



Safeguarding Policy 2017/2018

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Contents

1. Policy Statement
2. Policy Aims & Objectives
3. Definitions
4. Scope
5. Legal Requirements
6. Role and Responsibilities
- 7 Records, Confidentiality and Information Sharing
- 8 Procedure
- 9 Organisational Responsibilities
- 10 Safer Recruitment
- 11 Working with Parents and Carers
- 12 Managing Allegations against Staff and Volunteers
- 13 Training
- 14 References to related Easton and Otley Policies
- 15 Feedback and Updating the Safeguarding Procedure

Appendix 1 – Norfolk Safeguarding Children’s Board Referral Procedure

Appendix 2 - Definitions of Abuse provided by Working Together 2015

Appendix 3 - Full Definition of Female Genital Mutilation taken from Multi-Agency Practice Guidelines: Female Genital Mutilation

Appendix 4 - Full Definition of Child Sexual Exploitation taken from Safeguarding Children and Young People from Sexual Exploitation: Supplementary Guidance to Working Together to Safeguard Children 2015

Appendix 5 - Child Protection Conferences

Appendix 6 – Definitions of abuse of Adults provided by Norfolk Safeguarding Adults Board, Norfolk Multi-Agency Safeguarding Policy

1. Policy Statement

At Easton and Otley everything we do is to enhance our students' experience, therefore students and their safety and wellbeing is of utmost significance. We strive to provide a safe and supportive environment where the welfare and health and safety of students is valued, promoted and safeguarded thereby developing students who are able to learn, advance and progress in an environment that is both safe and secure.

2. Policy Aims & Objectives

The purpose of the Safeguarding and Prevent Policy and Procedure is intended to ensure that every young person who is a student at Easton and Otley College is safe and protected from harm.

Easton and Otley College is committed to:

- Protect children and young people at our organisation from maltreatment
- Prevent damage of our students' health, wellbeing, development and progression
- Ensure that children and young people at our college grow up in circumstances consistent with the provision of safe and effective care
- Undertake that role so as to enable students at our college to have optimum life chances and enter adulthood successfully

The Safeguarding Policy aims to:

- Define the organisational and individual roles and responsibilities for Safeguarding
- Outline our legal responsibilities in relation to Safeguarding and Prevent
- Outline the process for managing safeguarding referrals from both staff and students

Ethos

Safe environment

We are committed to promoting a positive, supportive and secure environment where students can develop a sense of being valued. We will do this through the effective implementation of procedures related to health, safety and well-being. The following procedures will support our commitment to providing a safe learning environment:

- Admissions, Review and Fitness to Study
- Alcohol and Drugs
- Anti-Bullying and Harassment
- e-Safety for Students
- Lockdown procedures
- Prevent Policy
- Student Absence
- Unwell Students
- Counselling
- Code of Conduct for Staff

- In addition to these procedures we will outline expectations from our community of students, staff, parents and carers. If these expectations aren't met, we will take complaints seriously and respond to them in-line with colleges' complaints procedure. Anyone can raise a complaint about any aspect of our services and have their complaint dealt with in a speedy, fair, thorough and confidential manner. Complaints can also be made via the Skills Funding Agency. Details can be found here: <https://www.gov.uk/complainfurthereducationapprenticeship>

3. Definitions

3.1 Child Protection is concerned with protecting young people from identified risk, Safeguarding extends to the prevention of harm and promotion of well-being of young people.

3.2 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

3.3 'Young people' refers to those who have not yet reached their 18th birthday. This procedure, however also extends to vulnerable adults.

3.4 A vulnerable adult is defined by the Department of Health (2000) as: *'a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'.*

3.5 Definitions of Abuse provided by Working Together 2015

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

3.6 It is important to recognise that Children, Young People and Vulnerable Adults are capable of abusing their peers. This is known as Peer-on-Peer abuse. Peers are able to perpetrate all types of abuse on another individual, with the exception of neglect and organisational abuse. However it is possible that peers may be collusive with neglect or organisational abuse. Additionally this includes the misuse of sexting, including the distribution of indecent images.

Peer on Peer abuse and Bullying will always be closely linked but should be differentiated by the degree of risk of significant harm. It is important that all concerns of abuse and bullying

are reported and addressed appropriately and not tolerated or dismissed as 'normal teenage behaviour'.

Upon concerns being reported to Safeguarding or to Course leaders (as per Student harassment policy), initial assessment will consider the risk of significant harm and whether there is a need to pass the concern to Safeguarding, if Peer on Peer abuse, or to Course Leader if bullying, for the most appropriate response.

