

# **SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURE**

**Effective for all employees, students, governors and volunteers on  
or after 1 September 2025**

Signature:



University Centre Somerset (UCS) College Group Chief Executive Officer

Signature:



Chair of Governing Board

|              |                                         |
|--------------|-----------------------------------------|
| Author:      | Vice Principal Student Experience & DSL |
| Approved by: | SLT and Governors                       |
| Date:        | September 2025                          |
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## Section 1 Introduction

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and Further Education colleges to ensure that their functions are carried out with due regard to safeguarding and promoting the welfare of children and vulnerable adults. This policy ensures that University Centre Somerset College Group does so.

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

This policy will be reviewed annually by SLT and Governors. It will be implemented through the College Group'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 Leadership Team and Governors through staff performance measures and day to day practice.

UCS College Group continues to review its safeguarding practices and learn from issues affecting our students, from national themes, and from annual updates to Keeping Children Safe in Education. Recent concerns have included the ongoing impact of the COVID-19 pandemic on young people, sexual harassment in education (see section 10.1 below), and the importance of filtering and monitoring to keep students safe online.

## Section 2 Statutory Framework and official guidance

To safeguard and promote the welfare of children and young people, the College Group 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)
- Keeping Children Safe in Education (DfE, September 2024)
- The OFS Statement of Expectations and ongoing conditions of registration regarding harassment and sexual misconduct
- The OFSTED review of sexual abuse in schools and colleges (June 2021)
- Section 26, The Counter Terrorism and Security Act 2015 (Prevent Duty)
- Meeting digital and technology standards in schools and Colleges (DfE March 2023)
- The General Data Protection Regulation (2018)
- Safeguarding Vulnerable Groups Act 2006
- The Southwest Child Protection Procedures
- Special educational needs and disability (SEND) code of practice: 0-25 years. HM Government 2014
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Early Years Foundation Stage

## Section 3 Intent

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 of vulnerable students over the age of 18. The intent of the Safeguarding and Child Protection Policy is to ensure that:

A safe learning environment is always provided for children and vulnerable adults, whether working on college premises or remotely.

UCS College Group will take every step possible to ensure the safety and safeguarding of apprentices, work experience students and other work-based students.

UCS College Group is able to take appropriate action to protect young people or vulnerable adults who are suffering or at risk of suffering harm, including emotional, physical, and sexual abuse; sexual harassment; 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 the risk of harm occurs in the physical world or online, and whether it occurs in college or outside. Victims will never be given the impression they are creating a problem by reporting abuse or sexual harassment.

Safe recruitment practices check the suitability of staff, governors and volunteers to work with or in proximity to children and vulnerable adults.

Staff and governors are trained to recognise the different types of harm and take appropriate action in line with college procedures and with Keeping Children Safe in Education (KCSiE). 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.

The College ensures that it regularly consults 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.

UCS College Group takes steps to support and protect the most vulnerable learners, including those with special educational needs and disabilities.

UCS College Group will ensure staff are aware that repeated or prolonged absence from College may be an indicator of a range of Safeguarding risks and will collaborate with other organisations such as the police in the case of College students becoming absent from education.

Section 175 places a duty of care on Local Education Authorities, and on governing bodies of schools and further education institutions to plan 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... Everyone who comes into contact with children and their families has a role to play'.

UCS College Group recognises its duty in this area and seeks 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.

#### **Section 4 Scope**

The Safeguarding and Child Protection Policy applies to all College staff (including temporary and agency staff), job applicants, all students, apprentices, prospective students, volunteers and governors whether they work or study in the College, from home, at outreach centres, or other designated areas.

The policy also applies to apprentices, students on work experience placements (including those on work experience inside the College Group) and other work-based learning programmes, and those engaged on any College-organised off-site activity.

The policy applies to working arrangements with other agencies to support the College's Safeguarding and Child Protection Policy, including local education authorities, the Bridgwater and Taunton College Trust, schools, support agencies, sub-contractors and employers.

