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# SAFEGUARDING POLICY

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SEPTEMBER 2023

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## **PURPOSE**

This policy provides guidance and instructions to all staff, directors, volunteers, sub-contractors and contractors to ensure The Park College (the College) commitment to safeguarding and promoting the welfare of young people and vulnerable adults. If any form of abuse is suspected or if a person is identified as being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken. The College requires all staff to share this commitment.

## **SCOPE**

This policy deals with the protection of children and all adults at risk. Throughout this policy reference is made to children and adults at risk.

## **Definitions**

- Child: someone under the age of 18
- Adult at Risk: An adult aged 18 years or over 'who may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (DH, 2000). This definition is taken from the current Department of Health guidance to local partnerships.

Students under the age of 18 attending the college are recognised as children, in line with Safeguarding children legislation.

Students over the age of 18 are recognised as adults, in line with Safeguarding adults' legislation.

All references to staff comprise of teaching staff, other staff and volunteers working in the organisation, visitors, and contractors to the organisation with direct contact with students, regardless of position, role or responsibilities. This policy is mandatory for all afore stated.

## **PRINCIPLES**

The College recognises that safeguarding and promoting the welfare of children and adults at risk is everyone's responsibility, and that the best interests of the student must be paramount. We have a statutory duty to ensure that we safeguard and promote the welfare of children and adults at risk of harm in our care. We adopt a student-centred approach which operates in the best interests of each student. The policy and procedures focus on how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of extremism.

To achieve this, the policy and procedure is reviewed annually to:

- Raise awareness of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for them to learn within the College
- Aid the identification of children, young people and adults at risk of significant harm, providing procedures for reporting concerns

- Establish procedures for reporting and dealing with allegations of abuse against members of staff
- Outline the role of governors and directors
- Respond to the safe recruitment of staff

All staff will receive appropriate training in order to familiarise them with the College's Safeguarding Policy and Procedure, relevant statutory guidance, the safeguarding issues and their responsibilities therein.

All staff undertake mandatory safeguarding and Prevent training (to include 'Part One of Keeping Children Safe in Education 2021) as part of their induction process and continual professional development (CPD) on an annual basis.

## **EQUALITY STATEMENT**

The College will make sure that all students have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The College is committed to anti-discriminatory practice and recognises the additional needs of young adults from minority ethnic groups and those with learning disabilities and/or difficulties and the barriers they may face, especially around communication.

## **OUTCOMES**

Because of this policy and its procedures being followed:

- Students at risk will be better protected from the impact of abuse or neglect
- all persons detailed in the 'scope' (above) will take the necessary steps to safeguard and protect the rights of students at the College
- statutory agencies will be contacted where appropriate.

## **STATUTORY FRAMEWORK**

The Care Act 2014 places specific safeguarding duties with regard to an adult who has need for care and support and is experiencing or at risk of abuse or neglect. Because of those needs the adult is unable to protect themselves from either the risk, or the experience, of abuse or neglect.

The Care Act 2014 Section 14.2 states that the safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged or above at the point of enrolment at college. The College aims to meet all relevant legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the college to protect young people and adults at risk.

This statutory framework includes:

- Keeping Children Safe in Education 2023, Working Together to Safeguard Children 2018, the Safeguarding Vulnerable Groups Act 2006, The Protections of Freedom Act 2012 and the Prevent Duty Guidance are the key documents upon which this policy is based
- The Education & Inspections Act 2006, The Serious Crimes Act (2015)
- The Mental Capacity Act 2005
- The Care Act 2014
- Prevent Duty Guidance for Further Education Institutions in England and Wales July 2015
- The Children Act 2004, which is fundamental to professionals working with children and young people in the UK
- The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children
- The Education Act 2002 (as amended) requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people
- the Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g. a lecturer or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach
- The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to children and adults at risk for which employers and individuals will be subject
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check
- The Equality Act 2015
- SEN Code of Practice 2015

We note the non-statutory [Guidance for Safer Working Practice for professionals working in education settings](#) published by the [Safer Recruitment Consortium](#).

## **VULNERABLE STUDENT**

A vulnerable student may be identified as a person who:

- Is a Looked After Child
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse

- Has suffered from domestic violence
- Has social or emotional developmental needs
- Has a criminal conviction
- Has a language barrier.

All students attending the College can be classed as vulnerable students as they have an EHC Plan which defines their needs.