This policy along with the College's anti-harassment and bullying policy should be used to inform that initial decision making process and formal responses. In order to ensure the safety of the alleged victim along with all other students, options including but not limited to: suspension without prejudice during further investigation (either internal or by external agencies), should be considered.

From initial concerns being raised, through to after the matter has been concluded, the alleged victim should be offered the most appropriate support available to ensure their ongoing safety and wellbeing. This could take the form of a referral to College Counsellors or external agencies, including Optum <https://www.livewell.optum.com> that will offer appropriate support.

3.7 There are other types of abuse which always involve aspects of the five definitions of abuse from Working Together however there are wider themes. These are:

Female Genital Mutilation (FGM) is defined in Multi-agency statutory guidance on female genital mutilation April 2016 as:

"FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death."

For Full Definition and information on types of mutilation see Appendix 3

Forced Marriage (FM) is defined in 'The Right to Choose': Multi-agency statutory guidance for dealing with Forced Marriage June 2014 as:

"A marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can be physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent coercion is not required for a marriage to be forced."

Forced marriage is therefore very different to an arranged marriage. Further risks around forced marriage may involve the victim being forced or tricked to travel overseas in order to marry however this does not occur in all cases.

Child Sexual Exploitation (CSE) is a form of sexual abuse which is defined above from 'Working together to safeguard Children 2015'. 'Safeguarding Children and Young People from Sexual Exploitation' further defines Child Sexual Exploitation as:

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

See Appendix 4 for full definition from Safeguarding Children and Young People from Sexual Exploitation: Supplementary Guidance to Working Together to Safeguard Children 2015.

Radicalisation is defined in Prevent Strategy June 2011 as

“The process by which a person comes to support terrorism and forms of extremism leading to terrorism.”

This can involve right-wing extremism such as Neo-Nazism, left-wing extremism such as Animal Rights, as well as extreme Islamism.

3.8 Definitions for abuse of adults as provided by Norfolk Safeguarding Adults Board:

The main forms of abuse and neglect are generally classified under the following ten headings.

Physical abuse

The non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment.

Domestic violence

Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member, regardless of gender or sexuality. Domestic abuse is not just about partners, but all family relationships including forced marriage.

Sexual abuse

Direct or indirect involvement in sexual activity without consent. This could also be the inability to consent, pressure or inducement to consent or take part.

Psychological (emotional) abuse

Acts or behaviour which impinge on the emotional health of, or which causes distress or anguish to individuals. This may also be present in other forms of abuse.

Financial or material abuse

Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk from abuse.

Modern slavery

Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse

Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.

Organisational (Institutional) abuse

Institutional abuse occurs where the culture of the organisation (such as a care home) places emphasis on the running of the establishment and the needs of the staff above the needs and care of the adult. This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home from domiciliary services.

Neglect and acts of omission

Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to individual(s). Ill-treatment and wilful neglect of a person who lacks capacity are now criminal offences under the Mental Capacity Act.

Self-neglect

Self-neglect is characterised as the behaviour of a person that threatens his/her own health or safety. Self-neglect generally manifests itself as a refusal or failure to provide himself/herself with adequate food, water, clothing, shelter, personal hygiene, medication (when indicated), and safety precautions.

The definition of self-neglect excludes a situation in which a mentally competent adult, who understands the consequences of his/her decisions, makes a conscious and voluntary decision to engage in acts that threaten his/her health or safety as a matter of personal choice.

See Appendix 6 for a full description of the Definitions of Abuse in Norfolk Multi-Agency Safeguarding Adults Policy.

4. Scope

This Policy applies to all employees and volunteers permanent or temporary of the College and includes any agency, or visiting professionals employed to provide services on their behalf.

4.1 The *Teacher Standards 2012* state that teachers, including Principals / Head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

4.2 All staff have a responsibility to provide a safe environment in which young people and vulnerable adults can learn.

4.3 All staff have a responsibility to identify young people and vulnerable adults who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

4.4 In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual young people or vulnerable adults.

5. Legal requirements

5.1 Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child.³ Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

5.2 Section 175 of the Education Act requires Further Education Colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

5.3 Everyone who comes into contact with children and their families has a role to play in safeguarding children. College staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Institutions and their staff form part of the wider safeguarding system for children. This

system is described in statutory guidance *Working Together to Safeguard Children 2015*.⁵ Institutions should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

5.4 The College has a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

In a briefing note to inspectors in 2013, Ofsted adopts the definition of safeguarding used in the Children Act 2004, and in the government's guidance document *Working Together to Safeguard Children 2015*. This can be summarised as: protecting children from maltreatment preventing impairment of children's health or development ensuring the children are growing up in circumstances consistent with the provision of safe and effective care Taking action to enable all children to have the best outcomes.

