influenced by the level of risk identified, wishes of the next of kin or risk assessment plan in place for the student if they go missing from College.

## **11. Child on Child Abuse**

- 11.1 The College recognises that young people are capable of abusing their peers and that child-on-child 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 the 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 student has reported being abused by another student, the Head of Student Services or the appropriate Head of Department should be contacted immediately. If the student is aged under 18 or a vulnerable adult living at home then parents/carers need to be contacted (unless there are circumstances not to do so). The College recognises that the welfare of the alleged victim will be the paramount concern. However, it also recognises that hasty or ill-informed decisions can irreparably damage a student's reputation, confidence and/or opportunity to achieve. Therefore, those dealing with such allegations within the College will do so 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 student who is the subject of the allegation, a risk management plan is put in place by the Head of Department with assistance from the Head of Student Services.
- 11.5 The College will take into account any action taken by the Police or Social Care Services regarding any investigation they undertake, however, the College will follow its own disciplinary procedure to deal with the incident.

## **12. Upskirting**

- 12.1 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.

## **13. Forced Marriage**

- 13.1 Forced marriage is different from, and should not be confused with, 'arranged marriage'. A student who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse, whether physical, psychological, financial, sexual or emotional pressure.
- 13.2 If there are concerns that a student may be in this situation, they can be offered support, as well as details of the Forced Marriage Unit which can offer specialist advice. Confidentiality is extremely important in these circumstances. Whilst establishing the student's situation, staff should try to ascertain the immediate risk the student is in. In all cases, staff must speak to the Head of Student Services or Student Services staff, to safeguard the student. If the student is going overseas imminently it is crucial to gather as much information as possible from them before they leave the country.

13.3 The student's family should not under any circumstances be contacted without seeking permission from the Head of Student Services. Confidentiality within the College is also essential, as other students may know the family and information may be passed on to them which can put the student at risk.

13.4 Course Coordinators, Attendance Officers, Learning Coaches or SEND Team Leaders should report students at risk of Forced Marriage missing to Student Services pastoral support staff, Head of Student Services or their HoS to minimise the risk of any harm.

#### **14. Female Genital Mutilation (FGM)**

14.1 There is a mandatory duty in law for professionals to report to the police when they discover that FGM appears to have been carried out on a female under 18. Those failing to report such cases will face disciplinary sanctions.

14.2 All professionals must act to safeguard girls at risk of FGM, particularly if it is known that a relative has undergone FGM or they 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.

15.2 Much like FGM, Breast Ironing is a harmful cultural practice and is child abuse. Similar to 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 sexual exploitation. Sexual exploitation can also happen to young people in gangs. Child Sexual Exploitation (CSE) also includes non-consensual sharing of nudes and semi-nude images or videos.

#### **17. Sexual violence and sexual harassment between children in schools and colleges**

- 17.1 Sexual violence - It is important that school and college staff are aware of sexual violence and the fact children can and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to:
- 17.2 **Rape:** A person (A) commits an offence of rape if a person intentionally penetrates the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- 17.3 **Assault by Penetration:** A person (A) commits an offence if a person intentionally penetrates the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- 17.4 **Sexual Assault:** A person (A) commits an offence of sexual assault if a person intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- 17.5 **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.)
- 17.6 What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
- A child under the age of 13 can never consent to any sexual activity
  - The age of consent is 16
  - Sexual intercourse without consent is rape.

### 17.7 **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

17.8 Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual "jokes" or taunting

- Physical behaviour, such as: deliberately brushing against someone, or interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Sharing of unwanted explicit content
- Upskirting
- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media
- Sexual exploitation; coercion and threats.

## **18. Domestic Abuse**

18.1 The Home Office's 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.

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

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

18.3 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.

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

## **19. Radicalisation**

19.1 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. Staff must be able to recognise possible signs and indicators of radicalisation.

- 19.2 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.
- 19.3 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.
- 19.4 [Proscribed terrorist groups or organisations](#) - This Home Office published document lists the extremist groups or organisations banned under UK law, and provides the criteria that are considered when deciding whether or not to proscribe a group or organisation.
- 19.5 Potential indicators include:
- Use of extremist language or vocabulary
  - 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
- 19.6 If staff become aware of any concerns regarding any student, staff member or stakeholder, this needs to be reported immediately to the Head of Student Services or a member of the Safeguarding team.

