



University
Centre
Somerset

Part of Bridgwater & Taunton College

SAFEGUARDING AND PREVENT POLICY

**Effective for employees, students, governors and volunteers on
or after 1 November 2020**

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1 Introduction

- 1.1 Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and Further Education colleges to make arrangements to ensure that their functions are carried out with due regard to safeguarding and promoting the welfare of children. This policy ensures that Bridgwater and Taunton College and University Centre Somerset (UCS) does so. University Centre Somerset activities take place in environments where under-18s are taught, and UCS students may engage with U18s in other ways, for example, through sports coaching or work in a childcare setting.

This Safeguarding and Child Protection Policy applies to all staff, including Senior Managers and Governors, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of this organisation.

This policy will be reviewed annually by SMT and Governors. It will be implemented through the College's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead, Senior Management team and Governors through staff performance measures and day to day practice.

At the time of the latest update to this policy, particular attention has been paid to the effects and implications of the Coronavirus (COVID-19) crisis, including students working remotely and at home, and the likelihood of disclosures when students return to College after extended periods at home.

2 Statutory Framework

- 2.1 To safeguard and promote the welfare of children, young people, and vulnerable adults / adults at risk the College and UCS will act in accordance with the following legislation and guidance:

- The Children Act 1989 and 2004
- United Nations Convention of the Rights of the Child 1991
- The Education Act 2002 (Section 175/157)
- Safeguarding Vulnerable Groups Act 2006
- Somerset Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Effective Support for Children and Families)
- Somerset Neglect Strategy 2017
- Special educational needs and disability (SEND) code of practice: 0-25 years. HM Government 2014
- Section 26, The Counter Terrorism and Security Act 2015 (Prevent Duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015) Early Years Foundation Stage 2017
- The Prevent Duty 2015
- Sexual violence and sexual harassment between children in schools and colleges; DfE May 2018
- The General Data Protection Regulation (2018)
- Keeping Children Safe in Education (DfE, September 2020)

As required by Working Together to Safeguard Children (DfE 2020), the College and UCS will follow the regional procedures for protecting children from abuse which are

outlined for the College's catchment area by the South West Child Protection Procedures (<https://www.proceduresonline.com/swcpp/>) and Somerset Safeguarding Children Board.

The College and UCS will also ensure that appropriate procedures are in place for responding to situations in which a young person may have been abused or neglected or is at risk of abuse or neglect, or a member of staff, volunteer or another young person has behaved in a way that has, or may have, harmed a child, or that indicates they would pose a risk of harm.

The College and University Centre Somerset will respond effectively to Prevent concerns (concerns that a student is being drawn into radicalisation) and will ensure that appropriate links exist with the Regional Coordinator for Prevent so that referrals can be made to the government Channel programme.

3 Intent

3.1 We believe that a child, young person or vulnerable adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people under the age of 18, and to keep them safe. We will also ensure any vulnerable adults over the age of 18 will be signposted and supported to Adult Services as required. The intent of the Safeguarding and Child Protection Policy is to ensure that:

1. A safe environment is provided at the College and UCS for children and vulnerable adults at all times, including every effort being made to help keep children and vulnerable adults safe online, whether working on College premises or remotely.
2. The College and UCS are able to take appropriate action to protect young people who are suffering or at risk of suffering harm, including emotional, physical, and sexual abuse; bullying in all its forms; neglect; radicalisation; female genital mutilation; forced marriage; slavery; honour-based violence; sexual and criminal exploitation (this list is not exhaustive). Action will be taken whether or not the risk of harm occurs in the physical world or online.
3. Safe recruitment practices check the suitability of staff, governors and volunteers to work with or in proximity to children and vulnerable adults.
4. Staff and governors are trained to recognise the different types of harm and take appropriate action in line with College and UCS procedures and with *Keeping Children Safe in Education*. Staff are also made aware of their Duty of Care towards all learners irrespective of age and swift action is taken on the rare occasion when there seems to have been a breach or abuse of trust.
5. The College and UCS ensure that they regularly consult with learners (in student forums, surveys and induction) about how safe they feel and about their general welfare, and action is taken where learners tell us they do not feel safe.
6. The College and UCS will take steps to support and protect the most vulnerable learners, including those with special educational needs and disabilities, and will support other organisations such as the police in the case of College students becoming missing children.

7. Section 175 places a duty of care on Local Education Authorities, and on governing bodies of schools and further education institutions to make arrangements for carrying out their functions with a view to safeguard and promote the welfare of children. *Keeping Children Safe in Education* recognises that 'Safeguarding and promoting the welfare of children is **everyone's** responsibility. School and College staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating'.
8. Bridgwater and Taunton College and UCS recognise their duty in this area and seek to meet and exceed the welfare and safeguarding needs of children and vulnerable adults, as well as ensuring appropriate practices for staff recruitment and selection and providing a safe and secure environment in which to study.

