

KING EDWARD VI COLLEGE

NUNEATON

PROCEDURAL STANDARD FOR

SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY

Strategic Ownership:	Designated Safeguarding Lead
Approved by SLT:	8 October 2020
Date Reviewed by JCC:	14 October 2020
Date Approved by LGB:	17 November 2020
Date Staff Informed:	November 2020
Date Impact Assessed:	This policy has been impact assessed and found to be compliant with the College's E&D statement and with most recent legislation
This Policy is shared on:	College Website
Date of Next Review:	September 2021

POLICY STATEMENT

King Edward VI College believes that a child or young person under the age of 18 should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practise in a way that protects them.

We will seek to keep children and young people safe by:

- Providing a safe learning environment for children and young people.
- Identifying children and young people who are suffering, or likely to suffer, significant physical and /or mental harm.
- Taking appropriate action to see that such children and young people are kept safe, both at home and at the College.
- Being aware that children and young people can be at risk of harm outside their family situation.
- Identifying children and young people who are suffering, or likely to suffer, impairment of their life chances and opportunities to learn and achieve.
- Taking action to ensure that such children and young people have access to all appropriate available support to improve life chances. This may include referrals to Social Services and/or the Police.
- Constituting a Safeguarding team that meets regularly and consists of key professionals in roles related to protecting and promoting the health and well-being of young people at College.
- Teaching our students to understand and manage risk through our tutorial curriculum and through all aspects of College life.
- Teaching students the value of healthy relationships, including sexual relationships.
- Having due regard to prevent young people being drawn into terrorism by regularly reviewing and implementing policies and procedures related to preventing extremism and radicalisation. This includes embedding of British values across the curriculum and in the general College ethos.
- Empowering our students to help keep each other safe.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- Being compliant with its legal responsibility regarding the safe recruitment of staff.

General Policy Statement

King Edward VI College, Nuneaton, has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children and young people attending at the College.

DfE guidance states "Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk".

The College is particularly mindful of its duty to take due regard to prevent young people being drawn into terrorism through radicalisation and extremism. Separate policies and plans are in place to embed the anti-radicalisation (PREVENT) strategies across the College.

1. Introduction

1.1 Throughout this document, reference is made to '*children and young people*'. This term is used to mean '*those under the age of 18*'. The College recognises that some adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults.

1.2 The College is committed to ensuring that the organisation approves and annually reviews key policies and procedures in order to:

- Provide a safe environment for children and young people to learn in.
- Identify children and young people who are suffering, or likely to suffer, significant harm.
- Take appropriate action to see that such children and young people are kept safe, both at home and at the College.
- Identify children and young people who are suffering or likely to suffer impairment of their life chances and opportunities to learn and achieve.
- Take action to ensure that such children and young people have access to all appropriate, available support to improve life chances. This may include referrals to Social Services and/or the police. In the case of Female Genital Mutilation, members of staff have a legal obligation to report evidence of this directly to the police.
- Train staff in recognising and report potential neglect and abuse. All staff should read and be familiar with part one of Keeping Children Safe in Education (April 2014 - updated September 2018).
- Constitute a Safeguarding team that meets regularly and consists of key professionals in roles related to protecting and promoting the health and wellbeing of young people at College.
- Teach our students to understand and manage risk through our tutorial curriculum and through all aspects of College life. Our approach is designed to help students to think about risks they may encounter both in and out of College and online and work with staff to work out how those risks might be overcome. Discussions about risk are empowering

and enabling for all children and promote sensible behaviour rather than fear or anxiety.

- Students are also reminded regularly about e-safety and tackling bullying procedures. As detailed in Part 5 of KCSIE Sept 2018, instances of Peer on Peer abuse in any form – physical, emotional, sexual, cyber – must be referred to the Safeguarding team and is always investigated. The College continually promotes an ethos of mutual respect and students are encouraged to speak to a member of staff in confidence about any concerns.
- Monitor online activity by using an e-safety package that reports to the Safeguarding team.
- Have due regard to prevent young people being drawn into terrorism by regularly reviewing and implementing policies and procedures related to preventing extremism and radicalisation. This will include the embedding of British values across the curriculum and in the general College ethos.
- Empower our students to help keep each other safe. Our welfare ambassadors lead this initiative and are trained in safeguarding procedures.
- Establish procedures for reporting and dealing with allegations of abuse against members of staff.
- Be compliant with its legal responsibility regarding the safe recruitment of staff (**See Safer Recruitment Policy**). In summary all staff involved in regulated activity, including volunteers whether supervised or unsupervised shall be subject to enhanced DBS (Disclosure and Barring Service) checks in line with the DfE guidelines published in 'Keeping Children safe in Education'(- April 2014,updated September 2018). At least one member of any staff recruitment panel will have had Safer Recruitment training through Smart log.
- 'Regulated Activity' is defined as contact with children of a specified nature in a specified setting (e.g. the College or a College organised event/trip). This activity should be frequent, intensive and/or overnight (period condition). N.B 'Frequent' is defined as more than 3 times a day in a 30-day period and 'overnight' is at any time between 2am and 6am with opportunity for face to face contact.

1.3 The College will refer concerns that a child or young person might be **at immediate risk of significant harm** to the appropriate agencies in line with the WSCB and interagency guidance. The investigation of such concerns will be the responsibility of the appropriate external agency.

1.4 In the case of concerns that **life chances will probably be impaired without support services** the College will work in partnership with other relevant agencies to investigate the concern, seek and agree appropriate multi-agency actions to support the young person and provide internal support as appropriate. Where appropriate the College will operate the common assessment framework (CAF) procedures to resolve issues with the young person's family.

1.5 Where **life chances may be impaired without support**, or where needs can be met by internal support mechanisms, the College will endeavour to

access all appropriate support available for the young person through its own support facilities and CAF procedures.

- 1.6 There will be a senior member of the College management team with lead responsibility for child protection issues, known as the Designated Safeguarding Lead (DSL). **See Annexe A for named Safeguarding Officers.** The DSL should help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that all College students experience.
- The Designated Safeguarding Lead (DSL) will be assisted by **other nominated staff** who have received appropriate training and will deputise in the event of the DSL being absent. The responsibilities of these deputies are the same as those of the DSL.
 - It shall be the DSL's or deputy's responsibility to judge the level of intervention required on an individual case by case basis.
 - The DSL will ensure all staff working with children and young people will receive training adequate to familiarise them with safeguarding issues and responsibilities, and College procedures and policies, with refresher training at least every three years (although the College will follow good practice and ensure all staff are regularly updated with new legislation and current issues). The DSL will keep an audit of such training and monitor regularly to ensure all staff are appropriately trained.
 - The College LGB will receive an annual report from the DSL which reviews how the duties have been discharged.
- 1.7 In the operation of these procedures the College will keep information confidential. However, in the interest of children and young people's well-being we will seek the consent of the young person to share information with relevant people/agencies when the DSL believes this will help to support the child.
- 1.8 Notes and Case Conference minutes are held by the DSL in a separate confidential file. A note saying that there is a safeguarding concern is lodged on the College information system (Promonitor) and one of the Designated Persons are named as staff from whom more information can be obtained.
- 1.9 In the case of 'looked after children' and 'previously looked after children'(LAC) the College will appoint a lead person to monitor their welfare. This person will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. In the event of a significant incident involving any of these young people, this lead person will ensure that any significant incidents are appropriately recorded and notified (with copies of recording provided) to the child's allocated social worker in addition to notification directly to the child's carer (whether that is a foster carer or kinship carer). See Annexe A for current lead for LAC.
- 1.10 It is the College's practice to caution staff to be mindful of their professional duties and responsibilities and to avoid contact with students or their

parents via social networking sites, emails, and mobile phone texts. Further details can be found in the staff code of conduct. Where a member of staff is a personal friend of the family of a student, this should be registered with HR to eliminate any potential safeguarding allegations.