## **Section 5 Key Documentation**

### **5.1 Keeping Children Safe in Education**

[Keeping Children Safe in Education](#) (KCSiE) is the key document from the Department of Education guiding our safeguarding practice and is the document that underlies this policy. It is updated annually and **all staff should read Part One**, or Annex A if advised by the Designated Safeguarding Lead (DSL) or a College DSL. Annex B also provides useful reference information about specific safeguarding concerns such as Forced Marriage, FGM or County Lines, for example.

### **5.2 The OFS Statement of Expectation and Condition E6**

The Office for Students Statement of Expectations provides a set of consistent recommendations to support HE providers in England to develop and implement effective systems, policies and processes to prevent and respond to incidents of harassment and sexual misconduct. Since the 1st August 2025 this has also become an ongoing condition of registration, as such institutions like UCS, who are registered with the OFS must demonstrate ongoing adherence relating to how they mitigate, educate and manage incidents of harassment and/or sexual misconduct.

See Section 10.1 for how UCS College Group responds to the statement and ongoing condition.

## **Section 6 Responsibilities**

### **6.1 Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead, and Single Point of Contact (SPOC) for Prevent is Bethan Foweraker, Vice Principal Student Experience. The DSL is a member of the Senior Leadership Team of the College and takes responsibility for child protection for the organisation. The DSL is also the College Groups Single Point of Contact for Prevent and will oversee any referrals to the Channel programme.

The Group DSL and College DSL's will receive training in child protection issues and inter-agency working, as required by the SSCP (Somerset Safeguarding Children Partnership) and will attend Somerset's Advanced Child Protection Update course every 2 years. As the College operates four large, and geographically separate colleges, a DSL will be appointed for each college. The College Group DSL, College DSLs and Co-ordinators will oversee the referral of alleged harm or abuse to Children's Social Care, working with Safeguarding Officers.

The College Group DSL will ensure the Senior Leadership Team and Governors are aware of trends in behaviour, changes in guidance or legislation, or specific safeguarding incidents that might affect policy or practice.

The College Group DSL and College DSL's are also responsible for ensuring that:

- Advice, support and regular updates are provided to staff on issues relating to safeguarding, sexual harassment, Prevent, filtering and monitoring and online safety, including those pertaining to higher education and OFS condition E6 relating to sexual harassment.

- A proper record of any child protection or Channel referral, complaint or concern is maintained (even where that concern does not lead to a referral)
- Parents and carers of children and vulnerable adults within UCS College Group are aware of the College's Safeguarding and Child Protection Policy
- Every effort is made to be aware of Children Looked After enrolled in the College, and their social worker and virtual school head are known
- UCS College Group liaises with local authorities and the SSCP and other appropriate agencies
- UCS College Group liaises with feeder schools to ensure that records are shared where students join the College with safeguarding concerns or subject to a Child Protection Plan.
- UCS College Group 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 and governors receive initial safeguarding training, and regular updates, and are aware of the College's safeguarding and child protection procedures, and of the principles of *Keeping Children Safe in Education*
- UCS College Group's Safeguarding Committee, which includes the link Governor for Safeguarding meets as a minimum once per term and reviews progress against the annual Safeguarding Operating Plan which is discussed at Safeguarding Committee.

The College Group DSL will provide an annual report to the Governing Body of the College setting out how the College has discharged its duties and ensure completion of Somerset's Virtual Audit for Safeguarding.

## **6.2 The Safeguarding team**

The current Safeguarding team is:

### **UCS College Group DSL**

Bethan Foweraker, Vice Principal Student Experience & DSL  
Tel: **01278 441342** email [fowerakerb@ucscollegegroup.ac.uk](mailto:fowerakerb@ucscollegegroup.ac.uk)

### **College DSL and Department Safeguarding Leads**

Jane Irons, Assistant Principal Student Experience and Safeguarding (Bridgwater College)  
Email [Ironsj@btc.ac.uk](mailto:Ironsj@btc.ac.uk)

Keira Scott, Assistant Principal Student Experience and Safeguarding (Taunton College):  
Email [scottk@btc.ac.uk](mailto:scottk@btc.ac.uk)

Helen Windsor, Assistant Principal Student Experience and Safeguarding (Cannington College):  
Email: [windsorh@btc.ac.uk](mailto:windsorh@btc.ac.uk)