4 Scope

- 4.1 The Safeguarding and Child Protection Policy applies to all College and UCS staff (including temporary staff), job applicants, students, apprentices, prospective students, volunteers and governors whether they work or study in the main campuses, outreach centres, or other designated areas.
- 4.2 The policy applies to students on work experience placements (including those on work experience inside the College and UCS) and work-based and workplace learning programmes, and those engaged on any College-organised off site activity.
- 4.3 The policy applies to working arrangements with other agencies to support the UCS Safeguarding and Prevent Policy, including HEI partners, the Office for Students, local education authorities, the Bridgwater and Taunton College Trust, schools, support agencies, sub-contractors and employers.

5 The Safeguarding and Prevent Team

- 5.1 Designated Safeguarding Lead (DSL)
 1. In line with Keeping Children Safe in Education, the Designated Safeguarding Lead, and Single Point of Contact (SPOC) for Prevent is a member of the Senior Management Team of the College:

Mark Nettle, Director of Student Services
 2. The DSL takes the ultimate lead responsibility for the protection of children and vulnerable adults for Bridgwater and Taunton College and UCS.
 3. The DSL will receive training in child protection issues and inter-agency working, as required by the SSCB (Somerset Safeguarding Children Board), and will receive refresher training at least every 2 years.
 4. The DSL will oversee the referral of alleged harm or abuse to Children's Social Care or Adult Social Care.
 5. The DSL is also the College and UCS Single Point of Contact for Prevent, and will oversee any referrals to the Channel programme.

6. The DSL will ensure the Senior Management Team and Governors are aware of trends in behaviour or concerns that may affect student welfare. Gathering safeguarding data and impact will be embedded into the provision's process to measure effective safeguarding practice and resolve any weaknesses.
7. The DSL is also responsible for ensuring that:
 - Advice, support and regular updates are provided to staff on issues relating to safeguarding, child protection, Prevent and online safety
 - A proper record of any child protection, Channel referral, referral to adult social care or, complaint or concern is maintained (even where that concern does not lead to a referral)
 - Ensuring that parents and carers of children and vulnerable adults within the College and UCS are aware of the College's Safeguarding and Child Protection policy
 - Every effort is made to be aware of Children Looked After and Care Leavers enrolled in the College and UCS, and their social worker and virtual school head are known
 - The College liaises with local authorities and the SSCB and other appropriate agencies
 - The College liaises with secondary schools which send pupils to the College to ensure that necessary awareness of Child Protection issues is shared appropriately
 - The College liaises with employers and training organisations that receive children or vulnerable adults from the College on work experience and placements to ensure that appropriate safeguards are put in place
 - Staff receive initial safeguarding and Prevent training, and regular updates, and are aware of the College and UCS safeguarding and child protection procedures, and of the principles of *Keeping Children Safe in Education*
 - The College's Safeguarding Committee meets as a minimum once per term
 - A Safeguarding Operating Plan is prepared and reviewed annually and forms part of the College's annual Operating Plan, and is therefore subject to Senior Management team scrutiny
 - A Prevent Risk Assessment and Action Plan is in place and progress made against it.
8. The DSL will provide an annual report to the Governing Body of the College setting out how the College and UCS has discharged its duties.

5.2 Designated Staff Members for Safeguarding and Prevent

1. The College will appoint an appropriate number of Deputy DSLs and designated Safeguarding Officers, ensuring that each College and UCS site has a designated officer present, and there are both male and female officers available. The current Safeguarding team is:

DSL

Mark Nettle, Director of Student Services
Tel **01278 441247**, email nettlemb@btc.ac.uk

Deputy DSLs

Louise Seymour, Head of Learner Journey (Cannington)
Tel **01278 655055 ext 5024**, email seymourl@btc.ac.uk

Keira Scott, Head of Student Engagement (Bridgwater)
Tel **01278 441267**, email scottk@btc.ac.uk

Helen Windsor, Student Engagement Manager (Taunton)
Tel **01823 366506**, email: windsorh@btc.ac.uk

DDSL with responsibility for safeguarding High Needs learners

Siobhan Gallagher, Head of ALS (Bridgwater)
Tel **01278 441856**, email gallaghers@btc.ac.uk

Safeguarding Officers

Sue Marson, Student Support Manager (Bridgwater)
marsons@btc.ac.uk

Eve Watt, Head of Student Services (Bridgwater)
watte@btc.ac.uk

Siobhan Wardle, Wellbeing Officer (Cannington)
wardles@btc.ac.uk

Helen Carpenter, Wellbeing Officer (Taunton)
carpenterh@btc.ac.uk

Note that if a situation arises in which none of the Safeguarding Officers are available, *Keeping Children Safe in Education* advises that 'any staff member can make a referral to children's social care' (Section 21). Somerset Children's Social Care can be contacted on **0845 345 9122**. There is also a consultation line for professionals (DSL / Deputy DSLs: **0300 123 3078**).

Outside normal term time the DSL will ensure appropriate availability of the Safeguarding Team for the level of activity taking place, and communicate arrangements to staff.

