



SAFEGUARDING AND PREVENT POLICY

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Context

"Section 11 of the Children Act 2004 places duties on a range of organisations, agencies and individuals to ensure their functions and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children"

Aims

- The aim of the college policy is to make all associated with Telford College feel safe and have clear roles and responsibilities in place for that to happen. This policy replaces the previous policy of **September 2020**
- The college recognises its responsibilities for safeguarding and Prevent within the remit of Ofsted "Education and Skills Inspection Framework Sept 2021"
- The college's duty of care will be in line with Government Legislation and Telford and Wrekin safeguarding partnership procedures.

The protection and safeguarding of students is the responsibility of everyone.

All staff are required to be alert to signs of abuse. They should report any concerns or suspicions if not immediately, as soon as possible, that day to the DSL. If in doubt they should talk with the Designated Safeguarding Lead DSL(s), delay is unacceptable. In line with Telford and Wrekin Safeguarding Partnership – Child Protection Procedures, which are reviewed and updated on an ongoing basis.

Purpose and Policy Statement

- Students can develop a special and close relationship with the college community, and they will view them as significant and trustworthy adults. For the purpose of this policy and to eliminate all doubt, the college community includes:
 - Whole college staff – including business support
 - Governors
 - Students
 - Volunteers
 - Agency staff
 - External speakers
 - Visitors
 - Contractors working in the college
- We believe that our college should provide a caring, positive, safe and stimulating environment, that we promote the social, physical and moral development of all of our students.
- So, it is no surprise that students will disclose safeguarding concerns to staff. Therefore, it is important that staff know the four defined categories of abuse:
 - **Physical**
 - **Sexual**
 - **Emotional**
 - **Neglect**
- Not forgetting **bullying and peer on peer** which can transgress across all four definitions.
- The 4 categories can be viewed in detail in Keeping Children Safe in Education 2021 (KCSIE)

As a college we also recognise that extremist views in students can be a sign of potential abuse and will be dealt with in the same way as any other concern that children may face whilst in our care. The same principle applies to Domestic Violence, Adult's Mental Health impact on the students, Special Education Needs, Children with a Disability, Female Genital Mutilation, Honour Based Violence, Child Trafficking, Modern Slavery, Forced Marriage, Suicide Intervention, Young Carers, Children in the Court System, Homelessness, Adoption, Children returned to their family from care, Sexual Violence, Sexual Harassment, Sexual Exploitation, Initiation or hazing, Drug, peer on peer and Substance Misuse, Gang Activity, County Lines Fabricated and Induced Illness (**see Section 7 "Children's Welfare"**). All our staff will be made aware of all these safeguarding issues that children may face whilst in our care and what steps they need to take if they are aware of them. For avoidance of doubt Annex, A of KCSIE 2021 will

be referred to for any assistance that the Designated Safeguarding Lead (DSL) or any other college staff may need in ensuring a student's safety and welfare.

- Because of the day to day interaction with students, college staff are also in a unique position to notice any change in demeanour such as being quieter than usual, changes in appearance, being withdrawn or not wishing to go home at the end of the college day.

Statement on Child Protection

At Telford College we agree that the safety, welfare and protection of all students is paramount and any delay in reporting concerns is unacceptable. This policy will be published on the Telford College website for all to view and will be reviewed annually.

However, if need be, it may be reviewed and refined before this annual commitment so that it is flexible to change and current with new legislation. Wherever possible there should be a conversation with the Designated Safeguarding Lead (or Deputy), who will help staff to decide what to do next. Options include:

- Managing any support for the student internally via the college's own pastoral support.
- Managing any support for an Apprentice via the colleges assessing team.
- An early help assessment.
- A referral for statutory services, for example as the student is in need or suffering or likely to suffer harm.

In exceptional circumstances where no designated safeguarding lead is not available, this should not delay appropriate action being taken, staff must take their concerns to the Executive Office Room (E216).

Telford College will work with any student, their family, their employer and other agencies, all college staff will be able to identify students who may benefit from early help. For avoidance of doubt, early help means this college will provide support as soon as a problem emerges at any point in a student's time at the college.

Staff within college may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. If the student's situation does not appear to be improving or is getting worse, staff should report this to social services.

- **All referrals to social services must be made via the Be-Safe team.**
- On occasions the college, where necessary, may be asked to participate in multi-agency meetings and in cases of sexually harmful behaviour (including social media and youth produced sexual imagery known as "sexting"), and be asked to undertake a risk and vulnerability management plan. This will be recorded and kept under review within the college and with other partner agencies. Furthermore, the college recognises that students are capable of abusing their peers and it will not be tolerated, and whilst participating in the above processes, the college will not pass off the abuse as "banter", "just having a laugh" or "part of growing up" (See Section 7 "Children's Welfare" for more detailed information). Any intervention will consider the victim, alleged perpetrator, all other students and if appropriate adult students and staff. Also, we will engage with parents/carers to manage and agree this process for all those involved.
- The college's role is to refer with the information received and **under no circumstances** become the investigator.
- The college also works to the Telford and Wrekin Safeguarding Partnership (TWSP) procedures for all staff who work with students, where allegations may be made by a child/adult of abuse in any form. "Allegations against Staff and Volunteers" where this is managed by the TWSP through the Local Authority Designated Officer (LADO).

- This college believes that those who work within the college community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adapted by this setting for Staff and Governors.

Responsibilities

Principal and Governors

The Principal and Governors are committed to working together to create and maintain a safe learning environment for all the students attending the college.

The Principal and Governors will follow the specific guidance as set out in Chapters 2 & 3 of "Working Together to Safeguard Children" 2018 and "Keeping Children Safe in Education" September 2021 and will ensure that:

- Ensure there are clear systems and processes in place for identifying possible mental health problems at the college, including routes to escalate and clear referral and accountability systems
- Clear arrangements are in place to encourage, facilitate and support the reporting of student welfare concerns, including instances where students are missing from college.
- That a Designated Safeguarding Lead (DSL) is available at all times whilst students are under direct supervision of college staff.
- Provision is made for appropriate training, induction, support and supervision for DSL's and other members of the college's community and workforce.
- The college works with the Local Authority Designated Officer (LADO) and appropriate partner agencies proactively to safeguard students. Contact details for the LADO are at the back of this policy.
- Records relating to Safeguarding and Prevent are kept safely and shared appropriately, on the college's safe network CPOMs.
- For alternative provision and work experience placements, we continue to be responsible for the safeguarding of that student as identified in Part 3 of KCSIE 2021
- Appropriate safeguarding policies are adopted, monitored and evaluated which will include areas such as:
 - ❖ Safeguarding and prevent
 - ❖ Suicide intervention
 - ❖ Bullying, harassment, and discrimination
 - ❖ Peer on Peer Abuse
 - ❖ Use of reasonable force and restraint and behaviour management
 - ❖ Health and safety including use of equipment and provision of first aid
 - ❖ Use of the internet, mobile phones and social networking sites
 - ❖ College trips, placements, outdoor activities, and external visitors
 - ❖ Drugs and substance misuse
 - ❖ Codes of conduct for staff and governors
 - ❖ Meeting the needs of students with special medical conditions
 - ❖ Meeting the needs of students on disseminating prescribed medications
 - ❖ College security
- The college premises are safe and that the college grounds are not open to unwanted intruders.