## **20. PREVENT**

- 20.1 Prevent is part of the UK's counter-terrorism strategy. It focuses on supporting and protecting individuals who may be at risk of being exploited by those looking to radicalise and subsequently drawn into terrorist-related activity. The programme is to prevent the exploitation of vulnerable people and to keep everyone safe.
- 20.2 Prevent is one of the Government's counter terrorism strategies and it aims to stop young people becoming terrorists or supporting terrorism.
- 20.3 The Prevent Strategy (**refer to Appendix 2**)
- Responds to the ideological challenge faced by terrorism and aspects of extremism, and the threat faced by 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.
- 20.4 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 from getting involved in terrorism.
- 20.5 The College recognises that it has a legal responsibility to fulfil the Prevent duty to protect students and staff from radicalisation. All staff, students and stakeholders are expected to uphold and promote the fundamental principles of human rights and

British Values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

- 20.6 Building resilience in our students and staff and the promotion of British Values is critical to preventing radicalisation. The College will provide a safe place in which students and staff can discuss issues and promote critical thinking to challenge extremist beliefs and ideologies.
- 20.7 The College will deliver Prevent training to students and staff to highlight the risks and enable reporting of concerns.

## **21. Internet Safety**

- 21.1 The internet provides students and staff with access to a wide range of content, some of which can be harmful. People intending to exploit young and vulnerable adults can use the internet, including social media, to groom and exploit vulnerability. The College, in particular, understands the risks are greater for young people and vulnerable adults.
- 21.2 Staff concerned about a student's internet use or their communication on the internet, should obtain whatever information they can, and then immediately report their concern to their line manager or member of the Safeguarding Team. Below are some examples of inappropriate use of IT which should alert safeguarding concerns:
- Accessing 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, pornography, weapons, drugs, etc
  - Risk of grooming which may lead to acts of violence.
- 21.3 The College has an Acceptable Use Policy (AUP) for IT in which students and staff are made aware of Internet safety. The College has in place the following mechanisms to ensure that students remain safe from; bullying, grooming, radicalisation, violent extremism or any other potential abuse of young people and vulnerable adults:
- Appropriate staff, including the IT Manager, can monitor any aspects of computing facilities used by staff, students, guests and governors.
  - Internet usage is logged, and if necessary, the College email account and activity are suspended by the IT Manager.
  - Any breaches of IT security by students are checked by the Head of Student Services and for staff by the Director of Physical Resources. Any safeguarding concerns are reported to and routinely reviewed by SLT 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. Student concerns are dealt with by the Head of Student Services. Concerns are followed up and logged for SLT review.
  - Any instances of misuse of the internet or college sites by students will be dealt with in line with the College Positive Behaviour and Disciplinary Procedure.
  - Google SafeSearch is activated across the College and will block inappropriate content from being accessed through Google Search results pages.
  - LANschool software provides additional protection by allowing teaching staff to monitor classroom activity and identify any suspicious materials or potential risks to students.

- It is the responsibility of all staff to ensure that, within the duty of care for students, the signs of vulnerability or concerns, in particular, around extremism or radicalisation are promptly followed up via the safeguarding reporting procedure.
- The College is aware that students may use mobile phones without accessing College Wifi, and is alert to the need for vigilance.

## **22. Supporting Students to Keep Safe**

- 22.1 Students will be supported to report any concerns they have to a member of staff or Student Services.
- 22.2 Students will be informed how to stay safe online, whether in College, at work experience or away from College.
- 22.3 Students will be provided with information on online safety at Onboarding, PSHE programme, their course and resources placed on the student portal to promote safety and wellbeing, including information to inform students they can speak to any member of staff they trust or a member of Student Services staff who will offer support.
- 22.4 The ILT Services Acceptable Use Policy (AUP) will be made available to staff to guide students on the acceptable use of the College's IT devices and WIFI use.
- 22.5 Staff will encourage students to take responsibility for their safety and wellbeing and not put themselves at risk.
- 22.6 Staff online interactions with students must never compromise professional boundaries.

## **23. Maintaining a Safe Environment**

- 23.1 Shipley College aims to ensure that all buildings used by the College for teaching and learning are accessible and provide a safe environment for students to study and staff to work.
- 23.2 Access to buildings is controlled and restricted, as far as is reasonably practicable, to legitimate users only. All such users are required to wear and display identification which provides an immediate visual indication of their status e.g. student, staff, visitor, Governor, etc.
- 23.3 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 it) through physical measures. Three short blasts of fire alarm will initially signal the implementation of the lockdown process. A lockdown is to prevent students, staff or visitors from moving into dangerous areas and to prevent or slow down attackers from accessing College buildings (or part of). For information on the College Lockdown procedure, refer to ANNEXE Ja - Business Continuity - Dynamic Lockdown Procedure, and ANNEXE Jb Lockdown Essentials September 2022.
- 23.4 Shipley College is committed to continuous improvement in Health & Safety and to attaining the highest possible practice standards throughout the College.
- 23.5 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.

