



**Buckinghamshire  
College Group**

# **Safeguarding and Child Protection Policy 2020-21**

Designated Senior Lead:	Kath Dunn, Executive Director Student Support & Services
Link Governor for Safeguarding:	David Bainton
Responsible Officer:	Head of Student Services
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## Contacts

### College contacts

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- Helen Sisk, Head of Student Services, email: [hsisk@buckscollegegroun.ac.uk](mailto:hsisk@buckscollegegroun.ac.uk)
- Nominated Safeguarding Governor: David Bainton
- Chair of Governors: Max Hailey

### Contacts in County

- Education Safeguarding Advisory Service 01296 382 912
- Education Safeguarding Advisor 01296 382 732
- First Response Team 01296 383 962
- Local Authority Designated Officer (LADO): 01296 382 070
- RU Safe? (Barnardos - Child Sexual Exploitation Service) 01494 461 112
- Children's Services, Out of Hours: 0800 999 7677
- Thames Valley Police 101 (999 in case of emergency)
- [Buckinghamshire Safeguarding Children Board](#) (click on web link)  
for procedures, policies and practice guidelines
- [Bucks Family Information Service](#) 0845 688 4944
- [Schools Web](#)  
School bulletin, Safeguarding links, A-Z guide to information and services

### Other contacts

- NSPCC 0800 800 5000
- Childline 0800 11 11
- Kidscape Bullying Helpline 0845 1205 204
- Female Genital Mutilation 0800 028 3550  
email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)
- Samaritans 0845 790 9090
- [CEOP](#) (Child Exploitation and Online Protection) (click on web link)
- Foreign and Commonwealth Office (Forced Marriages Section) 0207 008 0151
- Crimestoppers 0800 555 111

## Introduction

This policy deals with the protection and safeguarding of all children and young people at Buckinghamshire College Group and as such, all members of the College community as described below will have access to this document and the procedures herein:

- Buckinghamshire College Group employees
- All students
- Governors
- Volunteers
- Visitors to Buckinghamshire College Group
- Contractors working at Buckinghamshire College Group
- Any person or persons hiring out areas of Buckinghamshire College Group
- Buckinghamshire College Group Nursery employees
- Life Skills Centre and Future Life Skills Centre employees
- Subcontracted provision

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and in line with the following:

- Keeping Children Safe in Education – statutory guidance for schools and further education colleges Sep 2019;
- Working Together to Safeguard Children 2018;
- Buckinghamshire Multi-Agency Information sharing for Children, Young People & Families – Code of Practice for sharing personal information, August 2017;
- Local Safeguarding Children Board (LSCB) guidance. ([www.bucks-lscb.org.uk](http://www.bucks-lscb.org.uk));
- We will follow procedures set out by the Local Safeguarding Children Board (LSCB) including Early Help and Threshold intervention;
- Children Missing Education; Statutory Guidance for Local Authorities Sept 2016;
- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act 2015;
- Sexual Violence and Sexual Harassment between Children – May 2018;
- Serious Crime Act, Mandatory Reporting of Female Genital Mutilation, January 2020;
- The Equality Act 2010;
- The United Nations Convention on the Rights of the Child (UNCRC);
- We will take account of further guidance issued by the Department for Education and the local authority.

We believe clear governance and leadership is central to imbedding a safeguarding culture. The Governing Body takes seriously its responsibility under section 175 of the Education Act 2011 to safeguard<sup>1</sup> and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements are in place within our College to identify, assess, and support those children who are suffering harm or whose welfare may be in question. Governors will ensure all staff at the College have read and understood their responsibilities pertaining to Part 1, Part 5 and Annex A of Keeping Children Safe in Education Sept 2019 and have an auditable system in place to evidence this. In addition, all staff are required to read and adhere to the Staff Code of Conduct which governs behaviours expected of them as well as having an understanding of the Student Code of Conduct and our Attendance Policy.

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<sup>1</sup> Safeguarding (as defined in the Joint Inspector's Safeguarding report is taken to mean "All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are minimised" and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies"

We recognise all staff<sup>2</sup> and Governors have a full and active part to play in protecting our students from harm and actively promoting their welfare and that the student's welfare is our paramount concern.

All staff believe our College should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual student.

The College recognises that as well as threats to the welfare of students from within their families, students may be vulnerable to abuse or exploitation outside their homes and from other students. Staff will remain vigilant and alert to these potential risks.

We have a designated member of the Senior Leadership Team, the Executive Director, Student Support and Services, who has undertaken appropriate training for the role, as recommended by the Buckinghamshire Safeguarding Children Board (LSCB).