- All appointments to staff positions within the college community are made following the safer recruitment guidance within Part 3 KCSIE September 2021.
- The college's single central record of recruitment and vetting checks covering all staff and others identified by the college as having regular contact with students is kept up-to-date in line with Ofsted requirements. The single register is kept by Human Resources.
- The identity of visitors to the college is checked, a record made in the visitors' book, suitably identified/badge and that visitors are not left unsupervised within the college.
- The Designated Governor Safeguarding Lead has a workbook of roles and responsibilities available which will ensure the completion of the Safeguarding 175/157 audit.

The Designated Safeguarding Leads (DSLs)

The college has a team of staff who are Designated Safeguarding Leads. This team includes staff within Curriculum, Student Services, and the Apprenticeship Team. It includes a member of the Senior Leadership Team, and details of the team are displayed throughout college.

Name	Role	Contact
Susan Alder	Director of Student Services - Lead DSL	01952 642308
Caroline Welson	BeSafe Manager – Deputy DSL	01952 642369
Tom Cash	Head of Kickstart - DSL	01952 642541
Helen Swinnerton	Positive Behaviour Support	01952 642486
Shaun Bickley	Tutorial Coordinator - DSL	01952 642340
Daniel Blasczyk	Student Engagement Officer	01952 642384
Lora Rogers	Recruitment officer (Apprenticeships)	01952 642276
Tom James	Manager of the Willow Tree - DSL	01952 642325
Donna Evans	Business Programme Manager – DSL	01952 642497
Richard Boyes	Lead Tutor - DSL	01952 642586
Peter Ford	Kickstart - DSL	01952 642503
Karen Stevens	Student Services mentor - DSL	01952 642451
Debbie Price	Student Services mentor - DSL	01952 642361
Ashley Bowler	Head of Area and Learning coach - DSL	01952 642413
Louisa Berry	Progress coach - DSL	01952 642458
Paulette Kupiec	Progress coach DSL	01952 642200

Responsibilities of DSL

- The above team have received DSL child protection training and will liaise in accordance with the Telford and Wrekin Safeguarding Partnership (TWSP). It is the professional responsibility of the DSL's to update their own training. If in doubt, **"Keeping Children Safe in Education" September 2021 Annex B** should be referred to for clarification about the role of DSLs. The Role of DSLs and their Deputies is made explicit within Job Descriptions.
- **All staff will receive a copy of this policy and provided with any appropriate updates regarding Safeguarding and Prevent.**
- The Designated safeguarding Lead or Deputy will ensure that all staff have received appropriate safeguarding and prevent training within the advised timescales.
- The Designated safeguarding Lead or Deputy will ensure that all members of staff will have **completed an induction** to safeguarding systems within the college and satisfy themselves that member of staff understands their responsibility for sharing a concern and with whom. Furthermore, all staff will receive regular safeguarding updates.
- **All staff will be given a copy of Keeping Children Safe in Education (KCSIE 2021), and it is important that staff read and understand the guidance.**
- The Be Safe team has direct referral links with the **Social Care Safeguarding Advisors & Safeguarding Team via the Family Connect Team 01952 385385**. For avoidance of

- doubt the DSL should be the point of contact with regard to referring a student if there are concerns about possible abuse.
- Online safety will be treated as any other form of abuse and recognition that bullying can transgress across all four defined categories of abuse including bullying and harassment.

- The DSL will ensure that they have received training and are confident in dealing with online safety issues.

Where children are being asked to learn online at home the following information has been provided for advice on how to support schools and colleges do so safely: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#)

- The DSL will have due regard to safeguarding incidents and/or behaviours that can be associated with factors outside the college and/or can occur between students outside the college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as ***contextual safeguarding***, which simply means assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so our college will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

There is support available for colleges. Paragraph 43 and Annex A in the <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges> advice provides information and links to resources

- Ensuring that all such records are kept confidentially and securely and are separate from student records, ensuring that an indication of further record keeping in terms of child protection is marked on the students records.
- Ensuring that they or a ***deputy senior colleague*** are available to attend/assist in any meetings/verbal responses in relation to safeguarding, or any planning meetings as deemed necessary in the remit of child protection and safeguarding. Also, that attendance by any college staff includes key information to be tabled at the meeting, especially attendance figures which are considered a key element of all conference reports.
- Ensuring information regarding any student currently subject to a Child Protection Plan and deemed "at risk", who is absent without explanation for two days, is shared with Children's Services Family Connect Safeguarding Team.
- The Designated Safeguarding Lead has a workbook and will ensure the completion, on a yearly basis, of the [TWSCP 175/157 Safeguarding Self-Assessment Toolkit Audit](#). These will be supplied by the Telford & Wrekin Council Safeguarding Children in Education Officer.

The Staff

- All those in the college community, including supply teachers, visiting professionals working with students in the college (e.g. counsellors), external providers of college activities and those supporting college visits, are informed of the name of the DSL's and the college procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures:
 - ❖ during their first induction to the college
 - ❖ through a copy of this policy
 - ❖ through the staff handbook
 - ❖ supply teachers' induction book

- **All staff are required to be alert to signs of abuse. They should report any concerns or suspicions if not immediately, as soon as possible, that day to the DSL. If in doubt they MUST talk with the DSL(s), delay is unacceptable.**
- We recognise that children cannot be expected to raise concerns in an environment where colleagues fail to do so. Unacceptable standards, conduct or behaviour should be challenged appropriately at the outset, and will not be tolerated. A separate code of conduct policy has been adopted by this college.
- We will adopt the [**"Speak Up" Telford & Wrekin Policy 2021**](#) on raising concerns. However, where staff feel that they cannot report a concern through the above channels general guidance can be found at [**Advice on whistleblowing**](#). The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call **0800 028 0285 or e mail help@nspcc.org.uk**

Safeguarding Process

Response in College

Reporting to the DSL

- Any concern must be discussed with a DSL, as soon as is possible, no later than the end of the morning or afternoon session of that day.

Immediate Response to the Student

- It is vital that our actions do not abuse the student further or prejudice an investigation, for example:
 - ❖ Listen to the student, if you are shocked by what is being said, try not to show it
 - ❖ It is OK to observe bruises but not to ask a student to remove their clothing to observe them
 - ❖ If a disclosure is made, the pace should be dictated by the student, without the student being pressed for detail or by asking leading questions such as "what did he/she do next?" or "where did he/she touch you?" **It is our role to listen not to investigate.** Use open questions such as "is there anything else you want to tell me?"
 - ❖ Accept what the student says. Be careful not to burden them with guilt by asking "why didn't you tell me before?"
 - ❖ Do acknowledge how hard it was for them to tell you this and reassure them that they have done absolutely the right thing by telling you
 - ❖ Don't criticise the alleged perpetrator, the student may have warm feelings for them, but merely wish any abuse to stop
 - ❖ **Don't promise confidentiality**, reassure the student that they have done the right thing, explain whom you will have to tell (the DSL) and why; and, depending on their age, what the next stage will be. It is important that you don't make promises that you cannot keep such as "I'll stay with you all the time" or "It will be all right now".