- 23.6 The Head of Learning Support is responsible for assessing the needs of students with Special Educational Needs concerning students who have physical and/or medical requirements and sensory impairment and put in place Personal Emergency Evacuation Plans (PEEP).
- 23.7 It is the responsibility of all staff and students 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 and Communication, Head of Student Services or Director of Physical Resources, or member of the SLT.

## **24. Management of Student Behaviour**

- 24.1 It is important that students feel safe and learn within a positive environment. Inappropriate behaviour that causes distress or puts others at risk is challenged and stopped.
- 24.2 The College promotes and encourages positive behaviour which ensures a safe and supportive environment, free from bullying, including cyberbullying, and the safety of all students.
- 24.3 Student behaviour in breach of the 'Positive Behaviour Policy and Student Disciplinary Procedure' is always investigated and action taken.
- 24.4 Guidance is offered to staff in dealing with challenging behaviour to help defuse potentially difficult and disruptive situations.
- 24.5 Staff are encouraged to deal with student misconduct on an informal basis wherever possible, to improve behaviour in the first instance.
- 24.6 Where there is a concern about a student's behaviour, the Course Coordinator will formulate a Positive Behaviour Plan with SMART targets to ensure improvement and, depending on age, may involve next of kin.

## **25. If a student is required to be moved from College Premises to a Place of Safety**

- 25.1 If a student discloses a concern, such as domestic violence, abuse, or threat of forced marriage and may require a place of safety:
- Staff must report the concern immediately to the Safeguarding Team in Student Services or contact the Head of Student Services.
  - Student Services Safeguarding Team will liaise with external agencies to facilitate the process.
  - The student may be removed on the same day or within a very short time after disclosure, depending on the urgency of the case.
  - The student should be advised not to return home to collect belongings in cases of high risk. This can be done at a later time under police escort.
  - Under no circumstances should the student's next of kin be contacted.
  - A member of the Student Services Safeguarding Team will contact the police, Social Services or any other relevant organisation.
  - If next of kin contact the College, take their details and pass them on to the Head of Student Services. No information should be shared with the caller, including the whereabouts of the student.

- The member of the Safeguarding Team dealing with the incident will update relevant staff, managers and Security Support Officers, as appropriate, to ensure the safety of the student, other students and staff on the College campus.

## **26. Students who may Present a Risk to Others, including Sex and Violent Offenders**

- 26.1 Where a student makes a disclosure or information is shared to indicate that they may pose a risk to students 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 place for the person to enrol or continue with their programme of study. If the decision is taken that the person can enrol or continue at the College, any appropriate arrangements required will be put in place by the Head of Student Services with the Head of Sector or the Director to mitigate risks to students and staff.
- 26.2 The College recognises that it has a role in the rehabilitation of offenders to support their reintegration and the opportunity to live fulfilled lives. The potential risks to other students will always be assessed as part of the decision process.

## **27. Attendance at External Safeguarding Meetings**

- 27.1 If Curriculum staff are contacted by external agencies to attend support or review meetings, they should refer the request to their Head of Department. The Head of Department will seek advice from the Head of Student.
- 27.2 External student safeguarding meetings will be attended by a member of the Student Services team, SEND Team, member of the Safeguarding Team or the Head of Department, if appropriate. Meetings can take place in person, online or by group telephone call.

## **28. Contacting next of kin and External Agencies to Protect Children, young people and Vulnerable Adults**

- 28.1 In cases where the College has reason to be worried that a child, young person or vulnerable adult may be suffering harm, ill-treatment or neglect, Social Services or the appropriate external agency will be contacted for advice or to report the concern.
- 28.2 Where possible, the College will contact next of kin and attempt to seek consent before making a referral to an external agency. However, if contacting next of kin is likely to increase the risk of harm, or if consent is denied by the next of kin, but a safeguarding concern exists, the Head of Student Services or someone on their behalf will decide to seek advice or make the safeguarding referral.

