

# Safeguarding (including Child Protection and Prevent) Policy

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## 1 Scope and purpose

Wiltshire College and University Centre (the College) is committed to prioritising and promoting safeguarding and protecting children, young people and vulnerable adults at risk from harm and considers safeguarding to be everybody's responsibility.

This policy applies to all those working in, studying or visiting any college site including students, College staff, governors, volunteers and visitors. It is also applicable to contracted services staff, employers offering placements, agency workers and contractors with direct access to students. It applies to all groups regardless of age, disability, gender (including transsexual), marital status, parental responsibilities, sexuality, race, religion, and it is the duty of all staff, governors, students, visitors, and contractors to follow it.

For the purpose of clarity, any person under the age of 18 is deemed to be a child, and an adult at risk is deemed to be a person who is, or may be in need of, community care services by reason of mental or other disability, age, or illness, and who is, or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation. An adult is considered vulnerable, if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing. Any person up to the age of 24 with a current Educational Health Care Plan (EHCP) in place is treated as a child for the purposes of safeguarding and child protection legislation.

It may also include those who are vulnerable for some other reason for example those with caring responsibilities or have suffered abuse or trauma.

Safeguarding and promoting the welfare of children is defined for the purpose of the policy as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health and 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.

The purpose of this policy is to provide a framework by which the College carries out its duty to protect children, young people, and vulnerable adults from harm. The Policy provides clear information and direction to all members of the College community to ensure all child protection concerns, referrals and monitoring are handled correctly. The College does not have responsibility to investigate incidents of alleged abuse but has a statutory duty to assist local authorities with child protection issues.

All existing staff and new staff will be required to receive, read and acknowledge this policy and Part 1 of Keeping Children Safe in Education 2021.

The policy and supporting documents will be revised annually or before when there are changes to relevant legislation.

The College has clearly defined responsibilities under a number of legislative requirements and this policy should be used in conjunction with the following legislation where necessary:

- Children Act 1989
- Children Act 2004
- Adoption and Children Act 2002
- Education Act 2002
- Safeguarding Vulnerable Adults Act 2006
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Section 26 (1) of the Counter Terrorism and Security Act 2015
- Prevent Duty Guidance for Further Education Institutions 2015
- Mandatory Reporting of Female Genital Mutilation Oct 2015
- Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015
- Inspecting Safeguarding in Early Years, Education and Skills Settings August 2016
- Children and Social Work Act 2017
- Working Together to Safeguard Children July 2018 (updated 2020)
- Coronavirus (COVID-19): safeguarding in schools, colleges and other providers
- Keeping Children Safe in Education 2021
- Education and Training (Welfare of Children) Act 2021
- What to do if you are Worried a Child is Being Abused – Advice for Practitioners
- Department for Education Guidance Sexual Violence and Sexual Harassment Between Children in Schools and Colleges 2021
- Domestic Abuse Act 2021
- Information Sharing 2018
- Wiltshire Safeguarding Vulnerable Pupil Partnership (WSVPP) guidance  
<http://www.wiltshirescb.org.uk/home/about-wscb/>

The College is also committed to ensuring freedom of speech in relation to Section 43 of the Education Act 1986, The Equality Act 2010 and The Human Rights Act 1998.

The term ‘safeguarding children and young people’ embraces both child protection and a preventative approach to keeping young people safe. Therefore, safeguarding encompasses student health and safety, preventing and dealing with abuse, bullying and harassment (in person or electronically), meeting the medical needs of those with medical conditions, providing first aid, personal security (including eSafety), safeguarding from drugs, substance and alcohol abuse, peer on peer abuse, sexual harassment and sexual violence and criminal and sexual exploitation. It also gives due regard to the prevention of young people becoming extremist or being radicalised.

