



**KING  
GEORGE V  
COLLEGE**

# Safeguarding Policy & Procedure

## 2018-19

<b>Author:</b>	<b>Name</b>	J Kelly	
	<b>Job Title</b>	Assistant Principal Curriculum & Quality	
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# Safeguarding Policy and Procedure

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## 1. Key Personnel

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### 1.1 Senior Managers and Governors

Principal:	John Clarke
Designated Senior Safeguarding Lead:	Jesamine Kelly, Assistant Principal Curriculum & Quality
Deputy Designated Senior Safeguarding Lead:	Liz Jones, Head of Central Services
Chair of Governors:	Ronnie Fell
Designated Governor for Safeguarding:	Christine Bampton

### 1.2 Designated Safeguarding Officers

Karen Marsh – ext. 2758 (01704 392758)	Liz Jones – ext. 2759 (01704 392759)
Rebecca Rothwell – ext. 2713 (01704 392713)	Laura Rad – ext 2886 (01704 392886)
Holly Jones (KGV) – main switchboard – (01704 530601)	

## 2. Purpose of the Policy

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2.1 This policy states the responsibilities of the College in relation to Safeguarding children and vulnerable adults, in response to current legislation and guidance.

## 3. Scope of the Policy

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- 3.1 The policy and procedures applies to all students, staff, governors, providers of services to the College including volunteers and contractors, and all other users of the College (including Southport College and King George V College) and all College activities.
- 3.2 The policy and procedures are intended to safeguard all of the College’s students and provide for the College to discharge its legislative obligations to protect students under the age of 18 years and vulnerable adults.
- 3.3 In terms of this policy, ‘child’ or ‘children’ means those under the age of 18 as defined by the Children Act of 1989. An adult who is vulnerable is a person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation’ (*Department of Health, 2000*).

## 4. Guidelines

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- 4.1 In relation to children and young people, safeguarding and promoting their welfare is defined in ‘Working together to safeguard children’ as:
- protecting children from maltreatment
  - preventing impairment of children’s health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care

- taking action to enable all children to have the best outcomes.
- 4.2 In relation to adults, there is a different legislative and policy base for responding to their safeguarding needs. However, most of the principles and procedures that apply are the same as those for safeguarding children and young people.
- 4.3 All college staff members and governors should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Staff members working with children are advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned. When concerned about the welfare of a child, staff members and governors should always act in the interests of the child. There are various expert sources of advice on the signs of abuse and neglect. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to children's social care. Definitions of areas of concern in respect of safeguarding are available in the Appendix.
- 4.4 A child going missing from an education setting is a potential indicator of abuse or neglect. College staff members should follow safeguarding procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation.
- 4.5 If the College receives information about an adult student (18 plus) which suggests that he/she has been abused or that it is likely, it has a duty to refer these concerns to Adult Services and/or the Police. If the College is unsure whether a referral is necessary, staff will consult with appropriate agencies, which is usually Adult Care Services.

## 5. Policy Statement

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- 5.1 It is the responsibility of **everyone** within the College to ensure the safety and wellbeing of our students. It is **everyone's** responsibility to understand how to recognise, respond to, report, record and refer any concerns about the welfare of an individual student as appropriate.
- 5.2 The College is committed to a positive policy of equal opportunity and strives to support students wherever possible and create an environment that is safe and welcoming to all students. The College recognises that it has a duty of care to students, staff and stakeholder and endeavours to ensure that their wellbeing and health and safety are a priority.
- 5.3 **Creating a Safe Environment:**  
To create a safe environment for students The College will;
- Operate a 'zero tolerance' approach to weapons, drugs, alcohol and bullying, including cyber or social media bullying, in all forms
  - Have clear procedures for following up issues of conduct for both staff and students
  - Continually review the safety and security in College through cross College groups e.g. Safeguarding Sub-Group, Health and Safety Committee, ID Badge group
  - Ensure all staff, including volunteers, have an appropriate DBS and other checks; frequent visitors will receive an induction
  - Ensure all staff, students and visitors wear ID Badges at all times
  - Implement the Criminal Convictions Policy for all students

- Ensure all contractors receive a contractors pack including a DBS Matrix as well as the Colleges Safeguarding, Equality and Diversity and insurance requirements
- Ensure that all contractors are required to wear ID badges at all times

#### 5.4 Provide training and support for staff:

All staff will be given up to date information on Safeguarding through;

