

Safeguarding & Child Protection Policy

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The **purpose** of this policy is:

- To provide protection for the children, young people and vulnerable adults that use the services of Central Bedfordshire College, including the children of staff members, students, visitors and volunteers.
- To provide staff, students and volunteers with guidance on procedures they should adopt in the event that they suspect a child, young person or vulnerable adult may be experiencing, or be at risk of, harm.
- To provide guidance on procedures to be adopted to safeguard any person in the College community, irrespective of their age or vulnerability, who is at risk of harm.

The **scope** of this policy is all areas of college activity which have an impact on safeguarding including: Health and Safety, bullying and harassment, child protection, DBS vetting and barring procedures, work placement, trips and visits and contact with other agencies.

A. General Policy Statement

Central Bedfordshire College is committed to the well-being of students and staff and fully recognises the contribution it can make to protect and support its students. The college has a duty to safeguard and promote the welfare of students through the creation and maintenance of a healthy and safe learning environment.

The Principal and Board of Governors recognise their responsibility in ensuring arrangements are in place to safeguard and promote the welfare of all staff and students but especially those of children (under 19) and vulnerable adults (those over 18 with a reduced capacity to give informed consent due to a mental condition, disability or illness). The Governing Body has appointed a designated Governor for Safeguarding, to work with college staff to monitor compliance and promotion of good practice

The college has a range of policies and procedures that cover Safeguarding issues including:

- Admissions
- Drug & Substance Abuse (Student)
- Bullying & Harassment (Student)
- Attendance
- Behaviour (Student)
- Health & Safety
- Codes of Conduct
- Complaints
- Disciplinary (staff)
- Disciplinary & Exclusion (students)
- Induction (Student)
- Managing Allegations
- Single Equality Scheme – including Racial Equality & Equal Opportunities
- Recruitment
- Tutorial
- Staff Induction
- E-Learning

Central Bedfordshire College is committed to protecting the safety of all its students by encouraging self-awareness, providing supports and promoting clear lines of communication with staff.

The college will:

- Maintain a pastoral system where staff and students feel secure and are given opportunities to talk and to be listened to
- Promote and support learner voice as opportunities for students to raise concerns
- Ensure that Child Protection and vulnerable adult concerns are handled sensitively and in line with college procedures
- Include Tutorial and Enrichment activities that promote students awareness of health & safety and well-being issues so they can make fully informed life choices
- Provide learning activities which promote risk awareness as a key concept through which students are aware of their own duties and responsibilities in creating a safe environment for everyone
- Provide appropriate services to promote well-being amongst staff
- Provide clear guidelines to staff on all safeguarding issues and their responsibilities
- Provide training for staff to support the delivery of a comprehensive safeguarding approach
- Seek assurance that work based learning venues are safe for all students and provide information for employers to help them meet their safeguarding responsibilities
- Ensure that every effort is made to establish effective working relationships with parents/carers and staff from other agencies
- Sharing information about concerns with agencies that need to know, involving students and parents appropriately.

In developing the policies and procedures, the College will consult with, and take account of, guidance issued by the Department for Children, Schools and Families (formally the DfES) and other relevant bodies and groups.

The College will refer concerns that a child or young person might be at risk of significant harm to the relevant Social Services Duty Team. The location in which the child resides will determine the team to which the case is referred as Central Bedfordshire College predominantly has students from both Luton and the rest of Bedfordshire. Students also occasionally reside 'out of county'; in these cases, Social Services within other counties may be contacted.

The following definitions from Working Together to Safeguard Children 2006 should assist staff in deciding whether a child is suffering or is likely to suffer significant harm. Where abuse is suspected, the College will make a referral to Children's Social Care.

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 an illness, or deliberately induces illness, in a child.

Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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, causing children to frequently 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 a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

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 and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical harm or danger, failure to ensure adequate supervision, including the use of inadequate care-givers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

B. Designated Staff with Responsibility for Safeguarding & Child Protection

Staff Member with Lead Responsibility

The designated member of staff with lead responsibility for child protection issues is

Sarah Mortimer, Assistant Principal, Community and Academic Learning

This member of staff is a member of the Executive Team. In this policy she is referred to as the Senior Safeguarding Lead (SSL). She has a key duty to take lead responsibility for raising awareness within the staff 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 within the College.

She has received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children's Board (LSCB), and will receive refresher training at least every 2 years.

The Designated Lead member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Social Services

Duty Teams or the Police

- Ensuring that staff receive basic training in safeguarding & child protection issues and are aware of the College child protection procedures
- Maintain proper records of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with the Local Authority and LSCB and other appropriate agencies

The Designated Lead member of staff will report to the Corporation, setting out how the College has discharged its duties, annually. She is responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the Corporation at the earliest opportunity.

Other Designated Staff Members

Designated Governor

The designated governor is responsible for liaising with the Staff Member with Lead Responsibility, over matters regarding child protection, including:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children Boards procedures
- Ensuring that the Corporation considers the College policy on child protection each year
- Ensuring that each year the Corporation 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.
- Including remedying any deficiencies/weaknesses in regard to safeguarding & child protection arrangements

Other designated members of staff with responsibility for safeguarding & child protection issues are the Marcus Cook, Interim Head of Student Services and the Safeguarding Manager, Natasha Ray, Student Services Officer and Designated Safeguarding Officer, and Brantie Blake Student Services Advisor.

These designated staff members:

- Report to the 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 child protection
- Have particular responsibility to be available to listen to children and young people 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 LSCB, and will receive refresher training at least every 2 years.

C. Procedure to follow in the event of a disclosure or concerns being raised with regard to child Protection or Protection of Vulnerable Adults.

The following points give guidance on how to proceed should a member of staff become aware of a safeguarding concern following a disclosure by a learner.

- Remain calm, neutral and non-judgmental.
- Listen carefully to the statements made by the student. Do not attempt to interview or make probing questions.
- Do not promise to keep the information to yourself. Do state however, that the information will be passed only to the designated staff.
- Ask questions only to be clear on the nature of the disclosure and allegations being made. Ask open and non-leading questions. Do not make assumptions or introduce allegations that the learner has not made themselves.
- As soon as possible after the event, write down as far as possible in the learner's own words, what was said and the time, date and location. Also record any other persons present.
- Pass all details as soon as possible to the Designated Safeguarding Officer (DSO) or Safeguarding Manager (SM). If neither is available, then contact the Duty Principal.

On disclosure of the information, the Designated Safeguarding Officer will open up a Child Protection file. This file contains: A Student Details Sheet (Columbus print out), a Chronology Sheet (See Appendix I) and an Incident Report Sheet (See Appendix II).

If the information passed on to the Designated Safeguarding Officer suggests that a student, or other child, is at immediate and significant risk of harm, an Incident Report Sheet will be completed and under the guidance of the Safeguarding Manager, Social Services will be contacted regarding a referral.

The Designated Safeguarding Officer will follow the advice of the Initial Assessment Team – although this will not always result in a referral being accepted by them. If the referral is accepted, the Designated Safeguarding Officer should follow up the call in writing within 48 hours using the appropriate documentation. Copies of all letters will be added to the relevant Child Protection File.

All Child Protection Files will be kept in a secure and lockable filing cabinet

D. Reporting on Allegations of a Student committing Abuse.

Should an allegation of child abuse, or vulnerable adult abuse, be made against a student, the SM must be contacted immediately. The SM will inform Senior Safeguarding Lead (SSL) and they will inform the LSCB; decisions made regarding police involvement and possible suspension or expulsion will follow. Where possible the student involved should not be informed of the allegation, nor action taken to suspend or expel the student until advice has been obtained from the SSL. The only exception is if there is imminent risk of significant harm to the victim should the alleged abuser remain on college premises.

