Safeguarding Policy

2016

Approved September 2015

SAFEGUARDING POLICY

Reviewed September 2015 – to be updated in line with changes to legislation, statutory guidance and codes of good practice.
This Policy incorporates the Prevent duty.

1.0 PURPOSE

To set out in a single framework how the College will meet its statutory duty to safeguard and promote the welfare of children, and its duty under legislation, policy and guidance to safeguard and promote the welfare of vulnerable adults including with respect to the College Prevent Duty and all aspects of safeguarding and safer recruitment.

2.0 SCOPE

This statement applies to all staff, governors, volunteers, visitors and students, and is extended to those using the College for events and activities.

3.0 REFERENCES AND RELATED DOCUMENTATION

This document has been developed by reference to:

- Tees Local Safeguarding Children Boards’ Procedures
- Tees-wide Safeguarding Adults Multi-Agency Procedure
It should be read in conjunction with the following College documentation:

- Single Equality Scheme 2012-2015
- Health and Safety Policy
- Student Behaviour Policy

4.0 DEFINITIONS

Children: Those under the age of eighteen (sometimes referred to in other guidance as children & young people).

Vulnerable Adults: The definition of regulated activity for adults from the 10 September 2012 will identify the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time. The SVGA will no longer label adults as ‘vulnerable’ because of the setting in which the activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

Regulated Activity: Healthcare (by healthcare professionals), Psychotherapy and Counselling, First aid, provided by a first aid organisation (e.g. St John’s Ambulance).

Personal care: which is defined as:

1. Anyone who provides an adult with physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of the adult’s age, illness or disability, is in regulated activity.

2. Anyone who prompts and then supervises an adult who, because of their age, illness or disability, cannot make the decision to eat or drink, go to the toilet, wash or bathe, get dressed or care for their mouth, skin, hair or nails without that prompting and supervision, is in regulated activity.
3. Anyone who trains, instructs or provides advice or guidance which relates to eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails to adults who need it because of their age, illness or disability, is in regulated activity.

**Safeguarding:** Pro-actively keeping children and vulnerable adults safe from harm and abuse. This means ensuring they are safe from accidents, crime, bullying, and actively promoting their well-being in a healthy, safe and supportive environment.

**Child & Vulnerable Adult Protection:** A central part of safeguarding, it is the process of protecting specific children or vulnerable adults identified as suffering, or at risk of suffering, significant harm as a result of abuse or neglect.

**Significant Harm:** The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life. The local authority has a duty to make enquiries or cause enquiries to be made if a child or vulnerable adult is judged to be at risk of suffering significant harm.

**Duty of Care:** The duty which rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of a child or vulnerable adult involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of, or working with children or vulnerable adults in any capacity is considered, both legally and morally to owe them a duty of care.

**Extremism:** Vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

**Whistleblowing:** Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice, wrongdoing, illegality or risk in the organisation (for example, crimes, civil offences, miscarriages of justice, dangers to health and safety, neglect of safeguarding responsibilities), and/or the cover up of any of these. The malpractice has a public interest aspect to it, usually because it threatens others. It applies to raising a concern within the organisation as well as externally, such as to a regulator.

Further definitions relevant to each Appendix are included within the relevant section.

**5.0 STATEMENT OF ACTION**

Stockton Riverside College fully recognises its responsibilities to safeguard and promote the welfare of children and vulnerable adults, including the responsibilities its governors, managers, staff and volunteers have in regard to the protection of children and vulnerable adults from abuse and inadequate care.
The College is committed to responding in all cases where there is a concern and will comply with requirements by making and publishing an explicit statement of intent;

1. Stockton Riverside College is committed to safeguarding and promoting the welfare of children and vulnerable adults and expects all staff, governors and volunteers to share this commitment.
2. We believe that every student should be valued and safe.
3. We want to make sure that the students we have contact with know this and are empowered to tell us if they are suffering from harm.
4. We want children and vulnerable adults who attend or have contact with the College to enjoy what the College has to offer in safety.
5. We want organisations who work with or commission work from the College to have confidence and recognise that we are a safe organisation.
6. We want every young person and adult studying with us to see themselves as a valued part of the College community and to understand how this community operates within the wider UK community, including the importance of the UK democratic processes.
7. We will achieve this by having an effective Safeguarding Policy, which brings together all aspects of safeguarding and includes our Prevent duty.
8. This safeguarding policy statement and our safeguarding procedures apply to all staff, volunteers and users of Stockton Riverside College and any one individual or organisation we commission or partner with.
9. We will review our safeguarding policy and procedures at least once a year to make sure they are still relevant and effective.

Our policy has been developed by reference to legislation, national and local policy and guidance. These are the main elements:

A. Ensuring we provide appropriate levels of staff trained in Safeguarding and Child Protection, and that these staff are supported with training and guidance from a named Designated Safeguarding Lead, and overseen by the College Senior Lead for Safeguarding.

B. Ensuring we practice safe recruitment in checking the suitability of staff, governors, partner staff and volunteers to work with children and vulnerable adults.

C. Carrying out checks using the Disclosure and Barring Service in line with the staff member or students’ levels of responsibility and commensurate with any duties they are to undertake.

D. Providing training to staff on an annual basis, to ensure that staff are aware of potential signs of abuse, neglect and other circumstances of concern such as extremist grooming, and supplementing this training with more in-depth training on a three yearly basis or for staff with specific roles (please see Appendix D).
E. Providing guidance to staff about the conduct we expect from them in the delivery of their duties and as an employee of the College, in order to safeguard themselves and College students and to ensure the College provides an inclusive community within which to train and learn.

F. Providing a whistleblowing framework for staff to report safeguarding concerns to management and beyond if no action is taken.

G. Raising awareness of child and vulnerable adult protection issues and equipping children and vulnerable adults with the skills to keep them safe.

H. Raising awareness of the Prevent agenda and equipping students and staff with an understanding of Fundamental British Values.

I. Assessing the risk associated with any student based on information provided to the College by the student, parents or guardians, and agencies such as the Police and the Local Authority, and taking appropriate action in light of the risk to other students or users of the College.
# Safeguarding Contacts

The College has staff members with appropriate training and expertise at all levels of the organisation.

<table>
<thead>
<tr>
<th>Role</th>
<th>Contact Person</th>
<th>Email/Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nominated Governor for safeguarding</td>
<td>Norma Wilburn</td>
<td><a href="mailto:sarah.thompson@stockton.ac.uk">sarah.thompson@stockton.ac.uk</a> 01642 865415</td>
</tr>
<tr>
<td>Senior Leadership Team member for safeguarding</td>
<td>Mick Hickey</td>
<td><a href="mailto:catherine.turner@stockton.ac.uk">catherine.turner@stockton.ac.uk</a> 01642 865402</td>
</tr>
<tr>
<td>Designated lead responsible for safeguarding</td>
<td>Lorna McLean</td>
<td><a href="mailto:Lorna.mcLean@stockton.ac.uk">Lorna.mcLean@stockton.ac.uk</a> 01642 607464</td>
</tr>
<tr>
<td>Safeguarding officer – overall</td>
<td>Wendy Ellison</td>
<td><a href="mailto:Wendy.Ellison@stockton.ac.uk">Wendy.Ellison@stockton.ac.uk</a> 01642 865484 / 07970982324</td>
</tr>
<tr>
<td>Safeguarding Officer – Bede</td>
<td>Patrick Jordan</td>
<td><a href="mailto:patrick.jordan@stockton.ac.uk">patrick.jordan@stockton.ac.uk</a> 01642 373254</td>
</tr>
<tr>
<td>Safeguarding Officer – NETA</td>
<td>Martin Foster</td>
<td><a href="mailto:Martin.foster@neta.co.uk">Martin.foster@neta.co.uk</a></td>
</tr>
<tr>
<td>Welfare and Retention Officer</td>
<td>Helen Jenkinson – Welfare and Retention Officer</td>
<td><a href="mailto:helen.jenkinson@stockton.ac.uk">helen.jenkinson@stockton.ac.uk</a> 01642 865484 / 07792475888</td>
</tr>
</tbody>
</table>
Disclosure and Barrning Service

Disclosure and Barring Service (DBS) checks enable organisations to make safer recruitment decisions by identifying candidates who may be unsuitable for work that involves children under the age of 18, or that involves working with vulnerable adults. This policy sets out the College’s approach to DBS checking within the statutory framework.