- A clear induction programme, which includes Safeguarding systems and Policy, staff code of conduct and the role of the designated safeguarding lead;
- Training which will be provided for staff with specific responsibility for student wellbeing e.g. Progress Tutors and Curriculum Leaders, in how to support students at risk;
- Taking part in appropriate Safeguarding Training, in line with specific job roles;
- Safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually;
- Being made aware of the Colleges Policy and Procedures on Safeguarding;
- Being offered other relevant suitable training / information, as and when appropriate e.g. PREVENT training and awareness of national and local initiatives;
- Being provided with a business card with contact details for the relevant safeguarding staff ;
- Providing staff with external counselling / supervision where appropriate;
- Ensuring all governors and staff, including sub-contracted staff, have read at least **Part One** of *Keeping children safe in education: Statutory guidance for schools and colleges (2018)*;
- Briefings on the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

#### 5.5 Positive Promotion. Safeguarding and welfare support, will be promoted positively throughout College in a number of ways, including;

- Policies and Procedures available on the College website for stakeholders, e.g. parents, guardians and employers
- Monitoring of attendance
- Progress sessions including topics such as drug and alcohol awareness, mental health, sexual health, criminal exploitation and CE
- Student Induction
- Equality and Diversity Week
- Implementation of the College Mental Health Strategy
- Health and Wellbeing Week, Anti Bullying Week, E-Safety promotion and information, including sexual health and drugs and alcohol awareness throughout the academic year
- Ensuring Safeguarding is included within the 'Learner Voice' process.
- Information awareness raising days which are responsive to local and national trends
- Student Guide (Student Induction/Information Leaflet)
- Awareness-raising posters and VLE resources
- External agencies partnerships

#### 5.6 Support for Students. Students will be offered support through a number of mechanisms including;

- Dedicated Safeguarding Officers who will deliver timely interventions or appropriate support to our most vulnerable learners
- Learning Support for students with learning difficulties / disabilities and / or medical needs

- Counselling services
- Links developed with external agencies, including agencies linked to specific groups such as Looked After Children (LAC) (including those leaving care), Mental Health Services, Youth Offending Service (YOS) etc. The best outcomes for children and vulnerable adults are achieved by adopting a multi-agency approach, where professionals work effectively in partnership.
- Care Leavers Covenant to support those who are LAC or leaving care
- Measures to support students and staff at risk of being drawn into radicalisation
- Considering the needs of the individual and responding as far as possible
- Criminal Conviction (CC) Risk Assessments – new / re-enrolling applicants
- Fitness to Study and Practise Assessments
- Identification of young people who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years, with support from other agencies and professionals in an early help assessment.

## 6. Designated staff with responsibility for safeguarding

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### 6.1 The Principal

6.1.1 The Principal will ensure that:

- Policies and procedures adopted by the Governing Body are fully implemented and followed by all staff, particularly concerning referrals of cases of suspected abuse and neglect.
- Sufficient resources and time are allocated to enable the Designated Persons and other staff to be able to perform their duties.
- All staff and volunteers feel able to raise concerns about poor practice, and concerns are addressed sensitively and effectively in a timely manner.

### 6.2 The Chair of Governors

6.2.1 The Chair of Governors must satisfy himself or herself that the requirements, as set out in 'Keeping Children Safe in Education' (*DfE September 2018*) are fully complied with.

### 6.3 Senior Staff Member with Lead Responsibility for Safeguarding

6.3.1 The designated senior person (DSP) with lead responsibility for safeguarding and the protection of children and vulnerable adults is the Assistant Principal Curriculum and Quality.

6.3.2 The post holder has a duty to take lead responsibility for raising the awareness of staff of issues relating to the wellbeing of children, young people and vulnerable adults, and the promotion of a safe environment for children, young people and vulnerable adults enrolled with the College, in respect of child and vulnerable adult protection.

6.3.3 The post holder will receive training in child and vulnerable adult protection issues and interagency working, as required by the LSCB, and will keep up to date with developments in child and vulnerable adult protection procedures.

6.3.4 The DSP is responsible for:

- Promoting positive safeguarding procedures and practice
- Raising awareness of safeguarding issues among staff and students

- Providing advice and support to other staff on issues relating to safeguarding and child and vulnerable adult protection
- Ensuring that parents of children, young people and vulnerable adults within the College can view the Safeguarding Policy
- Liaising with staff responsible for work experience to ensure that safeguards are put in place to protect children, young people and vulnerable adults in work placements
- Ensuring appropriate arrangements are in place with partner schools so as to facilitate the flow of vital information on students at risk
- Ensuring that all staff receive basic training in child and vulnerable adult protection and are aware of the College child and vulnerable adult protection procedures.
- Keeping all staff and volunteers informed of good practice and developments
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Maintaining robust records of safeguarding incidents
- Ensuring the College has a robust system for monitoring vulnerable students
- Overseeing the referral of cases of suspected abuse on to Social Services, the Police and Vulnerable Adult Unit
- Liaising with the Local Authority, the relevant LSCB and other appropriate agencies.
- Undertaking Prevent awareness training and providing advice and support to staff on protecting young people and vulnerable adults from the risk of radicalisation.