E. Forced Marriage

The tradition of arranged marriages operates successfully within many communities in the college catchment area. There is a clear distinction between an arranged marriage and a forced marriage. In arranged marriages, the families of both spouses take a leading role in setting up the marriage, but the choice whether to accept the arrangement remains with the individuals. In forced marriage at least one party does not consent to the marriage and some element of duress is involved.

Forced marriage is primarily an abuse of women, though up to 15% of victims are male. Disabled young men are particularly at risk to this form of abuse. Forced marriage involves criminal acts such as abduction, physical violence, threatening behaviour and harassment. Sexual intercourse within a forced marriage is rape.

A staff member who suspects that one of their students is at risk of being forced into marriage without their consent, should inform the SM as soon as possible. The SM will liaise with the Forced Marriage Unit following an assessment of the case. If a student at risk of forced marriage leaves the course suddenly, without warning and without further contact, the tutor should inform the SM who will take on the responsibility for seeking to track down the student and informing the authorities if abduction is suspected.

F. Reporting and Dealing with Allegations of Abuse against Members of Staff.

The 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.

Introduction

In rare instances, staff of educational institutions have been found responsible for child abuse. Because of their frequent contact with children, young people and vulnerable adults, staff may have allegations of abuse made against them. The College recognises that an allegation of 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 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.

Receiving an allegation from a child or vulnerable person

A member of staff who receives an allegation about another member of staff, from a child, should follow the guidelines in Part C for dealing with disclosure

The allegation should be reported immediately to the Senior Safeguarding Lead, unless the SSL is the person against whom the allegation is made, in which case the report should be made to the Principal or the Designated Governor. The Senior Safeguarding Lead (or designated person if the allegation is against the SSL) should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Assistant Principal (or designated person).
- Record information about times, dates, locations and names of potential witnesses.

Initial Assessment by The Senior Safeguarding Lead (or designated person)

The SSL (or designated person) should make an initial assessment of the allegation, consulting with the Designated Governor and the Local Safeguarding Children’s Board as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately.

In accordance with the requirements of 'Working Together 2006', the Local Authority has appointed a Local Authority Designated Officer (LADO) to be known as the Allegations Manager to fulfil its statutory responsibilities; all concerns or allegations against staff who work with children are to be reported to the Allegations Manager at the Local Authority.

- The Senior Safeguarding Lead must discuss the allegations or concerns with the Allegations Manager within 1 working day. Managers must not begin any investigation prior to this discussion.

Other potential outcomes are:

- 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.

Enquiries and Investigations

Child protection enquiries by Children's 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.

The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Senior Safeguarding Lead (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Senior Safeguarding Lead (or designated person) 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 Senior Safeguarding Lead (or designated person) 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 Senior Safeguarding Lead(or designated person) shall:

- Inform the Principal the investigation is taking place and what the likely process will involve
- 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 Senior Safeguarding Lead (or designated person) shall keep a written record of the action taken in connection with the allegation.

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 (or his designated person). In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her 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: e.g. 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 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/ Vice Chair of Governors) should interview the member of staff. This should occur with the approval of the appropriate agency; 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 by a friend. 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 or Vice 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 or Vice Chair of Governors) should address the following issues:

- The Chair of Governors should be informed of the suspension in writing.
- the Corporation should receive a report that a member of staff has been suspended pending investigation, the detail given to the Corporation 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, in conjunction with the Senior Safeguarding Lead and the nominated 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 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.

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 at any disciplinary hearing, by a companion who should be a representative of a Trade Union or workplace colleague. The companion may not answer questions on the employee's behalf.

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 designated person) should give consideration to what information should be made available to the general population of the College.

Allegations without foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Safeguarding Children's Board in order that other agencies may act upon the information.

In consultation with the designated senior member of staff 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.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's 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 Secretary of State for Education under the "List 99" procedures.

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the nominated 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. Consideration should also be given to the training needs of staff.

G. Recruitment and Selection Procedures

See Recruitment and Selection Policy

H. Bullying and Harassment

See the Bullying and Harassment Policy

I. Responsibilities of College Staff.

The college has a Staff Code of Conduct, which all staff employed by the college must adhere to. Full compliance is essential to ensure the well-being of students and staff. As well as safeguarding students, the Code of Conduct is also intended to protect staff from the potential risk of a safeguarding allegation being made against them.