All workers undertaking “regulated” activity are subject to compulsory vetting and barring procedures including Enhanced DBS checks.

Regulated Activity applies to those staff or volunteers who:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once.

Those staff who undertake “non-regulated” roles are not subject to compulsory vetting and barring checks.

DEFINITIONS

Regulated Activity – Children under the age of 18: The following work constitutes “regulated” activity relating to children:

- Work in a specified place. Specified places are those named in the Safeguarding Vulnerable Groups Act and include ‘an educational institution which is exclusively or mainly for the provision of full-time education to children.’

- Work of a specified nature. This includes: teaching, training, supervising, caring for children and providing specified advice or guidance to children.

Specified Place: A place exclusively or mainly for the provision of full time education for children. As such it has assessed the nature of each post within the College, to determine which are “regulated” posts under the Act.

INFORMATION FILTERED BY THE DISCLOSURE AND BARRING SERVICE

The rules as to when a conviction or caution will be filtered are set out in legislation. This states that a certificate must include the following:

- Cautions or convictions relating to an offence from the prescribed list agreed by Parliament (never filtered).
• Cautions given less than 6 years ago (where individual 18 or over at the time of caution).

• Cautions given less than 2 years ago (where individual under 18 at the time of caution).

• Where the individual has more than one conviction offence all convictions will be included on the certificate (no conviction will be filtered).

• Convictions that resulted in a custodial sentence (regardless of whether served).

• Convictions which did not result in a custodial sentence, given less than 11 years ago (where individual 18 or over at the time of conviction).

• Convictions which did not result in a custodial sentence, given less than 5.5 years ago (where individual under 18 at the time of conviction).

**STATEMENT OF ACTION**

Enhanced DBS checks are mandatory for those FE posts that provide education and frequently teach, train, instruct, care for or supervise persons aged under 18 or vulnerable adults and carry out this work frequently (once a week or more) or intensively (four times a month or more or overnight).

However, in accordance with the Protection of Freedoms Act 2012, individuals who undertake such tasks but who are supervised, are not considered to be undertaking “regulated” activity and are not subject to Enhanced DBS Disclosures. Many volunteers will not be subject to compulsory checking because of this, although each case will be considered on its own merits.

Those posts which are not considered to be “regulated” are not subject to compulsory disclosure checking. In addition, as they are not regulated the College is not entitled to access the barred lists (adult and children) in respect of such posts.

Individuals applying for roles which constitute “regulated activity” are subject to enhanced Disclosure checking. The check will include a check of the barred list for working with children and vulnerable adults (as appropriate).

If the disclosure shows evidence that the individual is potentially a risk to children or vulnerable adults, the College reserves the right to withdraw any offer of employment. The Recruitment of Offenders Policy outlines the procedure for dealing with Disclosure information. Decisions will be made in the light of the seriousness and date of any offence. Minor offences of a non-safeguarding nature committed a long time ago will be considered to have little or no bearing on whether the individual is suitable to work with children or vulnerable adults. However, it is not possible to give firm rules on which
offences will result in offers of employment being withdrawn. This is a matter for professional judgement and each case will be considered on its own merit.

More serious offences committed recently may give rise to a reasonable belief that the individual is a potential risk to children or vulnerable adults. Where there is any doubt, or where it appears as though the offences committed are such that the individual is a potential risk, the matter will be referred to the Principal for a final decision.

New starters undertaking “regulated” activity should not commence employment in that role until all of the statutory pre-employment checks have been carried out, including the Enhanced Disclosure check. However, there may be some circumstances, for example where a person is needed to start work at the College at short notice that a risk assessment will suffice, pending a satisfactory Disclosure check being obtained.

In the event that it has not been possible to obtain a satisfactory Disclosure before the individual is scheduled to commence employment, the line manager with the approval of the Head of Department and relevant Senior Leadership Team member has discretion to allow an individual to begin work pending receipt. However, this will only be allowed when all the other statutory checks have been completed.

Appropriate supervision for individuals who start work prior to the result of a DBS Disclosure being known should reflect what is known about the person concerned, their experience, the nature of their duties and the level of responsibility they will carry. For those with limited experience and where references have provided limited information the level of supervision required may be high.

For those with more experience and where the references are detailed and provide strong evidence of good conduct in previous relevant work a lower level of supervision may be appropriate. For all new staff in regulated posts awaiting a disclosure check it will be made clear that they are subject to this additional supervision pending receipt of the check. The nature of the supervision will be specified and the roles of staff in undertaking the supervision clearly identified. The arrangements should be reviewed regularly by the appropriate line manager, e.g. the Head of Department. In these circumstances, the line manager is required to complete the Risk Assessment Form, which should be approved by the relevant Senior Leadership team member.

The College undertakes a range of pre-employment checks, depending on whether the role is a “regulated” post. For “regulated” posts, many of the checks are a statutory requirement.

**Full Time and Fractional Staff**

The procedure to be followed when appointing staff is set out in the College’s procedure “Recruitment and Selection of Staff and Volunteers.”
Hourly Paid Staff

Hourly paid staff are subject to the same employment checks as permanent staff. Where an hourly paid member of staff is required to start work at short notice, for example to cover staff absence, then all of the statutory pre-employment checks must be completed. Where a DBS criminal records check is required, the person may start work if a risk assessment is carried out using the procedure outlined above. The individual will not be allowed to work in regulated activity without a barred list check being carried out and found to be satisfactory.

Agency Staff

The requirement to carry out statutory checks also applies to supply agencies providing individuals to work for the College in “regulated” posts, e.g. agency teachers. In such circumstances, the College will ensure that the agency provides written confirmation that all appropriate checks – including an enhanced DBS Disclosure Check and barring checks - have been undertaken.

The individual cannot commence work in the role until this confirmation is received.

Volunteers

Volunteers are subject to the same scrutiny in terms of statutory checking as employed staff, if they are undertaking “regulated” activity (for example, a volunteer who attends an overnight field trip involving children). However, not all volunteers undertaking activities that would otherwise be described as “regulated” are subject to DBS checking.

Under the Protection of Freedoms Act, volunteers undertaking “regulated” activity are not subject to compulsory Vetting and Barring procedures if they are supervised.

Each case will be considered on its own merits.

Visiting Staff: Staff Employed by Other Organisations Undertaking Regulated Activity

Workers employed by other employers are sometimes contracted to work in “regulated” roles within the College. Such individuals will also include those “visiting” the College on Teacher Training placements.

For these individuals, the employer (or placing organisation) is required to verify that the required statutory checks are in place.

Governors

Governors who undertake “regulated” work are subject to the statutory checks, including an enhanced DBS disclosure. Governors who have not had the statutory checks are not
allowed to undertake frequent or intensive contact with children or vulnerable adults until all the statutory checks are in place.

**Single Central Record**

The Human Resources Service maintains a single central record of employment checks for staff engaged at the College. The reference number of a DBS certificate will be recorded on the record, together with the date it was seen and the initials of the member of the Human Resources Service who saw the check.

The Human Resources Service will also record when a barred list check has been undertaken and record when it was undertaken and by whom.

Staff undertaking “regulated” activity whose start date in the role was prior to 1 March 2002 are not subject to DBS checking. However, if: concerns arise about the individual’s suitability to work with children or vulnerable adults (e.g. because of an incident that has given cause for concern), or the individual moves to work that involves greater contact with children or vulnerable adults an Enhanced Disclosure check is required. The individual must not continue in the role unsupervised, or move to the role with greater contact without supervision, unless the Disclosure is received and is satisfactory.

An Enhanced check is also required when an individual whose appointment did not require them to be Disclosure checked, moves into a “regulated” post. For example, an individual employed as a Finance Administrator (and who therefore was not eligible for a Disclosure check) is promoted to a student advisory role. As the student advisory role is a “regulated” post, a satisfactory Enhanced Disclosure check is required before the individual can start work in that role.

