



SAFEGUARDING POLICY

Child, Young Person and Adults at Risk

AREA: | **Student Services**

TOPIC: | **Safeguarding (including child protection)**

Content

Child Protection policy (for use when a child, young person or adult at risk is in immediate danger of significant harm)

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1 Who this policy covers

This policy covers all children up to 18 years of age and adults at risk studying at or visiting any premises of the college. The policy also covers all College staff, Governors and visitors who are at immediate danger of significant harm from themselves or others and/or are experiencing difficulties with one or more element of their lives.

For the purposes of this policy, children are defined as persons under the age of 18. The fact that a child has become sixteen years of age and is living independently does not change their status or their entitlement to services or their protection under the Children Act 1989.

An adult at risk is defined as: -

‘a person aged 18 or over who:

- Is in receipt or who is or may be in need of community care services by reason of mental health or other learning/physical disability, sensory impairment, age or illness*
- And who may be unable to take care of themselves*
- Or unable to protect themselves from significant harm or exploitation’*

The policy identifies specific duties to support full time, part time, apprentices and work-based learning students.

2. Designated staff with responsibility for Safeguarding and child protection

The Designated Safeguarding Lead and Mental Health Lead (DSL) for the College is Bev Jackson, Head of Student Services, 01691 688032 and 01432 365566 or mobile 07962609734.

Bev Jackson is a member of the College’s Operational Management Team. Bev Jackson as DSL has the support of and direct access to Debra Baldwin, Director of Personnel, who is a member of the Executive Management Team and performs an auditing role on the College’s safeguarding practices.

In Bev Jackson’s absence a DDSL or another safeguarding network member should be contacted:

Deputy Designated Safeguarding Leads (DDSL) for the College are:

- Nicola Butler, Safeguarding Manager and DDSL - 01432 365523 ext.623 or mobile - 7790833601
- Bev Stevenson, Senior Wellbeing and Pastoral Mentor, DDSL – 01432 365472 ext. 272 or mobile 07967 732896
- Lynne Hughes, Senior Wellbeing and Pastoral Mentor, DDSL – 01691 688067 or mobile 07436 263799

DDSLs deputise for the DSL in her absence and/or unavailability, and when discussions have been held with the DSL and agreement has been reached that the DDSL is better placed to

undertake some of the activities, for example, reporting to the Police or multi-agency front door referrals.

3. Policy purpose

3.1 Policy statement

HLNSC recognises that young people and vulnerable adults have a fundamental right to be protected from harm and exploitation and that students cannot learn effectively unless they feel and are safe. The College is committed to ensuring that best practice is adopted when working with all young people and adults at risk, offering them support and protection, and accepts that it has a legal and moral responsibility to implement procedures, to provide a duty of care to young people, to safeguard their wellbeing and to protect them from abuse. This Policy therefore supports all students enrolled at the College. The policy also supports the welfare and safety of staff, Governors and visitors of the College.

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and young people.

In accordance with the Counter-Terrorism and Security Act 2015, there is a statutory duty on colleges to “have due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent duty. To fulfil this duty, HLNSC liaises with the local area prevent lead to receive updates regarding local concerns and to refer students of concern to the Channel process.

The policy is promoted to all staff and students via the recruitment and induction processes, during student workshops and staff CPD events and is available on the College VLE.

3.2 Policy Intent

The governing body is committed to ensuring that the College:

- Provides a safe education environment for children, young people and adults at risk
- Identifies and supports children and young people who are suffering, or likely to suffer, significant harm or abuse
- Takes appropriate action to ensure that such children, young people and adults at risk are kept safe, both at home and at the College.
- Recruits, trains and develops staff within the HLNSC safeguarding framework, meeting all statutory duties.

This policy has been developed in accordance with the principles established by: -

- The Children Acts 1989 and 2004
- The Education Act 2002 and 2011
- The Equality Act 2010
- Working Together to Safeguard Children July 2018

- The Safeguarding Vulnerable Groups Act 2006
- The Children and Social work act 2017
- Keeping Children Safe in Education 2022
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- What to do if you're worried a child is being abused March 2015
- Counter-Terrorism and Security Act 2015 – PREVENT Duty guidance April 2021
- Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020
- Mandatory Reporting of Female Genital Mutilation - Procedural Information 2020
- Herefordshire and Shropshire Safeguarding Partnership Procedures

In pursuit of this intent, the governing body provides strategic leadership, they will approve and annually review policies and procedures. The annual updating of the policy has staff consultation included within the process prior to Governor approval who review insight of the following objectives:

- Raising awareness of issues relating to the welfare of children and young people. Using a whole College approach in regards to the promotion of a safe environment for the children, young people and adults at risk learning within the College.
- Aiding the identification and safe care of children, young people and adults at risk of significant harm or abuse, in line with Government and local safeguarding partnership arrangements.
- Ensuring procedures for reporting concerns, record keeping and supporting identified vulnerable groups are pro-active, effective and robust.
- Ensuring all services and procedures are transparent and accessible to staff and students, working in line with the Equality Act and respecting individual protected characteristics.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- The safe recruitment and continued professional development of staff.
- Supporting the identification of and action under the Prevent Duty and reporting to external agencies when necessary.
- Partnership working with our Employers and training organisations (as relevant) for co-operation with the College in putting in place and subscribing to appropriate safeguards for all students.