Becc Baker, Strategic Lead for SEMH (Cannington College, Crockers & 14-16)  
[bakerb@btc.ac.uk](mailto:bakerb@btc.ac.uk)

### **Charlotte Wade, Residential Manager**

[WadeC@btc.ac.uk](mailto:WadeC@btc.ac.uk)

### **Safeguarding Coordinators**

Sophie Dodd  
Safeguarding Coordinator (Taunton)

[dodds@btc.ac.uk](mailto:dodds@btc.ac.uk)

Lauren Milburn  
Safeguarding Coordinator (Bridgwater)  
[Milburnl@btc.ac.uk](mailto:Milburnl@btc.ac.uk)

Leesa Hayes  
Safeguarding Co-ordinator (Cannington)  
[HayesL@btc.ac.uk](mailto:HayesL@btc.ac.uk)

UCS College Group also has several Safeguarding Officers across all four Colleges. The names of these colleagues can be found via SharePoint:

<https://ucscollegegroup.sharepoint.com/sites/StudentSafety/SitePages/Meet-the-Safeguarding-Team.aspx>

Note that if a situation arises in which none of the Safeguarding Officers are available, any staff member can make a referral to children's social care. Somerset Children's Social Care can be contacted on **0845 345 9122**. There is also the Family Front Door consultation line for DSL College DSLs: **0300 123 3078**).

Outside normal term time, the DSL will ensure appropriate availability of the Safeguarding Team for the level and type of activity taking place which will be communicated to Staff.

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.

Appropriate training and support will be provided to enable the designated staff to fulfil their role.

College DSLs and 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 responsibility to be available to listen to children and young people studying at the College
- Will deal with individual cases, including attending case conferences and review meetings as appropriate
- Will work together to share best practice in safeguarding
- Have received training in safeguarding issues and inter-agency working, as required by the SSCP and will receive refresher training at least every 2 years.

### **6.3 The Board of Governors**

The Governors of the College have a strategic leadership responsibility for Safeguarding at UCS College Group and will ensure that Safeguarding policies, procedures and training at UCS College Group are effective and always comply with the law.

Governors will ensure a member of the Senior Leadership Team holds the role of Designated Safeguarding Lead, and this person is trained to an appropriate level and has regular update training.

Governors should ensure there is a 'whole College Group' approach to Safeguarding that has the interests of children, young people and vulnerable adults at heart, and that all staff understand College Group policy in this area and have read Keeping Children Safe in Education Part One.

A link Governor for Safeguarding, with appropriate knowledge and skills, will attend Safeguarding Committee meetings on behalf of the Board and provide direct oversight and scrutiny of Safeguarding arrangements. This Governor will also, on behalf of the Board, ensure that the College has appropriate filtering and monitoring in place and reviews its effectiveness.

Governors will ensure that UCS College Group has robust recruitment procedures that deter and prevent those who are unsuitable to work with children from gaining employment at the College.

All Governors will receive Safeguarding and Child Protection training at induction and will receive annual updates.

#### **6.4 All staff**

Safeguarding is the responsibility of all Staff, and Staff should be able to identify concerns early and make the appropriate response through logging on MyConcern, or directly to a safeguarding officer if the learner is at immediate risk of harm. Staff have responsibility for ensuring there is a safe environment for students wherever they work.

If there are any concerns about the welfare of a young person or vulnerable adult, or disclosure or suspicion of abuse, all Staff should know how to respond and who to contact (see Sections 9.1 and 6.2). Staff should ensure they never make a person making a disclosure feel ashamed that they have disclosed abuse or harassment.

All Staff should be aware that the people may not feel ready, or know how to tell someone, that they are being abused or exploited. This should not prevent Staff from taking concerns to a Safeguarding Officer.

All Staff should be aware of the principles and processes described in this policy and have read and understood Keeping Children Safe in Education Part 1 (or Annex A where appropriate) and the annual updates to that document. All staff will attend Safeguarding Training at induction and safeguarding related training in each year of employment with UCS College Group (see section 8.4 below). Staff teaching higher education should also be aware of the UCS HE Sexual Harassment Policy, to ensure they understand the expectations, procedures and reporting mechanisms in place for higher education students within UCS College Group.