1. Safeguarding is not just about protecting children learners and vulnerable adults from deliberate harm neglect and failure to act. It relates to broader aspects of care and education, including:

- Children's and learners' health and safety and well-being
- The use of reasonable force described within the student success policy
- Meeting the needs of children and learners with medical conditions
- Providing first aid
- Educational visits
- Intimate care and emotional wellbeing Online safety and associated issues
- Appropriate arrangements to ensure children's and learners' security, taking into account the local context.

Safeguarding action may be needed to protect children and learners from:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online bullying and prejudice-based bullying
- Racist, disability, and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Radicalisation and extremist behaviour
- Child sexual exploitation and trafficking
- The impact of new technologies on sexual behaviour, for example sexting
- Teenage relationship abuse

- Peer on peer abuse
- Substance misuse
- Issues that may be specific to a local area or population, for example gang activity and youth violence
- Domestic violence
- Female Genital mutilation
- Forced marriage
- Poor parenting, particularly in relation to babies and young children
- Other issues not listed here but that pose a risk to children, young people and vulnerable adults

5.5 In developing this procedure, the College has consulted with the Norfolk Safeguarding Children Board and taken into account guidance from the Association of Colleges, Safecic and the Disclosure and Barring Service (DBS).

5.6 This procedure has been checked against the current guidance applicable to institutes which is:

- Keeping Children Safe in Education 2016
- Working Together to Safeguard Children 2015
- Safer Practice, Safer Learning: A whole organisation approach to safeguarding vulnerable adults for the learning and skills sector (NIACE/DIUS 2007)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People (2015)

5.7 Under Section 26 of the Counter-Terrorism and Security Act 2015, Easton and Otley College has a duty in the exercise of its functions to have:

"Due regard to the need to prevent people from being drawn into terrorism."

This is known as the Prevent Duty. Exploiting a student's vulnerability to being radicalised is another form of abuse. Therefore a staff member's response should be that of responding to a safeguarding matter using the processes detailed within this document. It is important that staff members report any concern about an individual and do not take a 'wait and see' attitude, so the Safeguarding Team can build up a picture of the student's vulnerability and act if necessary.

6. Roles and Responsibilities

6.1 It is the responsibility of every member of staff, volunteer and regular visitor to our college to ensure that they carry out the requirements of this procedure and, at all times, work in a way that will safeguard and promote the welfare of all our students.

6.2 The Governing Body will receive from the designated senior members of staff with lead responsibility for child protection an annual report which reviews how the duties have been discharged.

6.3 The Designated Governor or Principal and all staff working with students will receive training adequate to familiarise them with child protection issues and responsibilities and the

institute's procedures and policies, with external certificated refresher training every 2 years for designated and deputy designated safeguard leads. With all other college staff undertaking online refresher training at least every 3 years.

6.4 The Governing Body ensures that;

- The institution appoints a DSL for child protection who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training
- The DSL and DDSL role is explicit in the role holder's job description
- The institution has procedures for dealing with allegations of abuse made against staff including allegation made against the Principal and allegations against other children
- The institute follows safer recruitment procedures that include statutory checks on staff suitability to work with children
- The institute develops a training strategy that ensures all staff receive information about the school's safeguarding arrangements on induction and appropriate child protection training which is regularly updated in line with any requirements from the LSCB
- The DSL and DDSL receives refresher training every two years

Designated Governor

6.5 The Designated Governor is responsible for liaising with the Principal and senior staff member with lead responsibility over matters regarding child protection and safeguarding, including:

- Ensuring that the organisation has procedures and policies which are consistent with Norfolk Safeguarding Children Board procedures
- Ensuring that the Governing Body considers the institute's procedure on safeguarding each year
- Ensuring that each term the Governing Body has a formal report that informs the board of the is informed of how the organisation and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken

6.6 Governors will not be given details relating to individual child protection cases or situations to ensure confidentiality is not breached.

6.7 The Designated Governor is responsible for overseeing the liaison between agencies such as the police and the local authority in connection with allegations against the Principal or the senior staff members with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries. To assist in these duties, the Designated Governor shall receive appropriate training.