In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Government and other relevant bodies and groups. Guidance will include 'Working together to Safeguard Children in Education' published by the Department for Children, Schools and Families and 'Keeping Children Safe in Education' published by the Department for Education. The procedures have been developed in cooperation with the Herefordshire Safeguarding Children Partnership, Shropshire Safeguarding Children Partnership

and the Herefordshire Safeguarding Adult Partnership, Quality and Effectiveness Group and Herefordshire DSL Group.

The College will refer concerns that a child, young person or adult at risk might be at risk of significant harm to social care, police authorities and/or the appropriate agencies as agreed with the Herefordshire and Shropshire Safeguarding Partnerships. Utilizing the multi-agency front door approach Herefordshire Safeguarding HUB (MASH) and Shropshire First Point of Contact (FPoC). The College will fulfill its responsibilities to inform the Local Authority Designated Coordinator (LADO) of issues and allegations against staff. The College will also ensure that it refers, as necessary to the Disclosure and Barring Service and any other relevant organisations.

The governors with special responsibility for child protection issues, Mr. Alan Laying the chair of the governing body, and Mrs. Laura Johnston, Governor, will undertake appropriate training as necessary.

The Principal and all staff working with children, young people and adults at risk will receive differentiated training to aid understanding of how to identify, support and respond to child protection concerns. This training will also cover their responsibilities and College procedures and policies, with annual updates and full refresher training at least every 3 years.

Bev Jackson, Head of Student Services, a member of the Operational Management Team, has special responsibility for child protection issues and will be trained to Specialist level. She is assisted by members of the College's Safeguarding and Equality and Diversity Committee who also have special responsibility for child protection and safeguarding. Some Committee members will also be trained to Specialist level.

The governing body will receive from the designated member of staff with lead responsibility for child protection and adults at risk an annual report which reviews how the duties have been discharged.

4. Definitions of abuse

HLNSC and the governing body recognises the following descriptors and adopts KCSIE 2022 definitions of abuse:

Abuse: a form of maltreatment of a young person. Somebody may abuse or neglect a young person by inflicting harm or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people may be abused by an adult or adults or by another young person or young person.

Physical abuse: a form of abuse which may involve causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

Emotional abuse: the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. These may include interactions that are beyond a young person's developmental capability. It may involve seeing

or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young person frequently to feel frightened or in danger.

Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

Sexual abuse: involves forcing or enticing a young person or young person to take part in contact or non-contact sexual activities, not necessarily involving violence, whether or not the young person is aware of what is happening. The sexual abuse of young people by other young people is a specific safeguarding issue (also known as child on child abuse).

Neglect: the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Exploitation can be linked to gangs and serious violence, changes in behaviour, friendship groups, unexplained gifts and a decline in attendance and performance are all indicators of concern, this list is not exhaustive.

Child on child abuse (peer on peer)

Child on child abuse occurs when a young person is exploited, abused, bullied and / or harmed by their peers who are the same or similar age, this may though include intra-familial harm. The college adopts a College wide approach to positive behaviour and has a zero tolerance of unacceptable behaviour that may include, physical abuse, teenage relationship abuse, coercive control, banter, intimidation, humiliation, bullying including online, sexual harassment and sexual violence, sharing of images or up skirting this list is not exhaustive. Child on child abuse can occur in or outside of College, however appropriate action will always be taken. The College strives to explain to all students the law is in place to protect them rather than criminalise them.

Contextual Safeguarding and County Lines

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their community, at college, their peer group and online can feature violence and abuse. County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries usually by young people coerced into gangs. The 'County Line' is the phone line used arrange the drugs order.

Domestic violence and abuse

Domestic abuse can encompass a wide range of behaviours, it can be, but is not limited to, psychological, physical, sexual, financial or emotional abuse. Incidents or patterns of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). The College works within the Operation Encompass guidelines.

Female Genital Mutilation (FGM)

FGM means the partial or complete removal of the external female genitalia for non-medical reasons. FGM also applies to any other injury to the female genital organs. FGM is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as Sunna, gudniin, halalays, tahir, megrez and khitan, among others.