## **29. Multi-agency Working**

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

- 29.2 More specifically:
- 29.3 The College will work in partnership with other agencies in the best interest of the student. Therefore we 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.
- 29.4 Reporting of a safeguarding concern to Social Services should be made by the safeguarding team to the Social Services Duty Team. Where a young person or vulnerable adult already has a Social Worker assigned, the College will directly contact the social worker.
- 29.5 The College will attend inter-agency meetings, such as Initial and Review Child Protection Conferences, Planning and Core Group meetings, as well as Family Support Meetings.
- 29.6 The College will provide reports, as required, for these meetings. If no one from the College can attend, a written report will be sent.
- 29.7 Where a young person or vulnerable adult in College is subject to a Protection Plan or any multi-agency risk management plan, relevant college staff will be required to contribute to the preparation and implementation of documents, as appropriate.

### **30. Apprentices and Students on Work Experience**

- 30.1 All organisations employing an apprentice and/or student on work experience 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.
- 30.2 The College will ensure that when students undertake work experience the environment is safe and risks are minimised or removed.
- 30.3 Before starting work experience, students must be informed by the course team on how to identify and report safeguarding concerns, either concerning themselves, service users, if appropriate, the children or vulnerable adults they work with, etc. Students are required to follow the organisation's safeguarding procedure and inform the appropriate member of staff in the workplace. The student must also inform their Course Leader or tutor. If this is not possible, the student can always contact Student Services on 01274 327281.
- 30.4 A safeguarding risk assessment may be considered in the following situations:
- Regular lone working with an employer over long periods
  - Placement located in particularly isolated environments with one-to-one working
  - Work placement involves a high degree of travelling on a one-to-one basis
  - Work placement includes a residential element
  - Safeguarding disclosure is made.

### **31. Procedure to follow if a Shipley College student reports a safeguarding concern when at work experience.**

- 31.1 This covers a range of possibilities from minor to major risks, such as:

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

31.2 The following steps must be followed by the College staff:

- Reassure the student 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 student and include as much detail as possible, including names, times, locations, witnesses, etc. Check if the student spoke to anyone in the workplace about their concern and note what response (if any) was given.
- Clarify with the student anything that needs further information and write down the questions asked and the responses given.
- When the student finishes their account of the safeguarding concern, read it back to them, and ask them to confirm it is an accurate account.
- Inform the student that they will not return to the workplace without the prior permission of the Head of Department.
- If the student is under 18 and lives with parents/carer, inform the student that the parent/carer will be contacted. If the student is 18 or over, ask if they wish parents/carers to be contacted.
- Remind the student, where appropriate, that they should not discuss the matter with anyone unless directed to do so.
- The staff member must immediately pass on the written report to the Head of Student Services, Vice Principal Curriculum & Quality or their Head of Department.

31.3 Dependent on the seriousness of the incident:

- 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 Head of Student Services or the relevant Head of Department.
- However, if 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.

31.5 In all other instances, if a young person is at risk, the Head of Student Services or an appropriate member of staff to contact Social Services.

31.6 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](#)

31.7 Social Services should be asked for advice on whether they believe it is 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 advises that no communication with the Third Party about the incident should be made, then that advice must be followed.

31.8 The College member of staff dealing with the safeguarding concern will contact the parent/carer of the student 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 report or names of the external service users or workplace staff.

31.9 The College strives to maintain the highest level of trust and cooperation with Third Parties who offer work placement for College students. An allegation of safeguarding misconduct may cause tension in that relationship, not least in terms of the timing of communication from the College.

31.10 If it is inappropriate for the College to offer information to the work placement, the College should apologise for this and explain why it is unable to share information at that point. However, explain the procedure and what is likely to happen next (without sharing any information that may harm or be detrimental to the alleged victim).

## **32. Trip, Visit or Residential**

32.1 If a disclosure is made by a student on a trip, visit or residential, the senior member of staff responsible for the students 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.

## **33. Safer Recruitment, Selection and Pre-employment Vetting**

33.1 The College pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures, as outlined in [Keeping Children Safe in Education](#). As per recommendations for Safer Recruitment in Keeping Children Safe in Education, online checks are carried out for all shortlisted candidates.

33.2 The College will maintain a single central record which evidences the relevant vetting checks required including the DBS check at the correct level inclusive of the Barred List check, identity, qualifications, and right to work in the UK. Reference checks will also be carried out, with the requirement that at least one reference stating the employee is suitable has been received before the start of employment.