### **Section 7 Students**

#### **7.1 All students**

All students, whatever their personal, familial and social circumstances have the potential to be victims of abuse or harassment, and Staff should be vigilant to this possibility.

UCS College Group will ensure that students know how to report harassment, abuse or welfare concerns, whether taking place on college premises or externally, and whether historic or current. Students who do so will be supported and will not be made to feel ashamed or embarrassed, nor have fears of retribution.

Students will be given advice on how to protect themselves from harassment and abuse both face to face and online.

## **7.2 Vulnerable learners**

UCS College group actively seeks to support vulnerable and underrepresented learners at higher education pre-entry and during their studies via its Access and Participation Plan. This plan set out how UCS will improve equality of opportunity for underrepresented groups to access, succeed in and progress through higher education.

In general however, College Group staff should also be alert to the potential need for early help for young people also who are more vulnerable. For example, young people:

- with a disability and/or specific additional needs
- with special educational needs
- who are looked after or 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
- with poor attendance or high medical absence
- whose poor mental health may be an indicator of abuse
- suffering child on child abuse
- who are privately fostered
- who are services children, who may have had interrupted or constantly changing schooling.

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

## **7.3 Young people and vulnerable adults with SEN and disabilities**

There is a concern sometimes that, for young people or vulnerable adults with SEN and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. If a young person or vulnerable adult 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 or vulnerable adults with SEND have a higher risk of being left out, of being isolated from their peers, and are disproportionately affected by bullying. UCS College Group will ensure that children and vulnerable adults with SEN and disabilities are able to participate in all areas of college life.

## **7.4 Younger / non-College Children on College Premises**

UCS College Group has a duty of care towards young people who are studying on a school link programme, or young people present when an individual or organisation is using College premises to run activities for children. In such circumstances the College will:

- Work with the school or organisation to ensure consent is gained from link students and their parents / carers to take part

- Seek to ensure that for young people with special education needs (SEN), the College is informed of the level of support needed
- Request details from the school / organisation of any medical needs or requirements a young person may have
- Ensure that young people are made aware of the general standards of safety with which all young people and students should comply and be identifiable on site.

Concerns regarding safeguarding or Prevent for young people on these programmes must be referred to the Child Protection Officer at the school or organisation 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 UCS College Group students or staff are involved or affected. The College will inform the LADO where allegations are made against staff of the school or organisation.

Similar arrangements will be made to ensure the safety of children visiting the College for Taster Days, outreach events and other events.

Staff and Students may not bring their children onto the premises for any reason other than brief visits. However, if a child does attend College premises, with agreement from their line manager (or People Management as appropriate), the parent/legal guardian will always remain responsible for the child and will be required to keep them away from all hazardous areas. There may be exceptions to this for purposes such as work experience.

## **7.5 Arrangements in the Childcare Centre (Bridgwater College) and Nursery (Strode)**

Childcare Centre and Nursery staff undergo appropriate Safeguarding, Child Protection and Prevent training and are DBS checked when employment with the College Group commences, in line with its Safer Recruitment procedures.

This Safeguarding and Child Protection Policy is the over-arching Policy for the College Group. In addition, the Childcare Centre and Nursery have their own safeguarding policy that aligns with the College Groups policy, but is specifically adapted to meet the unique needs of the nursery environment.

## **7.6 Communication with parents and carers**

The College Group will ensure that parents/carers are aware of the responsibilities placed on the College and its staff for safeguarding young people and vulnerable adults will ensure the Safeguarding and Child Protection Policy is available on the website.

Parents and carers of under-18 students should be informed about Safeguarding concerns or referrals to Children's Social Care. The only reasons in which the College Group would not do so if it is considered that doing so might place the young person at increased risk of significant harm, for example where the parent / carer is an abuser or complicit in the abuse.

# **Section 8 Staff**

## **8.1 Safer recruitment**

The College Group 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.