The aims of this policy are:

- To support students' development in ways that will foster security, confidence and resilience, free from discrimination;
- To provide an environment in which students feel safe, secure, valued and respected and feel confident that they know who to approach if they are in difficulties;
- To ensure all teaching and non-teaching staff are aware of the need to safeguard and promote the wellbeing of students, identifying the need for early support to promote well-being and prompt reporting of cases of actual or suspected abuse;
- To provide a systematic means of monitoring students known or thought to be at risk of harm and ensure we, the College, contribute to assessments of need and support plans for those students;
- To acknowledge the need for effective and appropriate communication ensuring staff know how and when to share information to protect students in a way that is legal and ethical;
- To ensure our College has a clear system for communicating concerns and a model for open communication between students, teachers, parents and other adults working with our students;
- To underpin a structured procedure within the College, which will be followed by all members of the College community in cases of suspected abuse and their responsibility for referring any concerns to the Campus Safeguarding and Prevent Officer and/or Head of Student Services and Executive Director Student Support and Services;
- To ensure the College has robust systems in place which accurately records safeguarding and child protection concerns, which are clearly understood by staff and adhered to. Actions taken to address concerns and outcomes achieved are clearly and accurately recorded and these records are appropriately stored;
- To develop effective working relationships, guided by the Threshold document (<https://www.bucksscp.org.uk/wp-content/uploads/Report%20a%20Concern/Thresholds-doc-Sept-2018-new-1st-Response-number.pdf>), with all other agencies involved in safeguarding and promoting the needs of students at our College;
- To ensure that all staff appointed within our College have been through the safer recruitment process and understand the principles of safer working practices as set out in our Staff Code of Conduct, which stipulates their duty to challenge and report where behaviours of colleagues may have stepped outside of agreed safe practices;
- To provide clarity to other community users of our facilities with regard to our expectations of how they should maintain a safe environment which supports students' welfare and development.

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<sup>2</sup> "Staff" covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

## Responsibilities

All staff understand safeguarding children is **everyone's responsibility**. Any member of staff, volunteer or visitor to the College who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred will report it immediately to the Campus Safeguarding and Prevent Officer and in their absence, either the Head of Student Services or the Executive Director Student Support and Services. In the absence of either of the above, concerns should be brought to the attention of the most senior member of staff on site. Staff understand if there is an immediate risk of harm then they should call the Police or First Response directly and update the Designated Safeguarding Lead (DSL) at the earliest opportunity. See flow chart attached (Appendix Two).

- Staff will ensure the student is in a safe place and in receipt of support should this be needed;
- Staff will initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern arising;
- Staff will then follow this up, making a written report using the College referral records;
- All concern forms will be sent to the Campus Safeguarding and Prevent Officer and uploaded to CPOMS;
- Staff will ensure the **time and date** of the incident is recorded;
- A factual account of the incident including **who** was involved, **what** was said/seen/heard, **where** the incident took place, any preceding information which may have prompted the event;
- Staff will sign and date the report giving details of their role within College;
- The DSL will record when the report was passed to them and what action was taken alongside any outcomes achieved on CPOMS.

The Governing Body understands and fulfils its safeguarding responsibilities. It will:

- Ensure the Safeguarding and Child Protection Policy reflects the unique features of the community it serves and the needs of the students attending its provision. This will be reviewed at least annually;
- Monitor and evaluate the effectiveness of the Safeguarding and Child Protection Policy and be satisfied that it is being complied with;
- Appoint a Designated Safeguarding Lead (DSL) and deputy who are senior members of staff within the leadership team with the required level of authority. The roles and responsibilities of the DSL and deputy DSL are made explicit in those post-holders' job descriptions;
- Recognise the importance of the role of the DSL, ensuring s/he has sufficient time, training skills and resources, as necessary to be effective;
- Ensure measures are in place to have oversight of how we deliver on our responsibilities and these are exercised and evidenced, following up with the Principal any identified gaps in practice or where procedures may not have been followed;
- Recognise the contribution the College can make to helping students and young people keep safe, through incorporation of safeguarding within the curriculum and tutorial programme.
- Ensure safe and effective recruitment policies and disciplinary procedures are in place, which adhere to *Keeping Children Safe in Education (KCSiE) (Sept 2019)* and legislation referred to therein.
- Ensure the needs of students for early intervention and Child Protection are fully understood and resources allocated to meet identified needs.
- Support the Head of Student Services to complete an Annual Safeguarding Report for Governors, demonstrating how the College is meeting its statutory responsibilities for safeguarding and promoting the welfare of students, ensuring a copy of this report is shared with the Education Safeguarding Advisory Service within the recommended time frame.

It will be the duty of the Chair of Governors, Max Hailey, to liaise with relevant agencies if any allegations are made against the Principal. If there are concerns that issues are not being progressed in an expedient manner, staff/student/parents should escalate concerns directly to the Local Authority Designated Officer (LADO tel; 01296 382 070).

The Nominated Governor for Safeguarding will be familiar with Buckinghamshire Safeguarding Children Board (BSCB) procedures, Local Authority procedures and guidance issued by the Department for Education.

