



**RICHARD
TAUNTON**
Sixth Form College

**Safeguarding Policy and Procedures for the
Protection of Vulnerable Groups
including Children**

September 2018

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1.0 POLICY

1.1 General Policy Statement

Richard Taunton Sixth Form College ('the College') has a statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of children, young people and those adults deemed vulnerable receiving education and training at the College. We maintain an attitude of "it could happen here" where safeguarding is concerned and make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel safe and able to talk freely about their concerns, believing that they will be listened to and valued. We agree that everyone has responsibility for safeguarding children and young people (Working together to safeguard children, 2015, updated July 2018)

The College is committed to providing a safe learning environment that is based upon positive well-being, personal safety and security essential for all learners and staff. This includes the safety and security of the College site, the safety and security of students on offsite visits and the safe and positive behaviour of all staff, students and visitors.

In developing the policies and procedures, the Board will consult with, and take account of, guidance issued by the Department of Health, the Department for Business, Innovation and Skills, the Department for Children, Schools and Families and other relevant professional associations e.g. AOC, SFCA and other relevant bodies and groups. It is informed by recent legislation such as Working Together to safeguard Children (2015, updated 2018), Keeping Children Safe in Education (2018) as well as official guidance from Inspecting safeguarding in early years, education and skills settings (2016) and the Governance Handbook (2017).

This policy will be updated during the year to reflect any changes brought about by new guidance.

1.2 Definitions of terms used

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
protecting children from maltreatment;
preventing impairment of children's health or development;
ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
taking action to enable all children to have the best outcomes.

Within this document a number of terms are used which can be explained:

Child Protection is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **Staff** applies to all those working for or on behalf of the college, full time or part time, in either a paid or voluntary capacity. This also includes the Extended Leadership Team.

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to students of our college; however the policy will extend to visiting children and students from other establishments. For our students with an education, health and care plan (EHCP), this expands to 25 if they need more support than is available through special educational needs support.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, guardians and foster carers.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the Schools and Education Guidance for developing Safeguarding Policies document (Appendix A).

DSL is the Designated Safeguarding Lead

LSCB is the Local Safeguarding Children Board

LADO is the Local Authority Designated Officer

LBGT is lesbian, bisexual, gay and transgender

MASH is the Multi Agency Safeguarding Hub

SEND is special educational needs and disabilities

The LGB is the Local Governing Body

The Governing Body is committed to ensuring that the College:

Provides a safe environment for children, young people and vulnerable adults to learn in;
Identifies children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm; and
Takes appropriate action to see that such children, young people and vulnerable adults are kept safe, both at home and at the College.

In pursuit of these aims, the Board will approve and annually review policies and procedures with the aim of:

Raising awareness of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for children, young people and vulnerable adults learning within the College

Aiding the identification of children, young people and vulnerable adults at risk of significant harm, and providing procedures for reporting concerns

Establishing procedures for reporting and dealing with allegations of abuse against members of staff

Ensuring the safe recruitment of staff and volunteers

The College will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to Social Services and/or the appropriate agencies as agreed with the Local Safeguarding Children Board (LSCB). In cases of radicalisation, concerns will be referred to the MASH team, or Adult Services where the individual of concern is 18 or over. In this college any individual can contact the designated safeguarding lead (DSL) if they have concerns about a young person.

1.3 Training

All staff should be aware of systems within our college which support safeguarding include:

- this Safeguarding Policy
- the Student Support Policy (previously the Behaviour Policy)
- the Staff Code of Conduct
- how to respond to children who go missing from education
- the role of the DSL (including the identity of the DSL and deputies).

All staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided every year for all staff, with separate training to all new staff on appointment. All staff sign to the policy annually to acknowledge they have attended/read and understood the training. Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole college training session. Please see the College Safeguarding Training Schedule for further details. The DSL and safeguarding team members will attend annual training with regular updates to enable them to fulfil their role (*Keeping Children Safe in Education, 2018*). They will be assisted by other members of staff who also have received additional training in the protection of children, young people and vulnerable adults.