Forced Marriage

A Forced Marriage (FM) is a marriage conducted without the valid consent of one or both parties and where duress is a factor. FM is a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 and came into force on 16 June 2014. Forced marriage is different from, and should not be confused with, an arranged marriage.

Trafficking and Modern Slavery

Human trafficking is the process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain (including sexual). Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

5. Prevention of Extremism

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity. For this reason, College staff have targeted CPD to develop an awareness of signs of radicalisation and have the confidence to report their concerns to their line manager. Students also receive PREVENT workshops and related tutorial activities to raise awareness and promote British Values.

If any staff member has a concern they should inform the Designated Safeguarding Lead, Bev Jackson who will discuss the matter with other Senior Managers and external agencies as necessary. The DSL will utilise the Local Authority, Police CHANNEL procedures as necessary to gain support and advice regarding any concerns that College has about its students, staff, governors or visitors.

The college has a duty to ensure that the promotion of partisan political views in the teaching of any subject in the college does not take place. Students must be offered a balanced understanding of opposing views. The promotion of extremism is against College values and would constitute misconduct on the part of both students and staff. The College has a specific process for authorization of guest speakers.

6. Mental Health

At HLNSC we are committed to supporting and developing the mental and emotional wellbeing of students and staff. The College understands the challenges faced by people with mental health issues and the impact that this can have on both their personal and academic lives.

Our motivation to support the mental health of all our students and staff is to understand, support, and contribute to the management of mental health problems with commitment, passion and drive. The safeguarding team completes transition work for students disclosing support needs at applications, each campus has a wellbeing HUB open every day in term time for drop in or tailored bespoke mentoring support. The College has Togetherall who provide a 24/7 online support option for all students, and Health Assured who provide a telephone counselling service for students 24/7, both partners are funded by the College and have clear escalation procedures in place for risk levels 3 and 4. The college also have Mental Health First Aiders onsite. The package of support is enhanced by the tutorial framework, personal development opportunities and the wider curriculum delivery.

All students an access support directly in person and online, via tutor referral or using the QR codes around campus. The College has a strategy and action plan to substantiate its approach to mental health support and initiatives.

7. E-Safety and Social Media

HLNSC recognises the advantages of new technologies for staff and students as a means of communication and as a learning tool. However, this technology is open to abuse and can lead to the invasion of privacy and in its most serious forms, cyber bullying, grooming, trolling, PREVENT concerns and potential radicalisation, Child Sexual Exploitation and the potential distribution of inappropriate images. Therefore, restrictions are in place and the College has specialist software to block and filter potentially harmful websites and materials.

The College will ensure that online safety is delivered at regular intervals within the wider curriculum offer, focusing on content, contact, conduct and commerce. This enables students to learn about and manage the associated risks effectively and will support parents and the college community to become aware of and alert to, the need to keep children and young people safe online. The student and parent handbook identifies the expectations for safe online behaviour. College policies set out the appropriate use of digital technology while protecting the individual and maintaining a productive, working environment. Separate IT polices are in place which staff should familiarise themselves with.

8. Designated Staff Roles and Responsibilities

8.1 Designated Safeguarding and Mental Health Lead (DSL) is responsible for:

- a. Maintaining specialist designated safeguarding lead status at Level 3
- b. Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agency
- c. Providing advice and support to other staff on issues relating to child protection
- d. Ensuring that a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral) is maintained on My Concern
- e. Ensuring that parents of children and adults at risk within the College are aware of the College's child protection policy

- f. Liaising with the HSCP, SSCP and other appropriate agencies, and overseeing other safeguarding staff as appropriate
- g. Ensuring that appropriate arrangements are made for the pupils of secondary schools which send pupils to the College
- h. Ensuring that appropriate safeguards are put in place for employers and training organisations that receive children or young people from the College on long term placements
- i. Ensuring that staff receive basic training in child protection issues and are aware of the College child protection procedures.

The DSL will provide regular reports to the College Management Team and the Governing body and an annual report to the governing body setting out how the College has discharged its duties. She is responsible for reporting deficiencies in procedure or policy identified by the HSCP and SSCP (or others) to the governing body at the earliest opportunity.

Policies and procedures can be found on the College's intranet system, Moodle. This policy together with Annual Reports and plans are published on the College's website.

8.2 Deputy Designated Safeguarding Leads (DDSL) are responsible for:

Raising awareness of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning at the College. DDSLs will have received training in safeguarding and child protection issues and, although not legally required, will be trained to specialist level and will receive refresher training at least every 2 years.