The Nominated Governor will:

- Work with the DSL (SLT) to produce the Safeguarding and Child Protection Policy.
- Undertake the training available for Nominated Governors.
- Ensure Safeguarding is, as a minimum, an annual agenda item for the Governing Body.
- Meet regularly with the DSL (SLT) to review and monitor the College's delivery on its safeguarding responsibilities.

We have Designated Safeguarding Leads (DSL) at each Campus called Safeguarding and Prevent Officers along with the Head of Student Services and Executive Director Student Support and Services who are responsible for:

- Creating a culture of safeguarding where students are protected from harm. Ensuring students receive the right help at the right time using the Threshold Document (<https://www.bucksscp.org.uk/wp-content/uploads/Report%20a%20Concern/Thresholds-doc-Sept-2018-new-1st-Response-number.pdf>) to inform plans for support or protection (see Appendix One for definitions of the categories of abuse);
- Ensuring referrals to partner agencies are followed up in writing, within 24 hrs of initial contact;
- Establishing and imbedding a policy and process for recording and storing information about child protection concerns and outcomes achieved, enabling records to be reviewed and an overview gained, to support timely interventions and allowing prompt follow up, if it is felt the needs of the student are not being met. This includes use of the Escalation Process found on the BSCB website;
- Ensuring records are up to date and staff are supported to differentiate between fact / opinion / hearsay and are maintained in accordance with data protection;
- Ensuring records are stored safely and securely and remain confidential. The DSL will share information on a 'need to know' basis only. All child protection files are held separately from student records on CPOMS;
- Creating a culture of safeguarding and vigilance within the College, beginning with ensuring all staff receive an appropriate level of induction and training to support them to be professionally curious, to question behaviours and to "think the unthinkable" if they have concerns for a student;
- Acting as a focal point for staff to be able to discuss and share their concerns, supporting staff to formulate their thinking and be part of planning to address issues raised, liaising with other agencies and professionals to achieve change;
- Being available to staff for consultation and advice on safeguarding concerns raised;
- Ensuring arrangements are in place to support staff outside of these times for example Apprentices and Adult Learners;
- Contributing effectively to multi-agency working for the purpose of safeguarding and promoting the welfare of students, participating in Strategy discussions and attending Child Protection Case Conferences, submitting reports to the conference, which will be shared in advance with the parents. Contributing effectively to core group meetings, or other multi-agency planning meetings and contributing to the Framework for Assessments process;
- Providing the Principal with an annual report for the Governing Body, detailing how the College delivers on its safeguarding responsibilities and any child protection issues within

the College. The Governing Body will use this report to fulfil its responsibility to provide the LA with information about their Safeguarding policies and procedures.

- Meeting regularly with the Nominated Governor to share oversight of safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in delivery noted;
- Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role, including attending relevant training;
- Referring to the Police any cases where a criminal offence may have been committed or risk of harm is imminent;
- Retaining overall responsibility for the safeguarding of students although tasks may be delegated to other members of the safeguarding team at the College.

## Procedures

Our College procedures for safeguarding and protecting students from harm are in line with Buckinghamshire County Council and Buckinghamshire Safeguarding Children Board Child Protection Procedures, "Working Together to Safeguard Children 2018" and "Keeping Children Safe in Education" 2019 and statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.

We will ensure:

- We have a designated member of the Senior Leadership Team, Executive Director Student Support and Services who has undertaken appropriate training for the role, as recommended by BSCB. Our Designated Safeguarding Leads (DSL) will be required to update their training in accordance with the Learning Pathway agreed by the LSCB.
- We have a member of staff who will act in the DSL's absence who has also received training for the role of DSL and who will have been briefed in the role. In the absence of an appropriately trained member of staff, the Principal will assume this role.
- All adults (including agency tutors and volunteers) new to our College, are made aware of the College's policy and procedures for safeguarding and child protection, the name and contact details of the Campus DSL, their role and responsibilities under Keeping Children Safe in Education.
- All members of staff are required to attend annual training opportunities arranged or delivered by the Campus DSL, in order to develop their understanding of the signs and indicators of abuse, how to respond to a student who discloses abuse and the procedure to be followed to promote a young person's welfare. Staff are supported to further develop their understanding as mechanisms are in place to enhance this via team meetings, newsletters and email updates.
- All parents/carers are made aware of the College's responsibilities in regard to safeguarding and child protection procedures through this Policy which is available on our website.
- Through our Attendance Policy, we have in place a robust system for monitoring attendance and will act to address absenteeism with parents and students promptly to effect change and identify any safeguarding issues arising.
- All children and young people attending our College are required to have a minimum of two identified emergency contacts This is to support prompt communication in the event of a serious incident or a student missing from College.
- Any Under 18 student absent for ten College days, where it has not been possible to make contact with a parent/carer, will be reported as a Child Missing in Education using the CME Protocol.
- Any absence of two consecutive College days, without satisfactory explanation, of an Under 18 student currently subject to a child protection plan is immediately referred to their social worker.