As part of a staff training programme all staff will be informed on what to do if a child tells them he/she is being abused or neglected.

All staff should be aware of the **vulnerable status** and the possible need for early help in any child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

1.4 Referral

Following any concerns raised by staff, the DSL (or member of the safeguarding team) will assess the information and consider if significant harm has happened or if there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact children's social care (MASH). If no member of the DSL team is available, or there are immediate concerns, the staff member will refer directly to children's social care, or the police.

Generally the DSL will inform the parents prior to making a referral however there are situations where this may not be possible or appropriate.

N.B. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers who MUST report any discovery of an act of FGM on a girl aged under the age of 18 to the police.

1.5 Confidentiality

We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'working together' guidance. Information will only be shared with agencies who we have a statutory duty to share with and individuals within the college who 'need to know'. All staff should be made aware that they cannot promise a student to keep a disclosure confidential.

The Board will receive from the DSL an annual report which reviews how the duties have been discharged.

1.6 Types of Abuse

The Board recognises the following definition of abuse:

Abuse is a violation of an individual's human and civil rights by any other person or persons. It may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a child, young person or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.

Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Safeguarding action may be needed to protect children and learners from:

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography
- peer on peer abuse including bullying; sexual violence/harassment; physical abuse; sexting; hazing etc.
- teenage relationship abuse including sexual violence and harassment
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting, particularly in relation to babies and young children
- other issues not listed here but that pose a risk to children, young people and vulnerable adults.

Safeguarding also relates to broader aspects of care and education, including:

- children's and learners' health and safety and well-being, including their mental health

- meeting the needs of children who have special educational needs and/or disabilities (including PEEPs)
- the use of reasonable force
- meeting the needs of children and learners with medical conditions (including PEEPs)
- providing first aid
- the safety and security of the College site
- educational visits
- intimate care and emotional well-being
- online safety and associated issues (this reflects a widening range of issues associated with technology and a user's access to content, contact with others and behavioural issues)
- appropriate arrangements to ensure children's and learners' security, taking into account the local context.

(Ofsted, 2016)

1.7 Radicalisation and Extremism

'*Radicalisation*' is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

'*Extremism*' is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

In safeguarding individuals from radicalisation, the College works to the Prevent element of the Government's Counter Terrorism Strategy (Counter-terrorism and Security Act, 2015) and, where deemed appropriate, seeks external support for learners through referrals to the Channel Programme (via the MASH referral process). This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions.

It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of 'grooming' by others.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

If a child/young person or vulnerable adult discloses to a staff member that they or another child have been abused/radicalised, or if a staff member suspects from what they observe that abuse/radicalisation is occurring, they MUST report this to the DSL, one of the safeguarding team, or to the relevant authority.

1.8 Safe Recruitment

In accordance with section 175 of the Education Act 2002 and the DfE guidance (including Keeping Children Safe in Education, 2018) issued regarding Safer Children and Safer recruitment in Education, the College is committed to ensuring that its functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children and vulnerable adults receiving education or training. DBS checks in further education colleges relate to staff who are providing education and are regularly caring for, training, supervising or being solely in charge of persons aged under 18. Governors and Volunteers who are risk assessed as working regularly with children, or who care for, train, supervise or are in the sole charge of children should also have a DBS check. Therefore, safe recruitment and selection applies to all staff and volunteers (including Governors and individuals carrying out work experience) who may work or come into contact with children, young people or vulnerable adults.

The College Safer Recruitment Policy details its commitment to recruiting staff with knowledge, skills and experience appropriate to the job requirements, in a manner which is fair, timely, lawful and contributes to the achievement of the College's strategic values and objectives including equality of opportunity. Our policy states that each post or role should be clearly defined with a job description and person specification, vacancies should be advertised widely in order to ensure a diversity of applicants and clear selection criteria should be identified. All potential applicants and volunteers will be made aware of the requirements for relevant employment checks under this policy during the recruitment process.