- 1.11 It is strongly recommended practice that staff apply the maximum security on social networking sites and never share profiles or personal details with students or parents such as mobile telephone numbers.
- 1.12 All staff and visitors must display their ID badge while on KEC premises so that persons who should not be on site can be easily identified.

2. **Designated Staff with Responsibility for Safeguarding Children**

2.1 Senior Manager with lead responsibility

- The DSL is the Director of Progress & Inclusion.
- This person is a senior member of the College senior leadership team. They have a key duty to take lead responsibility for raising awareness within the staff of effective liaison with the Safeguarding Partners and the MASH Education Lead and other 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.
- They will have received training in Safeguarding children issues and inter-agency working, as required by the DfE guidance. They will keep up to date with developments in safeguarding children issues and will receive refresher training at least every two years.

The DSL is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding children.
- Maintaining a proper record of any safeguarding children referral, complaint, or concern (even where that concern does not lead to a referral to an external agency).
- Ensuring that parents of children and young people within the College are aware of the College's Safeguarding Children and Young People Policy.
- Ensuring there is effective liaison with the local Safeguarding Partners and Multi Agency Support Hub (MASH) and other appropriate local authority agencies in Warwickshire, Leicestershire & Coventry plus any other relevant local authority areas.
- Ensuring there is effective liaison with secondary schools that send their pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Ensuring there is effective liaison with employers and training organisations that receive children or young people from the College on relevant placements to ensure that appropriate safeguards are put in place.

- Ensuring that staff receive an appropriate level of training in safeguarding children issues and are aware of the College child protection procedures.

2.2 Other Designated Staff Members

Designated members of staff with responsibility for safeguarding children issues are listed in the Risk document.

The designated staff members will:

- Lead on child protection issues in the absence of the lead person.
- Know how to make an appropriate referral and make a referral wherever necessary, collaborating with a senior manager if possible.
- Be available to provide advice and support to other staff on issues relating to child protection.
- Have responsibility to be available to listen to children and young people studying at the College.
- Deal with individual cases, conduct assessments, attend case conferences and review meetings (CAFS) as appropriate.
- Have received training in child protection issues, be CAF trained, and undertake refresher training at least every two years.
- Include managers who can review referrals from Progress Coaches, teachers and other staff for students who require support because their chances to learn and achieve are impaired. They will ensure that appropriate support is accessed where it is available, and monitor the students' progress.
- Attend meetings of the Safeguarding Team.

2.3 Link Governor

The College has a link member of the LGB with responsibility for child protection issues whose name is listed in the Risk document.

The link governor will liaise with the DSL over matters regarding child protection, including:

- Ensuring that the College has procedures and policies which are consistent with Child Protection legislation.
- Ensuring that the LGB reviews the College policy on child protection each year.
- Ensuring that each year the LGB is informed of how the College and its staff have complied with the policy.
- Attending meetings of the C College child protection group.
- Ensuring the LGB receive training in Safeguarding and are aware of the College procedures.
- Inspect the single central register of staff at least once per year to ensure compliance with DBS checks.

- 2.4 The Chair of Governors is responsible for overseeing the liaison between appropriate agencies in the case of allegations against the Principal or other members of the Senior Management Team.

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

3. Procedure for Reporting Concerns

- 3.1 Should a child, young person or vulnerable adult tell a member of College staff or cause a member of staff to suspect that someone **may be at immediate risk of harm or abuse** (including radicalisation) the member of staff must:

- Use the six Rs: **Recognise, Reach out, Relate, Reassure, Record, Report.**
- Exercise the principles of Restorative Practice as advised by Education Safeguarding, to build professional connection and relationships with young people who are at risk of harm. Having a professional connection with a young person never precludes a Safeguarding Officer from dealing with safeguarding concerns involving that young person.
- Listen carefully and stay calm.
- Keep questions to the minimum needed to understand or clarify what is being alleged, keeping questions open rather than direct.
- Avoid using leading questions and never give a student words to assist them their explanation. It is important not to interrogate the student as the use of leading questions can cause problems for any subsequent investigation and any legal proceedings.
- Never stop a student who is freely recalling events and they should not be asked to repeat their story to a colleague or asked to write it down.
- Offer reassurance that by sharing information the child or young person has done the right thing and inform them of the need to share what has been said and to take advice on the next steps
- Never agree to keep the disclosure secret.
- Never contact parents/ carers until you have spoken to a designated person.
- Note all relevant information as presented by the young person and/or the situation as soon as practicably possible, recording dates, times, places, names and what was said (**see Appendix 1 for guidelines**).
- **Not investigate the matter themselves but report the concern immediately to the DSL or a designated deputy using the referral form (known as the Green form).**
- **It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

- The DSL (or deputy designated staff member in their absence), will assess the information presented and make a referral, if appropriate, to the relevant external agency.
- It is the DSLs responsibility to judge the level of action required. However, if the staff member feels that an issue has not been adequately dealt with any member of staff may make referral to the local safeguarding board.
 - For a summary of processes, guidance, and key contact information, **see Appendix 1**
 - For definitions of risks and types of abuse, **see Appendix 2**

4. 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 and supply staff. The word 'staff' is used for ease of description.

4.1 Introduction

- In rare instances, staff of education institutions have been found responsible for a breach of trust or abuse against a child. 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 not subject to delay.
- The College issues its **Code of Conduct** to staff, cautioning staff to be mindful of their professional duties and responsibilities when making contact with students via social networking sites, emails and mobile phones. At all times staff should ensure their professional standards are upheld in this type of communication.
- The College recognises 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.

4.2 Receiving an Allegation from a Child or young person:

A member of staff who receives an allegation about another member of staff from a child or young person should follow the guidelines below:

- The allegation should be reported immediately to the Principal except where an allegation involves the Principal, when the report should be made to the Chair of Governors. This must be done using a referral form (known as a yellow form: **See Appendix 1 and Available on the Briefing OneNote under 'safeguarding'**).
- In the event of this arising the email address of the Chair of Governors should be obtained from the Clerk to the Governors.jacqui.twigger@kecnuneaton.ac.uk
- The DSL should make an initial assessment of the need to report the allegations to appropriate external agencies.