If a DBS disclosure is not available before the individual starts his/her new role, supervision pending DBS checking applies as above.

**Staff from Outside the United Kingdom or who have Worked Abroad**

Staff who have come from overseas into a “regulated” post will, in addition to the statutory pre-employment checks referred to above, be subject to additional checks as considered appropriate. Such additional checks will include Certificates of Good Conduct or foreign police records. If these are unavailable (it is not possible to obtain these checks in every circumstance) the College will pursue other avenues such as additional references, so that safe recruitment is achieved.

UK staff who have lived or worked outside the United Kingdom for a significant period of time (at least three months) and who last did this within the previous 10 years prior to their employment in a “regulated” College post will be subject to similar additional checks. As with overseas staff, if it is difficult to obtain these records, additional checks will be undertaken, e.g. reference from overseas employer.
The College reserves the right to vary these parameters in a given situation, e.g. where an applicant worked abroad for a limited period of time or over 10 years ago. In particular, where this work is in certain settings, e.g. a children’s home or hospital, the College may make such additional checks as it deems appropriate.

**People who do not require a Disclosure and Barring Service Check**

It is not necessary to obtain a DBS Disclosure for visitors who will only have contact with children on an ad hoc or irregular basis for short periods of time. However, all visitors to the College must report to reception and sign in upon arrival and out upon leaving the premises.

Examples of those who are not required to have a Disclosure check include:

- Visitors who have legitimate business with the College and have only brief contact with children.
- Visitors or contractors who come on site only to carry out emergency repairs or service equipment and whose contact with children or vulnerable adults is infrequent or not intensive.
- Volunteers and parents who only accompany staff and children on one-off outings or trips that do not involve overnight stays, or who only help at specific one off events, e.g. a sports day, College open day etc.
- Secondary pupils on Key Stage 4 work experience in College or nursery classes; secondary pupils undertaking work in the College as part of voluntary service or vocational studies; or Key Stage 5 or sixth form pupils in connection with a short careers or subject placement. In these cases the school placing the pupil should ensure that s/he is suitable for the placement in question. In any event the College will not leave such pupils unsupervised with under 18s or vulnerable adults.
- People who are on site before or after normal College hours and when children are not present, e.g. local groups who hire premises for community or leisure activities.

**Students who require a Disclosure and Barring Service check**

Students who undertake placements which constitute “regulated activity” are subject to enhanced Disclosure checking. This starts with a disclosure from the student detailing any information they feel is of relevance which would not be filtered by the DBS service (see definition of DBS filtering), which is considered by a ‘Safeguarding Risk Assessment Panel’.

If the disclosure or subsequent information (e.g. as provided by the DBS certificate) shows evidence that the individual is potentially a risk to children or vulnerable adults, the panel reserves the right to advise the College to withdraw any offer of a course where the placement is a required part of the course.
The Recruitment of Offenders Policy outlines the procedure for dealing with Disclosure information. Decisions will be made in the light of the seriousness and date of any offence. Minor offences of a non-safeguarding nature committed a long time ago will be considered to have little or no bearing on whether the individual is suitable to work with children or vulnerable adults. However, it is not possible to give firm rules on which offences will result in offers of the course being withdrawn. This is a matter for professional judgement and each case will be considered on its own merit.

More serious offences or those committed recently may give rise to a reasonable belief that the individual is a potential risk to children or vulnerable adults. Where there is any doubt, or where it appears as though the offences committed are such that the individual is a potential risk, the College reserves the right to withdraw the offer of any course.

Work experience placements – employer DBS checks

Although Government DFE Advice on post 16 study programme placements (March 2015) states that DBS checks are not required to be carried out by a learning provider in the arranging of work experience placements, the College is committed to ensuring that young people in placement are afforded the same protections as those studying in the classrooms. For this reason, the following principles must be applied;

- The employer must demonstrate full compliance with all HSE guidance.
- The employer should not be a sole trader.
- The employer should be able to provide supervision of an adequate nature to the work experience student. This would normally mean more than one member of staff was on hand at all times.
- If there is a potential that an individual member of staff will be working closely with a student over an extended period of time, the employer should look to mitigate that, and if this is not possible the employer would need to comply with ‘regulated activity’ DBS requirements.

Associated forms – Safeguarding Risk Assessment Panel Form
Disclosure and Barring Service (DBS) forms
Department for Education Advice on Work Experience Placements
Appendix C

Summary of Checks Required

It is the responsibility of the Head of Department to ensure that Human Resources are aware of all appointments, in order to ensure that the correct checks are carried out and recorded on the Single Central Record (SCR).

It is the responsibility of the Human Resources Department to ensure that the appropriate checks are carried out, and that employees are not permitted to start work with the College prior to this.

In all cases, the identity checks, right to work in the UK, qualification checks, health declaration and references must be complete prior to commencing employment. In most cases, the DBS should also be in place prior to employment. In an exceptional circumstance, the Head of Department may require a member of staff prior to the DBS being available. In this case:

- the risk assessment must be completed by the HOD prior to employment commencing.
- The DBS must be applied for immediately.
- The DBS must be received by HR within 10 working days of being dispatched by DBS service.
- Where this does not occur;
  - the employee will be contacted by the HR department and invited to an interview with the Director of HR
  - The employee will be informed that the DBS must be received by HR the next working day.
  - If the DBS certificate is not received within the allotted time, the employee and the HOD will be informed by the Director of HR that they not be permitted to continue their employment.

<table>
<thead>
<tr>
<th>Category of Individual</th>
<th>Pre-employment Checks required</th>
</tr>
</thead>
</table>
| **Non-regulated posts**| • Identity  
• Right to work in UK  
• Qualification check  
• Two references  
• Health declaration  
• Online safeguarding training certificate |
| **Regulated Posts**    | • Identity  
• Right to work in UK  
• Qualification check  
• Two references  
• Health declaration  
• Barred list check  
• Enhanced Disclosure check or risk assessment |
<table>
<thead>
<tr>
<th>Category of Individual</th>
<th>Pre-employment Checks required</th>
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<tbody>
<tr>
<td></td>
<td>Non-regulated posts</td>
</tr>
<tr>
<td>Hourly Paid staff</td>
<td>• Identity</td>
</tr>
<tr>
<td></td>
<td>• Right to work in UK</td>
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<tr>
<td></td>
<td>• Qualification check</td>
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<td></td>
<td>• Two references</td>
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<td>• Health declaration</td>
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<td>• Online safeguarding training certificate</td>
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<tr>
<td>Agency Workers</td>
<td>• Identity</td>
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<tr>
<td>Volunters</td>
<td>• Identity</td>
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<tr>
<td></td>
<td>• Two references (at least one being taken up prior to start date)</td>
</tr>
<tr>
<td>Governors</td>
<td>Governors who undertake “regulated” work are subject to the statutory checks, including an enhanced DBS disclosure. Governors who have not had the statutory checks are not allowed to undertake frequent or intensive contact with children or vulnerable adults until all the statutory checks are in place.</td>
</tr>
<tr>
<td>Students attending placement where children or vulnerable adults are present</td>
<td>Students who are attending placements in any organisation where children or vulnerable adults are present will be subject to a Disclosure and Barring Service check, carried out by the College.</td>
</tr>
<tr>
<td>Students employed</td>
<td>Full responsibility for all pre-employment checks and Disclosure and</td>
</tr>
<tr>
<td>Category of Individual</td>
<td>Pre-employment Checks required</td>
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<tr>
<td>by an employer where children or vulnerable adults are present</td>
<td>Barring service checks lie with the employer.</td>
</tr>
<tr>
<td>Employers</td>
<td>Employers offering work placements to under 18s will be assessed about the need for a Disclosure and Barring check by the Work Placement Assessor.</td>
</tr>
</tbody>
</table>
Appendix D

Staff Training Arrangements for Safeguarding

The College requires all staff to be aware of their safeguarding responsibilities, and provides the parameters for staff training and development, and actions to be taken in the event of non-compliance.

