



GUILDFORD COLLEGE GROUP POLICY

ACADEMIC/NON ACADEMIC: Non Academic

FRAMEWORK AREA: Safeguarding

POLICY TITLE: Safeguarding – Child Protection and Adults at Risk

LEAD COLLEGE MANAGER: The Principal

Consulted with: Safeguarding Committee Meeting
Curriculum and Standards Committee

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GUILDFORD COLLEGE GROUP

Statement of Policy Purpose

This policy is one of a series in the College's integrated safeguarding portfolio which promotes and supports the safeguarding and wellbeing of all children, young and people and adults at risk attending the College. The College has a duty of care to all students and a student-centered approach to safeguarding concerns. The College's safeguarding arrangements are inspected by Ofsted under the judgments for behaviour and safety and leadership and management.

Applicability

This policy applies to all students, staff, governors and stakeholders enrolled within the Guildford College Group and any of its outreach centres, including franchises and work placements that offer qualifications on behalf of the Group, regardless of their background or protected characteristic. The procedures contained in this policy are consistent with those of the Surrey Safeguarding Children Board (SSCB) and the Surrey Safeguarding Adults Board (SSAB)

Legislative Framework

The principal legislation and policies governing this policy are:

Keeping Children Safe in Education 2018
Working Together to Safeguard Children 2015
Safeguarding Vulnerable Groups Act 2006
Education Act 2002, Section 175
The Children Act 1989, 2002
Counter-Terrorism and Security Act 2015
Prevent Duty 2015

All staff, including agency staff, temporary staff, volunteers and members of the Corporation, have a responsibility to act on any suspicion or disclosure that may suggest a anyone is at risk of harm.

Underlying Principles

- Listen to students and respecting and valuing them at all times
- Challenge discrimination and promote the right to equal protection under the protected characteristics as defined in the Equality Act 2010
- Be informed by evidence
- Respond to cause for concerns immediately
- Create a safe environment by ensuring appropriate risk assessments are conducted for those with known criminal convictions and medical support needs.
- Be a continuing process of support rather than an event
- Work in partnership with students and their carers, where appropriate, external agencies and the wider community

Consequences of non-compliance: Members of staff, members of the Corporation and host families will follow the process in Appendix.6

Dissemination

The Designated Safeguarding Officer and Deputy Designated Safeguarding Officer will ensure that the policy is distributed to all College Faculties and/or Departments and available on the College intranet and web site. Dissemination within Faculties and Departments to staff and/or students is the responsibility of the respective management teams.

All staff will receive a link to the safeguarding policy on their first day of employment or prior to employment. In addition they will receive safeguarding and Prevent training within a week of starting on line and within a month, face to face. In addition copies of Part 1 of Keeping Children Safe in Education will be issued to all staff at induction. As part of best practice, in addition “What to do if you’re worried a child is being abused- Advice for practitioners March 2015” is also to be distributed as part of the safeguarding induction for new staff.

General Policy Content

1 Introduction

Guildford College Group are committed to their duty to promote and safeguard the welfare of children, young people and adults at risk receiving education and training at the College. Staff are alert to the signs of abuse and safeguarding concerns and follow procedures to ensure that children, young people and vulnerable adults receive effective support, protection and justice.

Throughout these policies and procedures reference is made to 'children and young people' and "adults at risk".

The term "children and young adults" is used to mean those under the age of 18. Safeguarding and promoting the welfare of a child is the process of:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that 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 life chances

The term "adult at risk" is used to mean a person aged 18 years or over 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. Whether or not a person is at risk in these cases will depend upon the surrounding circumstances and environment.

Safeguarding and promoting the welfare of adults at risk is the process of protecting them from significant harm or exploitation.

2 Designated Staff with Responsibility for Safeguarding and Prevent

Senior Staff Person with Lead Responsibility:

The senior member of staff with lead responsibility for child protection issues is the Principal.

The senior member of staff with lead responsibility for staff is the Associate Principal Business Continuity.

The nominated Safeguarding Governor is the Chair of the Curriculum and Standards Committee and also sits on the Safeguarding Committee which meets 6 times a year and provides a valuable link between College governance, strategic leadership and operational activity.

The Associate Principal for Estates and Facilities has been named as the Designated Safeguarding Person (DSP) with lead responsibility for students and is the nominated College Prevent lead. This appointment must be decided by the

Safeguarding Governor and/or the Principal. The Head of Safeguarding and Wellbeing is the Deputy Designated Person and is the CSE lead.

The DSP and Deputy DSP are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Surrey Children Services or Adult Social Services.
- Raising awareness within the staff and student body of issues relating to the welfare and safeguarding of children, young people and vulnerable adults.
- Promotion of a safe environment for children, young people and adults at risk learning within the College
- Aiding the identification of children, young people and adults at risk in need or at risk of significant harm and providing procedures for reporting concerns
- Establishing procedures of reporting and dealing with allegations of abuse against members of staff
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agency as agreed with the Local Safeguarding Children Board (LSCB) and Surrey Safeguarding Adults Board (SSAB).
- Liaising with the Multi Agency Safeguarding Hub and other appropriate agencies
- Providing advice and support to staff on issues relating to child protection and adults at risk.
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral) until the young person's 25th birthday
- Liaising with the Local Education Authority (LEA), LSCB, SSAB and other appropriate agencies
- Liaising with secondary schools (where appropriate) that send pupils to the Group, ensuring that appropriate arrangements are made for school pupils attending College
- Liaising with employers and training organisations that receive children, young people and vulnerable adults from the Group on placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive appropriate training in Safeguarding and Prevent issues including risks for young people and adults at risk and are aware of the College Safeguarding procedures
- Ensuring access to a Safeguarding Officer of the same gender as the child or adult at risk where requested

- Providing an annual report to governors which reviews how the duties have been discharged. The annual report will include statistics by race, age, gender and disability.