4.3 Initial Assessment by the DSL:

- Where the allegation is considered to be either a potential criminal act or indicates that the child has experienced, is experiencing or is likely to experience significant harm, the matter should be reported immediately to the Local Authority Designated Officer (LADO). The appropriate external agency will then be expected to conduct an investigation. The DSL and/or Principal, in consultation with the LADO, will also assess the case for suspension of the member of staff. Should this action seem advisable, the DSL / Principal will consult with the HR Director in order to follow the appropriate College policy relating to staff disciplinary procedures.
- The member of staff should be informed of the allegation within two working days of its communication, but not necessarily immediately. Advice should be sought from the LADO in these cases, but the College should be mindful of its duty towards its employees and may wish to seek its own legal advice.
- In all cases involving an investigation by an external agency, even when the College Staff Disciplinary Procedure has been invoked, the College's internal investigation procedures will be held in abeyance pending advice from the investigating agency to avoid College procedures compromising the initial external investigations.
- Where an allegation is substantiated then the staff disciplinary procedures will be invoked and in all but the most exceptional circumstances will involve the dismissal of the member of staff.
- Suspension during any investigative period may be recommended where a child is at risk of significant harm but the stance should be that only rare cases will require suspension. However suspension should be considered where necessary for the good and efficient conduct of the investigation.
- Suspension of the member of staff should not be the default option. An individual should only be suspended if there is no reasonable alternative and after advice is sought from the personnel department.
- The reasons and justification for suspension should be recorded providing a named contact at the College and the individual notified of the reasons in writing.

- It is the C College's decision whether or not to suspend an individual, but recommendations from outside agencies may be taken into account.

4.4 If the allegation is unproven

- Allegations that have been found to be unproven should be removed from the personnel records. False, malicious, or unsubstantiated allegations should never appear in a future reference.
- Students that have been found to make false or malicious allegations may have breached the C College's behaviour policies and sanctions may be applied.
- There may be referral to the police if there are grounds for believing a criminal offence may have been committed by a student or other person making a malicious allegation.

N.B. It is helpful to consider 'unproven' allegations as false, unsubstantiated, or malicious. The C College's response will take this into account when considering the level of action to take in these circumstances.

4.5 Where the allegation is NOT considered to warrant an immediate report to the LADO or appropriate agencies, an internal investigation under the College Complaints Procedure should be undertaken. Several outcomes from this investigation are possible:

- The investigation concludes that although it is neither potentially a crime nor a cause of significant harm to the child, the allegation represents inappropriate behaviour or poor practice by the member of staff. The matter should then be addressed in accordance with the College Staff Disciplinary procedures.
- The investigation concludes that the allegation can be shown to be unproven. In these cases, when the allegation has been made by a student, the College Student Discipline procedures may be invoked. It may be helpful to look at the level of action to be taken given the following definitions of "unproven" - malicious (clear evidence to prove a deliberate act to deceive and the allegation is clearly false, sufficient evidence to disprove the allegation), unsubstantiated (insufficient evidence to prove or disprove the allegation).

The senior member of staff should take all or some of the following actions:

- Inform the member of staff against whom the allegation is made, orally and in writing, that no further disciplinary action will be taken.
- Consideration should be given to offering counselling/support to the member of staff.
- Inform the parents/carers of the alleged victim of the outcome of the investigation. Keep a record of the allegation and, since false

allegations may be indicative of problems of abuse elsewhere, consideration should be given to a referral to the Safeguarding Partners in order that other agencies may act upon the information.

- 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.

The DfE's 'Keeping Children Safe in Education' statutory guidance indicates that investigation outcomes should use the following definitions:

1. **Substantiated** – there is sufficient evidence to prove the allegation
2. **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
3. **False** – there is sufficient evidence to disprove the allegation
4. **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
5. **Unfounded** – to reflect cases where there is no evidence or proper basis which supports the allegation being made

Cases in which an allegation is proven to be false, unsubstantiated, or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious should also not be included in any reference.

4.6 External Enquiries and Investigations

- Child protection enquiries by Social Service 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.
- Where appropriate the College shall hold in abeyance its own internal enquiries for a reasonable period to allow initial formal Police or Social Service investigations to proceed to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing complaints and staff disciplinary procedures.
- If there is an investigation by an external agency, for example the Police, the DSL 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 with the agency's enquiries.
- The DSL and Principal 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. Subject to

objections from the police or other investigating agency, the DSL 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 of the allegation and the investigation.
- Keep a written record of the action taken in connection with the allegation.

4.7 Monitoring Effectiveness

- Where an allegation has been made against a member of staff, the DSL, together with Principal and other colleagues as appropriate 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.

4.8 Whistleblowing Procedure

The College has a Whistleblowing Policy and Procedure. The aim of this policy and procedure is to provide employees and workers (referred to as 'workers' in the policy) with a means for raising genuine concerns of suspected bribery, breaches of the law and other serious wrongdoings. The policy is also designed to cover concerns that staff have about the conduct of individuals in a position of trust within the organisation which could be detrimental to the safety or wellbeing of young people and where staff, for whatever reason, feel unable to raise them under the organisation's standard safeguarding procedures.

5. Recruitment and Selection Procedures

- 5.1 The College, through the Personnel Manager, will regularly review its recruitment and selection procedures to ensure that all are compliant with current legislation related to Safe recruitment.
- 5.2 The College will ensure all staff undertaking recruitment activities are properly trained in safe recruitment best practice.
- 5.3 The College will publish, operate and regularly review a Safe Recruitment Policy.
- 5.4 All recruitment advertisements and job descriptions should include information that keeping young people safe is all staff's responsibility.

- 5.5 At least 2 members of staff must sit on any interview panel of which one will be a manager trained in safer recruitment practices.
- 5.6 In the case of all recruitment processes related to external appointments, the interview process should establish the applicants are aware of their duty to safeguard young people.
- 5.6 All new staff will be supplied with copies of key safeguarding documents and agree to comply with the contents before commencing employment.
- 5.7 It is a recommendation in the DfE's 'Keeping Children Safe in Education' that institutions should contact the Teaching Regulation Agency (TRA) Teacher Services to check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction of the Education and Skills Act 2008.
- 5.8 Behaviours that render a candidate unsuitable to be working with children must be considered, e.g. domestic abuse.
- 5.9 Where applicants for initial teacher training are salaried by the College, the College must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) will be obtained. Where trainee teachers are fee-funded, it is the responsibility of the Trainee's organisation to carry out the necessary checks. The College will obtain written confirmation from the provider that it has carried out all pre-appointment checks that the College would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children. There is no requirement for the C College to record details of fee-funded trainees on the Single Central Record (SCR).

6. Record Keeping

- 6.1 In relation to student Child Protection records the designated lead person shall retain a secure file in a locked draw. The secure file will contain the following until DOB + 25 years:
- Referral forms.
 - Any notes, memoranda or correspondence dealing with the matter.
 - Any other relevant material.
 - A timeline.
- 6.2 Copies of Information should be sent under separate cover to new school/ Colleges if transferred whilst the child is still under 18.
- 6.3 Copies of reports, notes etc. relating to proven allegations against staff should be kept securely locked at all times under the care of the DSL,

and kept until the persons normal retirement age or for a period of ten years if that is longer.

6.3 Referral forms may be sent electronically to the DSL but should be deleted by the referring member staff once sent. The referral form should be saved by the DSL in a confidential secure area only accessed by the DSL and deputies. A paper copy should also be kept by the DSL as above.