<table>
<thead>
<tr>
<th>Safeguarding Training - Staff Requirements</th>
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<tbody>
<tr>
<td><strong>Detail</strong></td>
</tr>
<tr>
<td>Initial briefing</td>
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<tr>
<td>LSCB training (computer-based)</td>
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<tr>
<td>Detail</td>
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<td>Annual update training</td>
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<tr>
<td>Online e-safety training</td>
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<td>Online e-safety training for Managers</td>
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<td>Detail</td>
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<tr>
<td>Workplace Health and Safety Vetting. Workplace health and safety vetting for managers</td>
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<tr>
<td>Governor Training</td>
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<td>Audit of Single Central Record</td>
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<td>Prevent</td>
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<td>Detail</td>
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<td>Equality and Diversity</td>
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<td>awareness</td>
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Staff Code of Conduct

PURPOSE AND CONTENT

The purpose of this appendix is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in their day to day work (the Code of Conduct) and how they should behave towards one another (the Model of Professional Behaviour).

This document cross-references to the Performance Management and Development schemes, and to the Core Competencies that all staff are requested to demonstrate.

It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, which implies allowing room for initiative and judgement. However, this document provides a consistent framework and guidelines.

Staff should seek advice from the Director of Human Resources in the first instance or another member of the Senior Leadership Team (SLT) if they have any queries about the content of this document, or if they require advice on how any aspect of conduct may be regarded.

The Code of Conduct and Model of Professional Behaviour apply to all staff at the College, irrespective of anyone's position or role in the College, together with any agency/casual staff and any workers at the College who are here on a voluntary basis.

WORKING WITH STUDENTS

In their dealings with students the College expects that all staff will:

- Ensure their relationships with students are never of a kind that could compromise their professional responsibilities.
- Undertake their responsibilities in respect to the safeguarding of students and act appropriately if they have concerns of a safeguarding nature.
- Promote College standards of student behaviour including the promotion of Fundamental British Values.

WORKING WITH COLLEAGUES

Staff must adhere to the College’s policies and procedures because their actions have consequences for others.

REPRESENTING THE COLLEGE

In order to preserve the reputation of the College, staff must:
• Obtain approval from the Principal, or in the Principal’s absence a member of the SLT, before contacting the press.

• Check with the relevant budget holder before committing College resources other than those for which they have responsibility.

• Take care over the use of College headed notepaper and the College logo, whether for use themselves or the use of students they are supervising; in particular ensure that written communication they are sending outside the College is prepared by a member of the Secretariat Team.

• Maintain professional standards of conduct towards others when acting in a College capacity.

• Dress appropriately when acting in a professional capacity and with due regard for the conclusions others may draw from their attire (see Staff Code of Conduct).

• Not engage in activity that would draw the College into disrepute.

ADDITIONAL PROFESSIONAL RESPONSIBILITIES

Staff are reminded that they are expected at all times to observe the following professional obligations:

• To preserve the confidentiality of information relating to the College’s staff, students, finances, marketing and strategic planning, together with any further information rightly to be judged the property of the College (except as outlined in the Whistleblowing regulation).

• To exercise proper professional discretion in the event of their being offered hospitality or gifts of any kind to ensure that their line manager is informed of their acceptance of any such gifts or hospitality with a value in excess of £25 per instance.

• To wear their College ID with the appropriate coloured lanyard at all times when on College premises.

COLLEGE PROPERTY

In order to preserve the quality of the College’s environment and physical resources staff must ensure that:

• They, and students for whom they are responsible, look after College premises and property which they use.
• Procedures for borrowing College equipment are observed.
• Energy is conserved wherever possible.
• The security of College property is maintained as well as possible and not put at risk.
• They pay the College for any costs incurred by the personal use of College equipment (for example phone, photocopier). However, in calculating this staff should bear in mind any costs they may have incurred by the use of their own equipment on College business (for example phone call on College business made from home).

Staff should also assist with the security of the College by directing to reception anyone who they think might be a stranger on site.
Appendix F

Whistleblowing – Safeguarding aspect

All members of staff are subject to the staff code of conduct guidance, and are responsible for ensuring they conduct themselves appropriately with learners, and maintain professional boundaries at all times.

Professional boundaries include:

- Personal relationships with students should not be sought out or conducted by staff members:
  - If any staff member has an existing relationship (e.g. family member) with an under 18 student, advice should be sought to ensure the staff member and student are safeguarded appropriately.

- Personal contact details should not be given to students.

- Students and staff should not be ‘friends’ on Facebook or other social media.

- Students and staff should have appropriate professional relationships.

- All staff must adhere to the College safeguarding guidance provided in the annual safeguarding update training.

If a member of staff is thought or identified to be behaving in a way that is putting a young person at risk, or behaving inappropriately with any student in a manner that could be seen to be subjecting them to harm or duress, this should be reported to the College Principal immediately.

Full information on the College Whistleblowing Policy is provided within the detailed policy document.
Child and Vulnerable Adult Protection

Child & Vulnerable Adult Protection: A central part of safeguarding. It is the process of protecting specific children or vulnerable adults identified as suffering, or at risk of suffering, significant harm as a result of abuse or neglect.

Significant Harm: The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life. The local authority has a duty to make enquiries or cause enquiries to be made if a child or vulnerable adult is judged to be at risk of suffering significant harm.

Duty of Care: The duty which rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of a child or vulnerable adult involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of, or working with children or vulnerable adults in any capacity is considered both legally and morally, to owe them a duty of care.

1. Who is responsible for Safeguarding and protecting Children and Vulnerable Adults from abuse?

Both are everyone’s business and it is essential you understand your role. We all have a Duty of Care.

Definitions of Abuse:

Physical Abuse: May include hitting, shaking, throwing, poisoning, burning, scalding, suffocating or otherwise causing physical harm. Physical harm can also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

Emotional Abuse: The persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on emotional development. This may involve conveying that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include persistent scapegoating, hostility, ridicule, frightening or threatening behaviour, or cruelty. It may feature age or developmentally inappropriate expectations being imposed on children or vulnerable adults. It may involve children seeing or hearing the ill-treatment of another or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment though it may occur alone.

Sexual Abuse: Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetration or non-penetrative acts. They may include non-contact activities, such
as involving individuals in looking at, or in the production of, pornographic material, watching sexual activities, or encouraging people to behave in sexually inappropriate ways.

**Neglect:** The persistent failure to meet a child or vulnerable adult’s basic physical and/or psychological needs, likely to result in the serious impairment of health or development. It may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from the family home). Failing to protect from physical harm or danger, failing to provide adequate supervision including the use of inadequate care-takers or the failure to ensure access to appropriate medical care or treatment.

**Financial or Material Abuse:** Gaining access to and misusing funds, possessions or benefits. More usually associated with a Vulnerable Adult.

**Institutional Abuse:** Institutional abuse can be seen when organisations allow the abuse of those in their care as a consequence of practices in the organisation. This could include routine bullying and humiliation of service users, shortage of food, warmth and clothing, and ‘rough’ handling of people. Institutional abuse can arise as a result of poor management, the absence of appropriate training and support for staff, a lack of policy and clear procedures and poor channels of communication.

**Child Sexual Exploitation:** Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

**Extremism:** Extremism is defined as vocal or active opposition to the fundamental British values. Young people and adults from all walks of life may be subjected to extremist recruiters via the internet or in person. Recruiters or groomers use similar methods to paedophiles to recruit others and to encourage others to become involved in extremist and even terrorist activity.

### 2. Is it Abuse?

Abuse is not always obvious so it is very important to be vigilant and share concerns and information (taking into account the requirements to do so confidentially and appropriately).

All concerns, including those which perhaps seem minor (such as noting a learner was behaving out of character) should be referred to the Personal Tutor of the person concerned. This enables a good record to be maintained of what can seem like minor issues when looked at in isolation. The Personal Tutor will action as required.
Actions may involve organising a tutorial with the learner, contacting the learner’s parents (with consent), referring the learner to internal services such as careers guidance or youth workers, raising as a general issue with the tutor group, or just noting for future reference.