## **DEFINITIONS**

### ***Safeguarding***

The term 'safeguarding children and adults at risk' covers both reactive adult/child protection and a preventative approach to keeping children and adults safe. Safeguarding and promoting the welfare of children is defined as: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

**Abuse:** a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse. They may be abused by an adult or adults or another child or children.

### ***Physical Abuse***

This may involve hitting, shaking, throwing, poisoning, burning, scalding, misuse of medication, inappropriate use of restraint, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child, young person or adult at risk.

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them going missing in future.

### ***Neglect***

Neglect is the persistent or severe failure to meet a child, young person or adult at risk's physical and/or psychological needs which can result in serious impairment of the health or development of the individual. It may also include neglect of, or unresponsiveness to, a child or adult's basic emotional needs

### ***Self-Neglect***

- a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them.

### ***Sexual Abuse and Exploitation***

Sexual abuse involves a child, young person or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or adult at risk to be aware that the activity is sexual and the apparent consent of the child, young person or adult at risk is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

### ***Emotional Abuse***

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young person and adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

### ***Financial Abuse***

Where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

### ***Significant Harm***

Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act 2014 section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

### ***Honour-based Violence***

Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

### ***FGM mandatory reporting duty***

From October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Mandatory reporting duty applies to all regulated professionals (as defined in section 5B(2)(a), (11) and (12) of the 2003 Act) working within health or social care, and teachers.

We note that, in addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

College teaching staff, including qualified teachers or persons who are employed or engaged to carry out teaching work, must report 'known' cases of FGM in girls aged under 18 to the police.

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance [The right to choose: government guidance on forced marriage](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **Child on Child Abuse**

Child on child abuse is a significant issue. It must never be tolerated, dismissed or ignored. Whilst it is clear that child on child abuse disproportionately affects females and The Park College must have appropriate support mechanisms in place, males, LGBTQ and SEND students will also be affected by this issue and staff must be aware of this and prepared to act accordingly. Child on child peer abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment.

### **Harmful sexual behaviour (HSB)**

Sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole college approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Students displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support students displaying HSB.

### **Students who are lesbian, gay, bi, or trans (LGBT)**

We note that a student who may be LGBT is not in itself an inherent risk factor for harm. However, students who are LGBT can be targeted by other students. In some cases, a student who is perceived by other students to be LGBT (whether they are or not) can be just as vulnerable as students who identify as LGBT. Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum. We will work with appropriate



agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT students.

### **Sexual harassment, online sexual abuse and sexual violence**

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable at the college and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the college, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-college approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure students are taught about safeguarding risks, including online risks and will support students to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: *Child on child sexual violence and sexual harassment*' of DfE guidance "[Keeping children safe in education](#)". All students are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure students are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, additional needs, and students from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls / young women and LGBT students). We will identify and address any barriers that can prevent a student from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue. We will keep comprehensive records of all allegations.

### **Sexual violence and sexual harassment between students**

Sexual violence and sexual harassment can occur between two students of any age and sex. It can also occur through a group of students sexually assaulting or sexually harassing a single student or group of students. It can occur online and offline (both physically and verbally). It is more likely that girls/ young women will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys / young men. Students who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in line with 'Part 5: *Child on child sexual violence and sexual harassment*' of DfE guidance "[Keeping children safe in education](#)" and train our staff members accordingly (including tutors delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue.

On one hand, we need to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another

educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to others. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the safeguarding file.

## PREVENT DUTY

In line with the Prevent Duty Guidance for Further Education Institutions in England and Wales (2015), protecting students from the risk of radicalisation is part of the Colleges' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Students may be identified as vulnerable to radicalisation at any time during their programme of study based on behaviour. The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friend's involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Statutory Prevent Guidance for Further Education (2015) summarises the requirements in terms of the following key areas:

- external speakers and events
- partnerships
- risk assessment and action plan
- staff and student training
- welfare and pastoral care and IT Policies.

**Radicalisation** refers to the process by which a person comes to support terrorism or other forms of extremism.

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

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

The College will work with partnerships including Prevent Programme Co-ordinator for Southwark to ensure it is responding to this duty guidance.

All staff working at The College (including visiting staff, volunteers, contractors and students on placement) are required to be able to identify and report instances where they believe a young person may be at risk of harm or neglect including any harm through extremism or radicalisation to the Designated or Deputy Safeguarding Lead (DSL). All students will be given information about radicalisation and extremism, they will have a safe place to discuss the risk relating to their communities and they will know where to go to ask for help.