When the DSL is not available or in conjunction with the DSL, the DDSL is responsible for:

- a. Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agency.
- b. Providing advice and support to other staff on issues relating to child protection.
- c. Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral).
- d. Ensuring that parents of children and adults at risk within the College are aware of the College's child protection policy.
- e. Liaising with the HSCP, SSCP and other appropriate agencies
- f. Ensuring that appropriate arrangements are made with secondary schools which send pupils to the College.
- g. Ensuring that appropriate safeguards are put in place for employers and training organisations that receive children or young people from the College on long term placements.
- h. Ensuring that staff receive basic training in child protection issues and are aware of the College child protection procedures.

8.3 Safeguarding Manager and DDSL role

- a. Support the Designated Safeguarding Lead and Senior Wellbeing and Pastoral Mentors/DDSLs to ensure that the College environment is safe and conducive to learning.

- b. Be a Deputy Designated Safeguarding Lead standing in for the DSL as and when required.
- c. Provide support and advice to the other Deputy Designated Safeguarding Leads, members of the organisation's Safeguarding Panel and all staff on safeguarding, child protection and Prevent related issues.
- d. Deal with external agencies and maintain safeguarding and child protection records.
- e. Be the Safeguarding Manager for all learners and act as a safe person for learners to contact who feel under threat from other learners or college users or who may be experiencing difficulties.
- f. Support the Designated Safeguarding Lead and Deputy Safeguarding Leads in referring vulnerable learners to the appropriate internal and external support services as necessary, including access to learning support.
- g. Support the Designated Safeguarding Lead in being the College link for safeguarding related external organisations for example the MASH team, FPoC, Police, probation, youth offending, LAs and other agencies.
- h. Access and co-ordinate communication from, and to, external organisations both verbally and in written form to include emails and Police reports, referrals and information via Anycomms or from FPoC.

8.4 Designated Staff Members – Wellbeing & Pastoral Mentors role

- a. Report issues to the DSL or a DDSL as appropriate
- b. Deal operationally with safeguarding issues as necessary in the absence of the senior mentor or staff member with lead responsibility in the relevant department
- c. Know how to make an appropriate referral
- d. Are available to provide advice and support to other staff on issues relating to child protection
- e. Have particular responsibility to be available to listen to children, young people and adults at risk studying at the College
- f. Deal with individual cases, including attending case conferences and review meetings as appropriate.
- g. Received training in child protection issues and inter-agency working, as required by the Herefordshire and Shropshire Safeguarding Partnerships, and receive refresher training at least every 3 years

8.5 Designated Governors

The designated governors are responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over matters regarding child protection, including:

- a. Ensuring that the College has procedures and policies which are consistent with KCSIE and the Herefordshire and Shropshire Safeguarding Partnerships' procedures
- b. Ensuring that the governing body considers the College policy on child protection each year
- c. Ensuring that each year the governing body 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.
- d. The designated governors are responsible for overseeing the liaison between agencies such as the police, social services – as defined by the HSCP and SSCP in connection with allegations

against the Principal or the DSL. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

- e. To assist in these duties, the designated governors receive appropriate training.

9 Missing from Education

HLNSC recognises young people missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.

Children who are missing from education are more likely to be vulnerable in one way or another and are at higher risk of going missing. Schools (College) have specific duties under the 2016 statutory guidance “Children Missing Education” (DfE 2016).

9.1 Dealing with a student missing from education:

- a. The College has an attendance reporting system in place and a dedicated absence hotline for each campus, this in the student’s handbook and all students are informed at induction.
- b. Any young person under the age of 18 or an adult at risk not reporting absence or registering for class will be directly contacted for a welfare call by their tutor/ curriculum support at the earliest opportunity that day.
- c. If the student has a college pastoral support assessment (CPSA) in place and associated risks then the safeguarding team will be called if contact is not made and police and parent/guardian informed as required.
- d. If after a reasonable attempt to contact the student directly and contact has not been made then the students next of kin, parent or guardian will be contacted, and concern escalated if required to support agencies.
- e. If it is deemed that a child, young person or adult at risk is missing, the College will advise the parent/carer of the organisation’s duty to ensure that the matter is reported to the police and if necessary, follow this up by contacting the police to verify the reporting by the parent / carer has occurred.
- f. Patterns of attendance and absence monitoring is undertaken by the personal tutor, any concern in patterns in relation to safeguarding is then reported to the DSL/DDSL.

10. Dealing with Sexual Violence, Harassment and Child on Child Abuse

If a student discloses an incident of sexual violence please reassure the student and follow the process in section 11 below. If it is an immediate report contact the police, DSL/DDSL and follow police guidance for securing of potential evidence.

If a student discloses an incident of sexual harassment please reassure the student and follow the process in section 11 below.

The DSL/DDSL will follow the guidelines below for child-on-child management as relevant.