The Principal and CEO will:

- Ensure that the safeguarding policies and procedures are implemented and followed by all staff
- Allocate sufficient time, training, support and resources to enable the DSP and deputy to carry out their roles effectively
- Ensure that students are provided with opportunities to learn about safeguarding, including keeping themselves safe online

The Lead Person for Staff in safeguarding matters is the Associate principal for Business Continuity

- Ensure that all staff are able to raise concerns about poor and safe practice and that such concerns are handled sensitively and in accordance with the Whistle-blowing Procedures
- Liaise with the local authority designated officer (DO) where an allegation is made against a member of staff
- Ensure that anyone who has harmed or may pose a risk to a young person or vulnerable adult is referred to the Disclosure and Barring Service
- Ensure the safe recruitment of staff and maintain a Single Central Record of employees and volunteers.

See other relevant policies such as the Whistle Blowing Policy, Recruitment and Selection Policy, DBS Policy, Probationary and Disciplinary Policy

The Associate Principal of Estates and Facilities and the Head of Safeguarding and Wellbeing have received training in Safeguarding and Prevent issues and inter-agency working as required will receive refresher training at least annually.

Contact details for the DSL and DDSL can be found in Appendix 7 together with details of how to contact a Safeguarding Officer.

The designated Safeguarding Officers:

- Report to the Head of Safeguarding and Wellbeing for the purposes of protecting children, young people and vulnerable adults.
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to protecting children, young people and vulnerable adults
- Have particular responsibility to be available to listen to children, young people and vulnerable adults studying at the College
- Will deal with individual cases, including attending case conferences and review meetings as appropriate

- Have received training in Safeguarding issues and inter-agency working as required and will receive refresher training at least every two years

3 Guildford College Group Corporation

It is the responsibility of the Corporation to ensure that the College's Safeguarding and Recruitment procedures are in accordance with the LSCB, SSAB and national guidance.

The Corporation is committed to ensuring that the Group:

- Provides a safe environment in which all students can learn and develop
- Appoints a designated safeguarding person who is a member of the senior management team and who has undertaken training in inter-agency working, in addition to Safeguarding and Prevent training
- Makes certain that the DSP role is explicit in the role holder's job description
- Has a Safeguarding and Prevent Policy and procedures, including a staff code of conduct, that are consistent with LSCB and SSAB and statutory requirements, reviewed annually and made available publicly on the College website or by other means
- Maintains clear procedures to identify and report suspected cases of abuse or likely abuse
- Provides all staff with safeguarding training at induction and the necessary information to enable them to meet their safeguarding responsibilities
- Maintains consistent good practice
- Provides appropriate support to students who have been abused
- Practices the safe recruitment of staff that includes statutory checks on staff suitability to work with children, young people and vulnerable adults.
- Contributes to inter-agency working and plans
- Provides a co-ordinated offer of early help when additional needs of young people and vulnerable adults are identified
- Has a procedure for dealing with allegations of abuse made against members of staff, including allegations made against the Principal and allegations against other students. See Appendix 11
- Has procedures in place for dealing with complaints about safeguarding arrangements

- Will approve and annually review policies and procedures to ensure that the Group is properly carrying out its functions, including staff training.
- Acknowledges and will comply with its obligations in connection with the provision of residential accommodation for children and young people set out in the Care Standards Act.
- Will inform the Local Authority Designated Officer and oversee liaison between agencies such as the police and the Social Services as defined by the LSCB in connection with allegations against the Principal which will need to be reported to the Chair of Governors. An external advisor will be appointed to investigate.

4 Procedures

The processes outlined below detail the stages involved in raising and reporting safeguarding and prevent concerns at the College.

Reporting to a safeguarding officer

All staff are required to report concerns and disclosures to one of the Safeguarding Officers. Where a concern is of imminent concern, a safeguarding officer must be contacted by phone or in person. A safeguarding referral must be completed under the confidential section of Pro Monitor within 24 hours. Appendix 7 provides a list of nominated safeguarding officers.

Any staff can refer to Children or Adults Social Services themselves. (KCSIE 2016)

5 Reporting allegation of abuse against a member of staff

Allegation of abuse against staff (including agency, contractors, nominated safeguarding officers, volunteers) must always be reported to the Principal.

6 Confidentiality and Information Sharing

All staff will understand that safeguarding issues warrant a high level of sensitivity, not only out of respect for the student and staff involved, but also to ensure that being released into the public domain does not compromise evidence.

Staff must only discuss concerns with a Safeguarding Officer, line manager or Chair of Corporation (depending on who is the subject of the concern). The Safeguarding Officer will then decide who needs to have the information and they will disseminate it on a need-to-know basis.