6.4 In the keeping of written records, the College will also ensure compliance with the provisions of the Data Protection Act 2018, implementing General Data Protection Regulation (GDPR), whilst maintaining the principle that in relation to safeguarding, GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe.

7. Site Security

All students and staff should be able to feel safe when they are on the campus. All staff and students will wear their ID at all times and will not be allowed to enter a site without it. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be admitted to a site unless they are accompanied by a member of staff. *Please refer to the Visitors Procedure for more detail.*

8. Supporting Staff

We recognise that child protection is a difficult and sometimes upsetting subject for those who work with students. Working with a student who has suffered harm or is at risk of harm may be stressful and distressing. We are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the Designated Person for the College or another member of the safeguarding team and to seek further support as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice such concerns will be addressed sensitively and effectively in accordance with agreed whistleblowing procedures. When a staff member reports a potential safeguarding issue using a green form, feedback summarising the actions undertaken will be given by the DSL to that staff member.

9. Confidentiality

Confidentiality is an issue which needs to be fully understood by all those working with students, particularly in the context of safeguarding and the protection of children and adults at Risk. We respect the right of students and families to have information about them dealt with sensitively and confidentially in line with statute and guidance.

Child Protection information regarding students in our College will be shared with staff on a strictly need to know basis. A member of staff will 'need to know' information when it is demonstrably to benefit the student.

All staff are expected to conform to the C College's standards of good professional practice and maintain confidentiality appropriately at all times. All staff must be aware of their responsibility to share information with the appropriate Designated Person and with other agencies in order to protect and safeguard students. This must be done in accordance with the C College's Safeguarding and Child Protection Policy. Advice will be sought by the appropriate Designated Person on this issue and where necessary from the appropriate local authority.

No one in the College may guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information. Where a student has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the student. No one in the College may guarantee to a student that they will keep a secret or confidence and must always make it clear to student in language that is appropriate, that any information which leads a member of staff to be concerned that a student is suffering or is at risk of suffering harm will be shared with the appropriate Designated Person in order to take measures to safeguard the student at risk. Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a student.

10. Hospitalisation

If a student age 16-18 is taken to hospital, the member of staff must make direct contact with their parent/relative/carer to make them aware of the situation. As a general rule the member of staff is not required to accompany the student in the ambulance, where parent/relative has been made aware of the situation. The exception here is when the student is on a trip and the parent / carer is not able to get to the hospital. In all cases, the appropriate Designated Person or in their absence a deputy should be made aware as soon possible of the situation.

11. Remote / Online delivery of lessons and meetings

This section is an extract from Annexe detailing Safeguarding students during the Coronavirus pandemic.

The College will take account of guidance from DfE in relation to the planning and delivery of online learning when it is issued as well as nationally recognised guidance including guidance from the UK Safer Internet Centre on safe remote learning and London Grid for Learning on the use of videos and livestreaming.

Staff will always use College/service owned technology and accounts for the delivery of remote lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used. College leaders will randomly sample recorded lessons in order to safeguard pupils/students and staff and to ensure that policies are being followed.

If staff need to deliver lessons/tutorials on a one-to-one basis or communicate with vulnerable students who are not attending College via video chat, they will contact parents/carers before sessions commence to inform of start and finish times, using Weduc, email or phone.

It is important that all staff who interact with students, including online, continue to look out for signs that a student may be at risk, distressed for some reason or vulnerable in some other way and report and record that following normal safeguarding procedures. All such concerns must be brought to the attention of a DSL and dealt with by a DSL as per the main policy in the normal way.

The College will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Below are other issues that staff need to consider when delivering virtual lessons, especially where webcams are involved:

- Staff and students must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in staff bedrooms, and the background should be blurred. Students may have to use a bedroom and so should blur backgrounds.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the College's ICT manager/co-ordinator for communication with pupils/students.
- Staff should record the length, time, date, and attendance of any sessions held.

APPENDIX 1

1. **Summary guidelines for all staff**, in the event that a child or young person tells a member of staff about something that gives rise to serious concern, immediate risk or possible abuse.

Member of staff should:

- Listen carefully and stay calm.
- Keep questions to the minimum and ensure they are open, not direct.
- Avoid using leading questions and never give a student words to assist them their explanation.
- never stop a student who is freely recalling events or make additional demands on them for repeating or recording information.
- Offer reassurance and inform them of the need to share.
- Never inform parents until you have consulted with a designated person.
- Never agree to keep a disclosure secret.
- Note all relevant information as soon as practically possible, recording dates, times, places, names and what was said.

1.1 Staff should not investigate concerns or allegations themselves but should report them immediately to a designated person and fill in the College's child protection concern form if asked to do so. Copies of this form are available on The Hub and on the Briefing One Note under 'Safeguarding' along with guidelines for completion.

1.2 The Designated Safeguarding Lead (DSL) is **Sujata Smith, Director of Progress & Inclusion.**

1.3 In the absence of the DSL, the report should be made to the designated deputy(s).

Gayle Page
Kate Tomkinson
Sharon Berrill
Tim Rogers

1.4 If none of the designated members of staff or senior managers can be contacted within 2 hours of the initial concern being made known, and the child in question is in the opinion of the member of staff in immediate danger of harm the person making the report must refer the matter without delay to Warwickshire / Leicestershire / Coventry Multi Agency Support Hub (MASH), depending on the home address of the student, using the contact details in 2.1 below. The person making the report must also notify the DSL or alternative designate as soon as possible about the action taken, and in any event within 24 hours of the initial concern arising.

- 1.5 If a member of staff feels that the action taken by the designated person is insufficient to protect the child from harm then they should make a referral to the local Safeguarding Partners or the NSPCC.

2. Summary guidelines for referral in cases requiring emergency action

- 2.1 Contacting Safeguarding Partners should be done using one of the following numbers making it clear that it is a Child Protection Referral.

Warwickshire:	01926 414144
Hinckley & Bosworth:	0116 305 0005
Leicestershire:	0116 454 1004
Coventry:	02476 78 8555

The Multi Agency Contact form (MAC) should be forwarded to the relevant children's team as directed.

The MASH Education Lead can be contacted if you are unsure or in need of advice. Use the DSL Infoline 01926 418608

NSPCC Helpline:	0808 800 5000
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- 2.2 The Designated or Deputy Safeguarding Lead should discuss with the Safeguarding Partners what action will be taken to inform the parents of the student if appropriate and a note of that conversation should be made.
- 2.3 The DSL and deputies must have regard to the DfE guidelines at all times and ensure all staff are familiar with these via the document 'Keeping Children and Young People Safe in Education' (updated each year).

APPENDIX 2

1. Definitions of abuse

Abuse is likely to consist any of the following:

1.1 Physical Abuse

Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

All staff should be aware of the issue of female genital mutilation and recognise that this is a serious criminal offence. Any staff suspicious that this may have been perpetrated on any young woman in our College or to anyone connected with them should disclose concerns to a designated person immediately.

