

Title: Safeguarding Policy

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Associated

documents/policies:

Bath College documents/policies:

Prevent Strategy

Accommodation Strategy

Child Protection & the Protection of Vulnerable Adult Policy

Health and Safety Manual

Bullying and Harassment Policy

Student Conduct and Disciplinary Policy

Travel Procedures (student trips)

Student Risk Assessment Policy

Student Fit to Study Policy

Recruitment and Selection Policy

Equality Policy

E-safety Policy

Whistle-blowing Policy

Confidentiality Policy

Staff Induction Policy

Staff Code of Conduct

Control, Restraint and Search Policy

External Speakers Policy

External documents/legislation:

Human Rights Act 1998

Children Act 1989 and 2004

Working Together to Safeguard Children 2018

Keeping Children Safe in Education Sept 2018

PREVENT Duty Guidance for Further Education Institutions in

England and Wales March 2015

Safeguarding Vulnerable Groups Act 2006

Safer Practice, Safer Learning, NIACE guide 2007

Whose Secret? 2007

Safeguarding young people on Work-Related Learning including

Work Experience DCSF 2010

The Right to Choose - Multi Agency practice guidelines for
handling cases of forced marriage (revised Jan 2013)

Provision of Therapy for Vulnerable or Intimidated Adult Witnesses
Prior to a Criminal Trial 2001

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1 Objectives

To define 'safeguarding' and outline the college's approach to both meeting its duties and our commitment to best practice.

This policy is an 'umbrella' policy summarising the college's generic approach to safeguarding. More detail and guidance is included for the different aspects of safeguarding within the policies listed above.

2 Background/Scope

Bath College is committed to promoting and ensuring the safeguarding of all children, young people and vulnerable adults from harm whatever, their age, gender, race, disability, language, religion/belief and/or sexual orientation.

The term 'safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people safe.

Safeguarding is not just about protecting children, young people and vulnerable adults from deliberate harm. It includes issues for FE Colleges such as student health and safety; bullying; hate, racist or homophobic abuse; or any form of harassment and discrimination;

meeting the needs of students with medical conditions and learning difficulties/disabilities; providing first aid; support / protection from drug and substance misuse; educational and off site visits; intimate care; e-safety; issues which may be specific to a local area or population, for example gang activity, radicalisation for violent extremism and college security, and safer recruitment and employment practices. Safeguarding enables effective early help and support for children, young people and vulnerable adults. It should be considered in terms of safe people, safe places and safe practices and procedures. It should be considered in terms of safe people, safe places and safe practices and procedures.

Safeguarding can be summarised as measures to prevent a young person or vulnerable adult from experiencing harm or abuse of any kind.

Safeguarding at Bath College is how we help everyone to feel and be physically and emotionally safe. It's also about how we respond to any incidents of bullying, harm or abuse, including the threat of forced marriage or female genital mutilation.

3 Appendices

- Appendix 1** Safeguarding Concern Form
- Appendix 2** Prevent Referral and Channel Panel
- Appendix 3** Prevent – Knowing when to refer
- Appendix 4** Safeguarding Team Structure
- Appendix 5** A quick guide for staff - 'What to do if you have safeguarding concern'
- Appendix 6** A guide for staff - 'When should I consider something a safeguarding issue and make a safeguarding referral?'

The college staff portal has a dedicated safeguarding site with many useful documents and links: <https://staffportal.citybathcoll.ac.uk/PublicSites/SafeGuarding/SitePages/Home.aspx>

4 Procedure

4.1 Designated person (and other key persons) details and responsibilities

Every member of staff has a duty to promote safeguarding and take steps to safeguard learners, but in addition to those general responsibilities there are other specific responsibilities as follows:

The Deputy Principal Curriculum and Quality is the college's Senior Designated Person for Safeguarding and Child Protection. The senior designated person leads on all internal and external communications, in partnership with the Director of Human Resources for staff recruitment and conduct. The senior designated person joint chairs the college's Health, Safety, Safeguarding and Equality Panel and leads on the updating of all staff on safeguarding matters. Full senior designated person responsibilities are listed in the college's Child Protection & the Protection of Vulnerable Adult Policy