## 6.4 Designated Staff Members

6.4.1 Other designated members of staff with responsibility for safeguarding and child and vulnerable adult protection are the Head of Central Services (Deputy Designated Senior Person), the Quality & Support Officer and Student Engagement Officers. These staff members are known as **Safeguarding Officers (SO)** and are trained and able to deal with any safeguarding issues and make full referrals to Social Services and deal with any other external agencies. The DSP must be kept abreast of any referrals made.

6.4.2 Responsibilities of Safeguarding Officers:

- To report to the DSP any child or vulnerable adult concerns as and when they arise.
- To know how to make an appropriate referral
- To be available to provide advice and support to other staff on concerns relating to child and vulnerable adult protection
- To be available to listen to the concerns of children, young people and vulnerable adults
- To make referrals, attend case conferences and review meetings as appropriate.
- To receive level 2 training in child and vulnerable adult protection issues and interagency working as required by the LSCB.
- Student Engagement Officers will lead regular support meetings where discussion about any concerns and specific support needs of individual learners is encouraged.

## 6.5 Designated Governor

6.5.1 A member of the Governing Body is appointed as 'The Designated Governor with responsibility for Safeguarding and Child and Vulnerable Adult Protection' and can be contacted through the Clerk to the Governors.

- 6.5.2 The Designated Governor is responsible for liaising with the Principal and senior staff member with lead responsibility over matters regarding child and vulnerable adult protection and ensuring that the College complies with the recommendations outlined in 'Safeguarding Children in Education' 2004 (2007).
- 6.5.3 The Designated Governor is responsible for overseeing the liaison between the Local Safeguarding Children's Board (LSCB), the Police and the local authority's Vulnerable Adults Unit where an allegation of abuse is made against the Principal or senior staff member with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the College and the parties undertaking such an investigation.
- 6.5.4 As a member of the Safeguarding Committee, the Designated Governor will be able to check that College policies and procedures for safeguarding and child and vulnerable adult protection are reviewed and thereby ensure any deficiencies or weaknesses are remedied.
- 6.5.5 The specific responsibilities of the Designated Governor will be to:
- Be an active member of the Safeguarding Committee which will meet as a group on a minimum of three times a year.
  - Check that the College has a Safeguarding Policy (which incorporates child and vulnerable adult protection) and procedures which reflect the LSCB interagency policy and procedures, and are available to all stakeholders upon request.
  - Ensure that there is a programme for all Governors to receive the same training as members of staff for Safeguarding.
  - Check that the College operates safe recruitment procedures which relate to all staff and volunteers.
  - Check that the College has procedures in place for conducting DBS checks and ensuring that staff are retrained every three years.
  - Check that the College has procedures in place for dealing appropriately with allegations against staff.
  - Ensure that the College has a designated senior person (DSP) appointed and trained to provide advice and support to staff and liaise with the local authority and other agencies.
  - Through membership of the Safeguarding Committee undertake an annual review of how duties are discharged and ensure that deficiencies or weaknesses are remedied promptly.
  - Receive appropriate LSCB training to level 2 or above.
  - Ensure there are appropriate safeguarding responses to vulnerable young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of children going missing in future.

## **6.6 Safeguarding Committee**

- 6.6.1 The Safeguarding Committee will:
- Oversee and review College Safeguarding Policy and Procedures including linked policies.
  - Raise awareness of developments in Safeguarding good practice and links to Health and Safety.
  - Ensure the quality assurance of provision of safeguarding information, advice and guidance.
  - Ensure compliance with national standards and LSCB guidance through annual audits.
  - Monitor the Staff and Governors' Training records.

- Receive and review the annual College Safeguarding Report prepared by the DSP prior to presentation to CET and Governors.
- Develop initiatives which maintain the highest profile for Safeguarding in College and its partners.

6.6.2 Membership of the Safeguarding Committee will include:

- Assistant Principal - Curriculum and Quality – (DSP)
- Head of Central Services (Deputy DSP)
- Head of Personnel and Payroll (staff member responsible for allegations against staff)
- Designated Governor for Safeguarding & Child & Vulnerable Adult Protection
- Director of Facilities Management
- Director of Teaching, Learning & Support
- Head of Department (Business Development)
- Head of Department (Curriculum)
- Head of A Levels (KGV)
- Quality & Support Officer
- Student Engagement Officers
- Student Services Officer (KGV)
- Learning Support Manager
- Member of the Teaching and Learning Observation Team
- Tutor
- Student Representative (nominated from Student Council)

6.6.3 The Safeguarding Committee will meet for a minimum of 3 times a year.

6.6.4 A safeguarding panel meeting will be convened on the occasion of a serious safeguarding concern. A panel meeting must comprise of a minimum of three members of the Safeguarding Committee and not including the Designated Governor or Student Representative.