Principal

6.8 The Principal is responsible for:

- Identifying a member of the senior leadership team to be the Designated Safeguarding Lead (DSL) and responsible for Prevent.
- Identifying an alternate member of staff to act as the Deputy Designated Safeguarding Lead (DDSL) in his/her absence
- Ensuring that policies and procedures adopted by the governing body are fully implemented and followed by all staff
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures
- Liaising with the Local Authority Designated Officer (LADO) where an allegation is made against a member of staff
- Ensuring that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service
- Ensuring that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online

Senior staff members with lead responsibility for safeguarding

6.9 The designated senior members of staff with lead responsibility for safeguarding have a key duty to take lead responsibility for raising awareness amongst the staff of issues relating to the welfare of young people, and the promotion of a safe environment for the young people learning within the organisation. They have received training in child protection issues and interagency working, and will receive refresher training at least every 2 years. The designated senior members of staff keep up to date with developments in child protection issues.

6.10 The designated senior members of staff are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Children's Services, Adult Services, the Police or the relevant secondary school child protection officer
- Referring all Prevent allegations and concerns through the channel panel for investigation
- Providing advice to the Principal on issues relating to child protection and safeguarding
- Ensuring that parents and carers of young people within the institute are aware of the organisation's safeguarding procedure
- Liaising with Norfolk County Council, Norfolk Safeguarding Children Board and other appropriate agencies
- Liaising with employers and training organisations that receive children or young people from the institutions on long term placements to ensure that appropriate safeguards are put in place
- Link with the College lead for Looked after Children and Care Leavers
- Ensuring that staff receive basic training in child protection issues and are aware of the Group's safeguarding procedures.

6.11 The designated senior members of staff will provide an annual report to the Governing Body setting out how the organisation has discharged its duties. They are responsible for reporting deficiencies in procedure or policy to the Governing Body at the earliest opportunity.

Safeguarding Officers

- Report to the senior member of staff with lead responsibility
- Ensure that the College's policies, systems and procedures for protecting children and vulnerable adults and for safe recruitment of staff are robust and conform to current legislation
- Raise awareness within the College of issues relating to the welfare of children, young people and vulnerable adults and promote a safe environment for learning within the College
- Refer cases of suspected abuse or allegations to the relevant investigating agency
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with secondary and feeder schools to ensure that appropriate arrangements are made for the students
- Provide advice, guidance and support to teaching and support staff on issues relating to child protection and safeguarding
- Deal with individual cases, including attending case conferences and review meetings as appropriate
- Receive training in child protection issues and inter-agency working, and will receive refresher training at least every 2 years
- Deliver staff training in child protection and safeguarding issues at induction and as part of the staff development mandatory programme

7 Records, Confidentiality and Information Sharing

7.1 Any information recorded will be kept in a separate named file or secure on-line system, or in a secure cabinet and not with the student's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within institutions on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

7.2 Child protection information will only be kept in the file and this file will be kept up to date. Record of contact with professionals and concerns that are raised while the student is at College and reports will be stored here.

7.3 When a student under the age of 18 or vulnerable adult leaves our College, the DSL will make contact with the DSL at the new institution and will ensure that the child protection file is forwarded to the receiving institution in an appropriately agreed manner.

7.4 Safeguarding files will be reviewed for deletion and / or destruction seven years after the most recent safeguarding file for that Student has been closed.

The College adheres to child protection procedures that have been agreed locally through the Norfolk Children's Safeguarding Board.

Referrals

7.5 The College will adhere to child protection procedures that have been drawn up in conjunction with Norfolk Children's Safeguarding Board. Referrals will be made as appropriate to the Constabulary, Children's Services, Adult Services or Secondary School Child Protection officers. Prevent concerns or allegations will be referred through the channel panel.

Inter-agency working

7.6 Our College will maintain good links with statutory bodies and external agencies. We will attend Multi Agency Public Protection Arrangements (MAPPA) panels, Channel panels when it is appropriate to do so and case conferences and work closely with Norfolk Constabulary's Vulnerable Person's Unit. The College will play a full part in multi-agency support packages and child protection plans. We will work with local agencies including Children's Services, Norfolk Probation Service, Mental Health and Youth Offending teams locally. We will work with any other organisation on a local level that is supporting young and vulnerable people in the community.

Admissions and Review

7.7 We will operate a robust Admissions and Review process designed to ensure that students with criminal convictions or serious mental health issues can enroll on a course that is right for them, without there being a risk to the safety of other students or staff. The College will maintain good working relationships with the Norfolk Youth Offending Team, the Norfolk Probation Service and partners within the local Norfolk and Suffolk NHS Foundation Trust to ensure that Admissions and Review panels are always attended by professionals who can advocate and advise on behalf of their clients.