Recruitment procedures will reflect the requirements of Keeping Children Safe in Education, Part Three and will aim to prevent people who pose a risk of harm from working with children.

The College Group 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.

On the rare occasions when an individual starts work in regulated activity before the DBS certificate is available, People Management 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.

Staff who have been employed by UCS College Group for more than a year will complete an annual declaration to state any new convictions or barring, and to check their awareness of each year's update to Keeping Children Safe in Education.

Full details of Safe Recruitment procedures are described in the Recruitment and Selection Policy and Procedure.

## **8.2 Allegations involving staff**

### **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 or vulnerable adult
- Possibly committed a criminal offence against or related to a child or vulnerable adult
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children or vulnerable adults
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults

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

In the College setting, 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.

### **Raising Concerns**

All College staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding arrangements without prejudice or fear of retaliation. For more information, see the College's Whistleblowing Policy.

An NSPCC whistleblowing advice line 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](mailto:help@nspcc.org.uk).

If staff members have concerns about another staff member then this should be referred to People Management or the College Group DSL. Where there are concerns about the Senior Leadership Team, this should be referred to the Chair of Governors via the Director of

Governance and Compliance. 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 feels that their genuine concerns are not being addressed, allegations should be reported directly to the Local Authority Designated Officers (LADOs). Staff may consider discussing any concerns with the Designated Safeguarding Lead and if appropriate make any referral via them.

See Annex 2 for further information about managing and investigating allegations against staff

### **Low Level Concerns**

The term 'low level' concern is any concern, no matter how small, that an adult working in, or on behalf of UCS College Group that may have acted in a way that:

- Is inconsistent with the values and appropriate professional behaviours expected.
- Does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the local authority designated officer, (LADO).

The behaviour of the member of staff, volunteer, governor, contractor or agency worker may not relate directly to a particular student or students but may raise an issue or issues of concern with respect to safeguarding. This may potentially call into question the adult's suitability to work with children.

Examples of such behaviour could include but are not limited to.

- Being overly friendly with students
- Having perceived favourites
- Taking photographs of students on their mobile phone
- Engaging with a student on a one-to-one basis in a secluded area or behind closed doors
- Using inappropriate sexualised, intimidating or offensive language
- Inadvertent or thoughtless behaviour
- Behaviour which is intended to enable abuse

### **Sharing Low Level Concerns**

UCS College Group recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

This culture is created by:

- Ensuring all staff are clear about what appropriate professional behaviour is and are confident in differentiating expected and appropriate behaviours from concerning, challenging or inappropriate behaviour in themselves and other adults.
- Having clear policies and procedures
- Supporting staff, governors, contractors, agency workers and volunteers to share any low-level concerns
- Supporting staff, governors, contractors, agency workers and volunteers to self-refer
- Addressing unprofessional behaviours and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to reflect on and identify any improvements in our safeguarding procedures.

A low-level concern about a member of staff, volunteer, governor, contractor or agency worker should be reported to the College Group Designated Safeguarding Lead (DSL) or College DSL, who will work with People Management and the LADOs to understand what further action should be taken.

### **8.3 Safer working practice**

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 guidance is provided for situations where particular care is needed, for example, for off-site trips and residentials, or when providing intimate care, or when students request specific or personal help from staff.

### **8.4 Staff training and development**

UCS College Group will provide annual Safeguarding training for all staff and governors. The training will be available in a variety of formats, address a range of Safeguarding, online safety and Prevent-related topics, will include ensuring awareness of filtering and monitoring, and ensure annual updates in all these areas.

A Safeguarding and Prevent briefing is included within the induction programme for new staff, and all new staff will be expected to complete an online 'module within the first week of employment, and attend the College Group's own Safeguarding and Prevent training courses 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, the latest edition of Keeping Children Safe in Education Part 1.

After the first year of employment, all staff will be expected to undertake Safeguarding and Prevent refresher courses each year. Staff will also be expected to repeat online compliance training, including Safeguarding Essentials, every three years, and continued access to student record systems will depend on staff remaining up to date in this regard.