## **7. Monitoring and Review**

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7.1 Implementation of this policy will be monitored through semesterly reports to the Board of Governors and monthly reports to CET.

7.2 The reports will include a breakdown of safeguarding and significant welfare concerns including counselling referrals and those relating to health and safety which have been brought to the attention of the Safeguarding team over the period of an academic year. The annual report will be received by the Board of Governors, at which point the Board will consider the effectiveness of the College's Safeguarding Policy and make any recommendations for revision of the policy where appropriate.

## **8. Responding to a disclosure or suspicion of abuse**

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8.1 Any member of staff (or a governor) who has knowledge of or a suspicion that, a child / vulnerable adult is or has been suffering significant harm must refer their concern to a Safeguarding Officer as soon as possible (but within 24 hours at the latest). They must also pass any written notes to the Safeguarding Officers and not retain any written information. All

allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in College in the first instance.

8.2 The designated officer who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:

- ✓ date and time of report
- ✓ your name and name of complainant
- ✓ name and DOB of child/vulnerable adult alleged to have been abused
- ✓ nature of alleged abuse
- ✓ description of any injuries observed, if any
- ✓ any other information given, including siblings if relevant (their full names and DOB if possible)
- ✓ confirmation that the student has been advised of the next steps and note any consent given

**8.3 Questions should be kept to the minimum required for clarity, and leading questions must be avoided.**

8.4 If uncertain about any situation, advice (which should be documented) should be sought from relevant organisations, for example from Police, Children's Services, Adult Care Services etc.

8.5 If abuse is suspected but not disclosed, it may be appropriate to remind the student about the availability of the College Counselling Service or external help lines.

8.6 If anyone other than the designated safeguarding lead makes a statutory referral to the relevant local authority, they should inform the designated safeguarding lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. This will include determining whether:

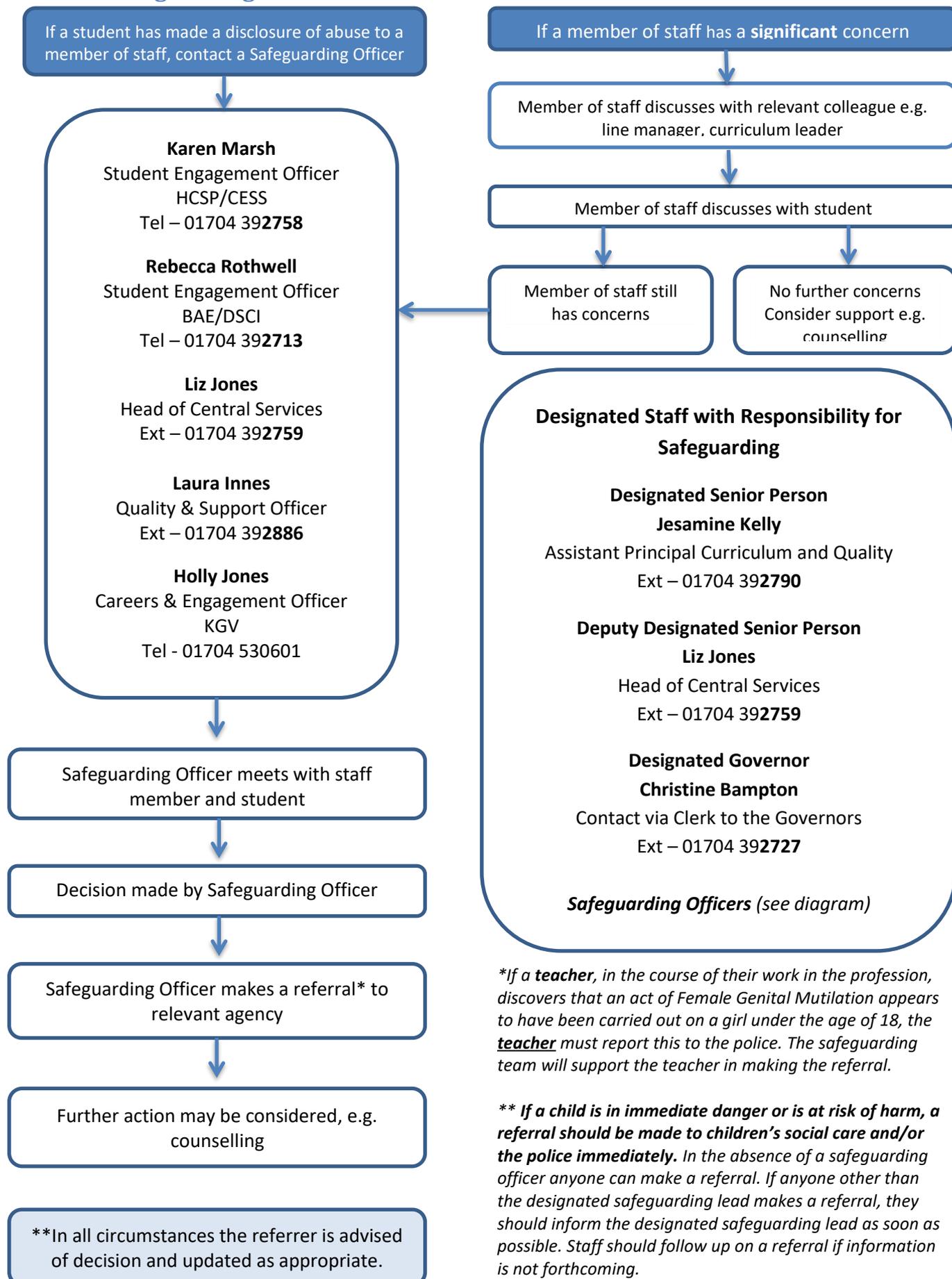
- *the child requires immediate protection and urgent action is required;*
- *whether the child is in need, and should be assessed under section 17;*
- *there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47.*