If the Personal Tutor is unsure of what action to take they will discuss with an appropriate colleague or member of the College management team. If still unsure (or unsure whether the matter is a safeguarding issue) the matter should be immediately referred to one of the College’s Designated Persons for Safeguarding:

- **Wendy Ellison – Safeguarding Officer (designated person)** 01642 865484 07970982324 (room 162 Teesdale).
- **Helen Jenkinson – Welfare and Retention Officer** (deputy designated person) – 01642 865484/07792475888 (room 162 Teesdale).
- **Patrick Jordan – Care, Guidance and Support Manager, SRC Bede 6th Form** 01642 373254
- **Lorna McLean – Skills Academy Manager & senior designated person:** 01642 607464

3. **Significant causes for concern**

A significant concern is where there has been, or is, a likelihood of harm (ill treatment or impairment of health) that will have a significant effect on development (physical, intellectual, emotional, social or behavioural) or health (mental & physical).

There are no absolute criteria for judging what significant effect means. It could depend on:

- the degree and extent of physical harm
- the duration and frequency of emotional abuse and neglect
- the impact on health and development
- any specific needs such as a disability
- the wider and environmental family context
- the capacity of parents/carers to meet needs

If you have a significant concern or you are unsure but think it may be significant it must be reported immediately to a Designated Person. Do not think of the
consequences on others (e.g. parents or another member of staff) of reporting – the focus must always be solely on the needs of the child or vulnerable adult. If you are unable to report the concerns to a designated person, you should contact Stockton Emergency Social Services directly, informing the designated person by email that you have done so (see numbers included below).

A significant concern can arise because a learner discloses about abuse, information is received from someone else (e.g. another learner) or there are signs and symptoms that indicate abuse either may already have taken place, or may happen in the future. A significant concern can also arise due to a final piece of information being added to previous concerns.

4. Disclosure (including allegations)

Disclosure may occur through classroom activities or may be made directly to you as a member of staff or volunteer. If a child or vulnerable adult tells you that s/he has been or is experiencing any form of abuse or his/her explanation of a physical injury is that a parent, guardian or other person has caused it, this is an allegation. If this happens:

- Remain calm, listen carefully and allow the person to speak without interruption and do not trivialise or exaggerate the issue.

- Never make suggestions, coach or lead the person in any way. This is very important as asking what could be seen to be leading questions could seriously weaken a case if it went to court. Leave this to those who will conduct the subsequent investigation (e.g. the police).

- Give the person plenty of time to talk and write down what they say as soon as possible afterwards). Record the date and the precise time of day s/he told you and the date and precise time you wrote it down.

- Be honest and explain that you are unable to keep the information they have told you a secret and that you will have to involve other people, but reassure them that they have done the right thing by disclosing to you, that only people who need to know will be told, and that the situation will be dealt with sensitively.

- Contact a Designated Person, or if you do not think it is advisable to leave the learner on their own ask someone else to contact them. If a Designated Person is not immediately available contact a College Head of Department or other College Manager. If physical injury has occurred also ask for a first aider immediately and in cases of imminent threat, e.g. physical attack on College premises, ask for Facilities to assist in ensuring immediate safety.
• Complete a Referral form as soon as you are not directly involved with the person who made the disclosure and deliver it and any other notes you made in a sealed envelope marked confidential to the Designated Person. Do not keep any copies, although you should make a general note for your own records (e.g. disclosure made by .. on .. at .. Referred to .. on .. at ..).

• In the unlikely event that a Designated Person is unavailable, available (e.g. in holiday periods or outside normal College opening hours) refer to your manager. If your manager is unavailable, you must take all reasonable steps yourself to protect a child or vulnerable adult from an immediate threat (e.g. contact First Contact / the Emergency Duty Team or the Police on the numbers below).

<table>
<thead>
<tr>
<th>First Contact Team (8.30am – 5.00pm Monday – Thursday (4.30pm on Friday)</th>
<th>Telephone: 01642 527764</th>
<th>Email: <a href="mailto:firstcontact@stockton.gov.uk">firstcontact@stockton.gov.uk</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Duty Team (out of hours)</td>
<td>Telephone: 08702 402994</td>
<td></td>
</tr>
<tr>
<td>Tithebarn House</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High Newham Road</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stockton on Tees TS19 8RH</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Police</td>
<td>Telephone: 01642 326326 or (999 in an emergency)</td>
<td></td>
</tr>
<tr>
<td>Prevent contact – Lesley Clelland 01642 303397</td>
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</table>

DO NOT contact parents, guardians or any other person (e.g. friends of the child or vulnerable adult) without first consulting the Designated Person. This is very important to prevent the potential for warning people who may be involved in the allegations, or who may take action if aware an allegation has been made (e.g. further abuse or making immediate arrangements for a child or adult to leave the country for a forced marriage or to join an extremist organisation).

5. Designated Person

On notification of a significant concern the Designated Person will:

• Check for any existing records (if appropriate to the situation) held in the safeguarding file.

• Determine the priority/level/immediacy of risk (could include factors relating to the person concerned, other children in the setting and any carers involved).
• Arrange for emergency first aid (if required) only. Any other medical intervention/ checks will be arranged by the Social Care Service and/or the Police.

• Act within the guidance provided within ‘Safeguarding: Information Sharing Advice for Practitioners’, March 2015

If the Designated Person decides a referral to the Adult or Children’s Social Care Service, or to the Channel service is required they will:

• Ask the view of the child or vulnerable adult concerned if they can understand the significance and consequences of making a referral, however whilst their view should be respected and considered, it remains the responsibility of the Designated Person to take whatever action is required to ensure the safety of the child/vulnerable adult involved and others who may be at risk. **The protection of the child or vulnerable adult must always be the most important consideration.**

• Where practicable (and appropriate for a vulnerable adult) discuss concerns with the family/carers and seek agreement for a referral **unless** this may, either by delay or the behavioural response it might prompt, place the child or vulnerable adult at risk of significant harm or compromise the safety of another person.

• Collate the details required for a referral as comprehensively as possible (including full address, date of birth, whether there are other children or vulnerable adults in the setting, any special needs and other professionals involved) and document whether consent for referral was obtained from the person and their family/carers, or if not the reason for this decision.

• Refer to Social Care Services or Channel in a timely way (reflecting the level of perceived risk but usually within a maximum timeframe of one working day) recording the name of the person referred to and the time of the call.

• Refer to the Social Care Services emergency duty team if out of hours.

• Confirm the referral to Social Care Services in writing within 48 hours.

• Keep a written record of all discussions with the child/vulnerable adult and their parents/carers, discussions with others with the College, information provided to Social Care, their advice and any decisions taken (timed, signed and signed).

• Store the records in the safeguarding file (kept securely in Room 162) and notify the senior designated person via email to alert them.
• Clarify with First Contact or Channel whether the referral has been accepted for action.

• If the referral is accepted for action, comply with requests from the Social Care Services or Channel for further involvement.

• If the referral is not accepted, clarify the reasons why not, and if you still consider that the person (or others) are at risk consult as appropriate (e.g. with designated overall lead for safeguarding) regarding next steps.

• If you consider that the matter can be dealt with by College services or those of another agency (excluding the Social Care services) follow the steps outlined below.

If a referral to the Social Care Service is not required or not accepted for action:

• If referral to external services is indicated for a child, check the Common Assessment Framework (CAF) database to see whether there is a current CAF open. If not refer to the service using CAF 1 and copy to the CAF lead. The CAF is a standardised tool used to identify at the earliest opportunity a child’s additional needs which are not being met by the College and universal services (e.g. GP, dentist, etc.).

• Consent for referral to external agencies must be obtained from the child/vulnerable adult and/or their parent or guardian as appropriate if the level of risk does not warrant referral to Social Care services under the ‘significant risk’ parameter.

6. Allegations against a staff member/volunteer

Actions will follow the policy and guidance in the staff conduct procedure and safeguarding whistleblowing procedure (appendix E/F), and Staff Disciplinary procedure.