1.9 Associated Policies

The Policy for the Protection of Children, Young People and Vulnerable Adults should be read in conjunction with the following College policies and procedures:

- The Mission Statement
- Health and Safety Policy
- Student Support Policy
- Disciplinary Policy and Procedure for non-senior post holders
- Disciplinary Policy and Procedure for senior post holders
- External Speakers Policy
- Safer Recruitment Policy
- Safeguarding Training Schedule
- Single Equality Scheme
- Staff Code of Practice
- E-Safety Policy

2. PROCEDURES

2.1 Staff Roles and Responsibilities

Senior Staff Member with Lead Responsibility (DSL)

The designated senior member of staff with lead responsibility for safeguarding issues is Liz Lee, Head of College; Mary O'Brien (Student Services Manager) is the deputy DSL.

The DSL will be a senior member of the College senior management team. They have a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for learners within the College.

The DSL should have received training in protection issues and inter-agency working, as required by the Local Children's Safeguarding Board (LCSB), and will receive refresher training at least every 2 years. They should keep up to date with developments in all protection issues, including radicalisation.

The designated senior member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the appropriate agency.
- Providing advice and support to other staff on issues relating to the protection of children, young people and vulnerable adults
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents of children, young people and vulnerable adults within the College are aware of the College's Policy for the Protection of Children, Young People and Vulnerable Adults
- Liaising with the Education Department of SCC, LCSB, DfE Regional Prevent Officer and other appropriate agencies
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils
- Liaising with employers and training organisations that receive children, young people and vulnerable adults from the College on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in all protection issues and are aware of the College protection procedures.
- Providing an annual report to the LGB setting out how the College has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the LCSB (or others) to the Board at the earliest opportunity.

Other Designated Staff Members

There are currently seven designated staff members, three male and four female. These designated staff members:

- Report to the senior member of staff with lead responsibility
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to the protection of children, young people and vulnerable adults
- Have particular responsibility to be available to listen to children, young people and vulnerable adults studying at the College

- Will deal with individual cases, including attending case conferences and review meetings as appropriate
- Have received training in child protection issues and inter-agency working, as required by the LCSB, and will receive level three refresher training at least every 2 years

In the event that the designated staff members are unavailable, any member of staff may refer their concerns to the MASH team, or, in an emergency, to the police.

Designated Governor

There is a designated member of the LGB with responsibility for protection issues ('the designated governor').

The designated governor (Ian Golding) is responsible for liaising with the Head of College over matters regarding the protection of children, young people and vulnerable adults including:

- Ensuring that the College has procedures and policies which are consistent with the LCSB's procedures
- Ensuring that the Local Governing Body considers the College policy on the protection of children, young people and vulnerable adults each year
- Ensuring that each year the Board is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

The designated governor is responsible for overseeing liaison between the appropriate agencies in connection with allegations against the Principal or the senior staff member with lead responsibility. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties the designated governor shall receive appropriate training.

2.2 Dealing with Disclosure of Abuse/Radicalisation and Procedure for Reporting Concerns

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home or witness something out of hours. See Appendix E for action regarding students causing concern.

Staff should:

- Listen to what is being said and take it seriously
- Make a note of what has been said as soon as practicable
- Reassure the student, but only so far as is honest and reliable

- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I am glad you have been able to tell me this', 'I am sorry this has happened', 'We are going to do something together to get help'
- Do not pass any judgement or ask 'why' questions.
- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff
- Share concerns with the designated safeguarding lead as soon as possible
- If you are not able to contact your designated safeguarding lead, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.
- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file and record the date, time, place, person's present and noticeable nonverbal behaviour, and the words used by the child. Record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising/injury
- This process can be distressing, ask for support if you feel you need it.