Recording Information

- Make some brief handwritten notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, recording facts, who you shared them with and not assumption, supposition and interpretation.
- Also record where you spoke with them and personal safety details such as "I discussed the incident with the student in the BeSafe office".

- If it is observation of bruising or an injury try to record detail, e.g. "right arm above elbow", "bruise noticed on fleshy part leg".
- Note the non-verbal behaviour and the key words in the language used by the student (try not to translate into 'proper terms' ensuring that you use the learner's own words). Body language should be noted and support any disclosure.
- It is important to retain on file signed original handwritten notes and pass them on to the DSL's who may ask you to complete a Family Connect Safeguarding Team referral request for service form.
- **All incidents must be recorded on the colleges secure system CPOMs**

Staff Disclosures and Allegations

- Staff (to whom a disclosure was made, who will be supporting the student and who might be attending, strategy and case conferences) would be able to liaise with the DSL, with the minimum number of people involved who have "a need to know basis" of detail.
- Of the staff not directly involved they will be informed on a "need to know basis".
- Staff may also need support either as a person who has received a disclosure or if an allegation has been made against them and subsequently needs investigation to conclusion. In both cases support should be offered and Human Resources Business Partner for your college consulted appropriately.
- Staff should not accept personal invitation visits to the homes of students unless permission or instruction has been sought from the Principal and it is viewed as a professional appointment, for example supporting Education Welfare issues etc. This should be viewed on a case by case basis. To support this, guidance from the **Department for Education (September 2010) states "Meetings with students away from the college premises should only be arranged with the specified approval of the Principal and the prior permission of the student in question"**.
- We accept this guidance from the Department for Education (September 2010) stating that in the case of private meetings; **"Staff and volunteers should be aware that private meetings with individual students could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another student or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place"**.
- Staff should be advised to seek support from their Professional Association or Trade Union if it is needed.
- All staff/governor meetings, where appropriate, will have safeguarding as a standing agenda item; this is testament to our college making these priority areas and at the forefront of our minds.
- The process of managing allegations against those who work with children can be viewed on <http://westmidlands.procedures.org.uk/> Section 1.14 "Allegations against Staff or Volunteers".
- The college has internal procedures and processes in place for dealing with allegations and will follow TWSCP Policies & Procedures and involve the DSL in college. The procedures make it clear that all allegations are to be reported straight away, normally to the Principal for referral if necessary. The procedures also allow for the Chair of Governors to be informed. If the Principal themselves are the subject of the allegation, the Senior DSL will liaise with the Chair of Governors and follow the appropriate process. The TWSCP procedures allow for the

Local Authority Designated Officer (LADO) to be party and responsible for monitoring cases to conclusion.

- The college will in addition also work within and alongside all agencies relating to **Part 4 of KCSIE 2021 "Allegations of abuse made against teachers and other staff"**
- We will liaise with our Human Resources Team to provide support to staff going through the disciplinary and LADO process. This will support referrers, investigators and those affected in any such dealings and gravity.
- To avoid potential allegations and for the safety and welfare of students and the protection of staff, we will do our upmost to ensure that classrooms have a clear pane, whereby easy viewing is possible, this is in light of national Serious Case Review recommendations and lessons learnt from them. Therefore, the masking of windows will be forbidden and as such treated as a health & safety issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example for the teaching of drama, in these cases the Principal will make a judgement on a case by case basis being appropriate, balanced and proportionate.

Confidentiality

- If abuse is suspected, information should be given directly to a member of the safeguarding team. In their absence, this should be to a member of the Senior Leadership Team.
- The personal information about all families is regarded by those who work in this college as confidential. All staff need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality in all areas of the college.
- Staff should understand that they need to know only enough to prepare them to act with sensitivity to a student and to refer concerns appropriately. It is inappropriate to provide all staff with detailed information about the student, the incident, the family and the consequent actions.
- Staff have a professional responsibility to share relevant information about the protection of students with other professionals, particularly investigating agencies.
- If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that student.
- Within that context, the student should however be reassured that this will be shared on a "need to know" basis. If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised. Further details on information sharing can be viewed at the Department of Education website.
- Parents and Carers play an important role in protecting their children from abuse. The college is required to consider the safety of the student and should a concern arise, professional advice will be sought prior to contacting parents/carers. If deemed appropriate parents/carers will be contacted, and the college will continue to work with the parents/carers to support the needs of their student. Gaining consent from the parents/carers will be sought, although in exceptional circumstances and with the best interests of the student being considered, this may be overridden.
- The college aims to help parents understand that the college, like all others, has a responsibility for the welfare of all students and has a duty to refer cases to Family Connect in the interests of the student. The Governors will include a safeguarding statement in the college prospectus and all parents can view a copy of this policy. The policy will be made available electronically via the college's portal website.

- The college takes seriously its duties to assist parents and help them with online safeguarding resources. As such, we would make them aware of the web page **Parent Info** which is a comprehensive, free resource for colleges and parents, covering a range of safeguarding topics and information about apps and when they are updated etc. The content is updated by CEOP (Child Exploitation & Online Protection Centre) and can be found at <http://parentinfo.org/>
- Parents/Carers that may have concerns regarding a whole college staff member can in the first instance raise those with the Principal, DSL or Governing Body of the college for further exploration. This may involve sharing those concerns with the relevant agencies. Where the parent/carers may have concerns regarding the Principal, the Governor for Safeguarding should be consulted in the first instance.
- Parents/Carers can liaise with Ofsted on such conduct issues or regulatory concerns, advice can be found on its website www.ofsted.gov.uk or contact can be made direct to Ofsted on; Helpline (08456 40445) or a Whistle-blowing line (08456 404046).
- On occasions Ofsted may forward complaints that **may** raise a safeguarding concern about our college via Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to Ofsted on a case by case basis. We wish to make it clear that there is a separate standalone formal college complaints procedure which can also be used to raise concerns of any nature, please see the college's website for familiarisation of that route. **We would hope that the need to elevate those concerns is a rare occurrence but for transparency we wish to make it clear that that route is available for parents. Parents/Carers can also speak to the Head/Governing Body if clarification is needed.**
- Parents/Carers can also access "**Parent View**" which is an online survey questionnaire where parents/carers can give their views on 5 statements from strongly agree to strongly disagree. The statements relating to safeguarding are:
 - ❖ **My child is happy at this college**
 - ❖ **My child feels safe at this college**
 - ❖ **My child is well looked after at this college**
 - ❖ **This college deals effectively with bullying**
 - ❖ **This college responds well to any concerns I raise**
- We will keep parents/carers informed in all areas of safeguarding and protection through the regular methods of interaction such as parents/carers evenings. We will also monitor "Parent View" at regular intervals and seek to quickly address any concerns with parents/carers that may be expressed on this site.
- This college wishes to make it clear to parents/carers the standards, behaviour and respect we expect from them and conversely from us. In relation to this we understand that in some instance's tensions can run high where safeguarding concerns arise and need to be discussed, but for the safety of all we wish to remind parents/carers that although colleges are fulfilling a public function, colleges are private places. This college will therefore act to ensure they remain a safe place for students, staff and other members of the community. The public has no automatic right of entry. The same principles of safety will apply to social media issues where we will **expect parents/carers to talk to college in the first instance, before talking to social media to express their thoughts.**
- If a parent's/carer's behaviour is a cause for concern, the college will ask him/her to leave college premises. We wish to make it clear that in serious cases, the Principal or the local

authority can/will notify parents/carers in writing that their implied licence to be on the college premises is temporarily revoked, subject to any representations that the parent/carer may wish to make. This college will give parents/carers the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the formal Complaints standalone policy. The content above has been adopted by this college from Department of Education advice, "**Best Practice Advice for College Complaints Procedures 2020**".