For reporting of sexual violence and harassment students can access the College safeguarding HUBs at any time to report in person, they can report via email or text message using the QR code on all safeguarding posters. Anonymous reporting for general action such as campus safety, transport safety etc can be provided through the student voice system. Students can also access anonymous 24/7 support and advice from Togetherall. Students receive workshops on healthy relationships, safeguarding, coercive control, personal safety and consent as part of their wider curriculum offer.

If students are alleged to have been involved in a safeguarding child on child incident: -

- The DSL/DDSL must be contacted immediately
- The DSL/DDSL will review the disclosures provided by the alleged victim and/or perpetrator
- The DSL/DDSL will assess the situation and may involve parents, carers or next of kin and the Police as deemed necessary and in conjunction with the young person's views.
- An internal investigation will take place as necessary and in conjunction with Police and/or social care advice
- The alleged victim and alleged perpetrator will be supported, and arrangements put in place to keep both in education if possible.
- The alleged perpetrator **may** also be suspended as a neutral act pending investigation by the College or police.
- If there is police involvement a CPSA risk assessment will need to take place so that a judgement can be made as to that individual's range of activity within the College, prior to the outcome of any formal investigation being known, unless suspension is in place throughout. During suspension the College will aim to continue the young person's education via the VLE.

11. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

The exact procedure will be determined in consultation with the HSCP/SSCP which establishes the locally agreed inter-agency procedures.

The College recognises that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff have professional curiosity and link with the DSL/DDSL if they have any concerns.

If a child, young person or adult at risk tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the child, young person or adult at risk but question normally and without pressure, in order to be sure that you understand what they are saying.
- Do not put words into the child, young person or adults at risks mouth.
- Reassure them that by telling you, they have done the right thing.
- Inform the them that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully, using the exact words of the child, young person or adult at risk.

- Make a detailed note of the date, time, place, what they said, did and your questions etc. Questions should only be used to establish an understanding of current level of risk.
- **If the child, young person or adult at risk is at immediate risk of significant harm inform the DSL or a DDSL straight away usually by phone or in person without delay**
- Find out what the child, young person or adult at risk would like to happen, but make them aware that you may have to act against their wishes if you feel they or others are at risk of harm (e.g. they may ask you not to disclose to anyone else)
- Adult learners have the right to make their own choices where they are capable of doing so, with the exception of if their actions may put a child at risk
- Record all information onto the Colleges recording system MyConcern as soon as possible
- Staff must not investigate concerns or allegations themselves

If in doubt, inform Bev Jackson the Designated Safeguarding Lead and or Nicola Butler Safeguarding Manager (contacts as above) or a deputy designated safeguarding lead as outlined in section 2 above. Internal and/or external support can be given. The student can be referred to a Wellbeing and Pastoral Mentor for ongoing support.

The College's 'Sharing Information Policy is also available on MOODLE to be read in conjunction with this policy.

12. Reporting and Dealing with Allegations of Abuse Against Members of Staff

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

12.1 Introduction

In rare instances, staff of education institutions have been found responsible for child abuse and because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. The College recognises that an allegation of child abuse made against a member of staff 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 timely.

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.

12.2 Receiving an Allegation from a Child, Young Person or Staff Member

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines in this document for dealing with disclosure – section 11 above. A member of staff or child raises general concerns about a staff members behaviour or use of language in a potential safeguarding capacity.

The allegation or concern should be reported immediately to Bev Jackson the DSL or Nicola Butler Safeguarding Manager and DDSL.

The DSL/DDSL will:

Obtain written details of the allegation/concern from the person who received or is reporting it, ensuring it is signed and dated. The written details should be countersigned and dated by the DSL or identified DDSL.

Record information about times, dates, locations and names of potential witnesses.

12.3 Initial Assessment by DSL or DDSL

The DSL or identified DDSL should make an initial assessment of the allegation, consulting with the Principal, the Designated Governor, the Local Authority Designated Officer (LADO), Multi Agency Safeguarding Hub (MASH) and the Herefordshire Safeguarding Partnership or Shropshire Safeguarding Community Partnership as appropriate.

Where the allegation is considered to be either a potential criminal act or indicates that the child or adult at risk has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Police and LADO.

It is important that the DSL or identified DDSL does not investigate the allegation. The initial assessment made by the DSL should be on the basis of the information they have received. They should only make a decision on whether or not the allegation warrants further investigation.

Where the concern/allegation does not meet threshold, this is classed as a low-level concern. The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the College disciplinary procedures.

The allegation can be shown to be false because the facts alleged could not possibly be true.

12.4 Enquiries and Investigations

Child protection enquiries by social care, the police or the MASH team 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.