## 1.1 Key Principles

The following principles underpin the College’s work with children, young people and adults at risk of harm. The College approach will;

- provide a safe environment for children, young people and adults in which to work, learn and take part in social and recreational activity
- be compliant with key safeguarding legislation including the Prevent Duty
- have a coordinated approach, safeguarding is everyone’s responsibility
- be focussed on early intervention and help for emerging issues
- be student centred
- actively involve students and their families
- support the achievement of best possible outcomes for students
- be holistic in approach

- ensure equality of opportunity
- be multi-agency in approach
- ensure sharing of relevant information takes place
- ensure a continuous process rather than an event to facilitate a contextualised approach in safeguarding students
- design procedures to provide the services required and monitor the impact the provision has on a student's developmental progress
- comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Disclosure and Barring Service and 'Keeping Children Safe in Education' 2021
- comply with 'safer recruitment' procedures and undertake disclosure and barring checks, to ensure that all employees and workers under terms of engagement are suitable to work at the College
- develop and implement procedures for identifying, reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service.
- ensure employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to students in the workplace.
- educate and support students in staying safe and being healthy including full-time and part-time students, apprentices and work-based students.
- ensure that any child, young person or individual with additional needs, including Looked After Children or Care Leavers going missing from education, place of residence, particularly if repeated, is reported to the appropriate authority.

## 1.2 Helping Students to keep themselves safe

Students will be advised about College procedures in relation to safeguarding as part of their induction into the College. The College web page will provide students with reminders about who to contact should they have a safeguarding concern. All staff, students and visitors are issued with safeguarding cards detailing college and out of hours contacts.

Students will be advised about health and safety procedures to ensure that they know how to stay safe within the college environment; whilst undertaking practical activities and when on placement or work experience.

Students will be provided with guidelines about keeping themselves safe online as part of their induction into using the College's IT network.

Through tutorial Key Messages and enrichment themed days offered as part of the Student Tutorial Programme, students will have opportunity to attend and participate in activities designed to raise awareness of national, international and local issues and concerns which may impact on the ability of the student to keep themselves safe. These include: eSafety, sexual health and exploitation, drugs and alcohol awareness, healthy relationships, domestic violence, peer on peer abuse, crime, road safety, anti-bullying, equality and diversity, emotional resilience and the dangers of being drawn into extremism or radicalisation. These activities are aimed at different levels and abilities to enable all students to participate.

Students will learn about British Values and their impact in creating a Safe and Respectful environment in College and the wider community.

### 1.3 Promoting the Welfare of Children, Young People and Adults at Risk

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

It is recognised that because of the day to day contact with young people, staff are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important that all staff (including those who do not come into contact with children) recognise the important role they play in protecting children. The College will therefore;

- establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to.
- ensure that young people and adults at risk know that there are adults in the College whom they could approach if they are worried.
- include opportunities at College for young people/adults at risk to develop the skills they need to recognise and stay safe from abuse in a local and national context.

Where specific safeguarding issues arise, expert and professional organisations will be contacted to provide up to date guidance and practical support. These will include the NSPCC advice which can be found on [www.nspcc.org.uk](http://www.nspcc.org.uk) and the Prevent Regional HE/FE Co-ordinator South West for the Department for Education (DfE). These issues could include:

- Child sexual exploitation
- Peer on peer abuse (child on child)
- Child missing from education
- Children missing from home or care
- Bullying including cyberbullying
- Domestic violence
- Alcohol/Drugs
- Fabricated or induced illness
- Faith abuse
- Honour based violence which can include female genital mutilation (FGM) and forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Modern Slavery
- Private fostering
- Extremism and radicalisation
- Sexting
- Sexual violence and sexual harassment between children in schools and colleges
- Teenage relationship abuse
- Trafficking

- Self-harm, risky behaviour
- Crime, fear of crime
- Exploitation including financial, sexual and criminal
- Victimisation and prejudice due to race, sexuality, faith, gender, disability etc
- Upskirting
- Serious Violence

### Peer on Peer/Child on Child Abuse

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of college and online. It is important for all staff to recognise the indicators and signs of peer-on-peer abuse and know how to identify and respond to reports. This can include (but is not limited to):

- Bullying including cyberbullying, prejudiced based and discriminatory bullying
- Abuse with intimate partner relationships
- Physical abuse, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- Causing someone to engage in sexual activity without consent
- Upskirting and initiation/hazing type violence and rituals

Staff should challenge inappropriate behaviours and not tolerate or dismiss sexual violence or sexual harassment as 'banter', 'part of growing up' or 'just having a laugh'. Physical behaviours will also be challenged.

If an allegation is received victims should be reassured that they are being taken seriously and that they will be supported and kept safe. As is always the case, staff in doubt should always speak to the Designated Safeguarding Lead (DSL) or Deputy.