2.3 Allegations against other pupils which are safeguarding issues

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. They may include Sexual violence or sexual harassment. It is likely that, to be considered a safeguarding allegation against a pupil, some of the following features will be found. If the allegation:-

- Is made against an older pupil and refers to their behaviour towards a younger pupil or where there may be a coercion/power imbalance, or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this student
- Indicates that young people outside the school may be affected by this student

When an allegation is made by a pupil against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding lead (DSL) should be informed

- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The DSL should contact the multi-agency safeguarding hub to discuss the case

- The DSL will follow through the outcomes of the discussion and make a referral where appropriate
- If the allegation indicates that a potential criminal offence has taken place, once referred to the multi-agency safeguarding hub, the police will become involved
- Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files
- It may be appropriate to arrange for alternative education provision for a short period for either or both pupils as the allegation is an allegation and will need to be fully investigated
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out. If they have concerns that the disclosure has not been acted upon appropriately they might inform the head teacher/ safeguarding governor of the school and/or may ultimately contact the children's services department or the Local Authority Designated Officer LADO. They may use the whistleblowing procedure.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. In some cases additional counselling might be needed and they should be encouraged to recognise that disclosures can have an impact on their own emotions.

Children may become subject to Child in Need plans or Child Protection plans. This will always involve multiagency working around the child / family. All agencies are required to provide written reports for each meeting. Our school may also send a representative to the meeting to share this report and hear the wider picture.

2.4 Allegations of Abuse against members of staff

All staff should take care not to place themselves in a vulnerable position with a student of this College. In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with vulnerable groups, staff and volunteers may have allegations of abuse made against them. The College recognises that an allegation of abuse made against a member of staff or volunteer may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The College recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised 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, measured way.

All staff should be aware of the Staff Code of Practice and the College Disciplinary Policy and procedures. These documents can be found in G:/Public/HR/Policies and Procedures.

If an allegation is made against a member of staff, this should be reported immediately to the DSL specifically. The DSL will contact the local authority designated officer (LADO) within 24 hours for guidance on next steps. No investigation or interview with the victim, member of staff or witnesses should be carried out until advice from the LADO has been sought and received. If the allegation made concerns the Head of College, the person receiving the allegation will immediately inform the Chair of the LGB or Designated Safeguarding Governor who will contact LADO for guidance.

The LA's Designated Officer is: Sue Sevier

Phone: 023 8091 5535

E-mail: LADO@Southampton.gov.uk

A member of staff who receives an allegation about another member of staff from a child, young person or vulnerable adult should follow the guidelines in section 2.2 for dealing with disclosure.

The College will follow the DfE guidance on dealing with allegations of abuse against Teachers and Other Staff. Actions will be taken both to protect the child, young person or vulnerable adult and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place, giving the staff member leave of absence on full pay or ensuring they are not working alone.

Child protection enquiries by social services 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. The child protection agencies, including the police, have no power to direct the College to act in a particular way, however, the College should assist the agencies with their enquiries.

If there is an investigation by an external agency, for example the police, the Head of College (or DSL) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Head of College (or DSL) is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Head of College (or DSL) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the Head of College (or DSL) shall:

- Inform the child, young person or vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the child, young person, or vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Chair of the LGB and/or the designated governor of the allegation and the investigation.

The College shall hold in abeyance its internal enquiries while the formal police, LADO or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the College's existing staff disciplinary policy and procedures. Allegations of this nature could be construed as gross misconduct.

The fact that an employee/volunteer tenders their resignation or their employment is ended using a compromise agreement, must not prevent an allegation being followed up in accordance with these procedures. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of vulnerable people, including any in which the person concerned refuses to cooperate with the process.

Where an allegation has been made against a member of staff, the designated governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the LCSB. Consideration will also be given to the training needs of staff.

2.5 Criminal Prosecution during the course of employment

Staff or volunteers who are the subject of a criminal prosecution (including any caution or conviction) must inform the Head of College immediately, providing full written details of the criminal conviction. It will be the responsibility of the Senior Management Team to consider whether the nature of the prosecution has any potential impact on the member of staff's employability, taking into consideration the Rehabilitation of Offenders legislation. Staff should be aware that it might be necessary to refer the matter for consideration under the College Disciplinary policy.