- Students must inform College if there are any changes to where they will be living. College has a mandatory duty to inform the local authority via the First Response Team, if a child under the age of 16 yrs, lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.
- Our Commercial Bookings Procedure reflects the ongoing responsibility the College has for safeguarding those using the site outside of normal College hours, ensuring the suitability of adults working on College sites at any time. This includes the purpose of the letting when for religious or political reasons.
- The College operates Safe Recruitment practices including ascertaining the suitability of employed staff and volunteers in regulated activities. Checks will be made through the Disclosure and Barring Service.
- We apply the same level of scrutiny to staff employed via an agency, ensuring their identities, qualification and suitability to work safely with students.
- Allegations against members of staff are referred to the Local Authority Designated Officer (LADO). There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. The College recognises that this is a legal duty and a failure to refer when the criteria are met is a criminal offence.
- Our procedures are reviewed and updated annually as a minimum.
- The names of all the DSLs are clearly displayed around the College sites in appropriate locations.

## Prevention

We recognise College plays a significant part in the prevention of harm to our students by providing effective lines of communication with trusted adults, supportive friends and an ethos of protection. We include within this the emotional wellbeing of our students and recognise the role College plays in identifying vulnerability and preventing the political indoctrination of students either by self-radicalisation or through exposure to extremist views.

We are aware of the Prevent Duty to protect young people from radicalisation and extremism. At our College we view this as a safeguarding matter like any other and these processes will be applied to support children and their families where vulnerabilities are identified, invariably this will require us to work with partner agencies to support and protect the vulnerable student.

Concerns regarding the conduct or behaviour of a student, where it is believed they are vulnerable to extremism, will follow the same process of reporting as with any other safeguarding concern. A referral will be made to the First Response Team and passed by them to the Channel coordinator.

All College staff are required to attend training to support them to identify a range of safeguarding and child protection matters, helping them to recognise and respond appropriately should concerns arise, supporting them to act on or escalate concerns.

Whilst a central part of our work with students is to support them to stay safe whilst on-line, we also have in place appropriate web filtering systems so that young people cannot view potentially extreme material, which we also monitor.

We recognise some students, because of their life experiences or additional needs including Special Educational Needs, may be disproportionately affected by the behaviours of their peers or vulnerable to the influence of others. We will work in partnership with colleagues in other agencies to promote the wellbeing of this cohort of students.

The College community will therefore:

- Establish and maintain a safeguarding ethos, which is understood by all staff, enabling students to feel secure. Ensuring all students know there are staff in College whom they can approach if they are worried or in difficulty.
- Receive focused annual training to support learning and understanding of the changing landscape of safeguarding which is underpinned by legislation and includes issues such as FGM, themes of exploitation and management of sexual violence and sexual harassment.
- Understand safeguarding and protection of students has to be viewed within the context of the students' lived experience and the factors around them which may impact on this; friends, family, College and their community.
- Provide, across the curriculum and through tutorials, opportunities which equip students with the skills they need to stay safe from both physical and emotional harm and to know to whom they should turn for help.
- Ensure staff work effectively with partner agencies to seek advice support and guidance, drawing on multi agency expertise, knowledge and experience to support students at risk of harm including emotional and intellectual harm via social media and use of the internet.
- Be sensitive and alert to the possibility of the risk some students' behaviours may pose to their peers. Staff will be supported by the DSL to assess and act on concerns highlighted to ensure College remains a safe place to learn.

## Supporting Students

We recognise the young minds of our students can be vulnerable and may be exploited by others. Therefore staff will be alert to the signs of vulnerability and/or susceptibilities to violent extremism, grooming or indoctrination and report concerns via our safeguarding and child protection procedures.

We recognise that the College may provide the only stability in the lives of young people who have been abused or who are at risk of harm and therefore take our responsibilities seriously.

We accept that research shows that the behaviour of a young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. Research also tells us that young people with special needs are at an increased risk of abuse. Changes in mood, patterns of behaviour, injury and responses to stimulus around them may be wrongly attributable to their disability. Staff are therefore trained to **question behaviours** and be **professionally curious** about changes noted. All staff are required to be prepared to **“think the unthinkable”**, raise the concern and ensure safeguards are in place. We recognise students with communication difficulties may be especially vulnerable and for this reason we link behaviour with safeguarding, **“listening to behaviours”** acknowledging not all students will be able to verbalise what may be troubling them.

Staff understand the need for a culture of vigilance to be present in the College to support safeguarding. This includes awareness and sensitivity to changes in the attitudes of students, which may indicate they are at risk of radicalisation.