## 1.4 Student Behaviour and Equality of Opportunity

The College recognises that young people/adults at risk who are abused, or witness violence may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. College may be the only stable, secure and predictable element in the lives of young people at risk. When at College their behaviour may be challenging and defiant or they may be withdrawn. Therefore, the College will endeavour to support the young person by ensuring that:

- The College ethos promotes a positive, supportive and secure environment and gives students a sense of being valued.
- The College behaviour expectations are communicated through the College Safe and Respectful Culture campaign and upheld by British Values, which are aimed at supporting all students in the College. The College will ensure that students know that certain behaviour is unacceptable, but they are valued and not to be blamed for any

abuse which has occurred towards them.

- The College liaises with other agencies that support the student such as the local Multi Agency Safeguarding Hub (MASH), Children's Social Care, Child, and Adolescent Mental Health Service (CAMHS), the Education Welfare Service; SEND Teams and Virtual Schools from a number of local authorities.
- The College will provide an environment that is safe, promotes equality, inclusion, self-confidence, a feeling of worth and the knowledge that students' concerns are listened to and acted upon. This will be promoted through the Safe and Respectful Culture ethos.

## 1.5 Activity On-line

### **On-line safety and E-safety**

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases if staff are unsure, they should always speak to the DSL.

### **Remote Learning**

There are a number of considerations which staff and students should take when engaging in remote or online working and teaching. Considerations can be found in appendix 1 & 2.

Please read the The Social Media Policy in conjunction with this document. The College will endeavor to both filter and monitor all internet usage within the College in a responsible and transparent way to ensure and maintain the safety of staff and students

## 1.6 Access to College Campuses - Wearing of ID Badges

In order to ensure that anyone accessing any of the College campuses is provided with a safe environment, it is a requirement that all governors, staff, students, visitors, and contractors visibly wear ID badges on the College lanyards provided whenever they are out of the classroom environment.

- All teaching staff and tutors are required to check their students' ID badges are worn at the start and at the end of all sessions. At the teaching staff or tutor's discretion students may remove their ID badges during sessions if this would not adhere to Health and Safety practices i.e.: during practical/workshop sessions.
- Any student that has forgotten or lost their ID badge must be issued with a temporary sticker which the student should wear for the duration of the day.
- Any staff member that has forgotten their ID must be issued with a temporary staff ID badge which can be obtained from Reception. If a staff member loses their ID badge they must collect a temporary staff ID from Reception and also contact Human Resources for a replacement.
- All staff are required to conduct regular ID checks of common areas whilst they are



moving around College. Any student found without an ID badge should be directed to Reception or the LRC to obtain a temporary sticker.

- Security staff on each campus will conduct regular ID checks whilst out on patrol and will carry with them a supply of temporary stickers to issue to students who do not have their ID badges with them.

## 1.7 Students Studying at Employer's Premises or Subcontractors

### Employers

Where children and vulnerable adults are working with any of the following the college will ensure safeguarding policies and procedures are in place and that both the employer and student are provided with information about college safeguarding teams including contact details. Students attending these placements will be provided with safeguarding information including how to report any concerns they have in relation to their placement.

Safeguarding is a key theme in initial discussions when working with new employers. The Business Development team provide new employers with information relating to Safeguarding to ensure that they understand their responsibilities, and how to alert the college to any concerns they may have in relation to a student's wellbeing. College staff discuss safeguarding at each review with each student and employer to ensure it remains a key theme.

### Work Placements

Work and industry placement employers are supported to ensure that they understand Safeguarding requirements within the context of their business, including the risks of radicalisation and the Prevent Duty. Where necessary, for example if a particularly vulnerable student attends their workplace, additional measures may be taken, such as requiring a member of staff to undertake appropriate training or requiring DBS checks of staff working in close contact with the student.

### Subcontractors

Subcontractors who are contracted to work with students under 18 or vulnerable adults are required to adhere to the guidance in Keeping Children Safe in Education 2021, including ensuring that staff have read Part 1 of that guidance. All subcontractors of the college are required to have in place a Safeguarding policy which sets out how they uphold their safeguarding duties to students of all ages, including the Prevent Duty, and which includes details of named contacts for students, professionals and other agencies and members of the public to raise any safeguarding concerns they may have.

Subcontractors should ensure that they have a suitable trained safeguarding lead that is identified to the College. The College will provide each subcontractor with a named contact within its Safeguarding Team who will be available to discuss cases and provide support with referrals. Termly Subcontractor reviews held with the Vice Principal, Curriculum and Business Development will always include matters relating to Safeguarding and Prevent.