2. Appropriate training and support will be provided to enable the designated staff to fulfil their role. Deputy DSLs will be trained to the same level as the DSL Safeguarding Officers:

- Report to the senior member of staff with lead responsibility
- Are trained to make appropriate referrals to Children's Social Care, and Channel referrals under the Prevent Duty
- Will be available to advise and support other staff on issues relating to safeguarding and Prevent
- Have particular responsibility to be available to listen to children, young people and vulnerable adults studying at the College and UCS
- Will deal with individual cases, including attending case conferences and review meetings as appropriate

- Will work together to share best practice in safeguarding
- Have received training in safeguarding issues and inter-agency working, as required by the SSCB and will receive refresher training at least every 2 years.

5.3 Reporting Safeguarding and Prevent concerns

Students of the College and University Centre Somerset should use the contact details provided above if they have concerns about themselves or another learner. There is also an email address you can use: staysafe@btc.ac.uk

The Safeguarding Team will seek to support you appropriately and keep you informed about any action – such as referral to Children or Adult’s Social Care or the Channel Programme – undertaken in response to what you have told us.

6 The Board of Governors

6.1 Governors will ensure that they comply with their duties under legislation. They will also ensure that the College and UCS policies, procedures and training are effective and comply with the law at all times.

Governors will:

- Ensure that an effective child protection policy is in place, together with a staff code of conduct
- Appoint an appropriate senior member of staff to act as the Designated Safeguarding Lead (DSL), trained to what is currently referred to as Somerset’s ‘Level 3’ training, with refresher training every two years, and provided with the time and resources to carry out the function effectively. Mark Nettle is DSL.
- Identify a link governor to take leadership responsibility for the organisation’s safeguarding arrangements. The College’s link governor for Safeguarding is David Taylor.
- Ensure staff are provided with, and read, *Part One of Keeping Children Safe in Education (DfE 2018)* – and are aware of specific safeguarding issues
- Ensure that staff induction and training is in place with regards to child protection and safeguarding
- Ensure safeguarding is regularly discussed and outcomes recorded at Governor meetings
- Ensure the requirements of The Governor’s Safeguarding Audit Section 175 are met and actions when needed completed in a timely way
- Support and promote a culture in the College and UCS in which the welfare of children, young people and vulnerable adults is prioritised, and where staff and volunteers are confident to challenge senior leaders over any safeguarding concerns

7 Supporting Young People and Vulnerable Adults

Safeguarding and promoting the welfare of young people and vulnerable adults is everyone’s responsibility. In order to fulfil this responsibility effectively, all professionals should make sure their approach is student centred. This means that they should consider, always, what is in the best interests of the student.

7.1 Early Help

Children who may require early help will be offered **early** intervention through Early Help support services for families.

A directory of early help services is available from the Early Help Advice Hub on 01823 355803. Somerset Choices and Professional Choices will also help practitioners and families find information and support to prevent escalation of needs and crisis.

The College will ensure staff are aware of the early help process, and understand their role in identifying emerging problems, including sharing information with other professionals to support early identification and assessment of a child's needs. It is important for young children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a request for involvement to Children's Services if the child's situation does not appear to be improving.

7.2 More Vulnerable Learners

College and UCS staff should also be alert to the potential need for early help for young people and vulnerable adults who are more vulnerable. For example, students:

- with a disability and/or specific additional needs
- with special educational needs
- who are acting as a young carer
- who are showing signs of engaging in anti-social or criminal behaviour especially if there is a concern that it is exploitative
- missing education
- whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence
- who are showing early signs of abuse and/or neglect
- with poor attendance or high medical absence
- suffering peer on peer abuse
- who are privately fostered
- who are services children, who may have had interrupted or constantly changing schooling.

Such learners will be identified and flagged through application, interview and enrolment procedures and on-course interventions.

Education Providers and College / UCS staff members will be aware of the main categories of maltreatment: physical abuse, emotional abuse, sexual abuse and neglect. They will also be aware of the indicators of maltreatment and specific safeguarding issues so that they are able to identify cases of children who may need help or protection. (See Appendices for information on further descriptors of abuse and specific safeguarding issues)

7.3 SEN and disabilities

There is a concern sometimes that, for young people and vulnerable adults with Special Educational Needs (SEN) and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. If a student is behaving in particular ways, or looking distressed, or their behaviour or demeanour is different from in the

past, staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs.

Young people with SEND have a higher risk of being left out, of being isolated from their peers, and are disproportionately affected by bullying. The College and UCS will ensure that students with SEN and disabilities are able to participate in all areas of College and UCS life.

7.4 Safeguarding during and beyond the Coronavirus (COVID-19) crisis

The College and UCS seek to ensure that the changing circumstances created by the Coronavirus (COVID-19) outbreak, in particular linked to the closing and reopening of educational establishments, and the demands of remote teaching, learning and support, are recognised and reflected.