Section 5B (6) of the Female Genital Mutilation Act 2003 states teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

The College is also very mindful of the growing issue of young people self-harming. Referrals should be made through the normal safeguarding procedures and designated staff will take action to support the child and where appropriate the parents / carers of that child subject to the normal caveats of information sharing.

1.2 Neglect

Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs. It will result in serious impairment of the child's health or development.

1.3 Sexual Abuse and Exploitation

Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the apparent consent of the child is irrelevant.

More specifically staff should be able to recognise the signs of sexual exploitation and report any suspicions to a designated person.

'Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them sexual activities. Child sexual exploitation can occur through the use of

technology without the child's immediate recognition for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social /economic and/or emotional vulnerability.' Sexual exploitation may be organised or opportunistic. It may take place when a student is groomed using technology or is encouraged to think that they are entering into a relationship. It may be linked to gang membership. Boys as well as girls are sexually exploited. Young people are vulnerable to sexual exploitation in many ways and the vigilance of staff is key in identifying possible signs or indicators. The Rochdale Serious Case Review into the sexual exploitation of a group of young people highlighted the importance of FE Groups in identifying and meeting the needs of vulnerable young people who might be at risk of this form of abuse. Staff must be vigilant to any signs or concerns that a student may be sexually exploited, and report concerns as a matter of urgency.

1.4 Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child 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. CCE does not always involve physical contact it can also occur through the use of technology.

1.5 Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

Teenage relationship abuse can be a significant issue and staff should report any such bullying to a lead person.

1.6 E- Safety

Children and young people increasingly use mobile phones, tablets, and computers on a daily basis. Those technologies and the internet are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face

meetings. The College's **e-safety policy** explains how we try to keep pupils safe in College. Cyberbullying and sexting by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites on College networks. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe when using social media.

1.7 Bullying

While bullying between young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti bullying policy. The subject of bullying is addressed at regular intervals in our tutorial curriculum and all students are introduced to the policy at induction.

1.8 Radicalisation

Under the Prevent Duty legislation, Colleges have a duty to put into place policies and procedures to prevent young people and vulnerable adults from being drawn into radicalisation and extremism. Staff have responsibility to familiarise themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College. The College recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The College will continue to empower its students to create communities that are resilient to extremism and protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced. Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology.

Terrorism is an action that endangers or causes serious violence to a person/people causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Any concerns should be treated as a Safeguarding issue and the procedures outlined in this policy should be followed. *Also refer to separate documents – 'The Colleges Approach to Countering Extremism' – on website and staff Moodle area. Please also refer to the Visitors Procedure for dealing with Guest Speakers.*

1.9 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. Some communities use religion and/or culture as a way to coerce a person into marriage.

1.10 The effects of domestic abuse

Children and young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Appendix 3 (Green Form)

Logging a concern about a child's safety and welfare

*** Guidance notes for completion ***

(NB **All** concerns must be recorded but a Designated Safeguarding Lead must be informed **immediately** about **all** disclosures by a child of abuse and **any** situation where a child may be at immediate risk of harm at the end of their school day – this form should then be filled in and passed to the DSL as soon as possible after the DSL has been informed)

Pupil's Name: <i>Name of child this concern is about</i>	Date of Birth:	Year Group:	Form:
Date:		Time (of writing this record):	
Name of person completing this form (please print):			
Job Title:			
Signature:			
Reason(s) for recording the incident/concern (headline): <i>Headline in a few words about nature of the concern, e.g. 'concern about child's physical presentation' 'unpleasant smell' 'child hungry' 'Comment by child to member of staff' 'Comment by child to another child' 'concerns re: child's behaviour' 'child's comments in a lesson/during play' 'interactions between child and parent'</i> <i>'indirect disclosure raising concern about possible physical abuse/sexual abuse/emotional abuse/neglect'</i> <i>'direct disclosure of physical abuse/sexual abuse/emotional abuse/neglect'</i>			
Record the following factually: <u>When</u> (date & time of incident or concern arising)? <u>Where</u> did your concerns arise? <u>Who else</u> - were any other children or staff present? <u>What exactly did you see/hear/smell that raised your concern?</u> N.B. Please record any direct disclosures/statements/comments using the child or adult's exact words in quotation marks. <i>Date, time and where whatever is being recorded was seen or heard</i> <i>Were any other children or staff/other adults present?</i> <i>What exactly was seen, heard, smelt or said that has raised concern?</i> <i>Record direct disclosures/statements/comments using child's or adult's exact words within quotation marks</i> <i>As far as it is possible to identify, if a child or adult is reporting an incident that occurred previously, who was involved and where and when did it take place?</i> <i>Facts for which there is demonstrable evidence should be recorded as such, e.g. the child was crying, the child's clothes smelled of urine, the child said ".....", the child has a bruise on the left cheek of her/his face.</i>			
NB if additional pages are used, these must be attached securely to this form			
Professional opinion: Your professional opinions, impressions and worries are important. Facts should be recorded in the box above but please record your opinions, impressions and worries here and state what has led you to form them (e.g. something you have noticed, feel or suspect). <i>Facts should be recorded in the box above.</i> <i>It is important and reasonable to record professional opinions, impressions and worries that fall short of facts but these must be recorded as such, e.g. "I formed the impression that the child was frightened because....." "In my opinion, the child was not provided with adequate care before coming to school because" "I was concerned that mother had been drinking</i>			

alcohol and should not be driving the children home because I could smell alcohol and her speech was slurred”.

Add any additional information the member of staff/volunteer considers relevant and necessary for DSL to know in order to safeguard child and decide most appropriate response

Action taken, including names of everyone spoken to about the incident/concern:
Clear statement of what the member of staff recording the concern did in response, e.g. reassure child, tell parent they would have to record and report what parents had told them, discuss with any other colleagues, inform DSL.

Name of Designated Safeguarding Lead this form was passed to:

Date and time incident/concern was shared with Designated Safeguarding Lead:

Please check to make sure your report is clear and will be clear to someone else reading it next year

NOW PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD FOR COMPLETION OVERLEAF (NB by end of working day at latest if child is not at immediate risk of harm)

(Following sections to be completed by Designated Safeguarding Lead)

<p>Time & date information received by DSL and from whom</p>	<p><i>Time and date green form received by DSL from member of staff/volunteer recording the concern</i></p>
<p>Any advice sought by DSL (date, time, name, role, organisation & advice given)</p>	<p><i>Details of whoever DSL speaks to after receipt of green form, e.g. parents/carers MASH social worker in locality Children’s Social Care Team Education Safeguarding Manager Police Officer health professional</i></p>
<p>DSL’s analysis of presenting issues/concerns and advice received</p>	<p><i>DSL’s analysis of information presented by member of staff on front of green form in context of previous green forms submitted about the same child and DSL’s knowledge of the child’s circumstances</i> <i>Does information on its own or in combination with other information already known indicate that the child is suffering significant harm? NB refer to Working Together 2015 definitions of abuse ‘Worried about a child?’ poster ‘Signs and Symptoms’ handout WSCB Thresholds for Intervention document.</i></p>
<p>Action taken (referral to or consultation with MASH or local Children’s Services team/ monitoring advice given to appropriate staff/ Early Help etc.) If decision not to refer, state reason.</p> <p>Note time/date/names/ who information shared with and when etc.</p>	<p><i>If information on its own or in combination with other information already known indicates that the child is suffering significant harm, refer to Children’s Social Care via MASH.</i> <i>If there is evidence of physical or sexual abuse and/or child is likely to be at immediate risk of significant harm at the end of her/his school day, telephone MASH on 01926 414144 (Option 1) first to inform them of imminent referral and then submit MAC.</i> <i>Otherwise, submit MAC to MASH.</i> <i>Inform parents unless doing so is likely to increase risk of significant harm.</i> <i>If unsure, seek consultation with MASH (Option 3) or Education Safeguarding Manager.</i></p> <p><i>If no, discuss with parents consider any early help/support that school may be able to offer consider whether referral to single agency (e.g. school counsellor, School Nurse, Educational Psychologist) is appropriate (record all such early help on Pre Early Help Single Assessment Action Plan form) discuss positively with parents/young person whether initiation of an Early Help Single Assessment would be useful in order to ensure child’s needs are properly assessed and understood and to co-</i></p>