Record Keeping

- In the absence of a national standards framework across the country for record keeping we have adopted guidance from Telford & Wrekin Safeguarding Board [**"Workbook Guidelines for Child Protection Records, Transfer, Retention & Archiving" \(September 1st 2021\)**](#) to keep our systems robust with the latest current advice.
- It is important to keep handwritten and typed up notes/records in a chronological order including details of dates, times, staff/others involved and actions taken including any relevant emails or statements, **Never discard handwritten notes**.
- This college has adopted an electronically maintained recording system called Child Protection Online Management System (CPOMS). The CPOMS system is a totally secure system of record keeping which enables us to quickly encapsulate a student's journey with us. We will ensure that a restricted number of staff will have full access to this system as named key holders. **If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.**
- Where students are transferring to other colleges within and outside of the district we will follow the transfer guidance within the Workbook Guidelines. This includes any transfer to Further Education Colleges.
- Access to these records should be clearly stated as to whom-i.e. DSL's, Principal, Learner Manager, and Senior Management Team or as the college feels appropriate.
- All safeguarding and prevent records are clearly marked as such and are kept securely locked on the premises or and within CPOMS use, the nominated key fob holders are responsible, accountable, documented and are identifiable within our college for total security at the setting. Also, procedures are in place when a member of staff leaves the setting or is on long sickness for that fob to be returned. Withdrawal of safeguarding records from the college by staff will be noted and signed for, as will files released to Professionals, such as the Group Solicitor, Safeguarding/Child Protection Officers, LADO, NSPCC or Police Teams. In respect of files being released when requested by the Police under [**Section 29 of the Data Protection Act 2018 a form entitled "Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6\(1\)\(d\)"**](#) should accompany that release and a copy will be retained for our records. Also we will consider the [**Information sharing advice for safeguarding practitioners**](#). This college will also seek advice and adopt HM Government Information Sharing Advice July 2018.
- [**https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice**](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)
- If in any doubt we will seek advice from our **chosen Data Protection Officer**.
- Upon releasing records, the college will request ID Badges for release.

When a Student Transfers to Another College

- If a student is subject to a Child Protection Plan deemed at risk, the student's key worker within Social Care will be contacted by a DSL.
- When a student changes college within or outside the authority, all safeguarding records will be passed on to the DSL of the next educational setting by the current DSL Person or to Social Care within the authority if the student is transferring to another authority. The DSL if thought appropriate may wish to share relevant safeguarding information in advance of a new students arriving if they need continuing support e.g. in response to sexual abuse. If the student is transferring/leaving to another college within term time, best practice would be for a signed record/or hard copy acknowledgement that the transfer of files has taken place. The current host college in this process should **not** photocopy and retain safeguarding records as this is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018 (DPA 18), but rather produce a chronology to pass on with the safeguarding records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice.
- **Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.**
- **We will follow the guidance on the child protection file set out in Annex C KCSIE**

Retention of Student's Files

All colleges must keep educational records on their students. These should include:

- copies of the reports which have been sent to parents/carers on the student's achievements, as well as other records about those achievements
- exchanges of correspondence between parents/carers and the college
- any information the college has on the student's education from the local authority
- education health and care plan (EHCP)
- any personal educational plan

There may be other records kept like details of attendance, exclusions, behaviour and family background. This is not compulsory but would be viewed as "best practice". The educational record does not include the notes that a teacher makes for his or her own use.

The safeguarding file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return. Student records will be stored and retained in accordance with the data protection policy.

Student safeguarding files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be shredded. Also a useful document to be familiar with is the **"Workbook Guidelines for Child Protection Records, Transfer, Retention & Archiving" TWSCB September 1st 2018**

Further information is available via: www.education.gov.uk and www.direct.gov.uk

Student's Welfare-Context

This section is paragraphed into 15 areas and all staff will be made aware of these safeguarding issues students may face. All staff will be trained in how to escalate any of the concerns appropriately.

For avoidance of doubt Annex A of KCSIE 2021 will be referred to for any assistance that the DSL or any other college staff may need in ensuring a student's safety and welfare.

1. Poor or Irregular Attendance - “College staff need to be particularly sensitive to signs which may indicate possible safeguarding concerns. This could include for example, poor or irregular attendance or children missing from education” (Ofsted September 2021). The recognised figure for persistent absence is having two consecutive days of absence with no contact, although concerns may still be raised if above or below this. The college will comply with the statutory guidance [**“Children Missing Education” \(September 2019/20\).**](#)

In respect of this and at a local Telford & Wrekin Council level, the college will require behaviour and attendance leads to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, [**“Policies and Procedures for Identifying Children Not Receiving Education \(CNRE\) and Children Missing Education \(CME\)” Telford & Wrekin Council \(September 2019/20\).**](#) This document has a further two supplementary elements that will be complied with and adhered to [**“Modified Timetable Protocol” Telford & Wrekin \(September 2019/20\)**](#) and [**“Children Out of College Protocol” Telford & Wrekin Council \(September 2019/20\).**](#)

In addition to the above and where reasonably possible we shall endeavour to hold more than one emergency contact number for each student. This goes beyond the legal minimum and is good practice and gives the college additional options to contact a responsible adult when a student is missing education and poses a potential welfare/safeguarding concern.