8.7 If a **tutor**, in the course of their work in the profession, discovers that an act of **Female Genital Mutilation** appears to have been carried out on a girl under the age of 18, the *tutor* must report this to the Police. Safeguarding staff can provide support to the tutor in such instances.

8.8 Staff (usually the safeguarding officers) should follow up on a referral should that information not be forthcoming. Should they be dissatisfied with the actions being taken by a local authority then the relevant authority's escalation procedures should be followed.

8.9 **Early Help** - The *Early Help Pathway* involves listening to parent's and the child to find out the child's needs and what is working well in their life. An action plan, agreed with parent and child, is put in place to make sure the child gets the right sort of help. This support is voluntary – the parent and child can choose to be involved. Based on the information the parent and child provide, all those who can help the child will work together to provide the support that child needs.

## 8.10 Safeguarding Flowchart



## 9. School Pupils aged 14 – 16

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9.1 Some children attend College courses as part of their School Links or Taster Programme. In the case where College need to report and deal with a concern or disclosure of abuse the College's Designated Person will contact the School's Designated Person.

## 10. Work Based Learning

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10.1 The College will hold Safeguarding Policies and details of designated persons for all subcontractors. All learners on Work Based Learning programmes receive an induction, which includes raising awareness of the Colleges commitment towards Safeguarding, details of the support services offered and contact details for the Safeguarding Officers. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given. In accordance with this policy assessments are made to ensure that the learner's wellbeing is safeguarded by the work placement team.

10.2 The College has arrangements in place to ensure that, prior to work related activity commencing:

- Pre-placement Health and Safety checks of employer's premises and health and safety management arrangements are complete, including insurance details
- Consents (parental / guardian / learners) are obtained
- Employers are made aware of relevant College policies
- Requirements for DBS checks are assessed and the relevant processes undertaken as required

## 11. Confidentiality

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### 11.1 The Basic Principles

11.1.1 As a fundamental principle, staff will offer a confidential service to learners using the College, with information only being disclosed with the learner's consent or where there are legal requirements to do so.

11.1.2 The boundary of confidentiality for each staff member is that information is only passed to somebody who is authorised to receive it from someone who is authorised to disclose it. Regarding disclosure or sharing information, the main principle to be observed is that any disclosure should be kept to a minimum and on a need to know basis (the minimum necessary is the maximum permissible).

### 11.2 Limits to Confidentiality

11.2.1 Young people, including those aged under 16, generally have the same right to confidentiality as do adults. However, staff cannot offer or guarantee absolute confidentiality to any learners in the following circumstances:

- a. where safeguarding issues are involved;
- b. where there is significant threat to life (the student's own life or someone else's);
- c. where a person needs urgent medical treatment; and or
- d. where potential or actual serious criminal offences are involved

- 11.2.2 Limits to confidentiality will be made clear to learners at the earliest opportunity. Where confidentiality has to be broken, the staff member should seek to ensure that the learner is informed first or as soon as possible afterwards.
- 11.2.3 The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent. Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- 11.2.4 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or deputy. Fears about sharing information should not stand in the way of the need to promote the welfare, and protect the safety, of children.
- 11.2.5 Information should be 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.
- 11.2.6 The College counsellors work to the British Association for Counselling and Psychotherapy ethical framework. This allows the counsellor to break confidentiality in circumstances, with or without the learner's consent if necessary where, in her/his professional judgement:
- there is a serious risk of the learner harming themselves or being harmed
  - there is a serious risk of another person being harmed
  - there is a risk of a serious crime being committed.