It remains the case if the College and UCS has to close due to virus-related lockdown, the email staysafe@btc.ac.uk will be monitored, and calls to 01278 441247 will be answered to report safeguarding concerns. If you are unable to get through, you can use the Children's Social Care out-of-hours line on 0300 123 23 27, or the police on 999, and email staysafe@btc.ac.uk to report what you've done.

Staff, governors and volunteers should be alert to the possibility of new safeguarding concerns about young people coming to light as they see them in person following any College closure.

The Safeguarding, ALS and Student Engagement teams will seek to continue to support vulnerable students, and those with Child Protection Plans or safeguarding concerns, remotely during any periods of closure.

Guidance will be provided to keep students not physically attending the College safe, especially online, together with advice about how concerns about these children should be progressed (see below).

Where the College or UCS becomes aware of peer on peer or criminal abuse, more likely to be occurring outside College, the College will do everything it can to support the victims.

Safeguarding learners and staff while teaching or supporting learners remotely

While nothing changes in terms of recognising and responding to Safeguarding concerns, some things do need a little more thought when working online and from home, especially with video lessons and calls.

Staff should use College-provided systems and / or accounts (e.g. Collaborate, Microsoft Teams), not personal systems and accounts (e.g. a personal Whatsapp account or group).

A neutral background should be chosen, or use the backgrounds you can find supplied with systems such as Teams. Avoid beds and bedrooms in the background. Position yourself away from where your children, spouse, or pets are.

Dress appropriately and professionally – this doesn't necessarily mean a suit and tie, but smart casual at least.

If a student is dressed inappropriately in a video lesson, suggest that the student logs out and dresses more appropriately before rejoining the lesson. If a student is revealing too much in the background (a bedroom may be the only place they can call from), again, ask them to log off, tidy up or move items, or blur the background if possible, before rejoining.

In many lessons it may be appropriate for only the teacher to be on video, with learners using the chat panel to interact. This is ideal from a safeguarding perspective.

In other situations, make sure students know how they can mute their audio (i.e. so others can't hear them) and switch off their video (others can't see them) if that helps them to feel more comfortable. Maintain a professional, business-like tone while teaching online

Seek student consent if you want to record a lesson, explaining what you will be recording, why, how long it will be kept and how disposed of. Ensure students have the option to opt out. If a student asks to record, ask why, and see whether this can be achieved another way e.g. by forwarding slides or other material.

Many of the principles above apply to 1:1 video calls. Ensure no-one can overhear what's being said, especially if sensitive, personal or confidential matters are being discussed. Make sure you can leave the call at any time and you should report any inappropriate content or comments to your line manager.

If phoning a student and there's no option except your own landline or mobile, protect your personal number:

- From a landline: dial 141 before the number
- From an iPhone: Settings - Phone - Show my caller ID and untick the box
- From an Android phone: Phone (the big green button with a telephone on it) - More – Settings - More Settings - Show my Caller ID - change the option to Hide Number

7.5 Emergency Contacts for Young People under 18

Where reasonably possible, the College will seek to hold more than one emergency contact for under-18 students in case of emergencies or welfare concerns, and in line with Keeping Children Safe in Education.

7.6 Mental and Emotional Health

It is recognised that poor mental health may be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. A young person's emotional health and wellbeing influences their cognitive development and learning as well as their physical and social health and their mental wellbeing in adulthood. The College will seek to meet or exceed the requirements of the governments green paper 'Transforming children and young people's mental health provision' (December 2017), through the provision of mental health services and strong external partnerships, for example with CAMHS.

7.7 Violence against women, harassment and hate crime

UCS will operate a zero tolerance policy towards these criminal activities and will seek to follow the recommendations of the UUK report 'Changing the culture: Report of the

Universities UK Taskforce examining violence against women, harassment and hate crime affecting university students' (October 2016)

7.8 Local Issues and Extra-familial harms

Safeguarding incidents can be associated with factors outside the home and outside the educational setting. Staff will be asked to consider whether students are at risk of harm outside the family, including sexual and criminal exploitation.

7.9 Home Stays (Exchange Visits)

Enhanced DBS checks will be carried out on host families providing residential accommodation for under-18 College students. The College will also carry out an enhanced DBS check for other residents in the host family home aged 16 or over.

7.10 Young people requiring hospital treatment

If a young person requires to be taken to hospital by ambulance from the College or UCS, staff should contact parents / carers / other family members and stress that the College or UCS will not be able to accompany the young person to, or at, the hospital. During the Coronavirus (COVID-19) crisis it will be made clear to parents and carers that staff cannot be exposed to the risk of transmission that a trip to hospital may incur and that then parent / carer must attend, or arrange for another family member to do so. There may be exceptions to this approach, for example in the case of residential students for whom parents / carers may be distant.