2.6 Referrals to the Disclosure and Barring Service (DBS)

In cases where the Senior Management Team reasonably believes a member of staff or volunteer has caused harm or poses a future risk of harm to vulnerable groups, including children, a referral should be made to the Disclosure and Barring Service (DBS).

The HR Manager will be responsible for coordinating the referral.

The Safeguarding Vulnerable Groups Act 2006 places a duty on employers of people working with children or other vulnerable groups to make a referral to the DBS in certain circumstances. This is when an employer has dismissed or removed a person from working with children or any other vulnerable group (or would have done if the person had not left or resigned etc.) because the person has:

Been cautioned or convicted for a relevant offence; or

- Engaged in relevant conduct in relation to children and/or other vulnerable groups [i.e. an action or inaction (neglect) that has harmed a vulnerable person or put them at risk of harm]; or
- Satisfied the harm test in relation to children and/or vulnerable adults [i.e. there has been no relevant conduct (i.e. no action or inaction) but a risk of harm to a vulnerable person still exists].
- A referral should not be made when an allegation is first received. The College must first undertake an investigation and evidence gathering in order to establish if the allegation has

foundation. Without evidence or information for the DBS to consider, many allegations will be quickly closed down as there will be no basis on which the DBS can proceed.

2.7 Safe Recruitment and Selection Procedures

As part of the College Recruitment and Selection Policy, and in accordance with the legislation detailed above, the College is required to maintain a single central record which provides evidence of the recruitment and vetting checks undertaken prior to employment, relating to staff identity, qualifications and criminal records. The record includes:

- Checks relating to identity – name, address and date of birth;
- Qualifications checks for qualifications which are a legal requirement of the role;
- Evidence of permission to work for those who are not nationals of a European Economic Area (EEA) country;
- Prohibited List check;
- DBS enhanced disclosure;
- Date that the check was evidenced.

In addition professional and character reference checks and checks on previous employment history should be carried out.

The College must seek written evidence that supply staff from agencies have been checked, and also check the identity of the person who arrives at the College from the agency. Overseas staff must be subject to a DBS check (or Prohibited List check where appointed before 2002). In addition, criminal records information should be sought from countries where individuals have worked or lived.

The HR Manager has responsibility for maintaining this central record and providing appropriate training for all staff involved in recruitment and selection. All queries relating to the safer recruitment and selection of staff and volunteers should be directed through the Human Resources department.

Approved by LGB:

Agreed by the Board:

Appendix A: What is child abuse?

The following definitions are taken from *Working together to safeguard children* (2015). In addition to these definitions, it should be understood that children can also be abused by honour based violence, forced marriage or female genital mutilation

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

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

Emotional abuse

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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Peer on peer sexual violence and harassment may occur between two children or groups of children of any age and sex. They may occur online and offline and be physical and verbal. 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.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Neglect

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.

Indicators of abuse

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

The NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to college in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*what to do if you are worried a child is being abused* 2015)

would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns college staff have should at least be discussed with the designated person/child protection co-ordinator.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from college or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. It is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor college performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at college, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map (Appendix C) can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the college.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)

- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the college, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

SEXUAL ABUSE

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in college, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Characteristics of child sexual abuse:

- It is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity Inexplicable decline in college performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at college, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

Appendix B: Briefing sheet for temporary and cover staff For supply staff and those on short contracts in *RTSFC*

While working in *RTSFC* you have a duty of care towards the students here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the college designated safeguarding lead (DSL), who is *Liz Lee*, Head of College.

This is not an exhaustive list but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behavior that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

1. Rather than directly questioning the child, just listen and be supportive
2. Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
3. Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
4. Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate

The college has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, on Moodle.

Remember, if you have a concern, discuss it with the DSL.