## 12. Safe Recruitment of Staff

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12.1 The College has a Safer Recruitment Policy which follows good practice guidelines (please see Recruitment Policy). A policy has been approved by senior management that sets out guidelines for DBS requirements. This is also covered for Contractors in the Contractors Policy. Where a DBS disclosure is not available prior to commencement of employment by the College, in exceptional circumstances, the principal can agree a start. Guidelines are set out in the 'Risk Assessment Supervision Pending DBS Disclosure' Policy.

## 13. Allegations Against Staff

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13.1 The College has a Code of Conduct Policy for staff which sets out clearly its expectations in terms of staff behaviour and provides staff with information on keeping themselves safe. Nevertheless, allegations against staff may occur.

13.2 It is a criminal offence for a person over the age of 18, in a position of trust, to enter into a sexual relationship with any student under 18 years old, even if the relationship is consensual.

13.3 If allegations are made against a member of staff, HR must be informed immediately. They will inform the Principal and relevant disciplinary procedures may be invoked. The College must also advise the Local Authority's Designated Officer (LADO) who may undertake a suitability assessment. If the allegation concerns one of the Safeguarding Officers a member of CET will be appointed to investigate as per College policy.

13.4 If a student makes a malicious allegation about a member of staff (or others) this may be dealt with under the College's Maintaining Student Responsibility (MSR) Conduct Procedure or Exceptional Review Procedure.

13.5 Where there are concerns about the Principal, this should be referred to the Chair of Governors. Staff may consider discussing any concerns with the College's designated safeguarding lead and make any referral via them.

## 14. Whistleblowing

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14.1 The College's Whistleblowing Policy and Procedures are available on the Staff Intranet or via HR.

14.2 All staff, governors and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

14.3 Where a staff member feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at - [Advice on whistleblowing](#)
- 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 or email: [mhelp@nspcc.org.uk](mailto:mhelp@nspcc.org.uk)

## 15. Support for Staff

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15.1 This policy document is available on the College website and internal intranet.

15.2 Where a member of staff finds a disclosure particularly distressing, they may wish to access counselling services, this can be done by contacting the HR Department on 01704 392703.

15.3 The Safeguarding Team have an open door policy for any staff who wish to discuss their concerns, staff will need to be mindful that the Safeguarding Team cannot, as with students, give absolute confidentiality to any disclosures.

## 16. Legal Framework

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16.1 The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools and Colleges had a legal obligation to work with investigating agencies acting on behalf of children in need. Guidance was published in '*Safeguarding Children in Education*' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer significant harm and take appropriate action in full partnership with other local agencies.

- 16.2 The Department for Education's statutory guidance for schools and colleges, *'Keeping children safe in education'*, came into force in April 2014 and was updated in September 2018. It sets out the responsibilities placed on colleges to safeguard and promote the welfare of children.
- 16.3 The statutory guidance *'Working together to safeguard children'*, which applies to organisations and professionals who provide services to children was updated in March 2015.
- 16.4 *'Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism'*, HM Government, 2015. Guidance on Prevent for further education and skills providers will be published in time for the start of the 2015/16 academic year.
- 16.5 The responsibility for making sure appropriate arrangements are in place lies with the governing body. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by the governing body.
- 16.6 The College is not an investigating agency. This function is carried out by the local authority's Children's Services, or other agencies with statutory powers. The *Children Act 1989*, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18<sup>th</sup> birthday, and also that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

## 17. Supporting Documentation

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- 17.1 This policy and related procedures are driven by the following legislation and guidance:
- 157 Prevent Toolkit
  - Children Act 1989
  - Children Act 2004
  - Children's Plan 2007
  - Contest (The National Counter-Terrorism Strategy)
  - Counter-Terrorism and Security Act 2015
  - Dealing with allegations of abuse against teachers and other staff – DfE 2012
  - DfES Safeguarding Children in Education
  - Education Act 2011
  - Employment 35/13-protected cautions and convictions further advice, AOC, July 2013
  - Equality and Diversity Act 2010
  - Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (DCSF 2009)
  - Keeping Children Safe in Education September 2018 (Department for Education)
  - NSPCC – Guidance on Child Protection Records
  - Prevent Cloud Instructions and Guidelines
  - Safeguarding Children and Safer Recruitment in Education (DfES 2010)
  - Safeguarding children from forced marriages
  - Safeguarding Vulnerable Groups Act 2006
  - Safer Practice, Safer Learning (NIACE 2007)

- Sefton – A coordinated response to self-harm in children and young people 2008
- Sefton LSCB - Multi-Agency Threshold Pathway to Provision Handbook 2015
- YPSI in Schools and Colleges – UK Council for Child Internet Safety 2017
- The Protection of Children in England – the Government Response to Lord Laming, 2009
- Vetting and Barring Scheme – Update. Independent Safeguarding Authority, 2009
- Working Together to Safeguard Children (HM Government 2015)