- The senior designated person is assisted at an operational level by the Student Welfare & Participation Manager and Safeguarding Lead including Prevent and a team of Safeguarding Leads. All safeguarding leads are supported by regular group supervision chaired by the Student Welfare and Participation Manager and individual one to one supervision with a qualified clinical supervisor.
- The Principal and governing body of the college have the responsibility to ensure that the policies, management and implementation of safeguarding meet the requirements of legislation, the Independent Safeguarding Authority and the protocols within the South West Safeguarding and Child Protection Group.
- The link governor for Safeguarding and Prevent is Jane Shaw.
- The Student Counselling Service working in partnership with Off the Record offers group or individual, confidential counselling for all enrolled students and is an integral part of the college's safeguarding provision. Limits to confidentiality are clearly explained and agreed at the initial appointment, before counselling begins.
- The Student Welfare Officers offer group or individual, practical support and information on a range of student life matters e.g. emotional health and wellbeing support including safeguarding, study skills, time management, budgeting and finance, accommodation and funding, and helping students to access internal and external services. This service is an integral part to the college's welfare provision.
- The College Nurses offer advice and guidance on a range of services e.g. health and wellbeing, contraception and sexual health, diet and exercise, stopping smoking, STI screening, alcohol and drug misuse, and physical health concerns.
- *The College Chaplain is here to talk to staff and students of all faiths and none. He is here to support and listen to members of the College community. He can offer religious advice and information on a range of matters including Life, Death, Self-Image, World Religions, Christianity Explored, Basics of Islam and The History of Religion in the UK.*

4.2 The Health, Safety, Safeguarding and Equality Panel

The remit of the panel is to ensure that the college is effectively implementing its policy on the Child Protection & the Protection of Vulnerable Adults, is complying with the South West Multi-agency guidelines and is following best practice as determined by the DCSF, Ofsted, and the Disclosure and Barring Service (DBS). The panel meets, as a minimum, 4 times per academic year.

Membership will comprise representatives from the following teams:

- SLG Chairs
- Estates
- Human Resources
- Student Participation
- Students' Union
- Safeguarding link Governor
- Services to Business
- Student Welfare

- Foundation Learning
- Marketing
- Unions

A report from the Health, Safety, Safeguarding and Equality Panel is made to the Corporation.

4.3 The Single Central Record and Staff training

At interview stage, all regulated activity applicants are list 99 checked, professional qualifications are checked and their right to work in the UK is confirmed, along with their identity. References are sought for new staff to verify their suitability for positions. Where any applicants are required to have work permits, then the appropriate checks and procedures are followed. Copies of documents confirming these pre-employment checks are held on personal HR files and data is held on the Single Central Record held by HR.

All new staff in regulated activity (including casual workers, bank workers and volunteers) are list 99 checked (new combined list held by the DBS) before commencing work and a risk assessment is completed pending the return of a DBS check. Agency staff are checked via the agency. Staff engaged in 'regulated activity' are required to have an enhanced DBS disclosure with a barred list check. External persons engaged in activity that includes regular contact with young people are also subject to DBS checks and must comply with the Engaging External People Policy.

All staff permanently employed at the college will be trained to Level 1 in safeguarding, through group sessions or Education and Training Foundation online training. Certain key staff will be trained to Level 2, including members of the Senior Leadership Group, the designated person, and the safeguarding leads. Training in safeguarding, or a commitment to undertake it on appointment, will be a contractual condition of employment. The staff induction programme will include initial safeguarding information and the designated person will provide annual updating to all staff.

4.4 Communicating with students

Safeguarding, and the college's commitment to it, will be promoted to students through social media, TV screens, posters, handbooks, Moodle (You Matter site), awareness raising events and in tutorials. It will also be embedded in all teaching and learning across the college.

A secondary college brand of Feel Safe has been created and promoted in the college by posters, banner stands and the student intranet. Feel Safe postcards are sent to work based apprentices.

The campaign has its own logo and dedicated e-mail address:



safe@BathCollege.ac.uk

4.5 Safeguarding work based learners and those undertaking work experience

All learners, regardless of their study pattern, will receive guidance about how to keep themselves safe and what to do if they feel unsafe. The college will ensure that where it is responsible for young people and vulnerable adults on placement with employers, an appropriate risk assessment has been carried out. DBS checks may be required, for example where any one person would have substantial unsupervised access to a young person or vulnerable adult.