Name:

Signed:

Date:

Line Manager:

Signed:

Date:

Appendix C: Body Map

Body Maps should be used to document and illustrate visible signs of harm and physical injuries. Always use a black pen (never a pencil) and do not use correction fluid or any other eraser. Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

***At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map below should be used.**

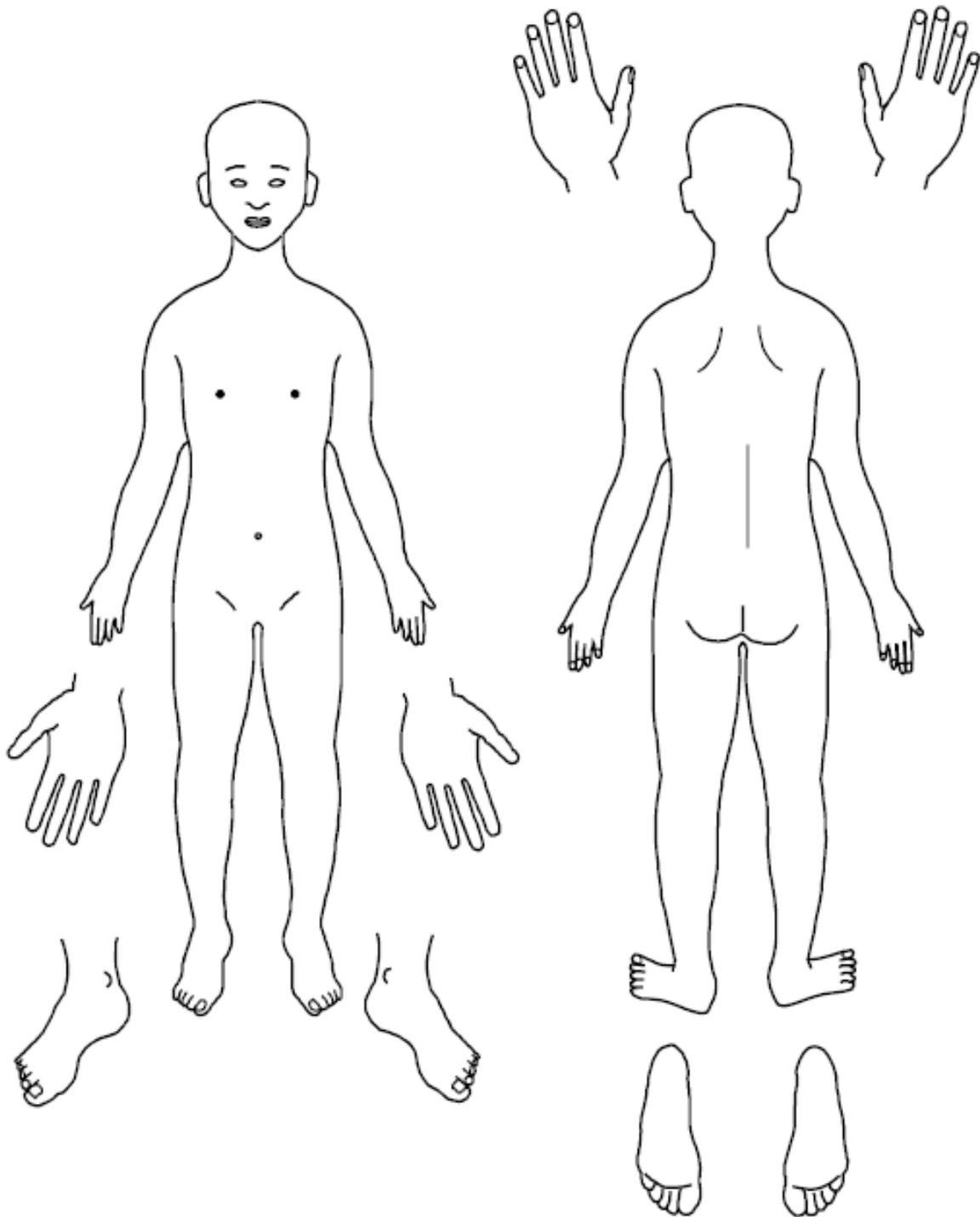
Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. Social Care direct or child's social worker if already an open case to social care/ Police.

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and record A copy of the body map should be kept on the child's concern/confidential file.