## 18. Related College Documents

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18.1 The following College documents provide links to this policy:

- Admissions Policy
- Anti-Bullying Policy (Students)
- Care Leavers Covenant
- Code of Conduct – Students
- Contractors Policy
- Criminal Convictions Policy and Procedure
- Drugs, Alcohol and Substance Misuse Policy
- Equality and Diversity Policy
- Fitness to Study Policy and Procedure
- Grievance Procedure
- Health and Safety Policy and Procedures
- ICT Acceptable Usage Policy
- ID Badge Policy
- Lettings Policy
- Lone Working Policy
- Maintaining Student Responsibility (Conduct) Procedure
- Online Safety Policy
- Personal/Safety and Security booklet (Staff)
- Recruitment and Selection Procedure
- Risk Assessment Supervision Pending DBS Disclosure Policy
- School Links – Child Protection Policy for relevant Schools
- Searching, Screening and Confiscation Policy
- Staff Bullying Policy
- Staff Disciplinary Procedure
- Whistleblowing Policy and Procedures
- Work Placement Policy

## Appendix: Southport College Student Safeguarding Procedure Definitions

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Throughout this document the following definitions apply:

**Safeguarding** – includes promotion of health and well-being as well as protection of specific individuals.

**Contextual Safeguarding** – contextual safeguarding highlights the importance of understanding the child’s wider social setting and how it can be an important factor in managing risk.

**Child** – in accordance with The Children Act 1989, (and also in the Children Act 2004) and therefore in accordance with the law, the College shall regard any learner below the age of 18 as a child.

**Young people aged 18+** – may in some circumstances be regarded as vulnerable as a consequence of earlier life-experience and may therefore fall within the remit of The Children Act 1989. The College will take action based on individual situations; for example, where a learner is over 18 but wishes to report abuse which took place when they were younger or if there are younger siblings in a family who are thought to be at risk.

**Vulnerable Adult** – is or may be in need of Community Care Services by reason of mental or other disability, age or illness and is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

**Vulnerable Students** - In addition, The College recognises the following groups of students as ‘Vulnerable’ due to their circumstances and therefore provides support:

- Looked After Children (LAC)
- Those leaving care
- Teenage parents
- Those with caring responsibilities
- Students under the Youth Offending Service

**Abuse** - may be physical, sexual, emotional, neglect, domestic violence, financial, institutional or discriminatory. Abuse is behaviour which deliberately or unknowingly causes harm. Abuse can be passive i.e. failure to care for someone, take action or alert about abuse. Abuse can be an isolated event or repeated.

**Significant Harm** - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)

**Physical Abuse** - actual or likely physical injury, or failure to prevent injury. May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

**Sexual Abuse** - Involving forcing or enticement to take part in sexual activities, including prostitution, whether or not the individual is aware of what is happening. Activities may involve physical contact including penetration or non-penetrative acts. For example it could include a child/vulnerable adult looking at or being involved in the production of/watching sexual online images, or watching sexual activities, or encouragement to behave in sexually inappropriate ways and can include grooming in preparation for abuse. Many young people who are victims of sexual abuse do not recognise themselves as such. They may not understand what is happening or even understand that it is wrong. It is recognised that sexual abuse can take place within a relationship whether heterosexual or same sex, or outside of a relationship. It can include rape and sexual assault or sexual acts to which a vulnerable adult/child has not consented, could not consent to or was pressured into consenting to. This may also include the use of new technologies, for example YPSI (see below). Sexual abuse is not solely perpetrated by adult males; women and children can commit acts of sexual abuse too.

**Child Sexual Exploitation (CE)** - Sexual exploitation of children and young people under 18 involves exploitative situations, contexts or relationships where young people (or a third person/s) receive 'something': (e.g. accommodation, drugs, alcohol, cigarettes, food, affection, gifts, money) as a result of them performing, and/or another/others performing sexual activities on them. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; e.g. being persuaded to post sexual images on the Internet or send photos by text without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships often being characterised by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

**Youth Produced Sexual Imagery (YPSI)** – formerly known as 'sexting' YPSI generally refers to the sending of sexually explicit images via text, email, or through social networking sites. For example, this could be a photograph of a young woman in a state of undress or a boy exposing himself. 'YPSI' is commonplace amongst young people. Many young people do not see 'YPSI' as a problem and are often reluctant to talk to adults about it because they are afraid of being judged or having their phones taken away. It may be common but 'YPSI' is illegal. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary.

**Emotional Abuse** - emotional abuse is the persistent emotional ill treatment as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning, or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. 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.

**Psychological Abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse or isolation.

**Peer on peer abuse** - This is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment, sexting (youth produced sexual imagery), physical abuse and initiation/hazing type violence and rituals.