Through training, staff are aware that students' behaviours may pose a risk to their peers, behaviours may range from bullying to those which are sexually abusive. When a member of staff becomes aware of this type of behaviour they may, dependent on the severity and the situation, call a Duty Manager who will conduct an initial investigation calling on the expertise of the Safeguarding and Prevent Officer or refer their concern to the Campus Safeguarding and Prevent Officer. In both instances all concerns will be dealt with sensitively, confidentially and in line with College Procedures and Policies.

Our College will support all students by:

- Encouraging the development of self-esteem, resilience and critical thinking in every aspect of College life including through the curriculum and tutorial programme.
- Promote a caring, safe and positive environment within the College.
- Monitor all absences from College and promptly address concerns about irregular attendance with the parent/carer for those under 18.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of young people and using the expertise and resources of colleagues in other services areas to promote the welfare of students.
- Ensuring staff work with Thames Valley Prevent Officers and the Channel Panel to support and safeguard if a student is thought to be vulnerable to or espousing radical political ideologies.
- Developing a good working knowledge of the Threshold Document and how it can be used to safeguard and promote the wellbeing of students, informing the notification to Social Care (First Response) as soon as there is a significant concern.
- Ensuring that a named teacher is designated for Children Looked After and that an up to date list of young people who are subject to a Care Order or are accommodated by the County Council is regularly reviewed and updated. We will work with the Virtual Schools Team to support the educational attainment for Children Looked After at our College.
- Staff are sensitive to the needs of students who are “looked after”, recognising they are likely to have encountered difficulties and challenges which may mean they are disproportionately affected by the behaviours of their peers, e.g., teasing, bullying or when negotiating relationships.
- Seeking appropriate advice, support and guidance to enable us to critically evaluate safeguarding information and concerns, and to act on them appropriately.

At our College we work hard to understand the impact on young people of living in families experiencing difficulties relating to mental ill-health and/or substance misuse and/or domestic violence and know that the students might experience abuse or neglect as a result of these difficulties.

Students are encouraged to seek help and support and are provided with information about how to access this, if they are encountering problems at home or elsewhere.

Whilst we strive to work together with families, staff understand that sharing information with parents may not always be appropriate and ensure that decisions of this nature are made in partnership with Children’s Social Care or the Police.

## **Confidentiality**

We recognise that all matters relating to child protection are confidential.

The Safeguarding and Prevent Officers will disclose personal information about a student to other members of staff on a need to know basis only. This will be governed by BSCB Information Sharing Protocols.

All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

Staff will not keep duplicate records of child protection concerns. All information will be reported to the Designated Safeguarding Leads and securely stored on CPOMS, separate from the student’s records.

Provision is in place for the information to be accessed, in the absence of the DSL, in an emergency.

All staff are aware they cannot promise a student to keep secrets which might compromise their safety or well-being or that of another. Staff will, however, reassure the student that information will only be shared with those people who will be able to help them and therefore need to know.

We will always undertake to share our intention to refer a young person to Social Care (First Response) with their parents/carers, unless to do so could put them at greater risk of harm or impede a criminal investigation.

In the event of a student disclosing abuse staff will;

- Listen to the student. Allowing them to tell what has happened in their own way, and at their own pace. Staff will not interrupt a student who is freely recalling significant events.
- Remain calm. Be reassuring and supportive but will endeavour to not respond emotionally.
- Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the student may have said. Staff are trained to use TED; Tell, Explain, Describe.
- Make an accurate record of what they have seen/heard using the College's referral form, recording; times, dates or locations mentioned, using as many words and expressions used by the student as possible, any words which are unclear to the staff member will be spelt phonetically.
- Reassure the student that they did the right thing in telling someone; they will reassure the student that they have not done anything wrong.
- Staff will explain to the student what will happen next and the need for the information to be shared with the Campus Safeguarding and Prevent Officer.
- In the unlikely event the Campus Safeguarding and Prevent Officer, Head of Student Services and Executive Director Student Support and Services not being available, staff are aware they must ring First Response for advice with support from the most senior member of staff on campus.

**If there is immediate risk of harm to a student Staff will NOT DELAY, and will ring 999**

- The student will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.

### **Supporting Staff**

We recognise that staff working in the College who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the Campus Safeguarding and Prevent Officer, receive supervision and to seek further support if necessary from HR.

Our Code of Conduct forms part of staff induction which details advice on the boundaries of appropriate behaviour in order to define and underpin the safe working practices adhered to within our College.

All staff are required to sign that they have read, understood and agree to comply with the agreed standards of practice set out in the staff Code of Conduct.

We recognise that our DSL(s) should have access to support as above and appropriate workshops, courses or Forums as organised by the County Council.

### **Allegations Against Staff**

All College staff should take care not to place themselves in a vulnerable position with a student.

We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Executive Director Student Support Services or the Executive Director Human Resources or the most senior member of staff available at the campus if neither are available.