8 Procedure

8.1 Staff at the College will be guided by the following process if a student makes a disclosure:

Listen carefully and stay calm

- Do not interview the student, but question normally and without pressure, in order to be sure that you understand what the student is telling you
- Do not put words into the student's mouth
- Reassure the student that by telling you, they have done the right thing
- Inform the student that you must pass the information on, but that only those who need to know about it will be told. Inform them as to who you will be reporting the matter
- Note the main points carefully
- Make a detailed note of the date, time, place, what the student said, did and your questions.
- Do not investigate concerns or allegations yourself, but report them immediately to the Safeguarding Officer
- Staff at the College will report any safeguarding concerns they may have about a student to the Safeguarding Officer for advice and guidance.

Where a member of staff is reporting a concern or disclosure about FGM (female genital mutilation) of a young person under the age 18, the member of staff must personally report to the police and the colleges Safeguarding Lead who will support that member of staff to make the report. This is in line with new guidance on mandatory reporting outlined in Keeping Children Safe in Education 2016

For all referrals to safeguarding, staff will need to complete the 'report a concern' by clicking on the "Raise a Safeguarding Concern" on the main page of share point. This online form will go directly to the Deputy Safeguarding Officer who will respond as soon as possible.

For matters which need immediate consultation with a Designated Safeguarding Officer the Safeguarding mobile (07785 300609) should be called.

Reporting a Concern or Disclosure and using Raising a Safeguarding Concern: [MyConcern](#)

8.2 Staff should raise any Safeguarding concern via the [MyConcern](#) software. The Safeguarding Officer should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the organisation. If the Designated Safeguarding Lead (DSL) is not available, the Deputy Designated Safeguarding Lead (DDSL) should be contacted regarding any concerns.

8.3 It is **NOT** the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

8.4 Following receipt of any information raising a concern, the DSL in conjunction with the DDSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

8.5 All referrals to the MASH team will be made in line with Norfolk Children's Services procedures as outlined in Appendix 1. Anybody can make a referral. However it is College policy that referrals are made by the Safeguarding team. It is both imperative and College procedure that all safeguarding concerns and disclosures are reported immediately to the Safeguarding team via "[MyConcern](#)" so that we can ensure that a single central record is maintained and that we share the right information when it is needed and the student receives the joined up support they need.

Students can raise concerns via the Red Button - available on Moodle. Ensuring students have an independent route to raise and report any safeguarding concerns that they may have.



Red Button – located on the students Moodle landing page.

8.6 Confidentiality must be maintained and information relating to the individual, and their families to be shared with staff on a strictly need to know basis.

9 Organisational Responsibilities

Safe Environment

Health and safety

9.1 The College will ensure a safe learning environment and the promotion of safe working practices. Through the College's comprehensive Health, Safety and Welfare policy, safe working practices are promoted across the College, work environments are equipped with work equipment that has been provided from reputable sources and is well maintained. Working environments are all assessed by staff, supported by competent health and safety advice from a dedicated health and safety department. This includes the assessment of any field trips or extra curricula activities.

9.2 Where students' courses involve an element of work experience, the workplace provided for this experience will be assessed by a member of the Employability team to ensure it as a minimum, meets the requirements of the former Learning and Skills Council recommendations. The workplace assessors are all competent to undertake these assessments. The College will brief employers on safeguarding before work placements take place.

9.3 The College recognises that students with learning difficulties and disabilities and vulnerable students are more at risk. Where appropriate, we will ensure that these students have individual risk assessments which are completed with student involvement.

Curriculum

9.4 Throughout our curriculum we will provide activities and opportunities for students to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our students to develop essential life skills. The College will endeavour to support all students through:

- Ensuring the content of the curriculum includes social and emotional aspects of learning
- Ensuring that the college embeds and promotes British Values (college values) including democracy, the rule of law, individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith
- Ensuring that students and staff have an awareness with regards Prevent
- Ensuring that child protection is included in the curriculum to help students recognise when they don't feel safe and to identify who they should tell
- Providing additional safeguarding advice before a student goes on a work placement
- Promoting online safety measures and online safety procedures including relevant issues associated with online safety through tutorials, for example.
- Delivering tutorial and enrichment activities which support the Every Child Matters themes
- Outlining students' duties and responsibilities in creating a safe learning environment.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies.