Training organisations will be asked to make a commitment to safeguarding students' welfare. Providers will be monitored annually for compliance with process and must report any incidents to the College for any subcontracted provision.

## 1.8 Death of a Young Person

If a young person dies whilst at the college the DSL or the DDSL and the Manager or Deputy of the Management Information System will follow the Guidance for dealing with the death of a student to ensure that the situation is handled as sensitively and efficiently as possible to cause least possible distress to all concerned.

## 1.9 College Residential Accommodation Settings

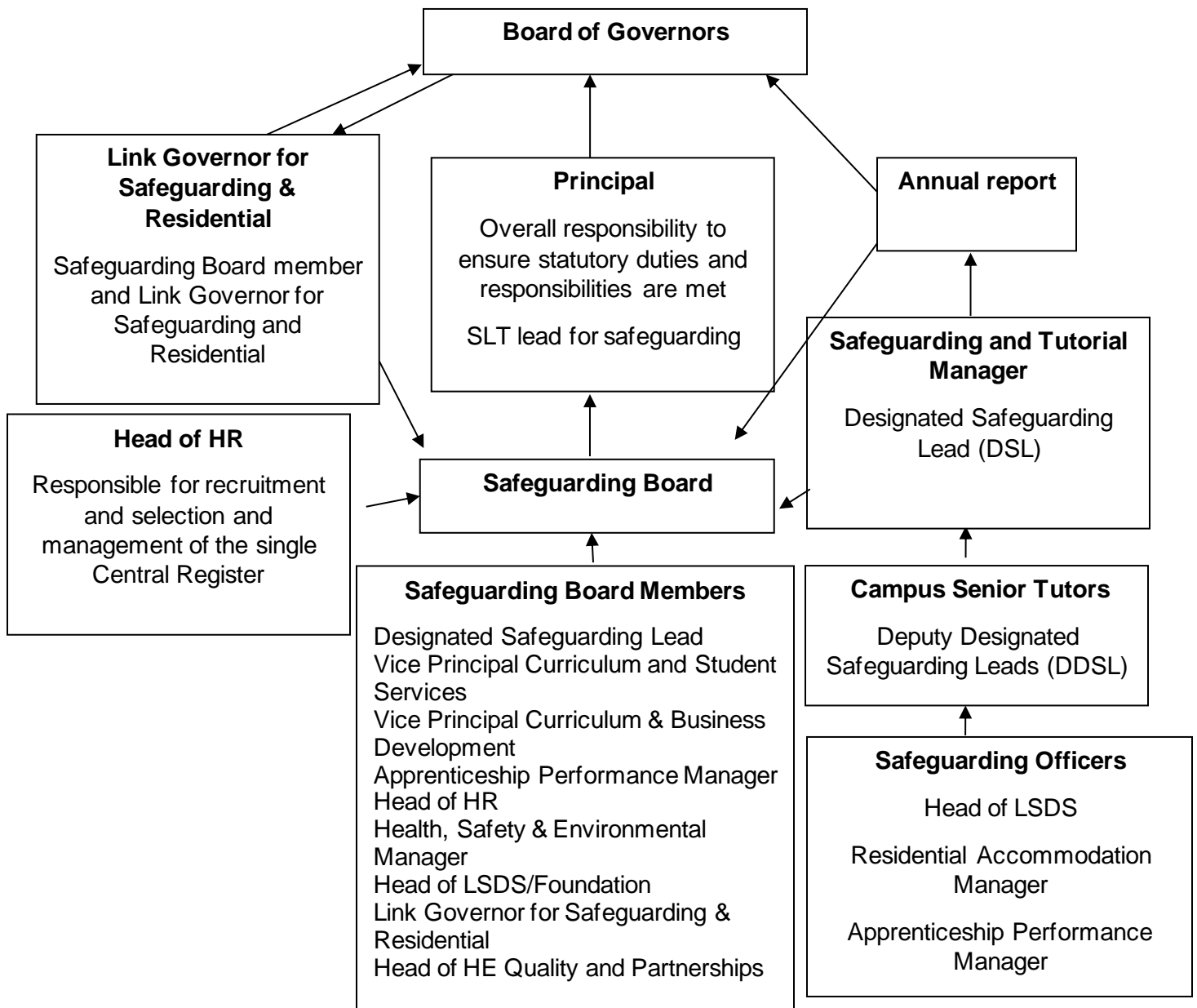
The College has Residential Accommodation, and these are regulated under the DfE Further Education Minimum Standards for Residential Accommodation 2018 and inspected under the Social Care Common Inspection Framework 2017.