2. Forced Marriage, Honour Based Violence & FGM-Where issues may be raised of Forced Marriage, Honour Based Violence or Female Genital Mutilation (FGM) whether by people within college community, the wider community, older or younger students in all college settings, we will follow Government guidance; [**“Handling cases of Forced Marriage” \(multi agency practice guidelines\) January 2013**](#) [**“Female Genital Mutilation” \(multi agency practice guidelines\) HM Government 2016 pages 42-44**](#) and [**Home Office “Mandatory reporting of female genital mutilation: procedural information” January 2020**](#) and further advice from the Home Office [**for all professionals and agencies “Multi-agency statutory guidance on female genital mutilation” April 2016.**](#)

In respect of FGM this college will adopt the local [**TWSCB “FGM Practice Guidelines and Resource Pack”**](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

We will consult appropriately and sensitively, in a two-way process, in line with that national guidance current, future and local procedure. This college recognises that FGM is against the law and can happen across all ranges of educational settings. Furthermore, this college wishes to make it clear that in line with Section 74 of the Serious Crime Act 2015 that “If a **teacher**, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police”

3. Child Sexual Exploitation-Where we as a college may feel that students may be being abused through exploitation (CATE), we will consult in the normal way with the Safeguarding Team Helpdesk via The Family Connect Team on 01952 385385 and seek advice as to whether the incident follows a [**CSE Care Support Pathway**](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [**CATE Referral Form**](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around

a student attending our college, we will ensure attendance whenever possible as part of the established multi agency process. In addition we have noted and made relevant staff aware of the ". <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

The college needs be aware of [https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges.](https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

Alongside this we have taken the same steps and made all staff aware of the https://www.telford.gov.uk/lscb/downloads/file/152/cse_warning_signs_checklist

4. Potential victims of Modern Slavery and Child Human Trafficking-Modern slavery, including human trafficking, is abuse. If as a college we become aware or have suspicions that a student may have or is being exploited or trafficked, we will contact Family Connect in the normal manner to seek advice and support. All students, irrespective of their immigration status, are entitled to safeguarding and protection under the law. This college recognises this as any normal safeguarding referral and potential victims of trafficking and modern slavery can be of any nationality and may include British citizens. This may cover not only those trafficked for sexual exploitation but those trafficked as drug carriers internally in the UK.

6. Students That Have Gone Missing-Where children have gone missing and not in manner of the above we will follow the [https://www.telford.gov.uk/downloads/file/13472/children_missing_from_home_are_and_education,](https://www.telford.gov.uk/downloads/file/13472/children_missing_from_home_are_and_education) where appropriate.

7. Private Fostering, Homelessness and Homestay arrangements - A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under the age of 18 if the child is disabled, this extends to children who are within homestay arrangements. Students who are looked after by the local authority or who are placed in a residential college, Children's home or hospital are not considered to be privately fostered. Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases where so called "sofa surfing" has been evident. It is important that colleges are alert to possible safeguarding issues, including the possibility that a student has been trafficked into the country. This college also recognise that students whether through family difficulties or through their own choice could be at risk of **becoming homeless**. This college recognises that we will refer and consult with relevant agencies to support any families or students in this situation.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the college becomes aware of a private fostering arrangement for a student that has not been notified to Children's Social Care, the college will encourage parents and private foster carers to notify Children's Social Care and will share information to Children's Social Care as appropriate.

8. Drug and Substance misuse-Where issues come to the attention of the college in relation to drugs and substance misuse we will follow the non-statutory advice contained within [Advice template \(publishing.service.gov.uk\).](https://publishing.service.gov.uk/) This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within our college. The document produced by the Department of Education and the Association of Chief Police Officers clearly sets out the role of colleges, their powers and what colleges can do. Coupled with this preventative and supportive approach, this will sit hand in hand with our statutory functions of safeguarding and the alerting to established referral procedures and the law of the land. Our drugs policy is a standalone policy but for avoidance of doubt, our stance and our approach are stated here.

9. Domestic Violence and Serious Harm- Research increasingly indicates that Domestic Violence/Serious Harm in any form can and does have an impact on children and people of all ages and backgrounds. For the avoidance of doubt, and in the spirit of student welfare, this college will liaise with agencies in a two-way process where Domestic Violence/Serious Harm is a factor in the household. Students within our care will be supported where needed, and guidance at the college is available for them. This college is part of the Operation Encompass process where Domestic Violence issues are shared directly with college, so that college have an initial awareness.

10. Suicide Intervention-This College accepts and understands that thoughts of suicide are common and the leading cause of death in young people. As such suicide intervention is our business too. This college wants to work with our students and work in partnership to support anyone in our college community that may have thoughts of suicide. This college will follow our [**College Suicide Intervention Policy**](#) to assist wherever we can in making those in our care as safe as is possible.

This college recognises that **suicide bereavement has been described as “grief with the volume turned up”** the effects on families, communities and society as a whole are devastating and tragic. This college will support in any way we can.

11. Students with Family Members in Prison and within the Court system

This college will be aware that some students will have family members in prison and within the court system and also may be subject to the court system themselves when parents are in the process of separating. We recognise that they may need extra support during this traumatic time in their lives. We will only do this with consent of the parents and wider family and any agency asking for us as a college community to support. In relation to students in the court system we recognise that assistance is hyperlinked and available within Annex A of KCSIE 2021 to support staff. (UPDATED)

12. Sexual Violence and sexual harassment between students in colleges – (peer on peer abuse)

Action following a report of peer on peer abuse, including sexual violence and/or sexual harassment

This college accepts that sexual violence and sexual harassment can occur between two students of any sex. It can also occur through a group of students sexually assaulting or sexually harassing a single or group of students.

This college will treat sexual violence and sexual harassment in line with any other safeguarding concern and refer onto relevant agencies as stated within our policy, as such this college will adopt the DoE document: _:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Peer on peer abuse is most likely to include, but may not be limited to:

- **Bullying (including cyberbullying, prejudice-based and discriminatory bullying);**
- **Abuse in intimate personal relationships between peers;**
- **Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);**
- **Sexual violence, such as rape, assault by penetration and sexual assault; (this**

may include an online element which facilitates, threatens and/or encourages sexual violence

- **Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;**
- **Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;**
- **Consensual and non-consensual sharing of nude and semi-nude images and/or Videos (also known as sexting or youth produced sexual imagery);**
- **Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and**
- **Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).**

Context- Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment, it may also include initiation/hazing they can occur online and offline (both physical and verbal) and are never acceptable. Staff will act in the best interest of the student. In light of this, will consider:

- ✓ The nature of the alleged incident
- ✓ The wishes of the victim in terms of how they want to proceed
- ✓ The ages of the students involved
- ✓ Any power imbalance between students
- ✓ Is the incident a one-off or a sustained pattern of abuse?
- ✓ Are there ongoing risks to the victim, other students, or college staff?
- ✓ Contextual safeguarding issues
- ✓ The rights of students to receive an education
- ✓
- Established research suggests it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. This college will have a whole college approach in:
 - ❖ The starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated.
 - ❖ Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
 - ❖ Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";

Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, genitalia and upskirting. Dismissing or tolerating such behaviours risks normalising them

- Students with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Research states that disabled and deaf students are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND students. These can include:
 - ❖ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
 - ❖ The potential for students with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
 - ❖ Communication barriers and difficulties overcoming these barriers
- We as a college will ensure that designated college staff understand consent. It will be especially important if a student is making a disclosure that suggests they might have been raped. Consultation will be sought through Family Connect for practical advice and support in this particularly sensitive area.
- In addition, and where necessary for effective safeguarding, this college will utilise/seek resources and support from established sources. This college will consider and in some cases access the toolkit [**Peer-on-peer abuse toolkit \(PDF\)**](#) to assist in our decision making. For an initial scoping we may consider the [**TWSCP Risk & Vulnerability Management Plan-Sexually Harmful Behaviour.**](#)
- This college will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole college approach. We will consult in the first instance with Family Connect for advice and support.
- In relation to sexting, also known as youth produced sexual imagery, this college will where necessary consult with guidance produced by The UK Council for Child Internet Safety (UKCCIS) Education Group "Sexting in Colleges" and Department of Education document "Searching, screening and confiscation" January 2018. The Designated Safeguarding Lead (or Deputy) will take the lead on these issues.
- It is important in this college that policies and procedures are developed in line with legal obligations, including the Human Rights Act 1998 and the Equality Act 2010 and especially the Public Sector Equality Duty.
- This college will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole college approach.