Under the Prevent Duty, safeguarding staff will be trained to recognise when it is appropriate to make a referral to the Channel Programme to support students who may be vulnerable to such influences and where we believe a student is being directly influenced by extremist materials or influences. It is unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to violent extremism or terrorism or which is intended to annoy, harass or intimidate another person. This also applies to use of social media systems accessed from College systems. The College has systems for assessing and rating risks. Risk assessments for planned events, including off site events, external visitors and speakers to mitigate any risk and clearly set out what is required for any event to proceed.

### **SPECIFIC SAFEGUARDING ISSUES**

All staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns:

All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL and included in the Safeguarding Report for the College Board to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Cases of students hurting other students will be managed in line with the following policies:

- Anti-bullying Policy
- Behaviour Policy

Safeguarding Policy and Procedures take precedent where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put students at the college at risk
- involves students being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

Risks of peer-on-peer (child-on-child) abuse will be managed by:

- challenging any derogatory or sexualised language or behaviour, including requesting or sending sexual images
- being vigilant to issues that particularly affect different genders

- direct instruction within the curriculum to develop understanding of appropriate behaviour and consent
- ensuring students know they can talk to staff confidentially
- ensuring staff are trained to understand that a student harming a student could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy.

If staff are aware of an incident involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), they must report it to the DSL immediately. Staff must not

- view, download or share the imagery, or ask a student to share or download it
- delete the imagery or ask the student to delete it
- ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident and reassure the student that they will receive support and help .

### ***Child on child sexual violence and sexual harassment***

Where any reports are made of child on child sexual violence or sexual harassment these must be dealt with seriously and quickly. Where such an allegation is made, the DSL will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support
- The alleged perpetrator: and
- All the other students (and, if appropriate, staff) at the college, especially any actions that are appropriate to protect them.

Allegations and the investigation will be recorded. Any subsequent risk assessment will be communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the college on a case by case basis.

Specific Safeguarding issues also include the following:

- bullying including cyber-bullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- Faith abuse

- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate crimes
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- trafficking
- peer-on-peer abuse
- stalking

In addition, given the local context of the London Borough of Southwark, the College recognises risk factors around county lines, serious youth violence including grooming and money laundering.

## **ON-LINE SAFETY**

The College will endeavour to both filter all internet use to ensure and maintain the safety of staff and students.

Staff and students must follow the Online Safety Policy and agree to the relevant Acceptable Use Policy.

## **ROLES AND RESPONSIBILITIES**

### ***Directors***

The Park College Directors instruct the college to:

- provide a safe environment for all students at risk of harm
- identify those that are suffering, or are likely to suffer significant harm or who are at risk of radicalisation
- ensure appropriate IT filters and monitoring systems are in place to ensure online safety
- ensure disclosures of potential abuse are reported appropriately
- have a system for identifying concerns in relation to abuse of children and adults at risk of harm and effective methods of responding to disclosures
- refer concerns to appropriate referral agents within social care
- work effectively with others as required by Keeping Children Safe in Education
- listen to the voice of the student and always act in the interest of the student
- ensure appropriate safeguarding responses for students who go missing from College
- ensure there is an effective Safeguarding Policy in place
- ensure all staff undertake relevant Safeguarding training
- have a clear understanding of safeguarding policy, procedure and practice at the college

- understand that additional barriers can exist for students with special educational needs (SEN) and disabilities when recognising abuse and neglect in this group.

Our governors and directors recognise that whilst all students should be protected, some groups, such as those who need a social worker; those who are absent from education; those requiring mental health support; looked after and previously looked after children; care leavers; those with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

The Directors will approve and annually review policies and procedures. They will receive regular safeguarding reports to:

- maintain awareness of progress across the College and/or issues relating to the welfare of young people and adults at risk of harm
- be reassured by the Principal and DSL that systems are in place and are effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known
- ensure effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students are in place including referral to Local Area Designated Officer
- ensure safe recruitment of staff and volunteers
  
- ensure staff are appropriately trained to discharge their duties in relation to safeguarding and Prevent
- ensure procedures are in place to make referrals to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.