33.3 All recruitment materials will include a reference to the College's commitment to safeguarding and promoting the wellbeing of the student.

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

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

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

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

34.8 Online pre-recruitment checks are conducted for shortlisted candidates.

## **34. Whistle Blowing, including Low Level Concerns**

- 34.1 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. Staff are made aware of the expected behaviour standards and can raise any concerns they have, ranging from **Low Level Concerns** to more serious concerns, in line with the College's procedure. The policies that include behaviour standards and details of how to raise concerns include:
- Employee handbook
  - Staff Code of Conduct
  - Whistleblowing Policy & Procedure.
  - Grievance Policy & Procedure
- 34.2 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 8:00 am to 8:00 pm, Monday to Friday
- 34.3 All concerns raised will be considered by the appropriate College Manager before deciding on how to proceed with the matter. More serious allegations will be dealt with under the procedures outlined in section 36 of this policy. Matters considered as **Low-Level Concerns** will be documented in a central and confidential document held in the HR department. Appropriate action will be taken for these concerns which may include informal action, training and/or letters of concern. When several Low-Level Concerns are recorded for the same member of staff, more formal action may be considered.
- 34.4 Refer to Appendix 4 - for 'Procedure For Staff On Reporting Low-level Concerns'.

## **35. Staff Update and Training**

- 35.1 Safeguarding is included in onboarding for all new staff, including volunteers.
- 35.2 The College provides appropriate mandatory training, and regular updates and will monitor the compliance of mandatory training. This will ensure staff are aware of their responsibility to safeguard and promote the wellbeing of young people and vulnerable adults.
- 35.3 All staff, volunteers and governors will be asked to read the mandatory training on Keeping Children Safe in Education. This document is provided by the DfE for schools and colleges 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.

## **36. Dealing with Allegations of Abuse against Members of Staff, Employers of Apprentices or Placement Provider, Volunteers, Contractors and other Visiting Professionals**

- 36.1 If an allegation is made against a member of staff involving a student at the College, the HR Manager or the Head of Student Services must be informed immediately. The matter will be investigated under 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.

- 36.2 The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers, contractors and visitors.
- 36.3 The College recognises that the welfare of the young person or vulnerable adult is of paramount concern. It 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.
- 36.4 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 or sexual relationship with a student, whatever their age, and a 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 the student may consider any member of staff of the College to be trustworthy since they work at the College.
- 36.5 College staff must maintain professional boundaries at all times when using electronic/social media. Staff should always avoid personal social media contact with students and their next of kin, initiated by either party, to ensure relationships remain within professional boundaries and do not breach the College Staff Code of Conduct.
- 36.6 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 student, Student Services will liaise with the student and their family or carer, and offer support and an advocacy role.

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

- 37.1 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.
- 37.2 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.

- 37.3 If there is an investigation by an external agency, for example, the police, the Principal (or nominated senior manager), HR Manager, or 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.
- 37.4 Subject to objections from the police or other investigating agencies, the Safeguarding Lead, nominated senior manager, HR Manager or the Principal, as appropriate will:
- Inform the young person, vulnerable adult and/or the next of kin making the allegation that the investigation is taking place and what the process will involve.
  - Inform the Designated Safeguarding Governor (if this is not possible, inform the Chair of Governors) of the allegation and the investigation.
  - Ensure the HR Manager keeps a written record of the actions taken in connection with the allegation, and the outcome.

### **38. Suspension of Staff**

- 38.1 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.
- 38.2 Suspension should only occur for a legitimate reason. For example:
- Where a student is at risk.
  - Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
  - Where necessary for the good and efficient conduct of the investigation.
  - The SLT will consider and review the decisions as to who is informed of the suspension and investigation.
  - LADO advice must be sought and followed before any action is taken by the College.
- 38.3 If a person resigns, this should not prevent the allegation from being followed up following College procedures.
- 38.4 Records of communication with external agencies need to be passed on to HR to record.

### **39. Records**

- 39.1 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 student will be recorded on CPOMs (information will not be included which could identify a member of staff).
- 39.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College's statutory duty to inform relevant agencies under the DBS procedures.

### **40. Investigating Allegations of Child Pornography**

- 40.1 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.
- 40.2 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.
- 40.3 The basic rule is to never make a copy during the investigation and not to view an image of child pornography. 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 SLT. The IT Network Manager will take action to isolate the PC/laptop and place it in a designated secure place pending an investigation.