	<p>ordinate early help. If unsure what early help would be appropriate, if it is refused or has been offered before and proved ineffective and for possible referrals to a Locality Panel, seek advice from locality Early Help Officer.</p> <p>Monitor and record monitoring arrangements.</p>	
<p>Outcome (include names of individuals/agencies who have given you information regarding outcome of any referral (if made))</p>	<p>Outcome of all of above including names of individuals/agencies who have given you information regarding outcome of any referral (if made)</p>	
<p>Parents informed Yes/no – reasons if no</p>		
<p>Where can additional information regarding child/ incident be found? (e.g. pupil file, serious incident book)</p>		
<p>Signed</p>		
<p>Printed Name</p>		
<p>Date</p>		
<p>Date/time/how member of staff submitting this form received feedback about action taken from DSL (please circle below as appropriate)</p> <p><i>Circle <u>one</u> of face to face/phone call/e mail to confirm how DSL gave feedback to the member of staff/volunteer that submitted the Green form. If face to face or phone call, M of S/volunteer must sign to confirm. If e mail, retain copy.</i></p>	<p>Date:</p>	<p>Time:</p>
<p>Face to face</p>	<p>Phone call</p>	<p>e mail (copy retained)</p>
<p>Signature of reporting M of S</p>	<p>Signature of reporting M of S</p>	

Logging a concern about the behaviour of a member of staff or volunteer

(N.B. This form should be used for recording and reporting **all** allegations of abuse by and **all** concerns about the behaviour of staff and volunteers that are in breach of the Staff Behaviour policy (code of conduct).

All allegations and **all** such concerns **must** be reported to the Headteacher* without delay)

About the member of staff or volunteer whose behaviour is causing concern or is subject of the allegation:	
Name (print):	
Job Title (print):	
Date (of writing this record):	Time (of writing this record):
About the person reporting the concern/allegation and completing this form:	
Name (print):	
Job Title (print):	
Signature:	
What is the nature of the specific allegation or concern about behaviour (brief headline)?	
Record the following factually: <u>When?</u> (date & time of incident) <u>What</u> exactly has raised your concern (what happened, what did you see/hear/find out or what were you told)? <u>Where</u> did your concerns arise? <u>Who else</u> - were any pupils or other staff present or involved? N.B. Please record any direct disclosures/statements/ allegations/comments using the child or adult's exact words in quotation marks	
NB if additional pages are used, these must be attached securely to this form	
Did you do anything or speak to anyone else before reporting the incident/concern to the Headteacher* (if yes, please provide names and details)?	
Any other relevant information:	

Date and time incident/concern was first shared with Headteacher* N.B. It is not necessary to complete this form before speaking to the Headteacher* – the circumstances may mean you need to speak to the Headteacher* first as a matter of priority:

Check to make sure your report is clear and will be clear to someone else reading it next year

**NOW PLEASE PASS THIS FORM TO THE HEADTEACHER*
(Headteacher* to complete sections overleaf)**

*** If the allegation/concern is about the Headteacher, this form must be passed to the Chair of Governors, who should complete the second part of the form.**

(Following sections to be completed by Headteacher*)

<p>Time & date information received by Headteacher*, and from whom</p>	
<p>Action taken (e.g. discussion with LADO PoT MAC submitted to LADO advice taken from HR/ Legal/ Chair of Governors)</p>	
<p>Date, time, name, role, organisation advice provided by</p>	
<p>If decision not to refer to LADO, state reason</p>	
<p>Parents informed? Yes/ no State reasons if no</p>	

<p>Outcome (e.g. Referral to LADO, PoT meeting convened, HR advice taken, Police investigation, internal investigation, informal management advice given and recorded, no further action)</p>	
<p>Signed</p>	
<p>Printed Name</p>	
<p>Date</p>	

Signature, date and time when member of staff submitting this form received confirmation of receipt of report/allegation from Headteacher*

Safeguarding students during the Coronavirus (COVID-19) pandemic

National lockdown with Colleges remaining open

Guidance has been published by the government to cover the period from 5 November- please see <https://www.gov.uk/guidance/new-national-restrictions-from-5-november#education-school-college-and-university>

Guidance below on online group and one-to-one sessions also applies in this scenario.

In addition to this, students who are clinically vulnerable or have family members who are clinically vulnerable can apply for permission to remain at home and to dial into face to face lessons where appropriate.

National lockdown with Colleges closing

This additional guidance is based on DfE advice published on 20th and 27th March 2020 – please see

<https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-students-and-young-people/coronavirus-covid-19-guidance-on-vulnerable-students-and-young-people>

and

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-Colleges-Colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-Colleges-Colleges-and-other-providers>

This appendix addresses how the College will apply the safeguarding and student protection policy in order to safeguard all pupils/students during closure due to COVID-19. It applies both to the minority of students who are attending College and the majority who will be staying at home pending further government advice.

Vulnerable students

From 20th March 2020 the government asked parents to keep their students at home, wherever possible, and asked Colleges to remain open only for those students who absolutely needed to attend. If another lockdown involving school closures happens, the same will apply. Students who absolutely need to attend are those students of workers critical to the COVID-19 response and students defined as vulnerable as follows:

- Students who have a social worker, including students who have a child protection plan and those who are looked after by the local authority. A student may also be deemed to be vulnerable if they have been assessed as

being in need or otherwise meet the definition in section 17 of the Students Act 1989**.

- Students and young people up to the age of 25 with education, health and care (EHC) plans*.
- Other students who the Designated Safeguarding Lead considers to be vulnerable, including those students who may be in receipt of early help were previously the subject of student protection or student in need plans were previously looked after or whose situation and wellbeing at home may become unsafe or insecure if they do not attend College.

*The DSL will undertake a risk assessment in consultation with the local authority and parents/ carers to determine whether students with an EHC plan need to continue to be offered a College place in order to meet their needs or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many students and young people with EHC plans can safely remain at home.

- **It may also be necessary and appropriate to undertake a similar risk assessment in relation to students with social workers. However, the College will provide a place for any student with a social worker:
 - if the social worker requires a place to be provided and;
 - the student's parents/carers are willing to send the student to College and
 - the student does not have an underlying health condition that puts them at increased risk.