Recruitment

10.1 The College already has processes in place to check the suitability of staff and students working directly with students. The college is committed to ensuring that all such staff have undertaken the relevant pre-employment checks and where appropriate undertaken Disclosure Barring Service (DBS) and barred list checks.

10.2 The College will additionally ensure that all student helpers, mentors, etc. who are in regular or significant occasional contact with under-18s or vulnerable adults must have had a satisfactory DBS and barred list check undertaken by the College before allowing them to work with children or vulnerable adults. A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post.

10.3 The College will ensure that they meet legislative requirements or any other statutory requirements, including those set out in the Disclosure Barring Service. All staff or student helpers employed to look after students must report any subsequent criminal convictions to the Principal or Deputy Principal who will decide on the appropriate course of action. Failure to do so will result in disciplinary action being taken.

10.4 Where the College is operating in partnership, e.g. offsite and 'partner' employees come into contact with our students the College will seek assurance that their employees will have been through the same pre-employment checks expected of the College staff.

10.5 In respect of 'contractors' who are on the premises to undertake emergency repairs the area will be cordoned off to ensure that no student access can be gained. For contractors who will be on site for a more prolonged time or frequently, and it is known to the institutions in advance the College will require that they undertake all appropriate checks prior to being allowed on site and follow the procedure for Contractors set out in the Colleges Group DBS Policy and Procedure. This may include requiring that the employer confirms that a DBS and barred list check has been undertaken.

11 Working with Parents and Carers

11.1 The College is committed to working in partnership with parents/carers to safeguard and promote the welfare of students and to support them to understand our statutory responsibilities in this area.

11.2 The College has produced a Safeguarding information booklet for parents, carers and corporate parents which is available to download on our website and available at reception points around College.

11.3 When new students join our College, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is referenced on the website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

11.4 We are committed to working with parents and carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

11.5 We will seek to share with parents/carers any concerns we may have about their child **unless** to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding concerns the College has about a child will not prevent the DSL or DDSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

11.6 For information about how the College works with Children's Services in Child Protection Conferences see Appendix 3.

12 Managing Allegations Against Staff and Volunteers

12.1 Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the students in the College. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

12.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

12.3 We will take all possible steps to safeguard our students and to ensure that the adults in our College are safe to work with children. We will always ensure that the **Norfolk Safeguarding Children Board Protocol 8.3: Allegations Against Persons who Work with Children** and the relevant Department for Education guidance is adhered to and will seek appropriate advice from the **Local Authority Designated Officer (LADO). The LADO can be contacted on 01603 223473.**

12.4 If an allegation is made or information is received about an adult who works in an educational setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Principal immediately. If the Principal is not available then the information must be passed to the Deputy Principal immediately.

Should an allegation be made against the Principal, this will be reported to the Chair of Governors. In the event that the Chair of Governors is not contactable on that day, the information must be passed to and dealt with by the Vice Chair of Governors.

12.5 Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors should contact the LADO directly on 01603 223473.

12.6 The college has a comprehensive Public Interest Disclosure (whistleblowing) Policy which College staff should use to report their concerns. This can be found via share point on the Cross College Information tab on the main page of share point and searching for "whistleblowing" in the search bar in the top right corner of the page.

If a staff member feels unable to raise concerns regarding safeguarding failures internally they are able to contact the NSPCC

Whistleblowing helpline on 0800 028 0285 available 08:00am to 08:00pm Monday to Friday.

13 Training

Code of conduct

The College has implemented a clear code of conduct that staff understand and can follow. The code of practice offers guidance to staff on the way they should behave when working with young people and vulnerable adults.

Staff training

All staff working with children, young adults and vulnerable adults will receive training adequate to familiarise themselves with child protection issues and the professional responsibilities, roles and duties to follow which are outlined within the institute's procedures.

All staff receive information about safeguarding and a copy of our staff code of conduct at induction. Appropriate safeguarding training takes place at least annually through monthly updates on key themes and priorities and through staff meetings and training days.

Formal accredited update training will be required within a three year period, or earlier as need is identified and judged appropriate.

DSL training

DSL's and DDSL will receive refresher training every two years or more frequently if it is appropriate e.g. to keep in line with new guidance and LSCB procedures.

New staff and Governor training

New staff and Governors will receive an explanation during their induction which includes the College's safeguarding policy, reporting and recording arrangements, the staff code of conduct and details of the DSL and the DDSL.

Visitors

Easton and Otley safeguarding leaflet for visitors is available at the College's reception/sign in point.