The Safeguarding team will also stay current with Somerset Safeguarding programmes:

Somerset Safeguarding Children Partnership Introduction to Child Protection (one day)  
Advanced Child Protection (two days)  
Advanced Child Protection Update (one day)

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, any outstanding training.

## **Section 9 Procedures**

### **9.1 Disclosure and Referral**

If a student discloses harassment or abuse to a member of staff, the member of staff should reassure the young person or vulnerable adult that they have done the right thing and assess whether there is immediate risk to that person or, for example, a sibling. It is vital not to give the student the impression that they are nuisance or that it is a problem that they have disclosed. Inform any Safeguarding Officer as quickly as possible, who will decide whether the concerns should be referred to Children's Services. If it is decided to make a request for involvement to Children's Services this will be discussed with the parents, unless to do so would place the child at further risk of harm.

While it is the Safeguarding Officers responsibility to make request for involvement, any staff member can make a referral to Children's Services. If a young person or vulnerable adult 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 or College DSL, they must be informed as soon as possible.

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. This recording will be then passed to a trained Safeguarding Officer who will ensure it is recorded on MyConcern.

For 14-16 students, if the young person's whereabouts are unknown, or they move to elective home education the Social Worker must be informed, and the setting follow the procedure for reporting children missing from education and elective home education. Attention must also be paid to the attendance and development of any young person about whom the College 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.

When a member of staff 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 member of staff must report this to the police and should talk to the DSL or College DSL immediately. This is a mandatory reporting duty. See Keeping Children Safe in Education: Annex B for further details.

## **9.2 Record keeping**

When a young person has made a disclosure, the member of staff receiving this should:

- Record the conversation as soon as possible
- Keep 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 DSL or College DSL 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 DSL / College DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving provision in a secure manner and separate from the child's academic file.

Child protection records will be scrutinised regularly by the Safeguarding Team to ensure the actions and outcomes have been carried out and any drift avoided.

## **9.3 Confidentiality**

Safeguarding and protecting young people and vulnerable adults raises issues of confidentiality that must be clearly understood by all staff.

If a young person or vulnerable adult discloses to a member of staff and asks that the information is kept secret, it is important that the member of staff tells them, clearly and sensitively, that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other staff to help keep the young person or vulnerable adult safe.

In this situation refer as quickly as possible to the DSL or College DSL.

## **9.4 Site safety**

### **General approaches**

All staff have a responsibility to ensure UCS College Group provides a safe environment for students, and all staff should be vigilant to intruders and any risk of harm to young people. Specific actions the College will take include:

**Security:** Maintaining suitable and reasonable physical boundaries and barriers such as fencing, gates and locks on doors, limiting site access and channelling visitors to Reception areas. Continuing to review and enhance these arrangements wherever possible.

**Identity:** Ensuring all legitimate users of the College can be recognised by an ID card and lanyard, or by a visitor badge (see the Visitor Policy and procedure for more information).

**Access control:** Continuing to install additional ID card operated external doors, to enhance the current security arrangements as funds and building projects allow.

**Oversight:** Asking contractors, visitors and volunteers using the premises to sign in at Reception, understand the College's approach to Safeguarding, and wear a visitor's badge or lanyard. Dependant on the purpose of the individuals lists, this may involve an additional College induction.

**Accompanied:** ensuring contractors, visitors and volunteers are always accompanied (the exception being the use of the Accessible Toilet) by a member of College Staff..

**Welfare:** all contractors, visitors and volunteers will be asked, if required, to use the Accessible Toilets and not the general toilets. Use of the catering outlets is permissible only if they are always accompanied by a member of College Staff.

**Health and Safety:** Ensuring risk assessments are in place for hazardous areas used by young people as part of their curriculum or enrichment

**Statutory Compliance:** Carrying out, and maintaining records of, Fire Drills, operate an effective First Aid service, and ensure steps are taken to minimise the transmission of Infectious Diseases.

**IT:** Ensuring adequate and appropriate monitoring and filtering systems to reduce the possibility of access to harmful online material on college systems (see the Online Safety Policy).