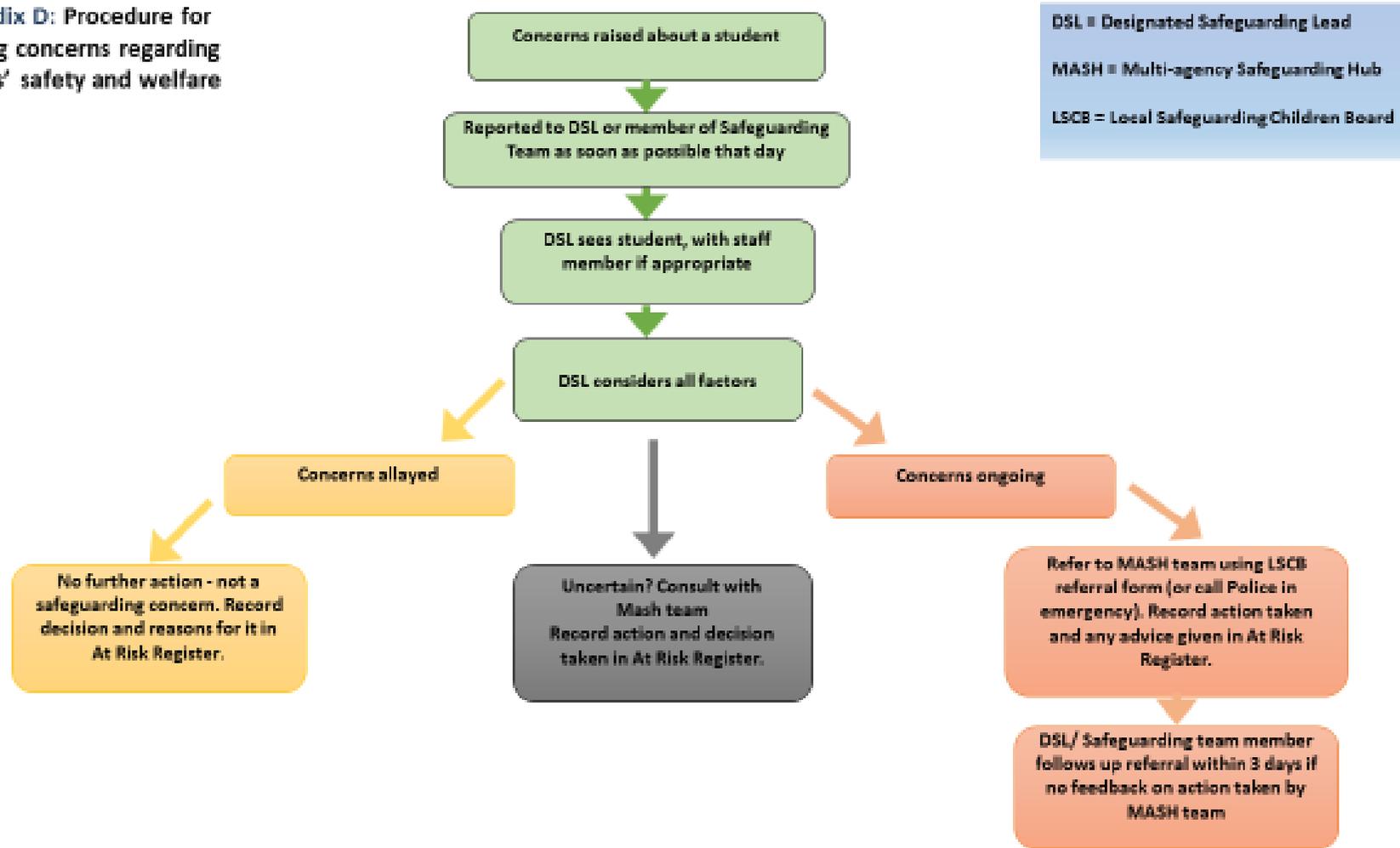
Name of child:

Date of birth:

Date recorded:

Name of staff member:

Appendix D: Procedure for referring concerns regarding students' safety and welfare



Appendix E : Guide for Action - Students Causing Concern

The following is a guide to managing students who are causing concern because of health, social, psychological, emotional or child protection reasons. The Safeguarding Team comprises Liz Lee (Designated Safeguarding Lead), Mary O'Brien, Paul Daniel and Mandy Sanchez. If in doubt, please consult one of the team for advice/support.