The notified member of staff above on all occasions should immediately notify the Executive Director Student Support Services and Executive Director Human Resources who will contact the Local Authority Designated Officer (LADO). The purpose of an initial discussion is for the LADO and the Executive Director to consider the nature, content and context of the allegation and agree a course of action.

The Executive Director will;

- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member or volunteer against whom the allegation is made, as well as supporting other staff and volunteers within the workplace
- Follow all advice given by the LADO relating to supporting the student making the allegation, as well as other students and young people connected to the College
- Ensure feedback is provided to the LADO about the outcome of any internal investigations within the College

If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO as above without notifying the Principal first.

### **Transfer of Risk**

Should an individual staff member or volunteer be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must inform the Executive Director Human Resources. In these circumstances, the College will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with students or vulnerable people.

### **Whistleblowing**

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so. For this reason, we have a separate Whistleblowing Policy which can be found on the intranet and website. Staff are required to familiarise themselves with this document during their induction period.

All staff are aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the designated 'Whistleblowing' Governor or the Local Authority Designated Officer (LADO).

## **Physical Intervention / Positive Handling**

Our policy on physical intervention / positive handling by staff is set out separately, as part of our Behaviour Policy. It complies with the Department for Education Guidance, 'The Use of Reasonable Force, Advice for Headteachers, Staff and Governing Bodies' July 2013. This policy states that staff may only use 'reasonable force', meaning no more force than is needed, to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Authorised staff can use such force as is reasonable in the circumstances to conduct a search for the following 'prohibited items'; knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

If the use of force is necessary, reasonable adjustments for disabled students and students with special educational needs will be made.

Any use of force or restraint will be recorded and signed by a witness. The parent/carer will be informed of the incident.

Staff who are likely to need to use physical intervention must be appropriately trained.

We understand that physical intervention of a nature which causes injury or unnecessary distress to a child or young person may be considered under child protection or disciplinary procedures.

## **Anti-Bullying**

At our College, we have an agreed definition of bullying which is "*Bully is a person who habitually seeks to harm or intimidate those whom they perceive as vulnerable*", students, staff, parents and carers are supported to understand this definition.

We have an Anti-Bullying Policy and measures in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

This policy is available to all staff, parents and carers and students.

Staff, students and parents are made aware of how mobile technologies are increasingly being used to bully young people both in and outside of the College environment. Cyber bullying is therefore referenced within our E-Safety Policy.

## **Racist Incidents**

Our Equalities, Diversity and Inclusion Policy references how racist incidents will be dealt with and acknowledges the serious nature of these events and their impact on the individual/group of students involved including those who may witness the incident. All incidents will be taken seriously and consideration will be given as to whether a multi-agency approach using child protection procedures is required.

## **Health and Safety – Under 16 Students**

Under 16 pupils who leave the site during the College day do so only with the written permission of their parent/carer. In the event of a student going missing during the course of the College day we will carry out immediate checks to ensure the student is not on site, staff will then make contact with the student's parents/carers and if necessary inform the Police.

## E-Safety

All staff are aware of the College policy on E-Safety which sets out our expectations relating to:

- Creating a safer online learning environment
- Giving everyone the skills, knowledge and understanding to help students and young vulnerable people stay safe on line, question the information they are accessing and support the development of critical thinking
- Inspiring safe and responsible use and behaviour of mobile technologies, to combat behaviours on line which may make students vulnerable including sexting
- Use of camera equipment, including camera phones
- What steps to take if there are concerns and where to go for help
- Staff use of social media as set out in the Social Media Policy.

Cyber-bullying, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sexting and image exchange under threat or use of coercion.

Students, staff and parents are supported to understand the risks posed by the **CONTENT** accessed by students – their **CONDUCT** on line – and who they have **CONTACT** with in the digital world.

### Sexting

‘Sexting’, also referred to as ‘youth produced sexual imagery’, is one of a number of ‘risk-taking’ behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with ‘online’ activity can never be completely eliminated.

Staff, students and parents are supported via training to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes imagery of pupils themselves if they are under the age of 18.

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our College. We will also use the guidelines for responding to incidents, as set out in the publication ‘Sexting in Schools and Colleges’ produced by the UK Council for Child Internet Safety. This requires us to share reports of sexting with the Police.

### Cultural Issues

As a College we are aware of the cultural diversity of the community around us and seek to work sensitively to address the unique culture of our students and their families as they relate to safeguarding and child protection.

As a staff team we are aware of the harm to children and young people that can be caused by practices linked to culture, faith and beliefs. We promote awareness through training and access to resources.

Staff will report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

We support students, via targeted sessions and delivery through our curriculum, to understand that some aspects of cultural or religious practice and beliefs could cause harm and they should turn to someone they trust or an organisation such as ChildLine for help and support.