7. Allegations against a learner

Actions will follow the Behaviour procedure for Learners.
## SAFEGUARDING CONCERN FORM

**CONFIDENTIAL ~ record of concern and action taken**

### MEMBER OF STAFF REPORTING INCIDENT/CONCERN/DISCLOSURE/ALLEGATION:

<table>
<thead>
<tr>
<th>Name</th>
<th>Faculty/area</th>
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<tbody>
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<table>
<thead>
<tr>
<th>Date and time concern disclosed to you</th>
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</table>

<table>
<thead>
<tr>
<th>Date and time concern recorded</th>
</tr>
</thead>
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<td></td>
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</table>

### LEARNER:

<table>
<thead>
<tr>
<th>Name</th>
<th>Date of birth</th>
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</thead>
<tbody>
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</table>

<table>
<thead>
<tr>
<th>Address</th>
</tr>
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<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Any special needs:</th>
<th>If YES, description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

### PERSON WHO REPORTED CONCERN TO YOU *(IF NOT THE NAMED LEARNER)*

<table>
<thead>
<tr>
<th>Name</th>
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### FACTUAL DESCRIPTION OF CONCERN/DISCLOSURE/ALLEGATION:

Be clear about the concern. Do not make assumptions but do not ask questions, just listen and record exactly what is said. You should also note presentation (for example emotional state) and any visible signs of abuse, i.e. bruises or other injuries.

<table>
<thead>
<tr>
<th>Referred to Safeguarding Designated Person (DP)</th>
</tr>
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<tbody>
<tr>
<td>Name</td>
</tr>
<tr>
<td>------</td>
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<td></td>
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</table>
THIS FORM MUST BE GIVEN IMMEDIATELY TO THE DP, WHO WILL ARRANGE FOR IT TO BE ACTIONED AND STORED CONFIDENTIALLY AND SECURELY.

YOU MUST NOT KEEP A COPY!

(ALTHOUGH YOU SHOULD KEEP A GENERAL NOTE IN YOUR RECORDS)

<table>
<thead>
<tr>
<th>Referral discussed with child or vulnerable adult</th>
<th>YES</th>
<th>NO</th>
<th>Consent given to refer</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Discussed with parent/guardian (if appropriate)</th>
<th>YES</th>
<th>NO</th>
<th>Consent given to refer</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
</table>

Reason for not seeking consent or reason given by learner/parent for not wanting matter to be referred (if applicable):

<table>
<thead>
<tr>
<th>Are there any other children/vulnerable adults living in the same setting who could be at risk?</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
</table>

If YES, how many? [ ] Ages, if known: [ ]

<table>
<thead>
<tr>
<th>Other professionals involved (e.g. Connexions, Social Worker)?</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
</table>

If YES, brief summary:

ACTION TAKEN by Designated Person:

Verbally referred to:

Date and time:

Written confirmation sent to:
<table>
<thead>
<tr>
<th>Date and time:</th>
<th></th>
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<tbody>
<tr>
<td>Referral accepted?</td>
<td>YES [ ] NO [ ]</td>
</tr>
</tbody>
</table>

Outcome and further action (including response from Social Services):
Prevent

Legislative Framework and Rationale

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “due regard to the need to prevent people from being drawn into terrorism”. The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty. This guidance came into force on 18th September 2015.

Definition of Extremism

The College understands that extremism can be related to terrorist ideals and activity, and is clear about the current risks to UK security. Extremism is defined by the UK Government as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." (UK Government, 2015).

The College’s Prevent work depends on effective partnership. To demonstrate effective compliance with the duty, the College has ensured productive co-operation with the police and local authorities and co-ordination through existing multi-agency forums, for example the Prevent Silver partnership. This strategy has been discussed with the Prevent Officers at Cleveland Police and with the Regional Prevent Coordinator, Nigel Lund.

Definitions

Fundamental British Values:

- Democracy.
- Rule of law.
- Individual liberty.
- Respect for those with different faiths and beliefs.

Channel: Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk.
- Assessing the nature and extent of that risk.
- Developing the most appropriate support plan for the individuals concerned.
Silver Group: A local advisory forum to share information on and intelligence about current potential extremist risks in the local area and actions being taken by local agencies to reduce or remove extremism and terrorist activity.

Policy Framework

The College views Prevent as an additional aspect of its already well-established Safeguarding Policies and Procedures, along with its embedded approach to Equality and Diversity and as such has integrated its Prevent response within the College Safeguarding policy and the Single Equality Scheme.

Staff training

The College recognises the need to provide appropriate training for staff involved in the implementation of this duty.

The College Senior Leadership Team, Safeguarding team and Governors have received training to understand the Government rationale for Prevent and the channels for further action and referral (updated as required). College academic and support managers have been provided with training on the Prevent agenda and the reason for its importance along with guidance on the implementation of the inclusion of Fundamental British Values.

All College staff should understand what radicalisation means and why people may be vulnerable to it. They need to be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism. Staff need to know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be being exploited by radicalising influences.

Initial briefings and awareness raising training have been led by the College Safeguarding Lead, and further training will be delivered throughout 2015/16 to support staff in delivering awareness raising to students. A programme of staff training matched to job roles is in place.

Staff training programmes will ensure that the following learning outcomes are addressed:

- All staff should understand the process and policies in place when vulnerability has been identified.
- All staff are aware of the internal referral systems if they have a concern.
- All staff should know how and where to get additional advice and support.
- Specific staff, for example safeguarding staff, should know how to refer to Channel.
• All teaching staff should know how to effectively include Equality and Diversity and promote the ethos of the fundamental British values in their planning and delivery.

• All staff are aware of the requirement to be respectful of others and tolerant of different faiths, beliefs, cultures and those with protected characteristics.

Disclosure and Referrals

Where a member of staff has any concerns about a student, as a matter of urgency they should refer the matter to Wendy Ellison, Safeguarding Officer or Lorna Mclean (Designated Safeguarding Lead). In the event neither of these staff are available, the College Senior Leadership Team Lead for Safeguarding and Prevent, Mick Hickey should be consulted for guidance.

There may be some circumstances where the College, in the course of Prevent-related work, identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should immediately be referred to the police by the Safeguarding Officer.

Prevent Compliance

1. The College fully recognises its role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.

2. The College understands that radicalisation is usually a process not an event. During that process, behaviours as well as opinions may change. These changes may be apparent to the friends, families and work colleagues of the person concerned. However, there may not be any external indication of radicalisation.

3. The Prevent work undertaken at the College will be closely aligned with the existing Safeguarding procedures.

4. The College already has robust procedures both internally and externally for sharing information about vulnerable individuals. Any concerns about a student at risk of radicalisation, should be made as a Safeguarding referral. This must be passed to the Safeguarding Officer as a matter of urgency.

5. The Safeguarding Officer will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the College will always share information with other institutions and key partners, such as the local Prevent Silver group.

6. The Prevent response will be implemented in a proportionate and risk-based way ensuring that opportunities in the curriculum are used to promote the British values to learners. British values are defined as “democracy, the rule of law, individual
liberty and mutual respect and tolerance for those with different faiths and beliefs.” These values are clearly mapped in tutorial programmes and every department has provided an action in their annual quality improvement plan detailing their response to these values.

7. The College will continue to encourage young people to understand and respect others with particular regard to the protected characteristics set out in the Equality Act 2010.

8. Young people will be taught about radicalisation and extremism as a part of the tutorial programme.

9. All College policies and procedures will be reviewed for the inclusion of Prevent actions by the Policy owner, and appropriate action taken.

Role of the Governing Body

1. The Governing Body ensures that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). The College has a Safeguarding policy (which includes the Prevent duty) in accordance with government guidance and the College ensures that it abides by locally agreed inter-agency procedures put in place by the LSCB and Prevent co-ordinators across the authority.

2. The Governing Body will ensure that the College’s Prevent Strategy complies with the Prevent duty as set out in the Counter Terrorism and Security Act 2015 and will scrutinise practice in the College, making sure that the policies and procedures in place are followed to prevent people being drawn into terrorism and extremism.

3. The Safeguarding Link Governor is fully aware of the Prevent response, and holds the Safeguarding Lead to account for this.

4. The Governing Body will receive training related to the Prevent duty and the College’s approach, and regular updates will be provided to the board.

5. Governors must exemplify in their conduct the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

6. Governors will ensure that they and the College actively engage with other sectors and partners to comply with and carry out the Prevent duty.