The college will discuss safeguarding specifically when risk assessing placements with employers and provide guidance about our policies and procedures.

4.6 Communicating with visitors

As visitors sign in to the college they will be provided with a small card containing safeguarding information 'Safe Students – Safe College – Safe Staff'.

4.7 Staff Induction and Training

All new staff undertake College induction training which includes a dedicated Safeguarding and Child Protection training session led by the Deputy Principal of Curriculum and Quality or the Student Welfare and Participation Manager. In addition, prior to commencing employment all staff are required to undertake online Level 1 Safeguarding training including Prevent. The induction training includes an introduction to the college Child Protection & the Protection of Vulnerable Adult Policy and Bath College Values and Code of Conduct and gives an outline of the responsibility of all staff with regard safeguarding and child protection. The Safeguarding Team structure is explained, including contact details and locations (Appendix 2). An introduction to the internal process of making a safeguarding referral is also clearly outlined and supported with documents (What to do if you have a safeguarding concern – A Quick Guide for Staff – Appendix 3 and 'When should I consider something a safeguarding issue and make a safeguarding referral'? – Appendix 4).

During employment ongoing Safeguarding and Child Protection training including Prevent takes place during the mandatory cross college Staff Development days and at other times as new legislation and guidelines are released. For example, in 2016/17 the Deputy Principal of Curriculum and Quality and the Student Welfare and Participation Manager undertook face to face, Safeguarding and Prevent updates for staff across both campuses to further embed the robust safeguarding practices and procedures.

4.8 Making Referrals

Where a young person is registered at College, consultation must take place with a member of the Safeguarding Lead Team as soon as possible after a concern comes to light. The safeguarding lead team will then be able to advise as they are best placed to initiate any referral to an external agency. A written record of any concern should be made using the College's internal Safeguarding Concern Form (Appendix 1). A verbal referral to the Safeguarding Team can be made immediately following the concern but must be followed up with the written referral. This document should be completed within 24hrs of a concern being raised and given to the Safeguarding Lead to whom the concern was referred. The Safeguarding Lead will then make the decision if a referral is needed to an external agency. If it is not possible to speak to any member of the Safeguarding Lead Team then the member of staff should contact the Deputy Principal of Curriculum and Quality or a member from SLG to discuss concerns, they will then initiate a referral to external agencies as appropriate. The Student Welfare and Participation Manager must be informed about the referral as soon as possible.

4.9 Confidentiality and talking to young people

Confidentiality is an issue that needs to be understood by all those working with young people, particularly in the context of child protection. You can never guarantee confidentiality to a young person as some kinds of information may need to be shared with others. Professionals can only work together to safeguard children and young people if there is an exchange of relevant information between them.

Talking to and listening to young people

If a learner chooses to disclose, you SHOULD:

- be accessible and receptive;
- listen carefully and uncritically at their pace;
- take what is said seriously;
- reassure them that they are right to tell;
- tell them that you must pass this information on;
- make a careful record of what was said.

You should NEVER:

- take photographs of injuries;
- examine marks/ injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;

- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask them to sign a written copy of the disclosure or a 'statement'.

For learners with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other learners.

4.10 Record keeping

Well-kept records are essential in situations where it is suspected or believed that a young person may be at risk from harm.

Records should:

- state who was present, time, date and place;
- use the child's words wherever possible;
- be factual/state exactly what was said;
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- be signed (electronic or hand written) and dated by the recorder;

Records about child protection or pertaining to welfare concerns or issues, including CAF paperwork, will be retained securely and separately to the curriculum records of the young person. If the young person moves to another education setting, these records will be sent in a timely and secure manner to the Designated Child Protection person of the receiving establishment.

4.11 Attendance at Child Protection Conferences

Members of the Safeguarding Lead Team will be expected to attend the initial Child Protection Conference and Reviews, and provide a written report. The Safeguarding Lead with take responsibility for an individual case then attend the subsequent core group meetings.

4.12 Child Protection

S47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. College staff do not investigate whether a young person has been abused. This is the duty of Social workers from the Safeguarding

team and the police. College staff refer reasonable concerns which indicate that a young person may be at risk of significant harm. It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines that a young person is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the young person's physical, psychological and social development.

In order to both understand and evidence 'significant harm', it is necessary to consider the family context, together with the young person's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the young person's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the young person's health and development and the adequacy of care provided.