13. Fabricated and Induced Illness

"The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information". [**Taken from "Safeguarding Children in whom illness is fabricated or induced" HM Government.**](#) This supplementary guidance to [**"Working Together to Safeguard Children"**](#) will be adopted by this establishment and we will adhere to our duties set out in [**"Working Together"**](#)

14. Youth Violence, Gang Activity & Child Criminal Exploitation (County Lines)

"The vast majority of young people and educational establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact." Taken from the Home Office

[**https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence**](https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence) In light of this we will embrace the Home Office document and follow this guidance which clearly sets out understanding the issue. The College has a duty and

a responsibility to protect our students and staff and we recognise dealing with violence also helps attainment.

Furthermore, criminal exploitation of children is a geographically widespread form of harm that is a typical feature of **county lines** criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Missing episodes are key to identifying potential involvement in county lines.

In respect of the above we will ensure staff and students must:

- ❖ Feel safe at our college at all the times
- ❖ Understand very clearly what safe situations are; and
- ❖ Be highly aware of how to keep themselves and others safe
- ❖ Monitor thoroughly missing episodes
- ❖ Be aware that any learner of any age and gender may be vulnerable to grooming activity by others of any age and gender
- ❖ Be aware a student of any age may be susceptible
- ❖ Be aware that it is exploitation even if consensual
- ❖ Be aware that it may be typified by a form of power imbalance

15. Extremism, Radicalisation & the PREVENT Agenda

- Extremist views by anyone in college will not be tolerated. Therefore, we will take and expect quick and decisive action where issues of this nature are brought to our attention and we as a college will follow the PREVENT Duty Guidance <https://www.gov.uk/government/publications/prevent-duty-guidance>. Namely, that we expect staff to encourage students to respect the fundamental British Values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. Staff should ensure that partisan political views are not promoted in the teaching of any subject in the college and where political issues are brought to the attention of students, reasonably practicable steps have been taken to offer a balanced presentation of opposing views. **We will treat extremism and radicalisation like any other safeguarding referral.**
- As a college we have procedures in place to monitor IT usage and have a duty to seek advice and explore by filtering suspicious content being viewed. Those within and outside the college community should be left in no doubt our duty to cooperate under the law.
- We will ensure that every frontline member of staff in college has received a **Workshop to Raise Awareness of Prevent (WRAP 3 Training)** as identified in the and delivered by an approved WRAP 3 trainer.
- The PREVENT Duty is seen by this college as its wider safeguarding obligations. Our Designated Safeguarding Lead and any other senior leaders will familiarise themselves with the [Revised PREVENT Duty Guidance for England and Wales](#), especially paragraphs 57-76 which are specifically concerned with colleges (and also covers childcare). The four general themes being; risk assessment, working in partnership, staff training and IT policies.
- As a college if we feel students are being abused through extremism or being radicalised, we will consult directly with Family Connect and the police PREVENT Team and seek advice. This is done with a [Prevent national referral form - Telford & Wrekin Council](#) for avoidance of doubt any PREVENT referral will be sent to **Family Connect and the Police** As with all referrals this referral will be dealt with appropriately by professionals. If it is deemed from the PREVENT Team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently those being **Scott Thomas-White** scott.thomaswhite@telford.gov.uk and **Jas Bedesha** jas.bedesha@telford.gov.uk. Our policy also recognises that the local police

can be contacted in imminent circumstances on **01386 591835/591825 or 591816** and at

prevent@warwickshireandwestmercia.pnn.police.uk

Health & Safety, Physical Intervention & The Use of "Reasonable Force"

- Policies on Health & Safety and Physical Intervention are set out in separate documentation. It reflects the consideration we give to the protection of our students both within the college environment and when away from the college when undertaking college trips and visits. There is separate documentation for this and we will liaise and contact Jo Barnett (T&W Outdoor Education Service Manager 01952 382057 for the relevant guidance to follow refer to www.twccommercial.co.uk/educationalvisits
- For avoidance of doubt for parents/carers and the whole college community there are circumstances when it is appropriate for staff in college to use "reasonable force" to safeguard children and young people. The term "reasonable force" covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain students. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. For avoidance of doubt reasonable force will only be used where de-escalation processes have failed.
- When using reasonable force in response to risks presented by incidents involving students with SEN or disabilities or with medical conditions, this college will consider the risks carefully, recognising the additional vulnerability of these groups. This college will consider our duties under the Equality Act 2010 where we make reasonable adjustments, non-discrimination and the Public Sector Equality Duty. This college will, by planning positive and proactive behaviour support, where necessary by drawing up individual behaviour plans for more vulnerable students and agreeing them with parents and carers. By doing this this college will as far as is possible reduce and minimise the occurrence of challenging behaviour and the need to use reasonable force.
- "Reasonable" in these circumstances means "using no more force than is needed". The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. The Department for Education believes that the adoption of a "no contact" policy at a college can leave staff unable to fully support and protect those in their care. The decision on whether or not to use reasonable force to control or restrain a student is down to the professional judgement of the staff concerned and should always depend on individual circumstances (see link below).
- <https://www.gov.uk/government/publications/use-of-reasonable-force-in-colleges>

Training

- The college will set aside a sum of money per annum to be agreed within its budget as contingency for training, updates and for attendance at inter-agency meetings for its' Designated Safeguarding Leads.
- All new staff receives **on induction (See Section 2- "Responsibilities")** of how to access the TWSCP Policies & Procedures, the College Safeguarding Policy (which includes signposting for online safety for students and staff), a copy of the colleges behaviour policy, Code of Conduct and accessing of whole college training. The same principle applies to current staff where refresher training may be considered by the Designated Safeguarding Lead. This may be done in a format such as regular briefings, e mails, newsletters or thematic workshop approaches.