The College should consider whether internal enquiries should be held in abeyance while the formal police or social care investigations proceed. This should be discussed with the police or social services to ensure that any action taken by the college does not prejudice their investigations. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, such as, the police, the DSL or identified DDSL should normally be involved in, and contribute to, the inter-agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the child or member of staff about whom the allegation is made. The DSL with the support of the Director of HR would 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 DSL/DDSL shall:
Inform the child/children 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 making the allegation have been informed that the allegation has been made and what the likely process will involve
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- Inform the Chair of Governors and/or the designated governor of the allegation and the investigation

The DSL/DDSL shall keep a written record of the action taken in connection with the allegation.

12.5 Suspension of Staff

Suspension should not be automatic. In respect of staff other than the Principal, suspension can only be carried out by the Principal. In respect of the Principal and Senior Post Holders, suspension can only be carried out by the Chair of Governors (or in their absence, the deputy chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives, for example, paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

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

- Where a child or young person is at risk
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct
- Where necessary for the good and efficient conduct of the investigation

If suspension is being considered, the member of staff should be encouraged to seek advice, for example, from a trade union.

Prior to making the decision to suspend, the Principal (or Chair of Governors) should interview the member of staff. This should occur with the approval of the LADO and/or appropriate agency from the SSCP/HSCP. In particular, if the police are engaged in an investigation the Officer in charge of the case should be consulted.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied. The member of

staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the Principal (or Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, and ideally within one working day.

Where a member of staff is suspended, the Principal (or Chair of Governors) should address the following issues:

- The Chair of Governors should be informed of the suspension.
- The Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal.
- Where the Principal has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the College
- The parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension
- Senior staff who need to know of the reason for the suspension should be informed
- Depending on the nature of the allegation, the Principal should consider with the designated Governor whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity

The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the College disciplinary procedures.

12.6 The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- The disciplinary charge against him/her.
- His/her entitlement to be accompanied or represented by a trade union representative or colleague.
-

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The child or children making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

The Principal (or DSL) should consider what information should be made available to College staff and students.

12.7 Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LADO, HSCP/SSCP in order that other agencies may act upon the information.

In consultation with the DSL and/or the designated Governor, the Principal shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

12.8 Records

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

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the Disclosure and Barring Service (DBS).

12.9 Monitoring Effectiveness

Where an allegation has been made against a member of staff, the designated Governor, together with the DSL 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 whether they should be drawn to the attention of the HSCP/SSCP. Consideration should also be given to the training needs of staff.

13. Recruitment and Selection Procedures

Recruitment and selection procedures will be reviewed on a regular basis in order to ensure that they reflect safer recruitment procedures. HSCP/SSCP Safer Recruitment training is provided to senior and middle management. At least one member of an interview panel will be safer recruitment trained.

Procedures will take account of the following:

- They apply to staff and volunteers who may work with children.
- The post or role should be clearly defined.
- The key selection criteria for the post or role should be identified.
- Vacancies should be advertised widely in order to ensure a diversity of applicants.
- A college application form must be completed, a CV alone is not accepted.
- Require documentary evidence of academic/vocational qualifications.
- Due diligence of shortlisted candidates may involve online searches.
- Obtain professional and character references.
- Verify previous employment history and any gaps.
- DBS regulations are adhered to together with related checks. All employees are required to have a satisfactory DBS in place. This is a condition of employment. However, if appropriate, staff can start work with the College with a risk assessment in place prior to their DBS being received. Authority for an employee to commence work without a DBS in place must be obtained from the Director of Personnel.
- Use a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks)
- Teaching staff working at Ludlow College Sixth Form will be subject to Teacher Prohibition Checks as per legal requirements.

14. Confidentiality and Information Sharing

Any issues regarding children, young people or adults at risk must remain confidential, and information shared only on a need to know basis. If staff are aware of on-going investigations

these must not be discussed with any other member of College staff or any external person other than the authorities dealing with the investigation itself. They should only be discussed with the identified safeguarding staff member, line manager and/or LADO (if relevant).

Guidance is

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mails; mobile phones; social network sites) and should familiarise themselves with advice and professional expectations outlined in the College staff code of conduct.

Please also refer to the College's Information Sharing Policy available on MOODLE.

15 The use of College premises by other Organisations

Where services or activities are provided separately by external individuals, other agencies or companies, appropriate safeguarding arrangements should be in place. These could include a DBS check, supervision and/or risk assessment. Individual's details may also need to be recorded on the College's single record. Employees should seek advice from their line manager before engaging the services of external individuals, groups or organisations.