**Neglect** - is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting them from emotional harm or danger. Neglect may include acts of omission such as ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating. Victims of neglect often suffer other types of abuse. Neglect may occur if a parent becomes physically or mentally unable to care for a child or where they have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

**Self-neglect** - is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

**Risk to Self and/or Others** – this may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress and mental health issues.

**Domestic Violence** - also known as domestic abuse, is defined as:

*"An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality".*

*[Home Office: 24<sup>th</sup> March 2015 Domestic Violence]*

Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as **'honour' based violence**, **female genital mutilation (FGM)** and **forced marriage** (see below). Domestic violence affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of a relationship and may continue after a relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

If a student discloses they are in an abusive relationship, we have a duty to offer them support, and /or find the relevant organisation that may be able to help them. If the student is an adult it is important to establish if they have children under 18. If the victim does have young children a referral may need to be made to Children's Social Care, ideally with consent from the parent.

**Forced Marriage** - where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. 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 often experiencing some form of abuse such as physical, psychological, financial, sexual or emotional pressure e.g. being made to feel like they are bringing shame on their family.

Confidentiality is *extremely* important in these circumstances. If there are concerns that a student is in danger of a forced marriage the Safeguarding team will follow government guidelines and will contact the Forced Marriage Unit. Forced marriage is illegal in the UK. The student's family should not under any circumstances be contacted without consultation with the Safeguarding Officer and student.

**Honour Based Violence** – “a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community” (Crown Prosecution Service). It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditions and beliefs of their culture. For example, honour based violence might be committed against people who:

- want to get out of an arranged or forced marriage
- become involved with a boyfriend or girlfriend from a different culture or religion
- wear clothes or take part in activities that might not be considered traditional within a particular culture

The term ‘honour based crime’ covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence. It can include:

- personal attacks of any kind, including physical and sexual violence
- forced marriage
- forced repatriation (sending someone back to their country of origin without their consent)
- written or verbal threats or insults
- threatening or abusive phone calls, emails and messages

**Female Genital Mutilation (FGM)** - refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. All staff have a duty to act to safeguard girls at risk of FGM. The risk to girls and young women increases where a relative has undergone FGM and victims are most likely to come from a community that is known to practice FGM. Girls at risk of FGM may not yet be aware of the practice or that it may happen to them, so sensitivity should always be shown when approaching the subject.

FGM is illegal in the UK. It is also illegal to arrange for a child to be taken abroad for FGM. Staff need to remain vigilant when potentially vulnerable females report that they are going abroad or return from trips abroad, and should look out for signs such as uncomfortableness when sitting, or needing to use the toilet more frequently. If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. The safeguarding team will support them in making the referral.

*Note: Care should be taken not to approach the family or attempt to mediate if forced marriage, honour-based violence or FGM is suspected.*

**Radicalisation** – vulnerable individuals being targeted for recruitment into extremism. Protecting individuals from the risk of radicalisation is similar in nature to protecting them from other forms of harm and abuse. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific factors may contribute to vulnerability which are often combined with influences such as family, friends or the internet, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular is a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Child Criminal Exploitation (CCE)** - often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, alcohol or even food and accommodation. While there is still no legal definition CCE, it is increasingly being recognised as a major factor behind crime in communities across Merseyside and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm (Merseyside Police Commissioner)

**Organised Crime Group** - a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise). This involves serious and organised criminality by a hard core of violent gang members who exploit vulnerable young people and adults. This may also involve the movement and selling of drugs and money across the country, known as ‘county lines’ because it extends across county boundaries. Young men and women may be at risk of sexual exploitation in these groups.

There is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control, however, there are significant links between different levels of gangs. Activity can include street gangs involvement in drug dealing on behalf of organised criminal groups and the sexual abuse of girls and boys by organised criminal groups.

**Human Trafficking & Modern Day Slavery** - *“the movement or recruitment by deception or coercion for exploitation through sexual exploitation, forced labour, domestic servitude, forced street crime, cannabis cultivation, grooming and other forms of abuse”* (Stop The Traffik – 2016). Since November 2015, public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking.

**Discriminatory Abuse** - includes racism, sexism or discrimination based on a person’s disability.

**Financial or Material Abuse** - includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

**Sexual Violence and Harassment** - Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. **Evidence shows girls, children with SEND and LGBT children are at greater risk.** When referring to sexual violence this is in respect of sexual offences under the Sexual Offences Act 2003 as described below:

- *Rape*
- *Assault by penetration*
- *Sexual Assault*

When referring to sexual harassment this means '**unwanted conduct of a sexual nature**' that can occur online and offline. 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, 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;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments/messages, including on social media;
  - sexual exploitation; coercion and threats

*(This list is not exhaustive)*