### **Run-hide-tell**

In the light of the concern that the College might be perceived of as a potential target for a terrorist attack, the College will promote the **run-hide-tell** response to students and staff and ensure a control group is identified who can coordinate actions taken and communication in the event of an attack. Full training is provided to both staff and students at the start of the academic year.

## **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>

Students should not be carrying knives in college or between locations, even if they are used during lessons such as catering or horticulture. 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 College Group DSL who will either:

- if it is a legal knife, keep it safely until they go home, asking them not to bring it to college 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.

## **9.5 Students requiring hospital treatment**

If a student requires to be taken to hospital by ambulance from the College, College staff should contact parents / carers / other family members and stress that the College will not be able to accompany the young person to, or at, the hospital. There may be exceptions to this approach, for example in the case of residential students for whom parents / carers may be distant.

## **9.7 Work based learning**

Staff who arrange, vet and monitor work experience placements and work-based or workplace learning will undertake appropriate safeguarding training.

Organisations who offer work experience placements or work-based/workplace learning for college 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.

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 College 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 SSCP or police aware of this.

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.

## **9.8 Early help**

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

UCS College Group will ensure relevant 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 DSL 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.

A directory of early help services is available from Family front door 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.

## **Section 10 Current key concerns**

### **10.1 Sexual harassment in education**

The [OFSTED Review of Sexual Abuse in Schools and Colleges](#) identified the prevalence of abuse and harassment in schools and colleges, even where organisations and Local Safeguarding Partnerships had not identified a problem.

'90% of girls, and nearly 50% of boys, said being sent explicit pictures or videos of things they did not want to see happens a lot...92% of girls, and 74% of boys, said sexist name-calling happens a lot or sometimes to them or their peers'. OFSTED also observed that 'for some children, incidents are so commonplace that they see no point in reporting them'.

For higher education the Office for Students (OfS) have drawn up its Statement of Expectations asking HE providers in England to develop and implement effective systems, policies and processes to prevent and respond to incidents of harassment and sexual misconduct.

The OfS have also recently implemented a new Ongoing Condition of Registration, Condition E6 which applies to incidents of harassment and sexual misconduct affecting students, including staff-student and student-student interactions. In response to this condition for higher education UCS College Group has a specific Policy in place (UCS HE Sexual Harassment Policy) detailing the mechanisms in place to prevent and respond to incidents of harassment and sexual misconduct. There is also a single source of information accessible for students and third parties on our website, which includes how to report any incidence of sexual harassment or sexual misconduct – this can be found [here](#).

As part of 'Safer Recruitment (See 8.1) all UCS and College staff undertake initial and regular training in relation to safeguarding, including all aspects of sexual harassment and misconduct. Setting out the expectations and professional boundaries for professional behaviours.

For higher education students they will receive specific training on this during induction and through the UCS Elevate Tutorial Programme of behaviours which may amount to abuse of power, coercion, sexual and/or romantic advances in the context of intimate personal relationships to raise awareness amongst the study body. Empowering students to refuse and report inappropriate behaviours from students or staff and providing information about how they can access support if required.

UCS College Group will respond robustly to these concerns, including:

- Raising the levels of understanding across the organisation of what constitutes sexual harassment and abuse and ensuring that incidents are never dismissed as 'banter', or 'part of growing up'.
- Introducing training for staff to ensure they are aware of the prevalence of sexual harassment, can identify the signs, and know what to do in response.
- Ensuring students are aware that support is available for victims, and that disclosing abuse or harassment will never be seen as creating a problem.
- Making sure students and staff know that UCS College Group will not tolerate sexual harassment and abuse.
- Including healthy relationships and consent topics in the tutorial curriculum.
- Recording incidents to understand better the prevalence of such behaviours within the organisation.
- Creating a mechanism whereby learners and staff can report if they are experiencing harassment or abuse via an online reporting mechanism
- Reporting on actions taken at Safeguarding Committee meetings.

## **10.2 Child on child abuse**

UCS College Group recognises that children can abuse their peers. Child on child abuse may include, but is not limited to:

- Bullying and cyber-bullying
- Abuse in intimate personal relationships
- Physical abuse, including online abuse which threatens physical abuse
- Sexual harassment (see above) and sexual violence
- Upskirting
- Initiation / hazing type rituals

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 child-on-child abuse may take, such as those listed above, and how to respond to it.