If staff have significant concerns about any young person, they should make them known to the Safeguarding Lead without delay in accordance with the college's reporting and recording procedures. These concerns may include reports of or observed evidence/suspicion of:

- Physical, Emotional, Sexual, Verbal abuse
- Bullying, Harassment, Discrimination
- Hate, racist, disability or homophobic or transphobic abuse
- Neglect including Financial Neglect
- Self-harm/ Mental Health Concerns
- Prevent – Radicalisation/Extremism
- Gender based violence - Female Genital Mutilation
- Child Sexual Exploitation/Grooming
- Domestic Violence including controlling behaviour
- Sexual behaviour including accessing pornography
- Substance misuse
- Gang activity and youth violence
- Faith abuse
- Children missing in education, home or care
- Fabricated illness
- Poor parenting (in relation to babies and young children)

Prevent

The Prevent Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015. 'Prevention' means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes the identification and referral of those at risk of being drawn into terrorism into appropriate interventions to ensure that they are given appropriate advice and support. These interventions aim to divert vulnerable people from radicalisation. '**Radicalisation**' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

If you recognise someone who is at risk from radicalisation, please contact the Student Welfare and Participation Manager & Prevent Lead who can help them get support by referring them to the Channel process (also see Appendix 2-4 for referral process flowchart and information).

Missing Children from Education

In the event of a young person missing from education the College i.e. the Student Welfare and Participation Manager or Safeguarding Lead will contact the parents/carers, Police, Virtual School, link School, and any other necessary external agency to raise the concern.

4.13 External partners in Safeguarding

The college is committed to working in partnership to ensure the safeguarding of all learners, and particularly children and vulnerable adults. Examples of key partners include:

- B&NES Children's Services and their Designated Lead Officer for Safeguarding
- Avon and Somerset Police
- Neighboring local authorities as above
- Local Safeguarding Children's Board (Bath College is an associate member)
- B&NES Safeguarding Adults Coordinator
- The Virtual Head for Looked After Children
- PREVENT Board
- All secondary schools from whom the college has pre-16 learners
- Any schools or other providers with whom the college shares collaborative delivery or franchises provision for post-16 learners
- Southside Family Project
- Youth Connect
- Sirona Care and Health
- Parents and Carers
- Diocese of Bath and Wells

4.14 Student Counselling Service

Prior to a criminal trial two broad categories of therapeutic work with vulnerable adults may be provided by the Student Counseling Service:

Counselling will address a number of issues, including;

- The impact of the incident(s) on the vulnerable adult
- Improving the self-esteem and confidence of the vulnerable adult
- Providing the vulnerable adult with information regarding access to confidential client records by the police, the Crown Prosecution Service and the Court.

Psychotherapy will address a number of issues, including;

- Treatment of emotional and behavioral disturbance, e.g. post-traumatic stress disorder
- Treatment of a vulnerable adult who has been highly traumatised and shows symptoms which give rise to concern for his/her mental well-being

4.15 Access to Confidential Client Records

If, at any time during counseling, a student discloses **historic sexual abuse** the counselor will;

- Explain to the student that confidentiality cannot be guaranteed
- Advise on the potential consequences of giving consent for access to client records to external agencies, including the police and Crown Prosecution Service
- Maintain an objective Client Record of all counseling sessions.

4.16 Preparation for Court

If **historic or current sexual abuse** has been reported to the police, the counselor will;

- Explain to the student that it is not in his/her best interests to discuss any details of the abuse during counseling, prior to the Court Hearing.
- Provide supportive therapeutic work as described in 4.14 above
- Gain written consent from the student before releasing the Client Record to the police or Crown Prosecution Service
- Advise the college's senior designated person for Safeguarding

Useful Contacts

The Senior Designated Safeguarding Lead (DSL) is:

Jayne Davis

Deputy Principal of Curriculum and Quality

Email: Jayne.Davis@BathCollege.ac.uk

Phone: 01225 328783

Location: Herschel Building, City Centre & Cam Building Somer Valley Campus

The Deputy DSL is :

Theresa Hallett

Student Welfare and Participation Manager

Email: Theresa.Hallett@BathCollege.ac.uk

Phone: 01225 328569

Location: Macaulay Building, City Centre or Wellow Building, Somer Valley Campus