8 Prevent

1. The College and University Centre Somerset will assess the risks of students and staff being drawn into radicalisation via a regularly updated Prevent Action Plan.
2. A Single Point of Contact (SPOC) for Prevent will be identified (the DSL / Director of Student Services), and staff made aware of the requirement to pass concerns to the SPOC, or in his absence, to any Safeguarding Officer.
3. Effective pastoral support (Wellbeing, Counselling, Safeguarding Officers) will increase the likelihood of Prevent concerns being recognised early on and allow appropriate action to be taken.
4. Staff will be trained how to identify possible radicalisation; who the SPOC is and where to take concerns; and made aware of regional, national and international radicalisation and terrorism developments.
5. The SPOC will ensure that strong links exist with the Regional Coordinator for Prevent for the Southwest (also a Governor of Bridgwater and Taunton College) and that advice can be sought and Channel Referrals made.
6. The College will maintain a robust firewall as part of its IT Acceptable Use Policy and ensure sites promoting terrorism or giving information about

weapons procurement or development cannot be accessed via College systems.

7. Users of the University Centre will be trained to follow the government's 'Run - Hide – Tell' response to any attack carried out on the Centre.
8. The Student Union and HE Student President will receive regular updates and asked to promote the University Centre Somerset approach to Prevent.

9 Dealing with Disclosure

9.1 Disclosure and Referral

When a member of staff is concerned about a young person or vulnerable adult he or she will inform the Designated Senior Lead. The Designated Safeguarding Lead will decide whether the concerns should be referred to Children or Adult Social Care. If it is decided to make a request for involvement this will be discussed with the parents of under-18s, unless to do so would place the student at further risk of harm.

While it is the DSL's role to make request for involvement, any staff member can make a referral to Children's Services. If a young person is in immediate danger or is at risk of harm, a referral should be made to Children's Services and/or the Police immediately. Where referrals are not made by the DSL, the DSL must be informed as soon as possible.

When a person is employed or engaged to carry out 'teaching' work in England, in the course of their work, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18, or there is a risk this might occur, the teacher must report this to the police. This is a mandatory reporting duty. See Keeping Children Safe in Education 2018: Annex A for further details.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations.

Attention must also be paid to the attendance and development of any young person or vulnerable adult about whom the College or UCS has concerns, or who has been identified as being the subject of a child protection plan, and a written record will be kept and attendance procedures followed.

Should the young person's whereabouts be unknown or they move to elective home education the Social Worker must be informed and the setting follow the procedure for reporting children missing education and elective home education.

9.2 Allegations of abuse made against other children

1. The College and UCS recognise that children are capable of abusing their peers.
2. Staff training and the Tutorial programme for students, will seek to promote a culture of mutual respect and tolerance, and staff will be trained to recognise the forms that peer abuse may take, including online abuse, sexting, banter, initiation ceremonies and sexual harassment.

3. The College's Staff and Student Disciplinary procedures will be invoked when peer abuse is recognised, and support offered to the victims of peer abuse through the Personal Tutor system and Wellbeing and Counselling services.

10 Record Keeping and Confidentiality

- 10.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

When a young person has made a disclosure, the member of staff/volunteer should:

- Record the conversation as soon as possible
- Do not destroy the original notes in case they are needed by a court
- Record the date, time, witness, place and any noticeable non-verbal behaviour and the words used by the child
- Indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions
- Agree and record actions and outcomes.

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

If a young person who is/or has been the subject of a child protection plan changes provision, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving provision in a secure manner, and separate from the child's academic file.

All child protection recordings will be scrutinised regularly by the Safeguarding Team to ensure the action and outcome has been carried and any drift avoided. All records are kept in accordance with SSE Record keeping guidance available on the Support Services for Education website under the Education Safeguarding section policy and guidance.

- 10.2 Safeguarding and protecting young people raises issues of confidentiality that must be clearly understood by all staff/volunteers in education.

All staff, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of young people with other professionals, particularly the investigative agencies (Children's Services; Safeguarding and Specialist Services and the Police).

If a young person confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tells the young person, in a manner appropriate to their age, that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to

other professionals to help keep the young person safe. This may ultimately not be in the best interests of the young person.

Staff/volunteers who receive information about young people and their families during their work should only share that information with appropriate staff in the College.

11 Communication with Parents and Carers

11.1 The College and UCS are committed to working in partnership with Parents and Carers. The College will ensure the Safeguarding and Child Protection Policy is available on the College and UCS websites.

The College will ensure that parents/carers understand the responsibilities placed on the College and its staff for safeguarding young people.

Parents should be informed prior to referral to Children's Services, unless it is considered that doing so might place the young person at increased risk of significant harm by:

- The behavioural response it prompts e.g. a young person being subjected to abuse, maltreatment or threats, or forced to remain silent if the alleged abuser is informed
- Leading to an unreasonable delay
- Leading to the risk of loss of evidential material.

The College may also consider *not* informing parents or carers where this would place a member of staff at risk.

12 Allegations Involving Staff

12.1 Definitions

An allegation is any information which indicates that a member of staff, a governor or a volunteer may have:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

This applies to any child the member of staff/governor/volunteer has contact with in their personal, professional or community life.