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the GDPR. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- family, associates and representatives of the person whose personal data we are processing
- professional advisers
- healthcare, social and welfare organisations

Safeguarding information will be stored and handled in line with the Data Protection Act 2018 principles. Information is:

- Processed for limited purposes
- Proportionate and necessary
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

The Safeguarding team will process personal data whilst you are a student and will store the personal data for a number of years. The retention period for different classifications of personal data has been established in line with information management guidelines. The information will be stored in a locked facility and any electronic information will be stored within a confidential area on ProMonitor and only made available to Safeguarding Officers, DSL, and the DSL Deputy.

Every effort will be made to prevent unauthorised access and sensitive information must not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Safeguarding information will be stored separately from the student's College and disciplinary file and will be tagged to indicate that separate information is held. Sharing agreements will need to be in place between the transferring institution before files are securely transferred.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from student or parent to see child protection records, they will refer the request to the designated safeguarding person.

The Data Protection Act does not prevent College staff from sharing information with relevant agencies, where that information may help to protect a young person. The College's policy on confidentiality and information sharing is in line with the General Data Protection Regulation

For further information please follow the link:
<http://www.gcgrp.net/DataProtection/1Overview.aspx>

Whistleblowing.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and at Guildford College Group we take any issues raised very seriously. Concerns should be raised with your line manager in the first instance.

Where a member of staff feels unable to raise an issue with their line manager or feels that their concerns are not being addressed, there are other channels open. The NSPCC whistle blowing helpline is available: 0800 028 0285

Please see the Whistleblowing Policy for further advice.

7 Safe Practice for Staff

From time to time staff may encounter young people and adults at risk who display attention seeking behaviour or profess to be attracted to them. Staff must deal with those situations sensitively and appropriately, but ensure that their behaviour cannot be misinterpreted. In these circumstances, the member of staff will also ensure that a senior colleague is aware of the situation.

It is a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent even if the basis for their relationship is consensual. A relationship of trust exists where a member of staff or volunteer is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken.

8 Related Policies/Documents

[Anti-bullying and Harassment Policy \(Students\)](#)

[Student Disciplinary Policy](#)

[Student Complaints Policy](#)

[Response to the Death of a Student Policy](#)

[Data Protection Policy](#)

E –safety Policy

Work Experience Policy

[Employee Safeguarding Code of Conduct](#)

[Work Experience/Placement Policy](#)

[Personal Relationships Policy](#)

[Freedom of Information Policy](#)

Restraint Policy

[Staff Prevention of Bullying and Harassment Policy](#)

[Staff Recruitment and Selection Policy](#)

[Staff Disciplinary Policy](#)

[Staff Probationary Procedure](#)

[Staff Grievance Policy](#)

[DBS Policy](#)

[Trips and Activities Policy](#)

[External Speaker Policy](#)

[Volunteers Policy](#)

[PIDA \(Whistleblowing\) Policy](#)

Freedom of Speech Policy

9 Support

We recognise that staff who have become involved with a young person or vulnerable adult who has suffered or is likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the Designated Lead or Deputy Designated Lead and encourage the staff member to seek further support through the Employee Assistance Programme.

Students may access support through the student counselling service or Student Wellbeing Advisors or another appropriate member of staff.

Appendix 1: Categories of abuse that refer to Children and Young People

The College and Corporation recognises the following as definitions of abuse:

Abuse: 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. A child may be abused by an adult or adults or another child or children.

Physical Abuse: Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer feigns the symptoms of, or deliberately causes ill health to, a child whom they are looking after.

Neglect: Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food, clothing or shelter, failure to protect a child from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child or young person's basic emotional needs.

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, sexual 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 and young people.

Emotional Abuse: The persistent emotional maltreatment of a child such as to cause severe and 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, although it may occur alone.

Appendix 2: Categories of Abuse that refer to vulnerable adults

Physical Abuse: This includes hitting, pinching, deliberately giving too much medication or physically restraining someone in an inappropriate way - for example, being locked in or force-fed.

Neglect: This includes ignoring or withholding physical or medical care needs. Examples are failing to provide appropriate food, shelter, heating, clothing, medical care, hygiene, personal care; inappropriate use of medication or over-medication.

Sexual Abuse: This includes any sexual act to which the vulnerable adult has not consented and may not understand. For example, being touched or kissed when it is not wanted, being made to touch or kiss someone else, being raped, being made to listen to sexual comments or forced to look at sexual acts or materials.

Psychological Abuse: This can happen where someone is isolated, verbally abused or threatened.

Financial/Material Abuse: This includes taking another person's money or possessions - for example, having money or property stolen, being pressured into giving people money or changing a will, misuse of benefits, not being allowed access to money.

Discrimination - Discriminating abuse includes any type of abuse aimed at a vulnerable adult because of their colour, religion, appearance or sexuality. For example, ignoring spiritual or religious beliefs, comments or jokes about a person's disability, age, race, sexual orientation, or gender / gender identity, ignoring cultural needs, for example diet or clothing

Institutional Abuse - This is abuse occurring in a social or health care establishment that may range from poor practice to ill treatment and gross misconduct. For example, lack of individual care, no flexibility of bedtimes or waking, deprived environment and lack of stimulation

Professional Abuse - Professional abuse is the misuse of therapeutic power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems/structures.

Appendix 3: Preventing Radicalisation and Extremism

Introduction and Context

Prevent is part of a Government initiative to develop a robust counter terrorism programme – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical- an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The current threat level from international terrorism in the UK is substantial which means that a terrorist attack is a strong possibility.