14 References to related Easton and Otley College policies and procedures

- Health and Safety Policy
- Student Success Policy- Fitness to Study
- Student Harassment policy
- Physical Restraint Policy
- Prevent Policy
- Lockdown Policy
- Complaints Policy
- Disciplinary, Capability and Grievance Policy
- Anti-Bullying and Harassment Policy
- Disclosure and Barring Service Policy (DBS)
- Recruitment and Selection Policy
- Code of Conduct Policy
- Public Interest Disclosure Policy (Whistleblowing)
- Social Networking Policy
- Computer Policy

15 Feedback and Updating the Safeguarding Procedure

Feedback about this procedure should be given to the Policy holder named at the front of this document.

This procedure was last updated in September 2017 and will be reviewed again in September 2018 or earlier if new legislation or guidance is published that affects the College and its safeguarding responsibilities

Appendix 1 – Norfolk Safeguarding Children’s Board referral procedure

The website for the Norfolk Safeguarding Children Board is <http://www.nscb.norfolk.gov.uk/>

MULTI AGENCY SAFEGUARDING HUB REFERRALS

Where there is a concern for a child or young person

Phone 0344 800 8020 – Call will be answered by NCC Customer Service Centre. State clearly that you have a concern for a child’s well-being and wish to report that concern.

- CSC will ask for the child’s name and address, this enables them to check if the child has a social worker.
- If the child does not have a social work CSC will do live 3 way handover to MASH Referral Co-ordinator.
- MASH will ask for all of the details known to your agency about the child, their family composition including siblings, the nature of the concern and your view of immediate risks. They will also need to know where the child is now and whether you have informed parent / carers of your concern.
- MASH undertake further information gathering about the child and their family from relevant agencies and their own multi-agency records and from this combination of information will make a decision as to whether a referral needs to be made to the Duty Team for an initial assessment.
- Where the concerns for a child are immediate and serious the MASH information gathering process runs parallel to essential safeguarding action planning between CSC, the police and health.
- The MASH is a referral mechanism undertaking information gathering, analysis and decision making. It does not provide direct services to children. Duty and Safeguarding team work directly with children and their families.
- MASH will inform referrers of the decision that has been taken – that a referral has been passed to a Duty Team, or an alternative service such as the CAF process is signposted.
- Where the MASH make a decision for no further action, the referrer is given clear reasons for this reason.
- NB where a NFA decision is made based on a 3rd party’s information the MASH may not be able to share that information with the original referrer.

Appendix 2 - Definitions of Abuse provided by Working Together 2015

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in

looking at, or in the production of, images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Appendix 3 - Full Definition of Female Genital Mutilation taken from Multi-Agency Practice Guidelines: Female Genital Mutilation

3.1 Definition

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother and/or death.

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

3.2 Types of FGM

FGM has been classified by the World Health Organization (WHO) into four types:

Type 1 – Clitoridectomy: partial or total removal of the clitoris (a small, sensitive and erectile part of the female genitals) and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).

Type 2 – Excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina).

Type 3 – Infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

Type 4 – Other: all other harmful procedures to the female genitalia for non-medical purposes, e.g. pricking, piercing, incising, scraping and cauterising the genital area.

The extent to which the WHO classifications of FGM come within the ambit of the criminal law is discussed at Section 3.1.4. (of the multi-agency guidance document).

Appendix 4 - Full Definition of Child Sexual Exploitation taken from Safeguarding Children and Young people from Sexual Exploitation: Supplementary Guidance to Working Together to Safeguard Children 2015.

Definitions

4.1 The sexual exploitation of children and young people is a form of child sexual abuse. Working Together to Safeguard Children¹ (2006) describes sexual abuse as follows:

'Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities or encouraging children to behave in sexually inappropriate ways.'

4.2 This guidance uses the following description of child sexual exploitation:²

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation commonly occur in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Appendix 5 - Child Protection Conferences

1. Children's Services will convene a child protection conference once a child protection enquiry under section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a child protection plan in order to monitor the safety of the child and the required reduction in risk.

2. Staff members may be asked to attend a child protection conference or core group meetings on behalf of the College in respect of individual children. Usually the person representing the institution at these meetings will be the Principal or DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible.

3. All reports for a child protection conference will be prepared in advance using the 'guidance and education report template' provided by Children's Services. The information contained in the report will be shared with parents/carers before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at College. In order to complete such reports, all relevant information will be sought from staff working with the child in the College.