In the College and UCS settings, consideration should also be given to cases in which an adult member of staff is alleged to have committed a sexual or physical assault on another adult – and whether this constitutes a risk to the young people the alleged has access to.

12.2 Raising Concerns

All College and UCS staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding arrangements. For more information see the College's Whistleblowing Policy.

An NSPCC whistleblowing helpline is available for those who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285, or email: help@nspcc.org.uk.

If staff members have concerns about another staff member then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chair of Governors. If a member of staff is the victim of abuse, that person is advised to contact the police as well as seeking support in College.

Where a member of staff feels unable to raise an issue with the College or UCS, or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Local Authority Designated Officer (LADO). Staff may consider discussing any concerns with the Designated Safeguarding Lead if appropriate make any referral via them. (See Keeping Children Safe in Education: Part Four, DfE 2018, for further information)

12.3 Initial Actions

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Principal.

The recipient of an allegation must not make a judgement about its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal will not **investigate** the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer:

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the LADO without delay.

If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with Somerset Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures.

12.4 College Investigations

If it is decided that the allegation does not meet the threshold for safeguarding, the LADO will hand the matter back to the College for consideration via its own procedures. Consideration should be given to:

- The gender mix of HR and other staff investigating (for example, ensuring a female member of staff interviews a female alleged victim)
- Offering internal or external pastoral support to the alleged victim at an early stage
- Keeping accurate, agreed and dated minutes of any investigation meeting.

The Principal/Chair of Governors should, as soon as possible following advice from the Local Authority Designated Officer, inform the subject of the allegation.

For further information see: SSCB's Allegations Management or contact Somerset Direct for a referral to the LADO: **Somerset Direct 0300 123 2224**.

13 Safer Working Practice

- 13.1 To reduce the risk of allegations, all staff will be made be aware of safer working practice, through induction and training, and from guidance contained in the Staff Handbook, Recruitment and Selection Policy, and the Staff Disciplinary Policy.

The College will ensure policies are provided for situations where particular care is needed, for example, for off-site trips and residentials, or when providing intimate care.

14 Staff Training and Development

- 14.1 The College will provide regular Safeguarding and Prevent training for all staff and governors. The training will be available in a variety of formats, address a range of Safeguarding and Prevent-related topics, and ensure awareness is updated annually.

- 14.2 A Safeguarding and Prevent briefing is included within the induction programme for new staff, and all new staff will be expected to complete the Level 1 online 'Safeguarding Essentials' module within a month of starting employment, and attend Level 1 face to face Safeguarding training within the 6 month probation period. Managers will be asked not to confirm new staff in post if staff have not attended such training within those timescales. In addition all staff and governors will be asked to read, and confirm they have read, Keeping Children Safe in Education Part 1.

- 14.3 After the first year of employment, all staff will be expected to undertake a minimum of one Level 2 Safeguarding or Prevent-related training in each year of employment. This can include (the list is not exhaustive):

- Face to face Safeguarding training
- Criminal exploitation training
- Prevent or WRAP training
- Online safety

These first three should be regarded as the priority courses, and good practice is to repeat these regularly to receive updated information. Other internal or external courses/events that qualify include:

- Attendance at a Safeguarding update briefing at a College Training Day or Staff Conference
- The Somerset Safeguarding training (levels 1 – 3)
- Courses or workshops on:
 - Domestic Violence

- Child Sexual Exploitation (CSE)
 - Female Genital Mutilation (FGM)
 - Drugs and substance misuse
 - Relationship / peer to peer abuse
- Project Argus/terrorist incident training
 - A revisit to Safeguarding Essentials, especially when this is updated.
- 14.4 The DSL, Deputy DSLs and Safeguarding Officer will be trained to Level 3 of Somerset's Safeguarding Training and will 'top up' Level 3 every two years to maintain up to date awareness.
- 14.5 At appraisal line managers will discuss with staff that year's Safeguarding or Prevent-related training, record this on the appraisal form, and support staff to book onto, and complete, training if this has not been achieved by the time of the appraisal.

15 Site Safety

- 15.1 The College and UCS will make reasonable effort to provide a secure, healthy, hazard-free environment for everyone studying, working or visiting here, and will promote a culture of vigilance for trespassers on site. The College will:
- Maintain suitable and reasonable physical boundaries and barriers such as fencing, gates and locks on doors, limiting site access and channelling visitors to Reception areas
 - Ensure all legitimate users of the College and UCS can be recognised by an ID card and lanyard, or by a visitor badge
 - Where possible and affordable, make key entrances to the building and areas of the building ID card operated and seek to extend the number of areas controlled in this way
 - In the light of the concern that the College or UCS might be perceived of as a potential target for a terrorist attack, the run-hide-tell response will be promoted to students and staff, and a control group will be identified who can coordinate actions taken and communication in the event of an attack
 - Provide appropriate supervision for different age groups, ensuring students do not enter potentially hazardous areas unless this is with appropriate protection and guidance as part of the curriculum
 - Take all reasonable steps to monitor contractors, visitors and volunteers using the premises, requiring them to sign in at Reception, take and read our Visitors Information leaflet including Safeguarding and Prevent, and wear a visitor's badge
 - Alert contractors, visitors and volunteers to the College and UCS Safeguarding expectations and protocols and ensure regularly visiting contractors have had a recent DBS check
 - Maintain an up to date single central record of staff, governors and volunteers that are in regulated activity with children
 - Carry out, and maintain records of, Fire Drills, and operate an effective First Aid service
 - The Childcare Centre will comply to EYFS regulations with regards to paediatric first aid, and incidents will be regularly reviewed and acted upon should patterns emerge
 - We will ensure that the College has an online safety policy that will include consideration of smart phone access to unfiltered 4G and 5G data.