16. Security

All staff, students and visitors wear identifiable lanyards, and for staff and students photographic ID. College key entrances have swipe access and the main town centre campuses security personnel available for support. All staff have a responsibility for maintaining awareness of buildings, visitors and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of external individuals as necessary. Visitors are expected to sign in and out via reception areas and to display a visitor's badge whilst on college site. All visitors are issued with safeguarding information on arrival. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The college will not accept the behaviour of any individual that threatens college security or leads other to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the college's sites.

17. Reporting to external agencies/organisations

17.1 Agencies

To ensure the safety of its students, staff, Governors and visitors the College will deal with a variety of external agencies including the Police, Social Care and Multi Agency Safeguarding Teams. The College will ensure that all communication and information sharing is necessary and/or essential to safeguard individuals and or groups. The College will consider sharing information on a case-by-case basis. Information will always be shared when relevant to the investigation of, or prevention of, a criminal offence.

17.2 Farriery Registration Council

The College operates its Farriery provision within the requirements of the FRC. One of the agreements made is that the College will inform the FRC when it becomes aware of any safeguarding or child protection issues relevant to one of its farriery students. The College will, however, determine the level of information provided to the FRC dependent on data protection considerations.

Please also refer to the College’s Information Sharing Policy available on Moodle.

18. Telephone Numbers

<u>Name/Department/Organisation</u>	<u>Contact Details</u>
MASH (Multi agency Safeguarding Hub) and Compass	Herefordshire - 01432 260800 www.herefordshire.gov.uk/MASH www.herefordshire.gov.uk/levelsofneeds Shropshire – 0345 678 9021 https://www.safeguardingshropshireschildren.org.uk/professionals-and-volunteers/
Family Assessment and Safeguarding Team	01432 261 628 01905 768 020 (Out of Hours)
Local Authority Designated Officer (LADO)	Hereford - 01432 261708 lado@herefordshire.gcsx.gov.uk Shropshire - 01743 254402
Herefordshire Safeguarding Partnership Shropshire Safeguarding Partnership	01432 260 100 www.herefordshire.gov.uk/hscb 01743 254259 / 254246 http://www.safeguardingshropshireschildren.org.uk/
Herefordshire Council Switchboard Shropshire Council Switchboard	01432 260 000 0345 678 9000

West Mercia Women's Aid	http://westmerciaconsortium.proceduresonline.com/index.htm
E-Safety	<p>Hereford - Initial Contact Team - 0345 6789021 Shropshire - SSCB Development Officer - 01743 254251 West Mercia Police - 0300 333 3000 SITSS - 01743 254230 Child Exploitation Online Protection Centre www.ceop.police.uk Internet Watch Foundation - www.iwf.org.uk</p>
West Mercia Police	<p>Emergency – 999 Switchboard - 0300 333 3000 Non – Emergency - 101</p>
Prevent team, Warwickshire and West Mercia Police	<p>DS Phil Colley 01386 591835 07736 084701 philip.colley@westmercia.pnn.police.uk</p>

<u>Name/Department/Organisation</u>	<u>Contact Details</u>
Shropshire's Safeguarding Partnership Independent Review Unit, Shropshire Council, Mount McKinley, Anchorage Avenue, Shrewsbury Business Park, Shrewsbury, SY2 6FG	<p>Tel: 01743 254259 / 254246 Email: SSCPBusinessUnit@shropshire.gov.uk</p>
Compass - Single point of coordination into Shropshire Children's Services at an Early Help level.	<p>Tel: 0345 678 9021 Emergency Duty Team Tel: 0345 678 9040 (Out of hours)</p> <p>Telford & Wrekin Council Family Connect Tel: 01952 385 385 (Out of hours) Tel: 01952 676 500</p> <p>Family Information Service Tel: 01743 254 400</p>
Public Protection Unit (West Mercia Police)	<p>Tel: 0300 333 3000 Tel: 0845 744 4888</p>
NSPCC	Tel: 0808 800 5000
Adult Protection Investigating Teams Shropshire Council	Tel: 0345 678 9021

Emergency Duty Team (Out of hours)	Tel: 0345 678 9040
Telford & Wrekin Council	Tel: 01952 381280
Emergency Duty Team (Out of hours)	Tel: 01952 676500
Suicide Prevention Care Pathway for Children and Young People in Shropshire	http://westmerciaconsortium.proceduresonline.com/pdfs/shrop_suicide_prevent_care_pathway.pdf
Self-Harm Care Pathway for Children and Young People in Shropshire	http://westmerciaconsortium.proceduresonline.com/pdfs/shrop_self_harm_pol.pdf

Internal Contact Details

Duty Manager (outside office hours, Tuesday/Wednesday only) 07974966201

Designated Safeguarding Lead and Mental Health Lead

Bev Jackson (DSL)
 Head of Student Services
 Hereford Campus
 Ext 666
 01432 365566
 And Oswestry Campus
 01691 688032