Further Education colleges are major education and training providers for the 16 – 25 year age group, particularly young people from ethnically diverse, and socially and economically disadvantaged areas. The age and profile of our students make it crucial to be involved in the Prevent strategy. Colleges have a part to play in fostering shared values and promoting cohesion. Colleges should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings. This strategy has five key objectives:

1. To promote and reinforce shared values, to create space for free and open debate and to listen and support the learner voice.
2. To break down segregation among different student communities by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society
3. To ensure student safety and that the College is free from bullying, harassment and discrimination
4. To provide support for students who may be at risk and appropriate sources of advice and guidance
5. To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism.

Appendix 4: Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse or injury sustained while a child has been inadequately supervised. The identification of physical signs is complicated as young people may go to great lengths to hide injuries often because they are ashamed or embarrassed, or that the abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to a Safeguarding Officer.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child, young person or vulnerable adult has been abused.

A child, young person or vulnerable adult who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing
- Look unkempt and uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or others' safety
- Self-harm
- Frequently miss college or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy go lucky to withdrawn
- Challenge authority
- Become disinterested in their College work
- Be constantly tired or preoccupied
- Wary of physical contact
- Be involved in, or particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected

The following are possible safeguarding issues that staff may be concerned about:

- Abuse www.nspcc.org.uk/preventing-abuse
- Extremism and radicalisation www.preventforfeandtraining.org.uk
- Child sexual exploitation www.nationalcrimeagency.gov.uk
- Bullying, including cyber bullying www.bullying.co.uk/cyberbullying
- Domestic violence www.nhs.uk/Livewell/abuse
- Substance misuse and drug trafficking www.catch-22.org.uk
- Faith abuse childfriendlyfaith.org
- Female Genital Mutilation www.gov.uk/female-genital-mutilation
- Forced marriage www.gov.uk/guidance/forced-marriage
- Gangs and youth violence www.eif.org.uk
- Gender based violence www.unfpa.org/gender-based-violence
- Sexting and exposure www.safeguardingschools.co.uk/responding-sexting-schools-colleges-ukccis
- Teen age relationship abuse www.nhs.uk/Livewell/teengirl
- Trafficking www.unseenuk.org/about/the-problem/human-trafficking
- Students who are missing www.missingpersons.police.uk
- Mental health concerns www.mind.org.uk
- Suicide attempts and thoughts of suicide www.nhs.uk/conditions/Suicide
- Self-harm www.youngminds.org.uk/
- Eating disorders www.nhs.uk/conditions/eating-disorders
- Fabricated or induced illness www.medicalnewstoday.com/articles/167880
- Hate crimes www.educateagainsthate.com
- Private fostering www.privatefostering.org.uk
- Peer on peer abuse www.trxionline

Child Sexual Exploitation:

The latest definition on Child Sexual Exploitation (CSE) which will be included in the *Working Together* Statutory Guidance is:

“that is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology”.

This manipulation or ‘grooming’ process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim’s options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited. (Barnardo’s 2012).

Children who are missing

Children may run away *from* a problem, such as abuse or neglect at home, or *to* somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse. Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after, and go missing from their family home. They can face the same risks as a child missing from local authority care. Staff must ensure that any concerns are identified urgently to the Safeguarding Team.

Domestic Violence:

The Home Office defines domestic violence as "Any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality".

Children who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviours that put children at risk, the links below provide useful information

Female Genital Mutilation:

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Tutors must personally report to the police a disclosure that FGM has been carried out after informing the Designated Safeguarding Lead.

Radicalisation:

Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to the Safeguarding Team who will liaise with the Multi Agency Safeguarding Hub (MASH) and/or the Counter Terrorist Unit (CTU) for advice. If appropriate, a referral will then be made to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal. The Counter Terrorism Unit (CTU) will be advised of any emerging themes or immediate concerns/ disclosures.

Bullying:

Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as the College operates a zero tolerance

approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures).
- Physical: Pushing, kicking, punching or any use of aggression and intimidation.
- Racial: Racial taunts, use of racial symbols, graffiti, gestures.
- Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- Verbal: Name calling, spreading rumours, teasing.
- Cyber: All areas on internet, such as email and internet chat room misuse.
- Mobile threats by text message and calls.
- Misuse of associated technology i.e. camera and video facilities and sexting

Private Fostering:

Is when a child under 16 is being looked after for more than 28 days other than by their parent/legal guardian and is not in the care of the Local Authority. To keep children safe, the Local Authority must be notified of any children living under such arrangements. Whilst being privately fostered this does not mean the child is unsafe, the Local Authority have a duty to know who is privately fostered, to monitor that's arrangement and offer support. If you are aware of any student who you feel maybe being privately fostered, please follow the safeguarding procedure for reporting to the safeguarding team

Honour Based Violence (HBV):

So called "honour based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including Female Genital Mutilation (FGM), forced marriage and practices, such as, breast ironing. All forms of so called HBV are abuse and staff should refer any concerns to the Safeguarding Team. There are a range of potential indicators that a child may be at risk of HBV.

Youth Produced Sexual Images (Sexting):

This includes the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal. 'Youth produced sexual imagery' is a more accurate definition than sexting and preferred by the guidance produced by Keeping Children Safe in Education 2018 because:

'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.

'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.

'Imagery' covers both still photos and moving videos

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and the police should always be informed
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

If staff are given images to look at by students do not look at them or delete them either. The Head of Safeguarding and Wellbeing has the authority to delete images. (New guidelines issued under CEOPs)

Peer on Peer Abuse

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim.

Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQ Children and young people (CYP) and those who are from different communities.

Situations where young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case. Peer influence or peer pressure is a major factor in the decisions made by young people to join groups. Many young people see it as a "way out" from their day to day life and feel a strong bond with their peers, one which they may be lacking at home.

County Lines

Gangs are deliberately targeting vulnerable children – those who are **homeless**, living in care homes or **trapped in poverty**. These children are unsafe, unloved, or unable to cope, and the gangs take advantage of this.

These gangs groom, threaten or trick children into trafficking their drugs for them. They might threaten a young person physically, or they might threaten the young person's family members. The gangs might also offer something in return for the young person's cooperation – it could be money, food, alcohol, clothes and jewellery, or improved status – but the giving of these gifts will usually be manipulated so that the child feels they are in debt to their exploiter.

However they become trapped in county lines, the young people involved feel as if they have no choice but to continue doing what the gangs want.

Appendix 6: Dealing with Disclosure of a Safeguarding Issue and Procedure for Reporting Concerns

If a child, young person or vulnerable adult discloses to a member of staff about a possible safeguarding concern:

- Listen carefully and stay calm
- Do not interview the child, young person or vulnerable adult although, if necessary, you may seek to clarify details by using open questions and without putting words into their mouth in order to be sure that you understand what they are telling you
- Reassure the child, young person or vulnerable adult that by telling you, they have done the right thing
- Inform the child, young person or vulnerable adult that you must pass the information on, but that only those that need to know about it will be told. Inform them to whom you will report the matter
- Note the main points carefully
- Make a detailed note of the date, time, place, what the child, young person and vulnerable adult said, did and your questions etc.
- Record your actions including a reason for your decision

Staff must not investigate concerns or allegations themselves but must report them immediately to a Safeguarding Officer who will then decide whether to make a referral in accordance with LSCB and SSAB guidelines.

Any member of staff can make a safeguarding referral to the LSCB or SSAB though generally the referral will be made by a Safeguarding Officer unless there are exceptional circumstances.

Reporting directly to child protection agencies

Staff must follow the reporting procedures outlined in this policy. However, they may also share information directly with Child or Adult Social Care, police or the NSPCC if:

- The situation is an emergency and a Safeguarding Officer is unavailable
- They are convinced that a direct report is the only way to ensure the student safety

Appendix 7: Safeguarding Team

Designated Safeguarding Person with Lead Responsibility:

Phil Coulthard, Associate Principal of Estates and College Services – Guildford College Group
Tel: 01483 448570 (Mobile: 07800 518541)

Deputy Designated Safeguarding Person with Lead Responsibility:

Penny Coulthard, Head of Safeguarding and Wellbeing
Tel: 01483 448561 (Mobile: 07973551114)

Safeguarding Officers:

Farnham College

Call the College switchboard Ext 5500 or 01252 716 988 to be connected to a Safeguarding Officer.

Merrist Wood

Call the College Reception on Ext 8575 or 01483 448 575 to be connected to a Safeguarding Officer. .

Guildford, Stoke Park

Call Ext: 8844 or 01483 448 844 to be connected to a Safeguarding Officer.

In the absence of a Safeguarding Officer the Duty Manager will be contacted.

To contact the Safeguarding Governor, email the Clerk to the Corporation on: rjones@guildford.ac.uk

Surrey Safeguarding Children Services

Multi-Agency Safeguarding Hub (MASH) 0300 4709100

Emergency Team out of hours Tel: 01483 517 898

Surrey Adult Social Services

Day time 0300 200 1005.

Emergency out of hours Tel: 01483 517898

Hampshire Social Services

Children Services 0845 603 5620

Adult Services 0300 555 1386

Halls of Residence at Merrist Wood- Duty Warden for residential students 07929 021 674

Appendix 8: Children and Young Children who are Particularly Vulnerable

Some children may have an increased risk of being abused due to societal attitudes and assumptions and diverse circumstances, rather than the individual child's personality, impairment or circumstances.

To ensure that all of our students receive equal protection, we will give special consideration to students who are:

- Disabled or have special educational needs
- Young carers
- Care leavers
- Living in a domestic abuse situation
- Living away from home including International students
- Living in temporary accommodation
- Vulnerable to being bullied or engaging in bullying
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- Asylum seekers
- Not speakers of English as a first language
- Involved directly or indirectly in sexual exploitation
- At risk of female genital mutilation (FGM) or forced marriage

International students are recognised as being at increased risk as they are living away from home in an unfamiliar culture and may initially have difficulties with language communication. An appropriate induction will be provided for International students and will include e-safety.

14-16 year olds are also considered to be at increased risk due to their age and vulnerability. While 14-16 year olds are attending one of the College's on Campuses they are required to stay within the grounds at all times and only permitted off site if accompanied by a member of staff.

Students Staying with Host Families

The College follows the guidance in Keeping Children Safe in Education, Annex C and Care Standards to ensure that hosting arrangements are as safe as possible.

Work Experience

The College has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in Keeping Children Safe in Education. See the Work Experience Policy. Students on work placement are provided with a wallet-card giving safeguarding contact details and information which is also provided on the back of their College ID card.

Safer Recruitment

Guildford College Group endeavours to ensure that we do our utmost to ensure employment of safe staff by following the guidance in Keeping Children Safe in Education (2018) together with the LSCB and College's individual procedures.