- See separate Coronavirus (COVID-19) Operating Procedures and Risk Assessment for the specific precautions taken at the time of the pandemic.

15.2 Access for regular visitors

A small number of staff from partner organisations may visit sufficiently frequently to warrant a College lanyard and freer access to particular areas of the College. This should be approved by a Senior Manager and the individual will be asked for a recent or new DBS clearance.

16 Younger Children

16.1 Younger Children on College Premises

1. The College has a duty of care towards young people who are studying on a school link programme whilst on College premises. In arranging school link programmes for young people of compulsory school age the College will:
 - Provide schools with adequate details of provision to enable the school to obtain parental consent for their child to participate. The College will require evidence of this written consent
 - Seek to ensure that for young people with special education needs (SEN), the College is informed of the details of the statement that has been agreed, in order to determine the level of support needed
 - Request details from the school of any medical needs or requirements a young person may have and agree with the school how the necessary support can be provided
 - Ensure that young people are made aware of the general standards of safety with which all young people and FE college students should comply and be identifiable on site.
2. Concerns regarding safeguarding or Prevent for young people on school link programmes must be referred to the Child Protection Officer at the school where the child is on roll (or the child's social worker if the child is not on a school roll), and to the relevant College Safeguarding Officer if other College students or staff are involved or affected.
3. Similar arrangements will be made to ensure the safety of children visiting the College or UCS for Taster Days and other events.
4. Staff should discourage students with young children from bringing them onto College sites repeatedly or for extended periods (except for young children attending the Childcare Centre in Bridgwater or the Nursery in Taunton) as the College is unable to provide a suitable environment for very young children.

15.3 Possession of knives and other weapons

The law states that it is illegal to:

- sell a knife to anyone under 18, unless it has a folding blade 3 inches long (7.62 cm) or less
- carry a knife in public without good reason, unless it has a folding blade with a cutting edge 3 inches long or less
- carry, buy or sell any type of banned knife
- use any knife in a threatening way (even a legal knife)

<https://www.gov.uk/buying-carrying-knives>

In practice students should not be carrying knives on campus or between locations, even if they are used during lessons such as catering or horticulture / arboriculture. If you suspect a student is carrying a knife, ensure two members of staff are present, then ask the student if they are carrying a knife, and ask to search any bag or turn out pockets. If the request is refused, tell them that we have no option but to contact the police. If they agree, and the knife is offered up, take this to the DSL or a Student Engagement Manager who will either:

- if it is a legal knife, keep it safely until they go home, asking them not to bring it onto campus again
- if it is a banned weapon (see the list at the link above), it will be confiscated and the police contacted and disciplinary action taken.

A similar approach should be adopted where possession of other weapons is suspected. Staff should always make the safety of themselves and other students and staff a priority.

16.2 Arrangements in the Childcare Centre

1. Childcare Centre staff undergo appropriate Safeguarding, Child Protection and Prevent training and are DBS checked when employment with the College commences, in line with the College's Safer Recruitment procedures.
2. This Safeguarding and Child Protection Policy is the over-arching Policy for the College. In addition, the Childcare Centre has its own Child Protection Procedures. These will be reviewed annually to ensure that they reflect changes to this Policy.

17 Work Experience, Work-Based and Work-Place Learning

- 17.1 Staff who arrange, vet and monitor work experience placements and work-based or workplace learning will undertake appropriate safeguarding training.
- 17.2 Organisations who offer work experience placements or work-based/workplace learning for College and UCS students will be vetted for their suitability to do so. Work Experience Advisors will make employers aware of the College's approach to Safeguarding, and expectations that the employer will safeguard young people on placement.
- 17.3 When the assessment suggests that an employer does not have safeguarding and child protection policies, or awareness of safeguarding and child protection issues, or where there is any evidence of risks to a student's safety, the College will ensure that no students are placed with that employer until the DSL or a Deputy DSL has made an appropriate assessment. If an employer is deemed unsuitable for work experience placements or work-based / workplace learning for safeguarding reasons, the College will make the SSCB or police aware of this.
- 17.4 Children and vulnerable adults who are placed with employers will be given clear advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse.