In accordance with the DfE's [filtering and monitoring standards](#), the Directors have assigned The Principal, Catriona Guyler-Kone and a Director, Steph Lea to ensure that these standards are being met. We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.

In developing policies and procedures, the Directors will take account of guidance issued by the Department for Education, OFSTED and other relevant bodies and groups. The College recognises its duty under the Counterterrorism and Security Act (2015) to have due regard to the need to prevent people from being drawn into terrorism.

### ***Designated Safeguarding Lead***

The Director responsible for Safeguarding is Steph Lea.

The Designated Lead is Catriona Guyler-Kone, Acting Principal.

The Deputy Designated Leads are Nick Thompson, lead tutor & Kat Durrant, tutor.

The DSL works directly with the Deputy DSL's to maintain day to day implementation of this policy.

The DSL has a significant level of responsibility and our governing body will provide the DSL additional time, funding, training, resources, and support needed to carry out the role effectively.

The DSL and Deputy DSL's will ensure appropriate and robust systems are in place that will co-ordinate reporting, monitoring, referral and support procedures. The DSL and Deputy DSL's have a key duty for raising awareness across all staff of issues relating to the welfare of young people and adults at risk studying within the College. The DSL and Deputy DSL's will undertake relevant Adult Safeguarding training, including inter-agency working. The DSL and Deputy DSL's will receive refresher training every two years and keep updated annually on safeguarding information and knowledge.

The DSL is responsible for understanding the online filtering and monitoring systems in place.

The DSL and Deputy DSL's are responsible for

- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- providing advice and support to other staff on issues relating to safeguarding
- providing all staff and leaders with regular updates on safeguarding at least annually
- maintaining a proper record of any child protection referral, adult safeguarding referral, complaint or concern (even where that concern does not lead to a referral)
- ensuring Safeguarding Policy is updated and reviewed annually and approved by Directors
- ensuring that parents/carers are aware of the College's Safeguarding Policy
- developing effective working relationships with other agencies such as Police, Social Services, Health Authority
- liaising with partner agencies offering placements to students
- ensuring that staff who are liaising with employers and training organisations that receive students from the College on placements put appropriate risk assessments and safeguards in place
- ensuring safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), obtaining references and recruitment in accordance with Department of Education guidance
- providing tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help students develop self-esteem and resilience
- ensuring all staff receive basic training in Safeguarding and Prevent issues appropriate to their roles and are aware of the College safeguarding procedures
- ensuring that the college contacts the LADO (Local Authority Designated Officer) regarding allegations against staff and, as a good practice, contacts the LADO for consultation regarding concerns raised in relation to members of staff (known as 'low level concerns').

- ensuring Health and Safety procedures are in place for students, including off site
- providing termly safeguarding reports to the Board of Directors.

### **Staff: Duty of Care**

Staff are accountable for the way in which they exercise authority, manage risk, use resources and actively protect all students from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between all members of the college community. Staff behaviour should demonstrate integrity, maturity and good judgement and comply with the Staff Code of Conduct at all times.

All our staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, students may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a student. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

### **Our Directors**

The Directors will ensure that they comply with their duties under legislation and that the policies, procedures and training in the college are effective and comply with the law at all times. The Directors will also ensure that all directors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at The Park College are effective and support the delivery of a robust approach to safeguarding. Their training will be regularly updated. The Directors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at [Human Rights | Equality and Human Rights Commission](#) and [Equality Act 2010: advice for schools](#).

Our directors will do all that they reasonably can to limit student's exposure to the risks from the college's IT system. As part of this process, our directors will ensure that the college has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Our directors will consider the age range of our students, the number of students, how often they access the IT system and the proportionality of costs versus safeguarding risks.

The directors will ensure that the college contributes to inter-agency working in line with statutory guidance "[Working Together to Safeguard Children](#)" and that the college safeguarding arrangements take into account the procedures and practice as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership (SSCP).

The directors have formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated governor or the headteacher.

Concerns about and allegations of abuse made against the principal will be referred to the Designated Lead of the Spa Education Trust and the board of directors. They will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the headteacher.



As a good practice, the principal will provide a termly report to the directors outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also as a good practice, directors will meet on a regular basis with the DSL to monitor the college safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the college is meeting its duties in respect of safeguarding.

### ***Wearing of ID Passes***

All staff, students and visitors must visibly wear ID badges on site.