4. Clearly child protection conferences can be upsetting for parents/carers. We recognise that we are likely to have more contact with parents/carers than other professionals involved. We will work in an open and honest way with any parents/carers whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents and carers.

5. Easton and Otley staff must inform a Safeguarding Officer if they are requested to attend a Child Protection Conference under Section 47 (Children Act 1989) so that an up to date central record can be maintained. Usually only Safeguarding Officers or a DSL would attend a Child Protection Conference on behalf of the College.

Child in Need meetings

6. Easton and Otley staff must inform a Safeguarding Officer if they are requested to attend a Child in Need meeting under Section 17 (Children Act 1989) so that an up to date central record can be maintained. Staff can attend Child in Need meetings on behalf of the College but they must feed back to the Safeguarding Officer.

Appendix 6 – Definitions of abuse of Adults provided by Norfolk Safeguarding Adults Board, Norfolk Multi-Agency Safeguarding Policy

Forms of Abuse and Neglect

- 21.1. Abuse and neglect can take many forms. It may be an isolated incident, a series of incidents or a long term pattern of behaviour. Abuse and neglect could:
- Affect one person or many more
- Be deliberate or the result of negligence or ignorance
- Exploitation, in particular, is a common theme in abuse and neglect. The degree or lack of intent will inform the response.
- Abuse and neglect can happen anywhere including:
- In a person's own home and/or other people's homes
- In public places or in the community
- At work
- Schools and colleges of further education
- In hospitals, surgeries or other health centres
- Care homes
- Day centres

22. Patterns of abuse

22.1. Patterns of abuse and neglect vary and include:

- Serial abusing in which the perpetrator seeks out and 'grooms' individuals by obtaining their trust over time before the abuse begins – sexual abuse commonly falls into this pattern as do some forms of financial abuse and radicalisation
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- Opportunistic abuse, such as theft occurring because money or jewellery has been left lying around
- Situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour neglecting a person's needs because the carer has difficulties. These could be debt, alcohol or mental health related or the specific demands resulting from caring for a vulnerable person

23. Categories and types of Abuse

23.1. The main forms of abuse and neglect are generally classified under the following ten headings. This should not be considered a definitive list, but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern:

Physical abuse

The non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment.

Domestic violence

Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member, regardless of gender or sexuality. Domestic abuse is not just about partners, but all family relationships including forced marriage.

Sexual abuse

Direct or indirect involvement in sexual activity without consent. This could also be the inability to consent, pressure or inducement to consent or take part.

Psychological (emotional) abuse

Acts or behaviour which impinge on the emotional health of, or which causes distress or anguish to individuals. This may also be present in other forms of abuse.

Financial or material abuse

Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk from abuse.

Norfolk Multi-Agency Safeguarding Adults Policy

Modern slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse

Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.

Organisational (Institutional) abuse

Institutional abuse occurs where the culture of the organisation (such as a care home) places emphasis on the running of the establishment and the needs of the staff above the needs and care of the adult. This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, for example, or in relation to care provided in one's own home from domiciliary services. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission

Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to individual(s). Ill-treatment and wilful neglect of a person who lacks capacity are now criminal offences under the Mental Capacity Act.

Self-neglect

Self-neglect can be a complex and challenging issue for practitioners to address, because of the need to find the right balance between respecting a person's autonomy and fulfilling their duty to protect the adult's health and wellbeing. Both perspectives can be supported by human rights arguments.

The Care Act 2014 statutory guidance includes self-neglect in the categories of abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances, where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise self-neglect as a safeguarding concern. However, interventions on self-neglect are usually more appropriate under the parts of the Care Act dealing with assessment, planning, information and advice, and prevention.

It is vital to establish whether the person has capacity to make decisions about their own wellbeing, and whether or not they are able or willing to care for themselves. An adult who is able to make choices may make decisions that others think of as self-neglect.

If the person does not want any safeguarding action to be taken, it may be reasonable not to intervene further, as long as:

- no-one else is at risk
- their 'vital interests' are not compromised – that is, there is no immediate risk of death or major harm
- all decisions are fully explained and recorded
- other agencies have been informed and involved as necessary.

23.2. Signs and symptoms for these categories of abuse are included in Appendix 6. (of the original document)

23.3. Further to the above, in considering what may constitute abuse or neglect, signatories to this policy are explicitly advised not to limit their view of what constitutes abuse or neglect to those types or the different circumstances in which they can take place, as abuse and neglect can take many forms and the circumstances of the individual case should carefully considered (14.17 Care Act Guidance).