18 Safer Recruitment

- 18.1 The College will ensure that there are appropriate staff with safer recruitment training to carry out interviews, and that safer recruitment practices are followed. We will maintain a **single central record** to ensure all statutory requirements. All references will be verified and recorded.
- 18.2 Recruitment procedures will seek to reflect the requirements of Keeping Children Safe in Education and will aim to 'prevent people who pose a risk of harm from working with children' (Section 71).
- 18.3 The College will ensure that procedures are in place to ensure that all appropriate checks are carried out on staff, governors and volunteers who have substantial access to children and vulnerable adults, including enhanced DBS checks, and that a single central record is kept of such checks. This process is detailed further in the DBS and Rehabilitation of Offenders Policy and Procedure.
- 18.4 On the rare occasions when an individual starts work in regulated activity before the DBS certificate is available, HR will ensure other recruitment checks have been carried out and that a full risk assessment is undertaken. The individual will be appropriately supervised and not left alone with young people until the DBS is obtained.
- 18.5 A range of Safe Recruitment procedures will be employed and these are described in the Recruitment and Selection Policy and Procedure.

19 Keeping Children Safe in Education 2020

- 19.1 The statutory guidance 'Keeping Children Safe in Education' 2020 is available online. New staff will be introduced to this document at Induction and asked to read [Part 1](#) and Annex A, which provides further information on:
- Children missing from education
 - Child sexual and criminal exploitation
 - Peer on peer and relationship abuse
 - 'Honour based' violence including FGM and Forced marriage
 - Preventing radicalisation
 - Harmful Sexual Behaviour

20 Review of Policy

- 20.1 This policy will be reviewed annually and will be referred to in the College's corporate publications and available on the College and UCS websites.
- 20.2 The College's Safeguarding Committee, Senior Management Team and Governors will monitor and review this policy annually.
- 20.3 This policy should not be read in isolation and should be cross-referenced to other relevant College student and employment and policies and procedures, including:
- DBS and Rehabilitation of Offenders Policy
 - Recruitment and Selection Policy and Procedure
 - The Staff Handbook
 - Staff Disciplinary Policy and Procedure
 - E-Safety Policy
 - The Work-based Learning Handbook
 - Data Protection Policy and Procedure

- Modern Slavery Policy
- Student Off-site Trips and Residentials Policy and Procedure
- Equality and Diversity Policy

Appendix

1. Definitions

Safeguarding:

- Protecting children (everyone under the age of 18) from maltreatment
- Preventing impairment of children's health or development
- Taking action where a child is suffering significant harm, or is likely to do so
- Taking action to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk

Child Protection: Specific protection measures for a child suffering or at high risk of harm, usually undertaken by Children's Social Care e.g. a Child Protection Plan.

See Section 2 below for definitions of types of harm and abuse.

Early help: Providing support as soon as a problem emerges at any point in a child's life.

Children and young people are those aged under 18 years.

Vulnerable adults are those aged over 18 who may be considered vulnerable to abuse, for example those with learning difficulties or disability.

SSCB – Somerset Safeguarding Children Board.

Channel: A multi-agency approach which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

2. Types of Abuse

Physical Abuse: Physical abuse causes harm to a person. It may involve hitting, shaking, cutting, 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. Physical abuse also includes a parent or carer fabricating illness in a child.

Neglect: Neglect is the persistent or severe failure to meet a child or vulnerable adult's basic physical and/or psychological needs. This can result in serious impairment of the child's health or development.

Sexual Abuse: 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. Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. Young people may be forced to exchange sexual activity for money, drugs, gifts, affection or status.

Emotional Abuse: Emotional abuse occurs where there is a 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.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse in which an individual or group takes advantage of the imbalance in power to coerce a child or children into sexual or criminal activity.

Other issues to be aware of (see also Keeping Children Safe in Education 2019):

Honour-based violence (HBV)

These are crimes which have been committed to protect or defend the honour of the family or community, and include:

Forced marriage: Marriage in which one or both spouses do not (or, in the case of some adults with disabilities, cannot) consent to the marriage and duress is involved. Further guidance is available here: <https://www.gov.uk/forced-marriage>

Female genital mutilation (FGM): Any procedure that's designed to alter, remove or injure a girls (or woman's) genital organs for non-medical reasons. The practice is illegal in the UK, and if suspected, the police should be contacted immediately. Further guidance is available here: <https://www.gov.uk/female-genital-mutilation>

Upskirting: taking a photo under a person's clothing without their knowledge or permission. This became a criminal offence in April 2019.

Breast binding / breast ironing: Attempts to make a female child appear male but causing long lasting physical harm by flattening the breasts.

Prevent

Prevent is part of the government's counter-terrorism strategy, CONTEST. Its aim is to stop people becoming terrorists or supporting terrorism. Channel is about safeguarding children and adults from being drawn into committing or assisting terrorist-related activity. It is about early intervention to protect and divert people away from the risk they face before illegality occurs.