#### **41. Location of Policy**

- 41.1 This Policy will be held on the staff portal and College Website.

#### **42. Related to other College Policies and Procedures /documents**

- Health and Safety Policies and Procedures
- ANNEXE J Business Continuity - Dynamic Lockdown Procedure
- Student Positive Behaviour Policy
- Admissions Policy and Procedure
- Fitness to Study Procedure
- Acceptable Use Policy (AUP) for IT
- Policy and Procedures for Events Involving External Speakers
- Recruitment, pre-employment & DBS Policy and Procedure
- DBS Procedure
- Grievance Policy & Procedure (Incorporates dealing with bullying & harassment)
- Disclosure & Barring Service (DBS) Procedure
- Whistleblowing Policy and Procedure
- Staff Code of Conduct
- Disciplinary Policy (not applicable to Senior Post-holders)
- Procedure for Personal Consent Required Regarding the Use of Digital Images, Printed Images and/or Video Recording
- Visitor Policy
- Freedom of Expression Policy
- Prevent Risk Assessment and Action Plan
- Online Learning Policy and Procedure
- Policy and Procedure for Events Involving External Speakers

#### **43. Monitoring and Reporting**

- 43.1 The SLT 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 necessities
- Failure to achieve developmental milestones, for example, intellectual 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 induced 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 violence or 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 violence 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

### **Examples which may indicate emotional abuse:**

- Overreaction to mistakes, continual self-deprecation
- Delayed physical, mental, and 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 when 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 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](http://www.selfharm.co.uk)
- [www.youngminds.org.uk](http://www.youngminds.org.uk)
- <https://www.samaritans.org/>
- [www.b-eat.co.uk](http://www.b-eat.co.uk)
- [Student Wellbeing & Mental Health site on the Student Portal](#)

## **Adult Safeguarding**

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

- Needs care and support,
- Is experiencing, or is at risk of abuse or neglect, and
- As a result of their need for care and support are unable to protect him or herself against abuse, 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 A 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 has 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 need 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 (Current National Threat Level - Feb 2023)
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

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

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

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

- To promote and reinforce shared values; to create space for free and open debate; and to listen and support the student voice.
- To break down segregation among different student communities including supporting interfaith and intercultural dialogue and understanding, and to engage all students in playing a full and active role with wider engagement in society.
- To ensure student safety and that the College is free from bullying, harassment and discrimination.
- To provide support for students who may be at risk and develop appropriate sources of advice and guidance.
- To ensure that students, apprentices 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 can monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent extremism in the name of ideology or belief.

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

### **Leadership and Values**

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

- Promoting core values of respect, equality and diversity, democratic society, student voice and participation
- Building staff and student understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### **Teaching and Learning**

To provide a curriculum which builds the resilience of students by promoting student voice and undermining extremist ideology. This will be achieved by:

- Embedding equality, diversity and inclusion, student wellbeing and community cohesion
- Promoting social and emotional aspects of learning - engaging students in social action - people coming together to help improve their lives and solve the problems that are important in their communities.

- Adapting curriculum to recognise local needs, challenge extremist narratives and promote universal rights - community cohesion
- Teaching and learning strategies which explore controversial issues and promote critical analysis
- Encouraging active citizenship and student voice

## **Student Support**

To ensure that staff feel confident to support students by working with other professionals, family members and communities. This will be achieved through:

- Maintaining strong links with key professionals and external agencies, such as the Local Authority Prevent Coordinator, Prevent Regional HE/FE Coordinator, Social Services, Local Authority Designated Officer (LADO), the Prevent Counter Terrorism Police, Neighbourhood Police team, etc.
- Remaining vigilant about what is happening in the College and the community
- Challenging discriminatory behaviour
- Helping staff to understand how to access support in the College and external organisations, such as Breaking The Cycle - Youth Workers to offer support to young people being groomed or at risk of being involved in organised crime.
- Making referral to the Prevent Channel programme which adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

## **Managing Risks and Responding to Events**

The College will monitor risks and deal appropriately with issues which arise. It will do this by:

- Understanding and managing potential risks of the threat from violent extremism and the impact on students, staff and more generally on the College
- Responding appropriately to events in local, national or international news that may impact on students, staff and communities
- Ensuring measures are in place to minimise the potential for any acts of violent extremism within the College campus, and plans in place to respond to any threat.
- Having effective ICT security and an Acceptable Use (AUP) Policy.
- Promoting awareness across the whole college
- Responding swiftly to signals or a report of any potential threats.