At our College we are aware of a range of practices and belief which can be classified as honour based violence, we include within this female genital mutilation, forced marriage and breast

ironing. Whilst this may be a part of a long held tradition within communities we categorise this as child abuse and will act according to our safeguarding and child protection processes to safeguard the student concerned.

Staff at our College understand there is a legal duty to report known cases of FGM to the Police and they will do this with the support of the Campus Safeguarding and Prevent Officer.

The College is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of child abuse, and a breach of children's rights. We recognise some students due to capacity or additional learning needs may not be able to give an informed consent and this will be dealt with under our safeguarding and child protection processes.

We recognise that both male and female students may be subject to honour based abuse e.g. where young people's cultural background are at odds with their behaviours such as homosexuality, under-age sex, relationships or life style choices.

We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff, any suspicions or concerns for forced marriage are reported to the Campus Safeguarding and Prevent Officer and the Forced Marriage Bureau as well as First Response.

Staff understand that whilst we try always to work in partnership with families, sharing information with a parent or member of the family is not appropriate in some instances where there may be cultural differences of opinion on abuse. Staff will report concerns to the Safeguarding and Prevent Officers who will liaise with First Response, the Police or the Forced Marriage Unit and follow advice given regarding protective strategies to safeguard the student.

### **Retention of Records**

When a disclosure of abuse, or an allegation against a member of staff or volunteer, has been made, our College will have a record of this. These records will be maintained in a way that is confidential and secure, in accordance with our Record Keeping Policy and Data Protection Legislation.

There is a statutory requirement for our College to pass any safeguarding and child protection records to the student's next educational establishment. We are required to have an auditable system in place to evidence we have done so. Any transfer of records will be carried out within the bounds of confidentiality. We are also required to retain a copy of any child protection records we generate until the student reaches the age of 25 yrs. These records will be stored securely.

If an allegation is made against a member of staff, a comprehensive, confidential summary of the allegation will be kept on their personnel file. This record will be kept by the College until normal retirement age of the staff member involved, or 10 years after the allegation if longer. This record will include a clear outcome, including when cases have been investigated and found to be without substance.

For cases in which an allegation has been proven to be false, unsubstantiated or malicious, the allegation will not be included in employer references, even if that person has been the subject of repeated allegations.

In the instance of repeated allegations however our College retains the right in the interest of safeguarding students to retain a record of concern<sup>3</sup>.

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<sup>3</sup> Safeguarding Children: dealing with low-level concerns about adults – Farrer & Co Adele Eastman and Katie Rigg, May 2017



We have a system for reviewing our archiving of information held and will only retain information for the agreed time span. All information will thereafter be disposed of via confidential waste management.

### **Use of Photography**

We will often use photographs and film to capture achievements and help promote successes within our College. Via our website we like to be able to share these events with parents. We are however mindful of the safety of our students.

As confirmed in the Data Protection Act, our College will ensure written consent is sought from the parent or carer of any student under the age of 18 *before* any photographs are taken. If consent is given, we will make a clear agreement with the parent or carer as to how the image will be used (*for example, in a brochure or website*) and how widely (*as part of a College newsletter for all parents, etc.*) Our agreement with parents and students includes how images will be stored, how long they will be stored for and how they will be disposed of.

Due consideration will be given to the appropriateness of clothing and posture, and details such as a student's name or age will not be shared unless integral to the use of the image (*such as the acceptance of an award*) in particular when additional identifiers are being shared.

We acknowledge the right of parents and students to withhold or withdraw consent at any point in time of the duration the student is at the College.

### **Policy Review**

The Governing Body of our College is responsible for ensuring the annual review of this policy, and for reporting back to the Buckinghamshire County Council. The date the next review is due is on the front cover of this policy.

## **APPENDIX ONE**

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a student or if a student discloses to them.

The following is intended as a reference for College staff and parents/carers if they become concerned that a student is suffering or likely to suffer significant harm.

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

### **Categories of Abuse**

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

#### **Physical Abuse**

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

#### **Emotional Abuse**

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

#### **Sexual Abuse**

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

#### **Neglect**

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: a. provide adequate food, clothing and shelter (including exclusion from

home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Exploitation**

Exploitation is a form of child abuse and may take a number of forms.