Safer Recruitment and Online Safety

- It was proposed that Safer Recruitment Training was a requirement from January 2010. The proposal was that from 2010 at least 1 person involved in interviewing an applicant for a post of Principal, Deputy Principal, Teacher or member of the whole college support staff must have completed the safer recruitment training. This training can be received from any provider but must be accredited by The Lucy Faithfull Consortium; this is acknowledged as the required provider's qualification. This will continue to be part of our policy on safeguarding. This requirement states that colleges should access "suitable" training. The college maintains the right to seek this training from reputable accredited providers that they choose. However, on each interview panel it will clearly officially mark as to whom on the panel is the person who has been fully "Safer Recruitment" trained.
- All staff working in the college/college community will be subject to enhanced Disclosure Barring Service (DBS) checks and this college will adhere and comply with "**Keeping Children Safe in Education" Statutory Guidance (September 2021)-Part 3 "Safer Recruitment" and where necessary Part 4 "Allegations of abuse made against teachers and other staff"**"
- This college is supported by our Human Resources Team. All college staff should make the Principal or Chair of Governors aware of any relationships and associations both within and outside of the workplace (including online) that may have implications for the safeguarding of students in college. This college's Designated Safeguarding Lead (Deputy) will make themselves aware of the requirements in relation to the Parts 3 and 4 of KCSIE identified above and seek advice where needed.
- All within the college community must adhere to "**The Corporate Information Security Policy (CISP)** including "**Acceptable Use of Equipment**" and the "**Social Media Policy-Acceptable Use for Employees**"; the college will make all aware of its existence and importance. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.
- Authority wide monitoring software is used within all colleges and will be reviewed, updated and checked regularly. This addresses and includes all online risk of harm, including risks posed by the online activity of extremist and terrorist groups. On occasions unacceptable websites might be accessed inadvertently; if this occurs then this should be closed down immediately and logged and reported to Senior Management and to the IT Team.
- It is recognised at this college that all Information Technology, whether personal or work based, is **a whole college issue** and all staff have a duty to be vigilant. The policies already mentioned cover the extent of this activity and its suitability, staff and students are to be left in no doubt that contravention of them will be forwarded to the appropriate agencies to be dealt with.
- Online safety is a growing and complicated area for all agencies. This college recognises that staff need to be aware that students with Special Education Needs and Disabilities (SEND) are particularly vulnerable, and the unique risks associated with online safety because of their SEND recognition. That is not to say that the principle doesn't apply to any other students in our care.
- The use of technology has become a significant component of many safeguarding issues. child sexual exploitation; radicalisation; sexual predation; technology often provides the platform that facilitates harm. An effective approach to online safety empowers this college to protect and educate the whole college community in our use of technology and we will work with our Information Technology partners to identify, intervene in and escalate any incident where appropriate. **Parents/Carers need to be in no doubt and work with us, support us in and out of college and be aware of this to assist us with effective online safeguarding. We CANNOT do this alone.**

The breadth of issues classified within online safety is considerable:

- ❖ **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- ❖ **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
- ❖ **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- Online safety is a major concern for all professionals' not only Social Media forums but issues around youth produced sexual imagery known as "[sexting](#)". This has been covered in detail in Section 12 of this Policy.

Taking Photographs in Colleges

- Our college and its staff will under **no** circumstances photograph injuries seen on students. Staff in colleges are not Crime Scene Investigators nor are they trained to the standard of hospital photographers. These experts are the only people who should be photographing injuries. Professional Crime Scene Investigators who undertake injury photographs present their evidence at court as an expert witness. College staff are not expert witnesses.
- If the concern is around non-accidental injury then that is a matter that requires immediate attention on the day resulting in an appropriate referral to Family Connect. Those professionals will control getting the process of photographic evidence gathering underway and assessment.
- We will as a college make sure staff should record all visible injuries on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

Site Security

- All staff, students, contractors and visitors to the college will be required to sign in at reception, wear an Identification badge and appropriate lanyard whilst on college premises and be accompanied by the appropriate member of staff.

COMMITMENT TO REVIEW

These Policies will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in Government Legislation or any changes in the duty of statutory agencies in Child Protection and the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on a yearly basis by a named person responsible below, who shall be accountable for that action.

Contacts

Safeguarding Team

Name	Role	Contact
Caroline Welson	BeSafe Manager – Deputy DSL	01952 642369
Sue Alder	Director of Student Services – Lead DSL	01952 642308
Tom Cash	Head of Kickstart - DSL	01952 642541
Peter Ford	Kickstart -DSL	01952 642503
Shaun Bickley	Tutorial Coordinator - DSL	01952 642340
Tom James	Manager of the Willow Tree - DSL	01952 642325
Donna Evans	Business Programme Manager – DSL	01952 642497
Richard Boyes	Lead Tutor - DSL	01952 642586
Lora Rogers	Recruitment officer	01952 642276
Karen Stevens	Lead Tutor - DSL	01952 642513
Daniel Blasczyk	Student Engagement Officer	01952 642384
Helen Swinnerton	Positive Behaviour Support	01952 642486
Debbie Price	Student Services mentor - DSL	01952 642361
Ashley Bowler	Head of Area and Learning coach - DSL	01952 642413
Louisa Berry	Progress coach - DSL	01952 642458
Paulette Kupiec	Progress coach DSL	01952 642200

Useful Contacts

Local Authority Lead	Cathy Hobbs, Group Manager, Access and Inclusion, School Performance and Development. 6A Darby House, Lawn Central, Telford, Shropshire, TF3 4JA cathy.hobbs@telford.gov.uk
LADO	Glen Ashbrook. Education Safeguarding Co-ordinator, School Performance and Development, Education and Corporate Parenting, 7A Darby House, Lawn Central, Telford, TF3 4JA, Telford & Wrekin Council Tel: 01952 380989 Mobile: 07973 812611 www.telford.gov.uk glen.ashbrook@telford.gov.uk
Police	PC Peter Rigby 21920Safer Neighbourhoods Teams North, Wellington Police Station, Victoria Road, Wellington, TF1 1LQ peter.rigby@westmercia.pnn.police.uk Tel : 01952 7713037 Tel : 07929800819
Prevent	Mrs Hifsa Haroon-Iqbal MBE DL MPhil, Regional Prevent Lead Further and Higher Education (West Midlands), Department for Education Email: Hifsa.Haroon-Iqbal@EDUCATION.gov.uk Mob: 07785-654148
Family Connect Telford & Wrekin Council	Families, carers and professionals can access comprehensive local information via this website relating to the needs of children aged 0 - 19 years old or to 24 years old for those with a disability. Telephone: 01952 385385 Email: familyconnect@telford.gov.uk

Useful Contacts

The Holly Project	YMCA Support for parents and families of CSE victims and survivors. Tan Bank, Wellington, Telford, TF1 1HJ Telephone: 01952 947831 Email: hollyproject@ymcawellington.co.uk
Child Exploitation & Online Protection (CEOP)	Has something happened online that has made you feel worried or unsafe? Advice available in age ranges and for parents/carers. Telephone: 0870 000 3344 Email: enquiries@ceop.gov.uk
<u>The Female Genital Mutilation Helpline</u>	The Female Genital Mutilation Helpline Telephone: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
Thinkuknow Child Exploitation & Online Protection (CEOP)	<u>Tell Someone</u> Think you or a friend might have been sexually exploited? Want some advice or someone to talk to? Worried about your child or a young person in your care? Please Tell Someone. Visit Thinkuknow.co.uk - the CEOP Centre's online safety site, where you will find advice and tips for children, adults and professionals of all ages. Telephone: 101.
Police	Malinsgate Police Station, Town Centre, Telford, TF3 4HW Telephone: 0300 333 3000 In an emergency, please contact 999 Non-emergency please contact 101
T&W Emergency Duty Team	Telephone: 01952 67650
Information Advice Support Service (IASS)	Telephone: 01952 457176
NACRO (drug and alcohol)	Telephone: 01952 248221
Samaritans	Telephone: 01952 25616
Senior Parenting Practitioner	Telephone: 01952 385385 / 0808 2000247
Youth Offending Service	Telephone: 01952 385985