## **Referral Process for Concerns Involving Terrorism or Radicalisation**

Report student concerns directly to the Head of Student Services or a member of the Student Services safeguarding team.

Staff concerns can also be reported to the Head of Student Services, HR Manager or member of the SLT. If this is not possible, speak to the Line Manager.

The Head of Student Services or the appropriate member of staff dealing with the concern will:

- Accurately gather all relevant information
- Speak to the student and/or member of staff
- Speak to the Police and/or the Local Authority Prevent Coordinator or report the concern using - [ACT Early](#) - Prevent Radicalisation and Extremism by Acting Early
- In an emergency, life-threatening situation or where they have reflected on a situation and feel it cannot wait until the next day, the staff member may report the concern to

ACT Early Support Line on 0800 011 3764. However, they must inform the Head of Student Services, Vice Principal Curriculum Quality or their Line Manager as soon as possible.

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

### **Information Sharing**

Sharing information when working with children and young people is often necessary. However, 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 support 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.

Under 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 student is over 16, they should be involved in decision-making about information sharing, unless they do not have the capacity to give consent.

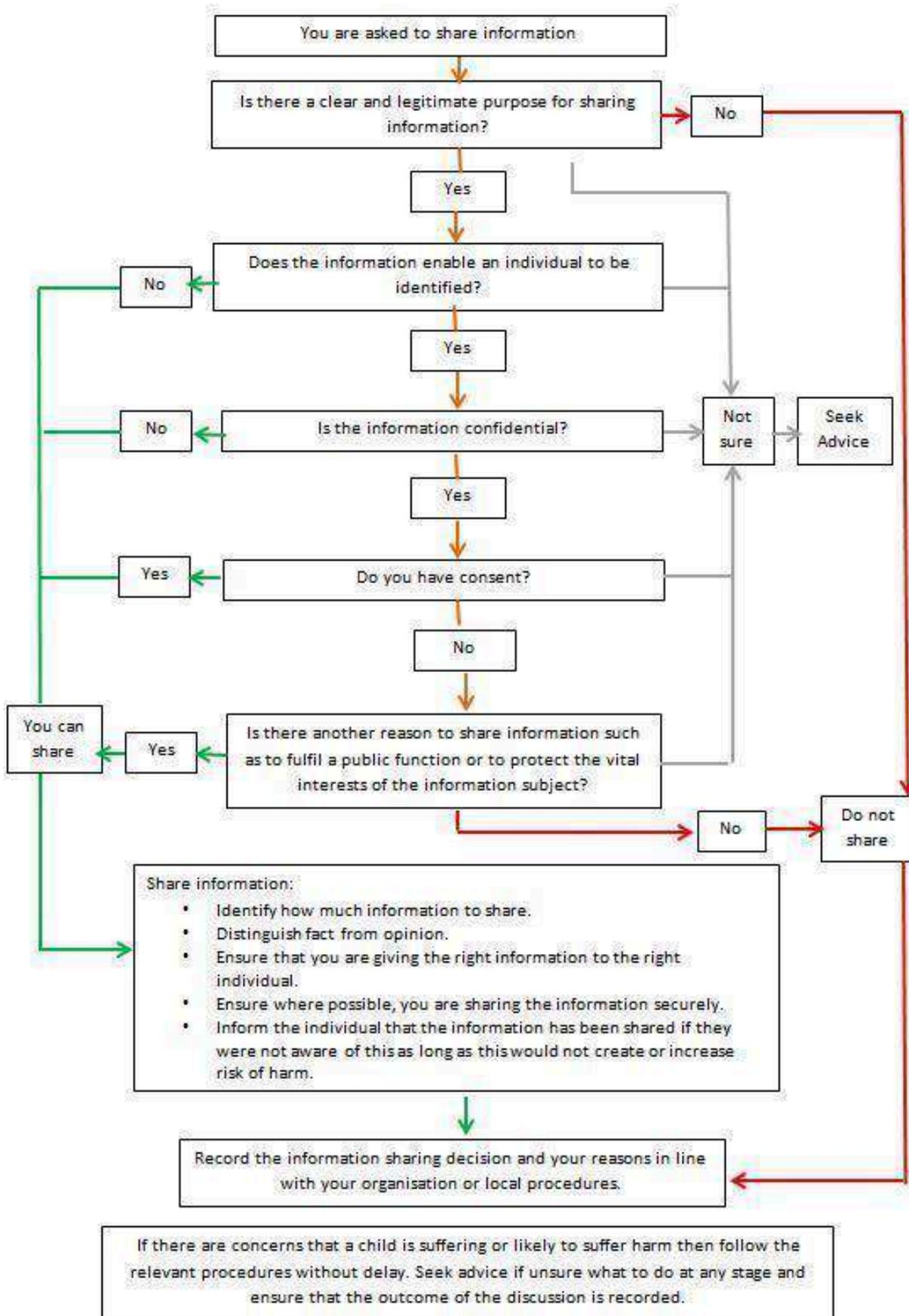
However, consent is not always a condition for sharing and sometimes we do not inform the child or family that their information will be shared if in doing so it would:

- Place the person at risk of significant harm
- Prejudice the prevention, detection or prosecution of a crime
- Lead to unjustified delay in making enquiries about allegations of significant harm to a child or serious harm to a vulnerable adult.

### **Related Government guidance**

- [Information sharing: advice for practitioners providing safeguarding services 2018](#)
- [Working together to safeguard children 2018](#)

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



(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.

## **APPENDIX 4 - Safeguarding Contact Details**

### **Reporting a concern**

If the concern is about a student, contact the Student Services on 01274 327281. They will take the details and responsibility for coordinating the safeguarding concern.

If the concern is related to a member of staff, speak to your Line Manager, contact HR manager, a member of the SLT or the Head of Student Services.

### **External key safeguarding contacts:**

#### **Safeguarding Children**

During office hours call Children's Social Care Initial Contact Point on 01274 433999 - (8.30 am to 5pm Monday to Thursday, 8.30 am to 4.30 pm on Friday)

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

Practitioners: [To share information or make a referral using our online forms.](#)

#### **Safeguarding Vulnerable Adults**

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 - (8.30 am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday)

Out of hours Emergency Duty Team - Telephone: 01274 435400 (outside office hours)

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

#### **Mental health and wellbeing**

Information on looking after your mental health and wellbeing is available on the [Student Wellbeing & Mental Health site](#) on the student portal.

Other useful websites offering support with mental health include:

- [www.childline.org.uk](http://www.childline.org.uk)
- [www.mind.org.uk](http://www.mind.org.uk)
- [www.mindmate.org.uk](http://www.mindmate.org.uk) (for children & young people)
- [www.nhs.uk/conditions/stress-anxiety-depression/talking-to-children-about-feelings/](http://www.nhs.uk/conditions/stress-anxiety-depression/talking-to-children-about-feelings/)

## **APPENDIX 5 - Procedure For Staff On Reporting Low-level Concerns**

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, in line with KCSiE, this must be reported as a low-level concern.

### **Creating a culture where all safeguarding concerns are reported, recorded and dealt with appropriately.**

As part of the College's approach to safeguarding, the college will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

This will enable the College to:

- identify inappropriate, problematic or concerning behaviour early.
- minimise the risk of abuse and ensure that adults working in or on behalf of the College are clear about professional boundaries and act within these boundaries, and by the ethos and values of the institution.

### **What is a low-level concern?**

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that:

*"Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO)".*

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

- being over-friendly with a young student or vulnerable students
- having favourites
- taking photographs of young people on their mobile phones, contrary to College policies and procedures
- engaging with a young person on a one-to-one basis in a secluded area
- humiliating a young person.

Low-level concerns may arise in several ways and can be reported by anyone. For example, a complaint or disclosure can be made by a student, parent/carer, staff member or anyone, within or outside the organisation.

### **How to Report a Low-Level Concern?**

All low-level concerns must be reported to the Head of Student Services, Line Manager, HR Manager or member of the SLT. The concern will be recorded by HR and dealt with appropriately and sensitively.

### **Concerns Raised about Supply Staff and Contractors**

Low-level concerns relating to agency staff or a contractor will be notified to their employer.

## **How will Low Level Concerns be Recorded?**

All Low-Level Concerns will be recorded by the HR Manager. The record will include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing the concern will be noted. However, if the individual wishes to remain anonymous then this will be respected as far as reasonably possible. Where records are kept, they will be kept confidential, held securely and comply with the Data Protection legislation.

Where a pattern of low-level concerns is identified by HR, action may be taken to escalate the concern to disciplinary action.

The College will retain any information of low-level concerns at least until the individual leaves their employment or 10 years after the issue whichever is the longer.