### **Child Sexual Exploitation**

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

### **Extremism**

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

### **County Lines**

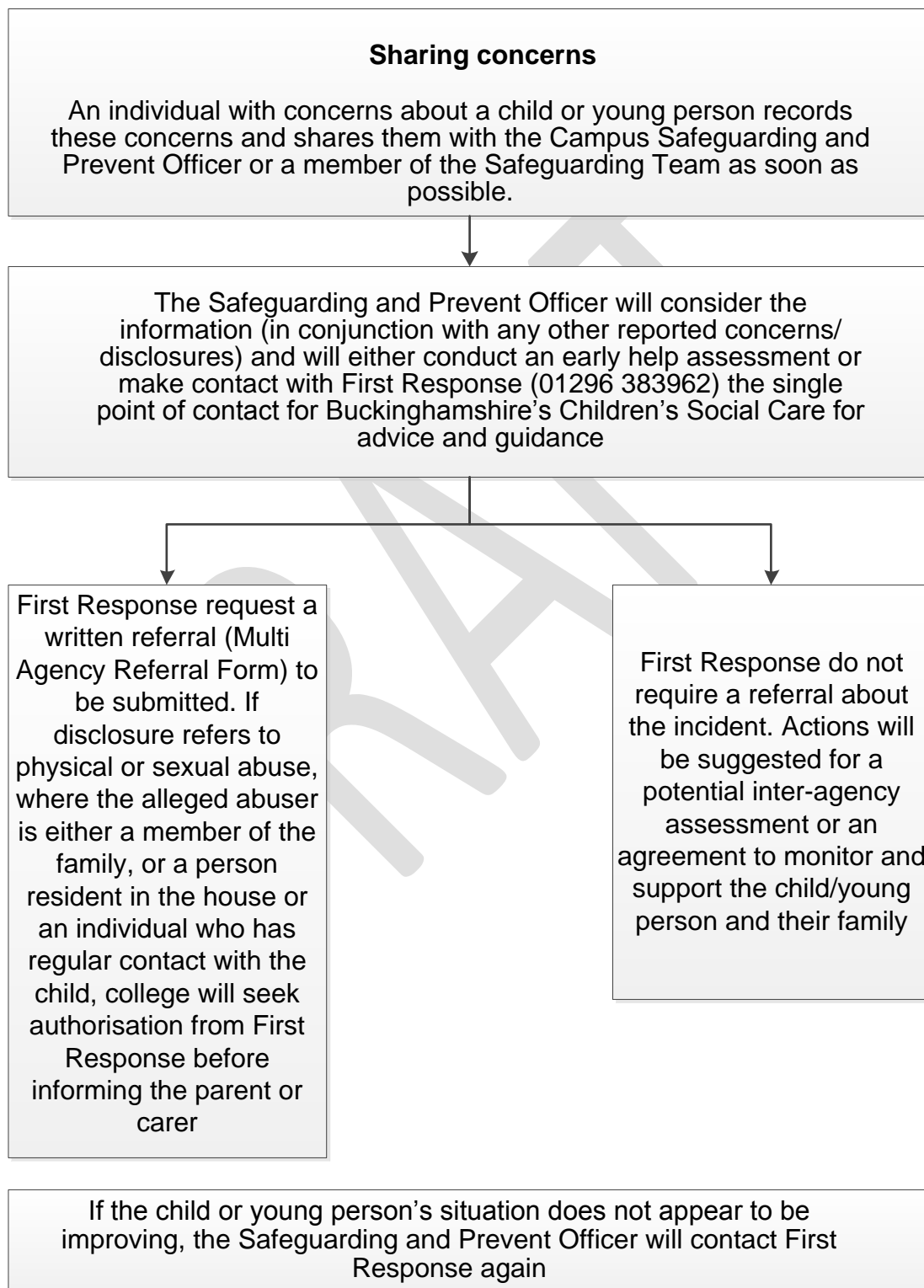
As set out in the Serious Violence Strategy (see link below), published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

### **Child Criminal Exploitation**

As set out in the Serious Violence Strategy

(<https://www.gov.uk/government/publications/serious-violence-strategy>), published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

## APPENDIX TWO



For serious emergencies in the evenings, weekends or public holidays, the Emergency Duty Team can be contacted on 01494 675802. Calls can also be made to the Police using 101 (non-emergency number) or 999 in the case of an emergency.

## Equality Impact Statement

We have a duty to consider the impact of changes on groups with Protected Characteristics (race, disability, age, sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership).

What are the overall aims of the change? Why are you proposing it?	The aim of this policy is to provide a framework to ensure that the guidelines are in place to support all stakeholders
Given the aims of your proposal, what issues does your data/information highlight?	Everybody is included within this policy, and all groups are given equality in regards to their needs and provisions
How could the proposed change affect positively/negatively on groups with protected characteristics?	This has a positive impact on all groups with protected characteristics, as they are ensured equal treatment and provision based on their needs. Risk assessments may be carried out to ensure that this is the case and provisions maybe altered to accommodate specific needs
What actions will you take to mitigate any negative impact?	No negative impact to having this policy
Is there any potential negative impact justified in light of wider benefits of the proposal?	No negative impact to having this policy
Recording final decision	This policy requires Executive and Corporation approval
Has the policy taken into consideration the requirements of GDPR regulations? Are there any actions that need addressing, e.g.; data sharing agreement; has data consent been considered; data retention timescales?	GDPR regulations have been considered and actions comply with data protection requirements.