Safer recruitment means:

- Applicants will complete an application form which includes their employment history
- Short-listed applicants will be interviewed
- All offers of employment are subject to satisfactory references, qualifications check, eligibility to work in the UK check, medical clearance and a satisfactory DBS check at Enhanced Level.
- At least one member of the interview team must have completed Safer Recruitment Training. This needs to be updated every 5 years.

All members of staff will undergo an appropriate induction that includes familiarisation with the College's Safeguarding policies. All staff attend safeguarding and Prevent training appropriate to role during their probationary period. The probationary period cannot be signed off without this mandatory training.

The College obtains written confirmation from supply agencies that agency staff have been approved.

The College maintains a Single Central Record of recruitment checks undertaken for employees and volunteers (and includes Governors) which includes the Safer Recruitment checks as above. (See the Recruitment and Selection Policy). It is good practice for the College to subject all applicants to a barred list check.

Where extended College activities are provided and managed by the College our own safeguarding policies and procedures apply. If other organisations provide services or activities on our site the College will check that they have appropriate procedures in place, including safer recruitment processes and the appropriate DBS checks.

Volunteers

Volunteers, including members of the Corporation, will undergo checks commensurate with their work in the College and contact with students.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the College's Risk Assessment process and statutory guidance. (See the Volunteers Policy)

Contractors

The College checks the identity of all contractors working on site and must request DBS checks. All are given a copy of the Health and Safety and Safeguarding Booklet

Safeguarding Allegations against Staff

When a safeguarding allegation is made against a member of staff the Associate Principal for Business Continuity, needs to be informed and an appropriate person appointed to investigate. If the member of staff is still in their probationary employment the Staff Disciplinary Policy does not apply to them. There is a separate Probationary Procedure that applies to such staff. The Safeguarding and Prevent Policy takes precedence in the event of any conflict of Policy terms.

The LADO must be informed when staff are suspended and if then their contracts are terminated due to the allegation being substantiated then the DBS needs to be informed.

SECTION ONE - Threshold

Judgement as to appropriate action should be used in respect of all cases in which it is alleged that a tutor or member of staff (including volunteers) in a school or FE college that provides education for children under 18 years of age has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely

If it is not a safeguarding matter then the matter may still need to be investigated and a conclusion reached and recorded, e.g. professional standards breach etc.

SECTION TWO – Outcome of Investigation

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient identifiable evidence to prove the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Malicious:** there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Useful links:

Working Together to Safeguarding Children 2015

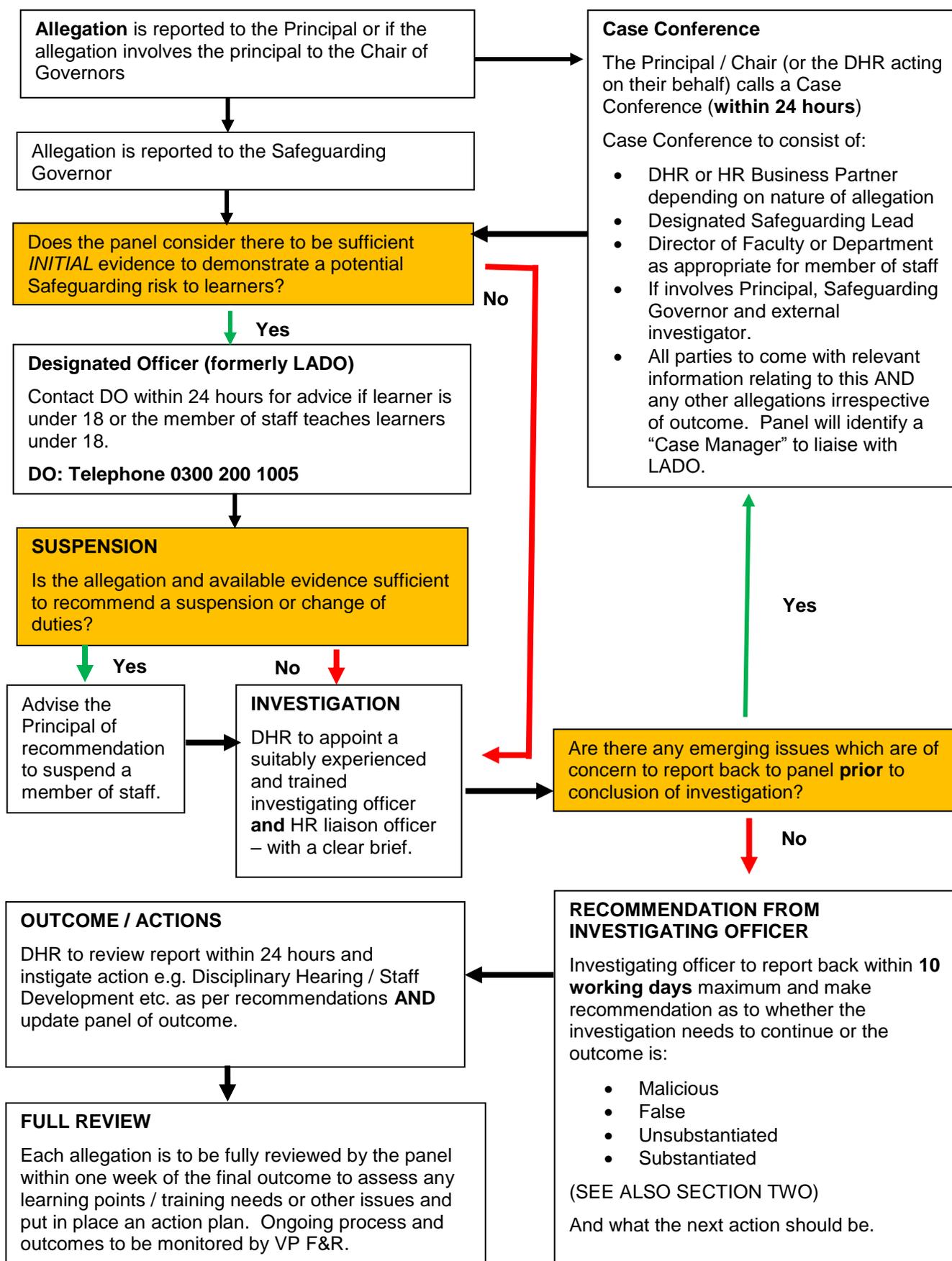
Managing Allegations Against Adults Working with Children SSCB