### **Recruitment**

#### **RECRUITMENT**

The Park College is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse students. Safe recruitment processes are followed and all staff recruited to the college will be subject to appropriate identity, qualification and health checks. As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the college.

Relevant members of staff and governors/directors who are involved in recruitment will undertake safer recruitment training. The college will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with staffing regulations.

This college will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned. Staff joining the College on a permanent or temporary basis will be given a copy of this policy. Additionally, the Staff Handbook issued to all staff confirms the College's safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

#### **ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO STAFF**

The Park College takes seriously all allegations made against and concerns raised in relation to members of staff. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately. Procedures are in place for students, parents and staff to share any concern that they may have about the actions of any member staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Principal or one of the Designated Safeguarding Leads if the Principal is not available and nothing should be said to the colleague involved. In cases where the Principal is the subject of the allegation or concern, they will be reported to Simon Eccles, Director, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold - known as 'low level concerns'.

### **Allegations that may meet the harms threshold**

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity in the college and will be used in respect of all cases in which it is alleged that anyone working in the college, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a student, or may have harmed a student and/or;
- possibly committed a criminal offence against or related to a student and/or
- behaved towards a student or students in a way that indicates he or she may pose a risk of harm to students; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with students. This includes behaviour that may have happened outside of college that might make an individual unsuitable to work with students, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a college's attention and appear to meet the above criteria. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO. Where we identify a student has been harmed, that there may be an immediate risk of harm to a student or if the situation is an emergency, we will contact the social care and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the student and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by social care services and/or police. In such cases, referral will lead to a Strategy Meeting or Discussion. This process will agree upon the appropriate course of action and the time-scale for investigations.

The college has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

### **Concerns and/or allegations that do not meet the harms threshold – known as 'low level concerns'**

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a student does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

All 'low-level' concerns will be brought immediately to the attention of the Principal or one of the Designated Safeguarding Leads if the Principal is not available and nothing should be said to the colleague involved. In cases where the Principal is the subject of the concern, they will be reported to Simon Eccles, Director, or Steph lea, Designated lead for Spa Education Trust.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "[Keeping children safe in education](#)".

### **Remote education**

We understand the importance of keeping, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of students being safe online. Parents and carers are likely to find it helpful to understand what systems our college uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their students are being asked to do online, including the sites they are asked to access and be clear who from our college (if anyone) the student is going to be interacting with online. We also note the DfE guidance [Safeguarding and remote education](#).

### **CONFIDENTIALITY**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The student must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need to know basis. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of students. The College is committed to protecting the rights and privacy of individuals, including students, staff and others, in accordance with the General Data Protection Regulations (GDPR) set out in the Data Protection Act 2018 that allows for disclosure of personal data where this is necessary to protect the vital interests of students.

### **SAFEGUARDING RECORDING**

All safeguarding concerns are either identified by, or referred through to, the DSL and Deputy DSL by members of staff, students, (either self-referring or bringing concerns about peers), parents/carers, employers or volunteers.

The DSL will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.

The DSL will take advice from the Director responsible for Safeguarding

All cases are recorded on the CPOMS system. Access to safeguarding concerns on CPoms is secure. All staff can record concerns. Only the DSL and Deputy DSL can access records.

Reporting potential harassment: all staff log incidents as a behaviour incident on CPOMS. The DSL and deputy DSL analyse all incidents to identify potential harassment. Actions required are added to the Behaviour Incident record. A separate safeguarding concern is recorded if the incident requires investigation and actions relating to potential harassment.

A Safeguarding Report is provided for Directors' meetings with detailed analysis of safeguarding disclosures which feeds into planning for training needs and preventative work with students, where necessary.

## **PARTNERSHIP AND INFORMATION SHARING**

New safeguarding partners arrangements were put in place in September 2019. The College will work in conjunction with the three local safeguarding partners (the local authority, the clinical commissioning group and the Chief Officer of Police, together with appropriate relevant agencies to ensure information is passed appropriately where there are safeguarding concerns and information sharing protocols are well established.

The Government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and is used by the College to support staff who have to make decisions about sharing information. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information.

The Counter-Terrorism and Securities Act (2015) places additional responsibilities on Further Education Colleges to include working with multi-agencies as part of the Channel process. Although not a Further Education College, we agree to abide by these processes.

This policy is agreed by the Board of Directors and will be implemented by.....

Signed: ..... Date: .....

Signatory name/s: ..... Date of next review: September 2024