Roles and Responsibilities of College staff

The Deputy Principal as the Senior Lead for Prevent is responsible for:
• The College strategic approach to Prevent.

• Providing updates and assurances to the Governing Body about the College’s compliance with the Prevent duty.

The Designated Safeguarding Lead is responsible for:

• Updating individual safeguarding and Equality and Diversity procedures.
• Liaising with the local Prevent Coordinators.
• Attending the Silver Group Partnership.
• Advising policy holders on the inclusion of Prevent.
• Monitoring the effective use of the CHANNEL referral processes.
• Overseeing the caseload of each safeguarding officer including Prevent referrals.
• Overseeing the training of staff.
• Overseeing the quality of the information on awareness of Prevent for students.

The Student Services Manager is responsible for:

• Providing training and resources to promote Fundamental British Values within tutorial.
• Ensuring the planned cultural and religious events are well conceived, effectively managed, and give consideration to the makeup of the College community and the College Prevent duty.
• Monitoring the College faith and contemplation room.
• Monitoring and oversight of the activity of the Student Union.
• Monitoring and oversight of other formal groups or societies within the student body.

The Care, Guidance and Support Manager SRC Bede 6th Form is responsible for:

• Providing training and resources to promote Fundamental British Values within tutorial at SRC Bede 6th Form.
• Working with the Student Services Manager to ensure any planned cultural and religious events taking place at SRC Bede 6th Form are well conceived, effectively managed, and give consideration to the makeup of the College community and the College Prevent duty.
• Monitoring and oversight of the activity of the SRC Bede Student Council.
• Monitoring and oversight of other formal or informal groups or societies within the SRC Bede 6th Form student body.

The Safeguarding Officer is responsible for:

• Referring concerns to appropriate agencies.
• Supporting individual learners who are working with agencies.
• Supporting groups of students or individuals who have been impacted by or exposed to any activity which might provide an opportunity to any extremist group. This might take the form of mentoring, monitoring or providing access to other agencies.
• Supporting and delivering training and awareness raising amongst staff and students.

The Head of Infrastructure is responsible for:

• Ensuring a robust disaster management/emergency plan is in place and will be responsive to a terrorist threat.
• Maintaining a proportionate and appropriate level of campus security including the enforcement of appropriate ID for staff, students and visitors.
• Ensuring that the IT hardware and software provides filtering against extremist and terrorist activity.
• Providing alerts if the College computers are used to access extremist content.

The Finance Director is responsible for:

• Ensuring funds raised or generated by the College are not used to fund terrorist activity.

Personal tutors and curriculum delivery staff are responsible for:

• Including education about Equality and Diversity within lessons and content where appropriate.

All staff are responsible for:

• Exemplifying fundamental British values in their conduct.
• Including Equality and Diversity in their everyday working practices.
• Challenging any uses of inappropriate conduct or language, from students or colleagues.
• Referring to the appropriate designated people where there are concerns.

Specific areas of focus

Alongside robust safeguarding procedures, all areas have been risk assessed, and the required actions have been summarised within this guidance, with full details in each of the policies governing the area of focus.

Commercial letting (Visitors to the College Policy)

• Commercial clients wishing to lease the premises who are deemed to have extremist views will not be able to rent or lease the premises. The College will gather this information via the Silver group, and will liaise with the Prevent Coordinator to
maintain an understanding of local and national extremist groups to remain vigilant of.

- All visitors to the College, no matter what their purpose, are expected to conduct themselves with respect for others and with respect for the College rules and guidelines, and should not carry out any activity that might place the College at risk of adverse publicity.

Visiting speakers (Visitors to the College Policy, tutorial guidance)

- The College takes seriously its responsibility to exclude those promoting extremist views that support or are conducive to terrorism. Visiting speakers who are deemed to have extremist views will not be invited into the College.

- Visiting speakers can provide a greatly enhanced experience to students, and can contribute significantly to the College tutorial programme. The Student Services Manager will provide information on all tutorial-related visiting speakers to allow the Safeguarding lead to assess the risks associated with any planned events and visiting speakers. As an outcome of the assessment, the Student Services Manager will be provided with feedback about whether an event should proceed, be cancelled or whether mitigating action is required (for example, a member of staff alerting the further education Prevent co-ordinators to concerns in relation to a guest speaker).

- All events and speakers will be assessed and approved.

- All tutorial visiting speakers will be from a reputable recognised national agency (for example, NHS) or will be supervised by a member of the College’s student services staff, who are expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form.

Online and e-Safety (ILT and E-Safety Regulations)

The College uses filtering as a means of restricting access to harmful content. The College filtering system is BLOXX. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT Services team and the Learning Resources Manager continuously monitor activity on the network surveillance software, IMPERO.

The College has policies relating to the use of IT on the premises. IT policies and procedures contain specific reference to the Prevent duty. As some young people and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.
Prayer and faith facilities (Tutorial calendar)

The College has a room available for prayer and quiet contemplation for use by individuals of any denomination. The room is accessible at all times, and is checked weekly by a member of the Student Services team to ensure that extremist literature is not displayed. This will be monitored by the Health and Safety Manager as part of general safety walks around the College.

Faith based and cultural celebrations (Tutorial calendar)

The College is proud of its community and celebrates a number of cultural and religious celebrations throughout the year. The Student Services team will ensure that the range of cultural and religious events observed continues to be representative of the student and staff body and is promoted through tutorial channels.

Partners and subcontractors (Partnership procedure and application)

The College works with a number of partners and subcontractors in its delivery of education. Contractors and partners provide an annual application to work with the College. In this application they are required to provide assurance that they will adopt and promote the Fundamental British Values within their delivery, and that they will not promote or engage in extremist related activities or propaganda. All partners and subcontractors attend mandatory training including on Prevent and Safeguarding.

Fundraising (Fundraising policy)

The College takes seriously its responsibility to ensure that fundraising carried out does not provide funding to extremist groups or fund terrorist activity. Fundraising activities are managed by either the College Staff Association, by the Student Services team, or by a Curriculum Department (for example the Prince’s Trust) to support a community venture or charity. All fundraising will include a self-assessment of the uses of the funds raised and any areas for investigation will be referred to the Finance Director.

Additional Links and Useful Information

Counter Terrorism Bill

http://www.legislation.gov.uk/ukdsi/2014/9780111123737/contents

Universities UK Guidance

http://www.universitiesuk.ac.uk/highereducation/Pages/Externalspeakersinhighe reducatedinstitutions.aspx#.VH3u5zGsWXo - Freedom of Speech on Campus: rights and responsibilities in UK universities (2011)

http://www.universitiesuk.ac.uk/highereducation/Pages/FreedomOfSpeechOnCampus.aspx#.VH3uzzGsWXo- External speakers in higher education institutions (2013)

www.safecampuscommunities.ac.uk
FAST (Families Against Stress and Trauma), a community organisation that supports vulnerable families and individuals, has launched the ‘Families Matter’ campaign. This film featured testimonies from three families who suffered from a loved one travelling to Syria. For more information on the campaign and to watch the film see:

www.familiesmatter.org.uk.

For information on the launch see:


The Education and Training Foundation Prevent guidance http://www.et-foundation.co.uk/az-list/
Safeguarding Risk Assessment Panels

Safeguarding Risk Assessment panels are held in the event of applications or enrolments by students with identified potential concerns. This may be:

- Due to a safeguarding concern or risk which the College is made aware of in the course of the admissions process or during enrolment - this concern may be related to a previous serious disciplinary incident by the student in question, may be due to the applicant being in custodial residences or may have a history of offending or risky behaviour.

- To allow learners on courses where placements are required to be considered during the DBS process and the suitability of the student attending a placement risk assessed.

Risks may become apparent at any stage of the student journey. This may be due to information disclosed by the student, information received in references or information received from other sources such as a Disclosure and Barring Service check.