Key Points

- If an allegation is made against a member of staff, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.
- Where the College has concerns about an existing member of staff's suitability to work with children, they should carry out all relevant checks as if the person was a new member of staff.

- An outcome should be reached within ten days where it is feasible to do so. However, for complex situations requiring further investigation the outcome at ten days may state the need for further investigation and give a deadline for completion (see Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges [2018]).
- In response to an allegation, staff suspension should not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification must be recorded by the College and the individual notified of the reasons.
- Allegations that are found to have been malicious must be removed from personnel records and any that are not substantiated or have been found to be malicious must not be referred to in employer references.
- Students that are found to have made malicious allegations are likely to have breached College behaviour policies. The College should, therefore, consider whether to apply an appropriate sanction which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

Appendix 9: Protocol for managing a safeguarding allegation against a member of staff or volunteer



Appendix 10: Safeguarding on line

Photography and Images

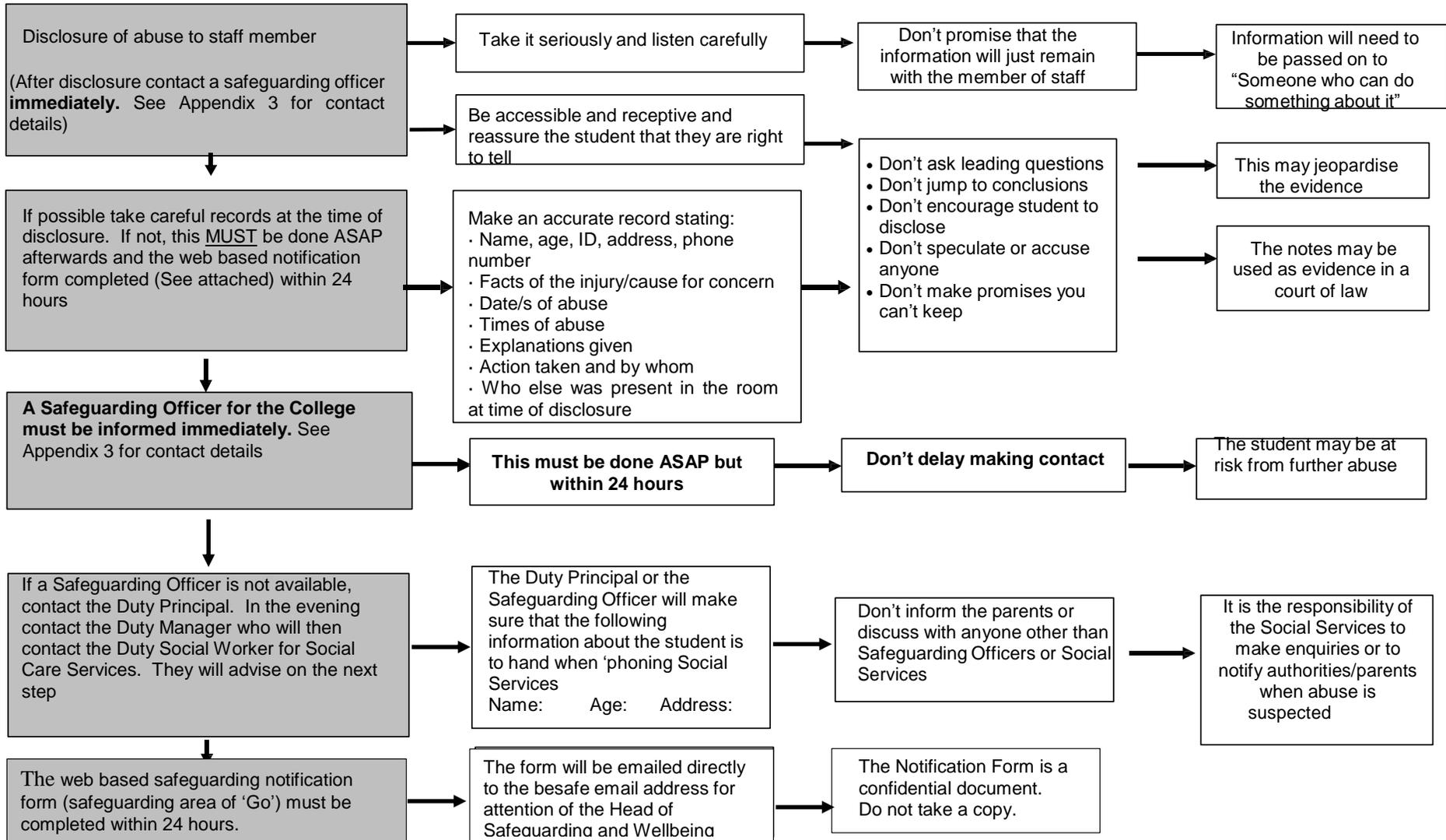
To protect students we will:

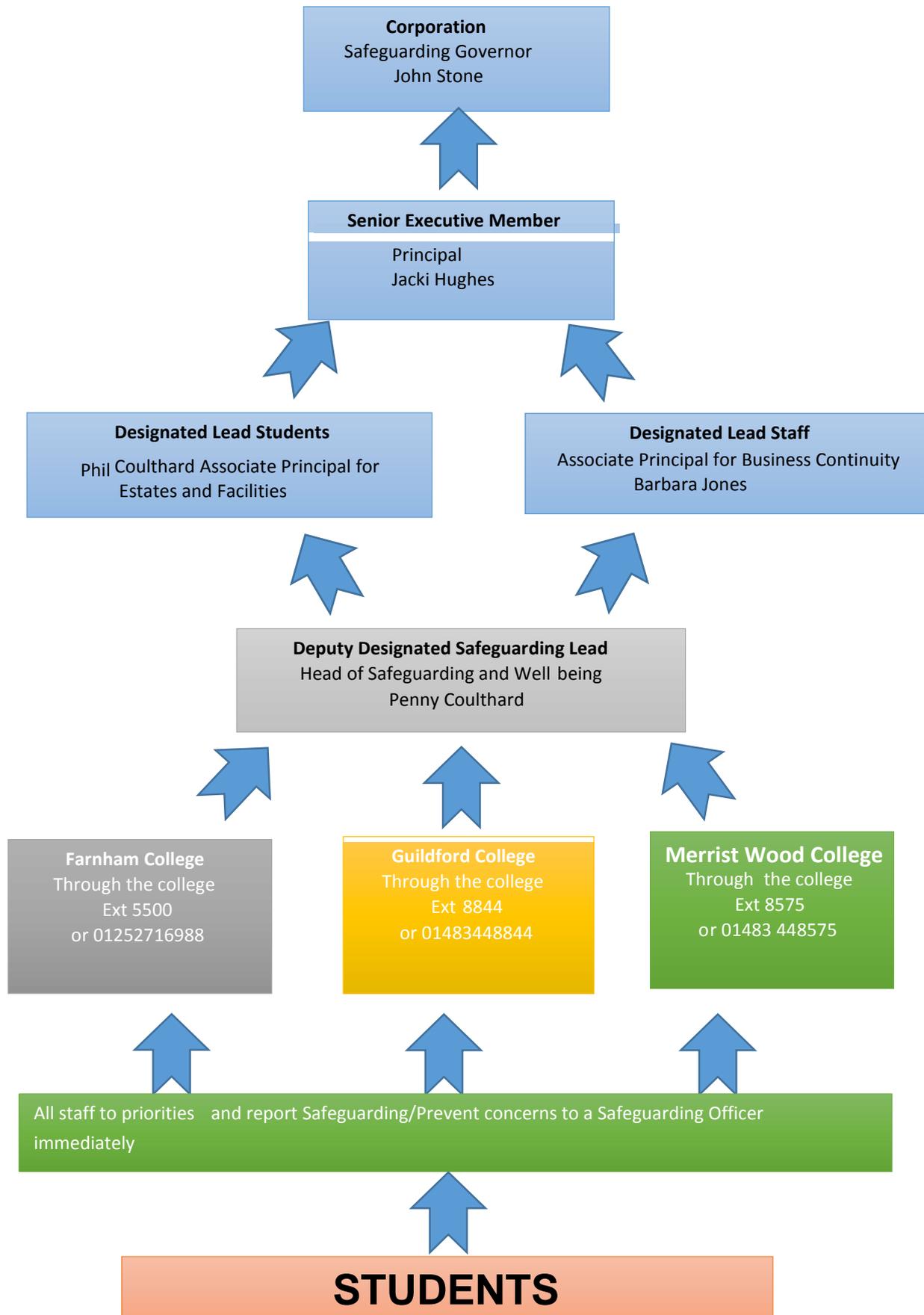
- Seek their consent for photographs to be taken or published
- Seek parental consent if under 18 years of age
- Use only the student's first name with an image
- Ensure students are appropriately dressed
- Encourage students to tell us if they are worried about any photographs that are taken of them

E-Safety

The College's E-Safety Policy explains how the College tries to keep students safe in College. Cyberbullying and sexting by students via text and/or emails will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying Procedures. Students undertake an e-induction on cyber-safety as part of the College induction.

Appendix 11: Protection Procedure for Children and Vulnerable Adults





Appendix 13: Abbreviations

CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DSP	Designated Safeguarding Person with lead responsibility for Students
Deputy DSP	Deputy Designated Safeguarding Person with lead responsibility for students
FGM	Female Genital Mutilation
LADO	Local Authority Designated Officer
LEA	Local Education Authority
LSCB	Local Safeguarding Children Board
SSCB	Surrey Safeguarding Children Board
Prevent	To stop people becoming terrorists or supporting terrorism and 1 of 4 elements of CONTEST , the Government's Counter Terrorism Strategy
Channel	Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people