UCS College Group's Positive Behaviour Policy and Behaviour Management procedures will be invoked when this type of abuse is recognised, and support offered to the victims.

## **10.3 Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home, currently or in the past, and/or suffer domestic abuse in their own intimate relationships. This may have a detrimental impact on their health, well-being, development, and ability to learn. Staff will be trained to recognise the signs of Domestic Abuse and its impact on young people, and how victims can be supported.

## **10.4 Child Sexual and Criminal Exploitation (CSE and CCE)**

These are two forms of abuse of power where an adult or adults manipulate a child into sexual or criminal activity, in exchange for something the child or their family wants or for apparent status. Trafficking and County Lines are common forms of CSE and CCE. Both girls and boys can be drawn into both types of exploitation, but the indicators may be different for different genders and may be hard to spot.

UCS College Group will work to support any victims of CSE or CCE and will work with police and other services wherever exploitation involving College students is discovered.

### **10.5 Extra-familial harms**

Extra-familial harms refer to safeguarding incidents and behaviours that occur outside the family home. These may include (the list is not exhaustive):

- Sexual or criminal exploitation
- Sexual abuse
- Serious Violence
- County Lines

UCS College Group will ensure that staff are aware of extra-familial harms and the risk factors associated with them.

### **10.6 Mental and emotional health**

It is recognised that poor mental health may be an indicator that a young person or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. A 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. UCS College Group 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 support and strong external partnerships, for example with CAMHS.

### **10.7 Radicalisation and the Prevent Duty**

UCS College Group recognises that young people and vulnerable adults are vulnerable to extremist ideology and radicalisation. While indicators of this can be hard to spot, staff will be trained to be alert to radicalisation and be made aware to refer concerns to the single point of contact for Prevent, the Vice-Principal of Student Experience who is in a position to make a Prevent referral if required.

### **10.8 Affluent neglect**

This refers to the neglect experienced by some young people or vulnerable adults in wealthy families. This can occur where there is over reliance on paid-for carers, long working hours of parents and / or the young person being placed in a boarding or residential settings against their wishes. Because of apparent material affluence, emotional neglect or abuse may be harder to spot than other types of neglect. UCS College Group will ensure staff are aware of Affluent Neglect and are able to respond appropriately.

## **Section 11 Review of Policy**

This policy will be reviewed annually and will be referred to in the College's corporate publications and available on the College website.

The College's Safeguarding Committee, Senior Leadership Team and Governors will monitor and review this policy annually.

This policy should not be read in isolation and should be cross-referenced to other relevant staff, student and employment policies and procedures, including but not limited to:

- DBS and Rehabilitation of Offenders Policy
- Recruitment and Selection Policy and Procedure
- The Staff Handbook
- Dignity at Work Policy
- Staff Disciplinary Policy and Procedure
- Online Safety Policy
- Data Protection Policy and Procedure
- Modern Slavery Policy
- Student Off-site Trips and Residential Policy and Procedure
- Equality and Diversity Policy
- Staff Social Media Policy
- Visitors Policy
- UCS HE Sexual Harassment Policy

## **Annex 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.

**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.

**SSCP** – Somerset Safeguarding Children Partnership.

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

**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.

### **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.

## Annex 2 Managing allegations

### Initial Actions

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. They 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 discuss with the College Groups Designated Safeguarding Lead and Executive Director of People and Culture whether it is necessary to refer the concern to the Local Authority Designated Officers.

If the allegation meets any of the four criteria set out at the start of this section, contact should always be made with the LADO within **one day** of disclosure.

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.

### College Investigations

The LADOs may ask the College to investigate matters following its own People Management procedures. In such instances, consideration should be given to:

- The gender mix of People Management 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 meetings.

The Principal/Chair of Governors should, as soon as possible following advice from the Local Authority Designated Officer, ensure the subject of the allegation is informed. The DSL should share the outcome of the College investigation with the LADOs and follow any further guidance the LADOs provide, for example submitting a DBS barring referral if required.

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