Area of Concern	First contact	Follow up	Recording Actions
Child Protection – you are concerned a student (or a younger sibling) has been, or may be at risk of being, abused. This includes being a victim of FGM, CSE or being threatened with forced marriage.	Refer to Safeguarding Team. If no-one available or out of hours ring MASH (02380832300) or Police	Safeguarding Team contact Soc Services (MASH) if required and will keep you informed. Maintain support for student through normal teacher/tutor contact	Record your actions in safeguarding section of ILP and copy in safeguarding team
Child Protection – you are concerned a student (or a younger sibling) has been, or may be at risk of being, radicalised.	Refer to Safeguarding Team. If no-one available or out of hours ring MASH (02380832300) or Police	Safeguarding Team contact Soc Services (MASH) if required and will keep you informed. Maintain support for student through normal teacher/tutor contact	Record your actions in safeguarding section of ILP and copy in safeguarding team
Child Protection – you are concerned a student has been, or may be at risk of being, abused by a member of staff.	Refer to LLE or PSW only.	We will inform the LADO (Local Authority Designated Officer) who will advise on next steps. Maintain support for student through normal teacher/tutor contact	Record your actions in safeguarding section of ILP and copy in LLE/PSW
Social – student left home/asked to leave home, but is safe.	Refer to No Limits (02380 224 224 or in College on Monday 11.50) for accommodation advice	Maintain support for student through normal teacher/tutor contact	Record your actions in safeguarding section of ILP and copy in safeguarding team
Social – student is being bullied, harassed or discriminated against. (Note - bullying is repeated behaviour, which is intended to hurt someone either emotionally or physically. Need to differentiate between bullying and peer conflict, which is a mutual disagreement between peers of groups of peers).	Refer to CM who will collect statements.	HoF may be involved to suspend student/s if appropriate (parents to be contacted first if this is the case). Maintain support for student through normal teacher/tutor contact	Record your actions in ILP and copy in CM/HoF

Social/health – student thinks she may be pregnant	Advise student to see GP/No Limits for advice or referral. (NB- If you have other safety concerns related to the student on top of the pregnancy, refer to Safeguarding Team)	Inform CM. Risk assessment for student may be needed – check with DNA/GKI Maintain support for student through normal teacher/tutor contact	Record in medical comments section in ILP.
Psychological – student is depressed/ anxious	Refer student to counsellor or see MOB to make appointment with wellbeing worker/MH Nurse	Contact parents for meeting to discuss. Maintain support for student through normal teacher/tutor contact	Record in medical comments section in ILP.
Psychological – student is self-harming	Refer to first aider if self-harm occurs at college or if wounds need attention.	Refer student to counsellor or see MOB to make appointment with MH Nurse Contact parents for meeting to discuss. Maintain support for student through normal teacher/tutor contact	Record in medical comments section in ILP.
Psychological – student says they feel suicidal	Refer to Safeguarding team who will contact CAMHS/GP or see MOB to make appointment with MH Nurse.	Contact parents for meeting to discuss. Maintain support for student through normal teacher/tutor contact	Record in medical comments section in ILP.
Psychological – student presents with hallucinations	Refer to Safeguarding team who will contact CAMHS/GP or see MOB to make appointment with MH Nurse.	Contact parents for meeting to discuss. Maintain support for student through normal teacher/tutor contact	Record in medical comments section in ILP.
Emotional – student is struggling to conform/comply; cannot control emotions/getting into trouble	Contact parents for meeting to discuss.	Refer student to counsellor or see MOB to make appointment with MH Nurse Maintain support for student through normal teacher/tutor contact	Record your actions in PLP