In circumstances where the College considers a student to be vulnerable and eligible to attend College but a student does not wish to attend College, the DSL, or member of the pastoral team, will explore the reasons for this directly with the student and ascertain that the student is not at risk by staying at home. If the student has a social worker, the DSL will liaise with the social worker and seek to involve them in the discussion with the student's parents/carers.

Where parents/carers are concerned about the risk of their student contracting COVID19, the DSL will discuss those anxieties with the parent/carer following the advice set out by Public Health England. If the student has a social worker, the DSL will liaise with the social worker and seek to involve them in the discussion with the student's parents/carers.

N.B. eligibility for free College meals in and of itself will not be the determining factor in assessing vulnerability for these purposes.

In line with advice from Warwickshire County Council, the College will create and maintain an up-to-date register/database of all pupils/students who are considered vulnerable as above.

Details of the names and contact details of the student's parents/carers other significant family members social workers family support workers and any other key professionals including health professionals and youth justice workers will be stored on ProMonitor.

The register and details on ProMonitor will be accessible to the designated safeguarding lead (DSL) and all deputy designated safeguarding leads including by secure access for DSLs who may need to self-isolate and/or work from home.

The College will assess the level of vulnerability of each pupil/student on the register/database using the RAG rating format as below. This will support the DSL to identify those students that need to be offered the opportunity to attend College (this must include all students with a social worker), those that can be supported by regular contact from a DSL and those whose attendance might be inconsistent and who may therefore need additional contact and support.

The **RAG** rating criteria are:

Red - most at risk of harm or neglect (will include all students subject of a child protection plan) and all students who are looked after.

Amber - a moderate risk of harm, but with some protective factors (will include those with a Student in Need plan and/or being supported by a family support worker).

Green - some concerns or unmet needs or have been red or amber and need monitoring.

Every student on the vulnerable students register/database will be allocated to a named DSL who will be responsible for ensuring that the identified level of support and contact is provided.

DSLs will record all contacts and outcomes with vulnerable students and their families in the usual way so that those records are visible to colleague DSLs and can be reviewed in regular DSL meetings.

Attendance monitoring

If the College has any eligible students in attendance, the daily attendance sheet will be submitted to the DfE by 12 .00pm using the pro forma:

<https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings>

If the College has closed, the return will be submitted once as required by the DfE.

For any student eligible to attend College who does not attend, the College will phone or email the student and parent/carer where necessary. If the DSL is concerned about the student's level of vulnerability, a decision will be made about whether a home visit is appropriate or if a phone call will suffice and the necessary frequency of such contact for each day of absence

In relation to **all students' subject of child protection plans and who are looked after** who do not attend College, the DSL or designated teacher for students who are looked after will **liaise closely with Children's Social Care**. A shared decision may be made that as long as one practitioner has seen the student, that will suffice as a safe and well check, but the DSL will log any such decision and all home visits undertaken.

In any event, **the social worker must be informed about any student who is the subject of a child protection plan, student in need plan or who is looked after who does not attend College on the first and (subject to the agreement reached with the social worker) each subsequent day of absence.**

For each student identified as vulnerable but who the DSL considers can be safely cared for at home (NB this will not include any student with a child protection plan, student in need plan or who is looked after without written agreement with the student's social worker), the DSL will identify the nature and frequency of contact the student will need to reassure the DSL of their safety and wellbeing. This might include phone calls, text contact, Skype or home visits.

Home visits

Any home visit must be risk assessed. If agreed that a home visit is necessary, it should be undertaken by two members of staff.

It is unlikely that home visits will be frequent. If they are undertaken, they will subject of a risk assessment based on the following guidelines:

- (1) The DSL will speak to the student's parents/carers to establish whether any member of the household has symptoms of COVID-19 has been diagnosed or is self-isolating.
- (2) Home visits will be undertaken by two members of staff, one of whom will be a DSL. N.B. It would be expected that any member of staff who has an underlying health condition/ vulnerability would be at home self-isolating. For the absence of doubt, no such member of staff will therefore undertake home visits.
- (3) The DSL will inform the parents/carers of the plan to undertake a home visit and that visiting staff will need to see and speak to the student through a window.
- (4) Staff undertaking home visits must wear gloves and avoid contacting metal surfaces with their bare skin. They will knock on the door of the house with covered hands. After knocking on the door, they will step back from the door.
- (5) Visiting staff will ask to see and talk to the student through a window and will aim to keep the conversation as upbeat and positive as possible.
- (6) Staff are advised not to enter households but simply to check that the student is well by a conversation through a window, maintaining the recommended social distance of 2 metres.
- (7) However, if undertaking a home visit, staff must actually see the student.

If a family is self-isolating and/or it is difficult/not appropriate to carry out a home visit subject to the risk assessment, the DSL will consider whether technology can be used to see the student, e.g. via Skype or other means of video chat. If carrying out

Skype/video chat, this should be agreed with parents/carers prior to any call being made.

All College policies including the student protection, staff behaviour and ICT acceptable use policies must be followed at all times both in face to face and electronic communication with pupils and parents/carers. No staff member should use their own ICT or telephone equipment or private message students or video conference with a student directly other than via College-owned equipment subject to parental agreement as above.

Where concerns for a student at home reach the threshold for significant harm, a referral must be made to Students' Social Care/Police as per normal safeguarding procedures. For that reason, all DSLs must have access to MASH and other key agency phone numbers and students' details even when working from home.

Designated Safeguarding Lead (DSL)

The DSL and deputy DSLs are as named in the main policy.

Wherever possible, the DSL or a deputy DSL will always be available on site the College is open. In the event that this is not possible (every effort will be made to ensure that such occasions are rare), the DSL or a deputy DSL will be readily accessible via telephone or online video contact, e.g. when working from home. All staff will be provided with contact details in order to be able to contact a DSL without any difficulty and will be informed about which members of the DSL team are available on each day that the College is open.

Where it is not possible for the DSL (or deputy) to be on site, a senior leader will always be present and will assume responsibility for co-ordinating safeguarding on site, always with telephone/ online access to the DSL as above.

All DSLs will have remote access to the register/database of all vulnerable students and other safeguarding records when working off site.

The DSL team will meet weekly to discuss the welfare and status of each student on the register/ database of vulnerable students.

The DSL team will liaise with MASH, Social Care, family support workers and other key safeguarding partners as normal, whether working in College or working remotely.

When working from home, DSLs will be accessible via access to their College Email account and should have use of a College-owned mobile telephone, the number of which should be shared with colleague DSLs, partners and the Education Safeguarding service.

The DSL team will continue to attend – either in person or virtually – student protection conferences core group meetings strategy meetings student in need meetings students who are looked after reviews and early help meetings.

If the College closes and pupils need to attend another College in accordance with local/hub arrangements, the College will maintain its overarching responsibility for

safeguarding the student. The DSL will be responsible for liaising with the receiving College in order to share information from the register/database of vulnerable students and to advise the receiving College about how best to respond to new/emerging concerns. The DSL must be informed by the receiving College about any new incidents or concerns and agreement must be reached and recorded about whether the DSL or a DSL in the receiving College is best placed to discuss issues with parents/carers, contact social workers, make referrals etc.