The following points represent common areas of concern and do not reflect the entirety

of the Code of Conduct:

- All staff will wear a college staff lanyard and ID badge at all times while on college premises or engaged in college business.
- When staff have visitors to the College, they will accompany them at all times
- All Staff will complete the College Safeguarding training
- All staff will follow the reporting process in the event of a safeguarding issue, concern, disclosure and/or allegation occurs
- Staff using social networking sites will avoid contact with students even if they are known to them personally.
- Staff will avoid uploading potentially damaging photographs or personal information onto social network accounts.
- Staff will not contact students using their own personal mobile, email or home telephone. All such communications will be via official college means.
- Staff will not visit students in their own homes.
- Staff will not transport students in their own vehicles

J. Educational visits and Work placements.

See Work Placement Policy

K. Safeguarding 14-16 students

See proposed 14-16 Safeguarding Policy May 2015

L. Visitors and Contractors

All visitors must sign in at reception and will be issued with a visitors badge and lanyard. Contractors are issued with guidance on an annual basis to ensure that they are aware of the college's commitment to safeguarding and their own responsibilities towards safeguarding. If appropriate, supervision or DBS checks for contractors will be arranged. For ease of identification, contractors working unsupervised who may not be DBS checked, will be issued with a red lanyard to distinguish them from other visitors.

See also the DBS Policy

M. Curriculum

The college introduces key elements of safeguarding awareness into the curriculum so that all students can develop an understanding of why and how to keep safe. A culture of value and respect for the individual is created. Key topics include: bullying, cyber bullying, internet safety, abuse, and health and safety. These topics will be presented to students in group tutorials.

N. Safeguarding Information for Students

All students know that we have staff with responsibility for safeguarding and know who they are. Materials used to inform students how to keep safe are found in the student handbook issued to all students in induction, materials on Moodle, and materials issued during tutorials and during induction.

All students will wear a student lanyard and ID badge while in college. Printed on the

back of the ID card are the safeguarding policy statement and contact details for the safeguarding team, including the out-of-hours mobile phone number.

O. Legislation and Guidance

This policy and the procedures therein are driven by the following legislation and guidance, together with any updated or recent replacement legislation or guidance:

Child Protection

- Safeguarding Children and Safer Recruitment in Education, DfES Jan 2007. (Updated 15 October 2012)
- Ofsted Handbook for the inspection of Further Education and skills.
- Children Act 1989
- Working Together to Safeguard Children 2013
- Protection of Children Act 1999
- Education Act 2002
- Safeguarding Children, DfES 2004
- Local Safeguarding Children Board safeguarding procedures.
- Children Act 2004
- Ages of Concern: Learning Lessons from Serious Case Reviews, Ofsted Oct 2011
- Safeguarding Children Across Services 2011
- Munro Review 2011
- UNCRC 1990
- European Convention of Human Rights Acts 1998

Adult Protection

- Safer Practice, Safer Learning, NIACE 2007
- No Secrets: Guidance on developing and implementing multi- agency policies and procedures to protect vulnerable adults from abuse, DoH 2000.
- Safeguarding Vulnerable Groups Act 2006

Appendix I: Child Protection File - Chronology of Significant Events/Concerns

Chronology of Significant Events/Concerns in respect of

(continue on additional sheet if necessary)

Date	Event	Reported by	Action Taken
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APPENDIX II

AT RISK RECORD To be completed by the Senior Safeguarding Lead or nominated person_

Name of Student:		Date:	Female/Male	Tutor name
Home address:				
Telephone no:		Mobile no:		
Name of GP:			GP's 'phone number	
What is the nature of the alleged abuse?				
Where did the alleged abuse take place?				
For how long has the abuse been going on?				
Description of any injuries observed:				
Notes:				
Action taken: (Details of contacts with Social Services/other agencies should include time/date)				