Staff with particular responsibility for Safeguarding

- Nicola Butler, Safeguarding Manager and DDSL - 01432 365523 ext.623 or mobile - 7790833601
- Bev Stevenson, Senior Wellbeing and Pastoral Mentor, DDSL – 01432 365472 ext. 272 or mobile 07967 732896
- Lynne Hughes, Senior Wellbeing and Pastoral Mentor, DDSL – 01691 688067 or mobile 07436 263799

Audit responsibility

Debra Baldwin
 Director of Personnel
 01432 365309 Ext 309

19. Staff and Student Training

All College staff and Governors receive safeguarding training at induction. The College staff team then receive differentiated training depending upon their role.

- All staff with direct contact receives targeted training.
- All staff receive regular safeguarding bulletins and updates.

- Reflective learning is supported and trends/topics disseminated in staff bulletins.
- Identified personnel receive specialist training with DSL/DDSL to Level 3 as minimum with renewal every 3 years and a minimum of annual updates.
- Governors receive bespoke training and annual updates.
- All staff receive an annual update for safeguarding.
- All students receive safeguarding information at induction and throughout their academic journey as part of the wider curriculum offer. Mandatory tutorials are delivered for safeguarding, PREVENT, healthy relationships and associated topics.

Staff training is reported through the Quality and Standards Committee.

20. Quality Assurance

HLNSC has developed a clear quality assurance framework seeking assurance of the effectiveness of safeguarding activity and safeguarding practice at the College.

It includes:

- The cross-College Safeguarding Network, reviews operational practice every half term with the College safeguarding specialists DSL/DDSL's and curriculum leaders.
- Regular case management reviews via the Safeguarding Network.
- Partnership representation on HSCP Prevent and Disrupt and DSL forums. Further representation on SSCP Exploitation Panel, SSCP training pool deliverers in post, both area partnerships develop and strengthen current practice.
- An internal audit framework is in place with the Director of HR.
- Termly reporting of Safeguarding practice to Governors via the Governors Safeguarding and Equality and Diversity Committee and Quality and Standards.
- Annual renewal and approval of policies by senior managers and the Governors.
- The annual safeguarding report is presented to Governors with opportunity for professional challenge.
- Safeguarding is included within the annual self-assessment for Student Services and approved by the senior management team.

Recognising signs of abuse

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, for example, via the internet. They may be abused by an adult or adults, or another child or children. Child abuse can have major long-term effects on all aspects of a child's health, development and well-being.

The main forms of maltreatment are:

Physical Abuse

Physical abuse is deliberately causing physical harm to a child. This might involve punching; kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation. Physical harm may also be caused when a parent or carer fabricates the symptoms of illness in a child. In pregnancy an unborn child can be harmed by domestic violence.

Emotional Abuse

Emotional abuse is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. Emotional abuse may include not giving a child opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature inappropriate expectations being imposed on a child, over protection and limitation of exploration and learning, or preventing the child from taking part in normal social interaction. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of children, or it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact including penetrative sex, oral sex, masturbation, kissing, rubbing, or touching outside of clothing, or it may involve non-contact activities such as involving children in watching sexual activities, producing or looking at sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Abusers can be men, women or other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger. It also includes failure to ensure access to education or to look after a child because the carer is

under the influence of alcohol or drugs. In pregnancy neglect may occur as a result of misusing alcohol or drugs.

Possible signs of abuse The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- Frozen watchfulness

Signs of possible sexual abuse

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age. Including sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia.

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

Signs of possible neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

College Polices:

This policy should be understood alongside other College policies related to safeguarding issues

- Equality and Diversity Policy
- Fitness to Study Policy
- Tutorial Policy
- Student Disciplinary Policy
- Behaviour code
- Staff Disciplinary, Grievance and Dismissal Procedures
- Staff Code of Conduct, Values and Behaviours
- Health and Safety Procedures
- Whistleblowing Procedures
- College Charter
- College Facilities – Code of Practice
- Prevent Strategy and action plan
- Prevent Risk Assessment
- Bullying and harassment Policy
- Single Equality Scheme
- Student Handbook
- Employer Handbook
- Student Complaints Policy
- Work Experience Policy
- Work Experience HASP Policy
- Data Protection Policy
- Internet Policy including IT Security Policy
- Accident Reporting Procedures
- Duty Manager Policy
- Fire Safety Policy and Procedures
- Health and Safety Responsibilities
- Personal Emergency Evacuation Policy
- Risk Assessment Procedure
- Recruitment and Selection Policy
- External speakers' policy

All policies are reviewed on a regular basis by the relevant managers and Committees.