Useful Websites:

- Keeping Children Safe in Education - 2021
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE 2021 September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf)
- Contextual Safeguarding
 - <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>
- NSPCC
 - help@nspcc.org.uk
- Ofsted
 - www.ofsted.gov.uk
- Data Protection
 - <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- Female Genital Mutilation (FGM)
 - [www.fgmlearning.co.uk](http://fgmlearning.co.uk)
- Suicide Intervention
 - <http://zerosuicidealliance.com/>
- Internet safety
 - <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
- Rape Crisis
 - <https://rapecrisis.org.uk/>
- Prevent
 - prevent@warwickshireandwestmercia.pnn.police.uk
- Reasonable Force Guidance
 - <https://www.gov.uk/government/publications/use-of-reasonable-force-in-colleges>

Remove from policy
Addendum COVID-19

Addendum to Telford College Safeguarding and Prevent Policy

March 2020

Response to COVID-19

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19.

This annex sets out some of the adjustments Telford College including Kickstart is making in line with the changed arrangements in the college and following advice from government and local agencies. <https://www.telfordcollege.ac.uk/covid-19-guidance-and-faq/>

The current position is that, following the Government announcement, Telford College is working differently, the majority of students are accessing the College remotely, but the College will be available to support those students that fit into the Governments vulnerable students' criteria. Despite the changes, the College's Safeguarding Policy is fundamentally the same: the welfare of children and young people always come first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access online resources). Staff may be aware of the mental health of both students and their parents or carers and should refer to safeguarding (the Be -Safe Team) about any emerging concerns.

We have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker and those with an EHCP.

For students' subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker: contact will be made by the safeguarding team twice weekly with these students in agreement with the family and social worker. Where families have requested this to be once per week, this has been discussed and agreed with the allocated social worker.

For students who are Looked after Children and recent Care Leavers: contact will be made by the Safeguarding team who will call daily, weekly or twice weekly as agreed with the student, carer and social worker.

For students with an EHCP: Tutors, Progress Coaches and Learning Support Advisors will maintain regular contact as agreed with student and parents / carers. Support can be delivered through individual arrangements based on curriculum activity.

For students on the edge of social care involvement or pending allocation of a social worker, or identified as high risk: contact will be made by the safeguarding team once per week for a welfare check.

NB Contact will be made remotely through telephone calls/Skype or other appropriate methods.

Reporting arrangements:

The college arrangements continue in line with our Safeguarding Policy.

The Designated Safeguarding Lead is:

The DSL Team

- Caroline Welson – caroline.welson@telfordcollege.ac.uk – 07811 158425
 - Susan Alder – susan.alder@telfordcollege.ac.uk – 07840 652966
 - Debbie Price – debbie.price@telfordcollege.ac.uk – 07876575014
 - Tom Cash (Kickstart) – tom.cash@telfordcollege.ac.uk – 01952 248494/642402
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- We will be operating during normal business hours, 8.30am – 5pm (Mon – Thurs) and 8.30am – 4.30pm (Friday).
 - Kickstart will be operating 8.30am – 2.45pm.

We have confirmed the arrangements to contact the LADO at the local authority remain unchanged: LADO Glen Ashbrook -. Telford and Wrekin Council – contact 01952 380989
Staff will continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

If you have access to CPOMs please continue to log confidential comments as you normally would. If you do not have access to CPOMs to log confidential comments, please email concerns to besafe@telordcollegecollege.ac.uk where a member of the safeguarding team will respond to the concern and log on CPOMs. This email address is monitored by all safeguarding staff.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team (listed above) who will follow appropriate measures in seeking the appropriate and necessary support. Out of hours guidance is included in the current safeguarding policy.

Should a child or young person be at risk of significant harm please contact local agencies–
familyconnect@telford.gov.uk

Should local agencies not be available please contact: Susan Alder (number above).

Allegations or concerns about staff

With such different arrangements in place, young people could be at greater risk of on-line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Any agency staff or volunteers working with students during college closure will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

New staff or volunteers

All new starters must have an on-line induction. They must read the college Safeguarding and Policy, the Whistleblowing Policy and the staff Code of Conduct. The HR department will ensure new recruits know who to contact if worried about a child or young person and ensure the new starters are familiar with the child protection procedure.

All new starters or volunteers need to confirm that they have read Part I and Annex A of Keeping Children Safe in Education.

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim measure and similar. When contacting these families our staff may ask about relationships between learners.

Risk online

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place. The College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium.

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for online working have been issued.

All within the college community must adhere to "[The Corporate Information Security Policy \(CISP\)](#) including ["Acceptable Use of Equipment"](#) and the ["Social Media Policy-Acceptable Use for Employees"](#); the college will make all aware of its existence and importance. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

Students accessing remote learning will receive guidance on keeping safe online, via Moodle and Tutorial.

For additional guidance:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>

Mental Health

Restrictions to movement and contact with other people means pupils are more likely to be at risk of mental health problems. College should make students and their families aware of where further support can be found. The Department for Education have produced guidance to support parents:

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

The following organisations can also provide support:

www.kooth.com – Free online emotional wellbeing and counselling with self-help articles

<https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing>

<https://www.mind.org.uk/information-support/helping-someone-else/>

Calm Harm App – A phone app providing help for those who use self-harm as a coping strategy;
<https://calmharm.co.uk/>

Forced Marriage, Honour Based Violence & FGM

Where issues may be raised of Forced Marriage, Honour Based Violence or Female Genital Mutilation (FGM) whether by people within college community, the wider community, older or younger students in all college settings, we will follow Government guidance; "[Handling cases of Forced Marriage](#)" (multi agency practice guidelines) January 2013 "[Female Genital Mutilation](#)" (multi agency practice guidelines) HM Government 2016 pages 42-44 and Home Office "[Mandatory reporting of female genital mutilation: procedural information](#)" January 2020 and further advice from the Home Office for all professionals and agencies "[Multi-agency statutory guidance on female genital mutilation](#)" April 2016.

Parents and Carers

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. We have set out the College's approach, including the sites students will be asked to access and set out who from the college (if anyone) their student is going to be interacting with online. Parents have been offered the following links:

- Internet matters - for support for parents and carers to keep their children safe online
- Net-aware - for support for parents and careers from the NSPCC
- Parent info - for support for parents and carers to keep their children safe online
- Thinkuknow - for advice from the National Crime Agency to stay safe online o UK Safer Internet Centre - advice for parents and carers

The Telford College website has guidance and advice for parents on keeping young people safe on line - <https://www.telfordcollege.ac.uk/parent-faq>