Applicants for courses that involve a placement working with children and/or vulnerable adults are required to disclose their full offending history at interview as per the DBS filtering guidance (Appendix B) and must also apply for DBS (Disclosure and Barring Service) disclosure. This will be made known to applicants as part of the application process and interviewer/s will inform the applicant of these requirements and provide the standard College form for applicants to provide details of any offence/s and the circumstances arising at the time/s if appropriate. Advice will also be provided by the interviewer at this stage regarding the risk assessment process that will be undertaken. Disclosures will be placed in a sealed envelope and passed directly to the Administrator designated to deal with DBS. They will log the need for a safeguarding risk assessment panel which will be convened to establish the next steps in the process of DBS checking. The designated administrator will convene the Safeguarding risk assessment panel, which will involve:

- Safeguarding designated lead.

- Deputy Head of Curriculum.

- Relevant Head of Department and where appropriate the course leader/personal tutor.

The student should be informed by the administrator that the risk assessment process is being invoked.

The panel must be held within five working days of the request being received by the administrator.
The risk assessment panel will meet and review the facts of the case with regard to all relevant factors including staff and student welfare and safety and the impact any decision will have on students, staff, placement clients and the College reputation. The panel will make a decision on whether the applicant can be offered an unconditional or conditional place, whether the applicant or student could be offered a placement without risk or damage to the College reputation, and what the conditions and controls should be if required.

There are three additional outcomes, following a risk assessment panel:

- **Acceptance with conditions**: The applicant will be admitted/allowed to continue but with certain conditions. These may include the option for the College to withdraw a place once a DBS disclosure has been received and a further risk assessment has taken place.

- **Deferred**: If there is insufficient information on which to make a full assessment, the learner’s application will be deferred until adequate information is obtained.

- **Refusal**: The applicant may be refused admission.

If the outcome is refusal of a place the decision will be communicated in writing to the applicant. **The College reserves the right to conduct a risk assessment on any learner at any time.**

The College reserves the right to withdraw the offer of a place if it is found that any learner has unspent criminal convictions that may potentially impact on the safety of the College community.

Applicants who have been refused a place at the College may appeal against this decision in writing within 10 working days of the refusal letter having been sent from College. The appeal following an admissions panel should be sent to the Senior Administrator. The Deputy Principal will consider each individual case and confirm their decision to the applicant in writing. All other admissions appeals should be sent to the relevant Head of Department for each curriculum area.
Providing a safe place of work and study

The College recognises the importance of sound health and safety practices in maintaining a robust safeguarding framework. To this end, the College has clear policies in place for all aspects of Health and Safety including, but not limited to risk assessment, personal protective equipment and offsite educational visits:

Risk assessment

- Activities with risk (practical)

Where practical activities are deemed to have an element of potential risk, the College will ensure that assessments of risk are undertaken by appropriately experienced Line Managers or nominated persons, in line with the College Health and Safety Policy.

This is likely to include activities such as:
- Construction and related fields including for example Woodwork, Painting and Decorating.
- Engineering and related fields including for example Electrical, Motor Vehicle.
- Sport and Exercise.
- Cooking.
- Hairdressing and Beauty Therapy.

Personal Protective Equipment (PPE)

When participating in practical activities both within College, and when on work placement, learners will be directed to wear appropriate PPE including for example: hand protection; head protection; ear protection; eye and face protection, body protection, foot protection, respiratory protection, fall protection. The College will ensure that learners are given training, information and instruction on the use of PPE.

Off-site Educational Visits

The College will ensure that off-site educational visits are conducted in accordance with the College Off-site Educational (OEV) Procedure:

- All visits will be approved by the designated manager.
- Medical and Consent must be completed for all students attending the visit.
- Transport will be arranged in accordance with the OEV policy.
- All educational visit activity will be risk assessed by the visit organiser, and counter signed by the relevant Head of Department or member of SLT.
- All members of staff organising or attending OEVs must have completed educational visits training/update (as appropriate) within the previous three year period, and all staff taking part in visits involving children and vulnerable adults must have been DBS-checked.
Appendix K

Work placements

In accordance with DfE Post-16 work experience as a part of 16 to 19 study programmes and traineeships: Departmental advice for post-16 education and training providers (March, 2015).

‘The employer has the primary responsibility for the health and safety of students whilst on a work experience placement.’

However, the College also retains a duty of care prior to the placement, so the College will make an informed judgement as to the suitability of the health and safety arrangements with the work experience provider. For the work experience provider to be suitable they must at least meet the Health and Safety Procurement Standards (HASPS) set out by the Learning and Skills Council.

The College Health and Safety Policy (Appendix 9) sets out how work experience placements will be managed in a way that fulfils and is compliant with the Health and Safety at Work Act 1974 and the Health and Safety (training for employment) Regulations 1990.

Workplaces not appropriate for work placement

Workplaces not appropriate for work placement include those where the business is managed by a sole trader, and/or would result in the work placement student being subject to long periods of time with one individual.

Information to provide to learners prior to work placement

Prior to work placement, learners will be provided with information on expectations of the employer, safeguarding contacts, safe working practices including personal safety. This information will include who to report concerns to and what to do in the event of any safeguarding incident.

Information to provide to employers prior to work placement

Prior to work placement, employers will be provided with information on expectations of the learner, safeguarding contacts, safe working practices including personal safety for work placement students. This information will include who to report concerns to and what to do in the event of any safeguarding incident.
Appendix L

Student Bullying

The Policy has been developed by reference to:

- Department for Education:  
- The Education and Inspections Act 2006.
- Children Act 1989.
- Protection from Harassment Act 1997.
- Communications Act 2003.
- www.stampoutbullying.co.uk.

DEFINITIONS

‘Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally’ (DfE).

Bullying is any repeated words or actions, which are aimed at causing someone to feel frightened, miserable and helpless at College. There are many definitions of bullying, but most people consider it to be:

- Deliberately hurtful.
- Repeated over a period of time.
- Difficult for people to defend themselves against.

Bullying can take many forms, for example:

- Verbal – name calling, sarcasm, threatening, teasing.
- Physical – pushing, hitting, kicking, punching or any use of physical aggressive contact.
- Social – ignoring, spreading rumours, treating someone like an outsider.
- Psychological/Mental – stalking, intimidation.
- Cyber – chat rooms, online, instant messaging – email, mobile phone.

Bullying is often motivated by prejudice or ignorance for example on the grounds of appearance, race, religion, nationality, gender, sexual orientation, jealousy. Those from minority ethnic groups, with disabilities, gay, lesbian or transgender (LGBT) or those with learning difficulties can be more vulnerable to this form of abuse and may well be targeted.
Harassment is any conduct which is unwanted by a recipient, which affects the dignity of an individual or group of individuals in the College. Harassment may be repetitive or an isolated occurrence against one or more individuals.

The Equality Act 2010 specifies protected characteristics which include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy & maternity.

All allegations/incidents of bullying will trigger an investigation which will be managed in line with the Student Behaviour procedure. Sanctions may include suspension whilst an investigation takes place and permanent exclusion.

All students, staff and other stakeholders have the responsibility to work together to ensure that bullying and harassment does not occur, or where it is found, action is taken. Advice and information in relation to bullying and harassment will be available from appropriate staff and volunteers. Students will be made aware of bullying, including cyber bullying harassment and safeguarding as part of tutorial.

Staff receiving reports of bullying must take appropriate action to follow up.

Anyone who reports an allegation/incident of bullying or harassment will be listened to carefully and be supported. This support will be available to all involved throughout the investigation process. However, this is not a replacement for the College behaviour procedure which will be followed at all times.

Allegations/incidents will be recorded and students will be told what is being recorded, in what context and why.

Parents/carers have access to this policy and practice about bullying via the College website.

Any incident of bullying will be discussed with the student’s parents/carers where appropriate and agreements made as to what action should be taken subject to compliance with the College behaviour procedure.

Support will be offered to the parents/carers, including where to obtain information from other agencies or support lines.

Information and advice on coping with bullying will be given to all involved.

**Useful Contacts**

- NSPCC Helpline 0808 800 5000
- ChildLine 0800 500 / [www.childline.org.uk](http://www.childline.org.uk)
- Kidscape [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Anti-Bullying Alliance [www.antibullyingalliance.org](http://www.antibullyingalliance.org)
- Bullying UK [www.bullyinguk.org.uk](http://www.bullyinguk.org.uk)