Reporting a concern

All staff and volunteers continue to have a responsibility for safeguarding students and will report any safeguarding concerns about students to a DSL in the normal way as set out in the main policy.

Staff should have access to the normal safeguarding recording format (e.g. green forms, CPOMS) when working off site including when working from home.

Staff and volunteers are reminded of the need to report any concern immediately and without delay.

In the unlikely event that a member of staff cannot access the normal safeguarding recording format (green form) remotely, they will contact the DSL via Email (cc to at least one other DSL and the Principal) to inform them that they need to share a concern. This will ensure that the concern is received.

Where a member of staff or volunteer is concerned about the behaviour of an adult working with students in the College, they should inform the Principal as normal (using a yellow form). If the notification needs to be made when the reporting individual is offsite, this should be done verbally and followed up with an email to the Principal on the same working day.

As normal, any concerns about the Principal should be reported to Chair of Governors.

Safeguarding training and induction

The DfE recognises that DSL training is very unlikely to take place whilst the threat of the COVID-19 virus remains and government guidance in relation to large gatherings and social distancing is relaxed.

DfE guidance states that for the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

The DSL will communicate any new or revised safeguarding advice, guidance, requirements, arrangements or information in writing to all staff and volunteers.

Where new staff or volunteers are recruited, they will continue to be provided with a safeguarding induction.

If adults from another College or setting are redeployed to work at the College during the COVID-19 virus, the College will take into account DfE supplementary guidance and will accept portability of pre-employment checks as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and students' Barred List check and;
- there are no known concerns about the individual's suitability to work with students and;
- there is no ongoing disciplinary investigation relating to that individual.

Upon arrival, all such redeployed staff will be given a copy of the College's safeguarding and student protection policy, staff behaviour (code of conduct) policy, behaviour policy, the College's safeguarding recording and reporting procedures and confirmation of DSL details and arrangements.

Safer recruitment/volunteers and movement of staff

The College will maintain its commitment to ensuring that only suitable people are given opportunities to work with students at the College. Any recruitment during COVID-19 will therefore be undertaken following the normal safer recruitment processes subject to the College's policy, local authority guidance and advice and Part 3 of *Keeping Students Safe in Education (DfE 2019)* [KCSiE].

Safer recruitment principles also apply to the recruitment of volunteers, subject to KCSiE.

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that the College is aware, on any given day, which staff/volunteers are in the College and that appropriate checks have been carried out, especially for anyone engaging in Regulated Activity. As such, the College will continue to maintain the single central record as outlined in KCSiE.

Online safety

The College is committed as always to providing students with a safe environment in which to learn. That includes online learning. The online filtering (in relation to College-owned devices) and monitoring systems will be in operation as normal. The College is unable to filter activity on devices not owned by the College. Parents may find it useful to refer to:

<https://www.internetmatters.org/blog/parental-controls/broadband-mobile/>

for guidance on putting some restrictions in place to keep students safe.

Where pupils/students are using ICT equipment in College, appropriate supervision will be in place as normal.

Students and online safety away from College

As above, all online lessons should be delivered by College staff in accordance with the College's safeguarding and student protection, staff behaviour (code of conduct) and acceptable use of ICT policies.

The College will take account of guidance from DfE in relation to the planning and delivery of online learning when it is issued as well as nationally recognised guidance including *guidance from the UK Safer Internet Centre on safe remote learning and London Grid for Learning on the use of videos and livestreaming.*

Staff will always use College/service owned technology and accounts for the delivery of remote lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used. College leaders will randomly sample recorded lessons in order to safeguard pupils/students and staff and to ensure that policies are being followed.

If staff need to deliver lessons/tutorials on a one-to-one basis or communicate with vulnerable students who are not attending College via video chat, they will contact parents/carers before sessions commence to inform of start and finish times. This can be done using Weduc, email or phone.

It is important that all staff who interact with students, including online, continue to look out for signs that a student may be at risk, distressed for some reason or vulnerable in some other way and report and record that following normal safeguarding procedures. All such concerns must be brought to the attention of a DSL and dealt with by a DSL as per the main policy in the normal way.

The College will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Below are other issues that staff need to take into account when delivering virtual lessons, especially where webcams are involved:

- Staff and students must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in staff bedrooms, and the background should be blurred. Students may have to use a bedroom and so should blur backgrounds
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the College's ICT manager/co-ordinator for communication with pupils/students
- Staff should record the length, time, date, and attendance of any sessions held.

The College recognises that College is a protective factor for students and young people and that the extraordinary circumstances created by the COVID-19 virus may well affect the mental health of some pupils/students and/or their parents/carers.

All staff will maintain an awareness of those issues in communication with students and their parents/carers including when setting expectations of pupils' work when they are at home.

Supporting students not in College

Any student on the College's register/database of vulnerable students who it has been decided does not need to attend College cannot attend College due to a risk to their own health or the health of another member of their household or whose parents/carers are unwilling to send them to College will have an identified plan of support that will be overseen by a named DSL and recorded on the student's safeguarding file.

The plan will include regular communication with the student's named social worker or family support worker where there is one. A record of all communications* with the student, parents/carers and practitioners in partner agencies will be made on the student's safeguarding file (*including telephone calls, Emails, other online communication, video conversations and virtual meetings).

The College will work closely with all stakeholders to maximise the effectiveness of any communication plan in order to safeguard the student.

This plan must be reviewed regularly (at least once per week) by the allocated DSL in discussion with at least one other member of the DSL team, using regular/planned DSL team meetings as appropriate.

The College will continue to share safeguarding messages on its website, social media pages and via newsletters.

Supporting students in College

The College will continue to be a safe space for all students who attend during the COVID-19 virus. Whenever the College is open and to maximise safety, the headteacher will ensure that appropriate numbers of staff are on site and that staff to pupil ratio numbers are appropriate.

The College will ensure that government guidance for education and childcare settings in respect of social distancing and advice from Public Health England in respect of handwashing and other protective measures to limit the risk of spreading COVID19 is followed regularly and robustly.

All students attending College will be provided with appropriate emotional support, bespoke to their needs, assessed vulnerability and circumstances.

Where the College has concerns about the availability of critical staff to work in College – particularly members of the DSL team, SENCo, designated teacher for

students who are looked after and first aiders – those concerns will be raised with the Local Governing Body without delay.

Peer on peer abuse

The College recognises that a revised process for managing any report of peer on peer abuse and supporting victims may be required during the COVID-19 virus when only a relatively small number of students will be attending College.

Where the College receives a report of peer on peer abuse, it will follow the principles as set out in part 5 of KCSIE and as outlined in the main policy as closely as possible.

The College will listen and work with all students involved, their parents/carers and any multi-agency partner required to ensure the safety and security of alleged victims, alleged perpetrators and all other students attending the College.

Concerns and actions must be recorded on the student's safeguarding file and appropriate referrals made by the DSL.

Support from the local authority

The Education Safeguarding service will be available as usual for advice and support on 01926 418608 or 01926 742525 and will also provide further updates and information from Warwickshire Safeguarding and the local authority as necessary and appropriate.