We recognise that there are additional safeguarding and wellbeing measures that need to be considered with residential settings, as young people are living away from home and are therefore more vulnerable. These are considered annually through the self-assessment process.

## 1.10 Use of College for non-college activities

When college premises/facilities are hired out to organisations or individuals the college must ensure that appropriate arrangements are in place to keep children safe. Where activities are provided under the direct supervision or management of college staff then our normal arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. Assurance should therefore be sought from the body concerned that they have appropriate safeguarding and child protection policies and procedures in place (including inspecting these if needed) and ensure that there are arrangements in place to liaise with the college on these matters as appropriate. Safeguarding requirements should also be included in any transfer of control agreement e.g., lease or hire agreement as a condition of use and occupation of the premises. Failure to comply with this would lead to termination of the agreement.

## 2 Accountability/Safeguarding Team



Wiltshire Safeguarding Vulnerable Pupil Partnership (WSVPP)	<a href="http://www.wiltshirescb.org.uk/">http://www.wiltshirescb.org.uk/</a> Tel: 01225 718093
Disclosure and Barring Service	<a href="http://www.gov.uk/government/organisations/disclosure-and-barring-service">www.gov.uk/government/organisations/disclosure-and-barring-service</a> Tel: 0870 90 90 811
Prevent Regional HE/FE Co-ordinator South West for the Department for Education (DfE)	email: <a href="mailto:salam.katbi@education.gov.uk">salam.katbi@education.gov.uk</a> Tel: 07824083307

### 3 Implementation

The College will:

- Have a named person as the Designated Safeguarding Lead (DSL), that person being the Safeguarding and Tutorial Manager and four Deputy DSLs, one on each College Campus.
- Ensure that all staff are aware of their individual responsibility for the protection of children and adults at risk in their care and that they are aware of the name and the role of the DSL and Deputy DSLs.
- Provide safeguarding training for all staff in child abuse awareness at induction and on a least a yearly rolling basis. This to include what to do if they are worried about a child or adult at risk and how to respond to a child or adult at risk who tells them about abuse.
- Set up a good, accurate record-keeping system to monitor all students about whom concerns have been expressed, whether or not these concerns lead to a child protection referral. These records will be held electronically in a secure drive, with access limited to the College Safeguarding team.
- Ensure that clearance is received from the Disclosure and Barring Service (DBS) service for all staff who may, in the course of their work, be alone with a student.
- Ensure that members of host families for under 18 international students have undergone (DBS) checks at the appropriate level.
- With staff colleagues, develop effective links with other agencies, such as Social Services, Police and Health Services and contribute to inter-agency enquiries, child protection conferences, meetings and other related groups as appropriate.
- Publish the College's responsibilities for safeguarding and the protection of children and adults at risk on the College website and provide dedicated Safeguarding cards for staff, students and visitors.
- Fulfil any special responsibilities or task required in the care of children on the child protection register.
- Ensure that child protection type concerns or allegations, which may meet the harms threshold, against adults working in College are referred to the Designated Officer for Allegations for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring, following resignation, dismissal, or when we cease to use their service in the case of a volunteer/agency staff.
- Ensure that child protection type concerns or allegations that do not meet the harms threshold are reported, recorded, and dealt with appropriately. By encouraging an open and transparent culture it will enable the College to identify concerning, problematic or inappropriate behaviour early to minimise the risk of abuse and also ensure that adults working in or on behalf of the College are clear about professional boundaries and act within these. These types of concerns are classed as 'low-level' concerns
- If an allegation is made against a governor our own local procedures will be followed. If the concerns are substantiated consideration will be made about removing them from office.
- Ensure that where a member of staff has been dismissed or they 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, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

- Have a widely communicated Prevent procedure and Channel referral process in place.
- The DSL will be trained and supported in the task of overseeing all child protection matters within the College. All staff members of the Safeguarding team will undertake Advanced Multi-agency training and update training every two years as a minimum and on appointment.

### 3.1 How the College will support students

The College recognises the importance of high self-esteem and self-confidence in keeping students safe. The College enrichment programme includes activities designed to promote the well-being of students and give them personal safety information. The increased vulnerability of people with special needs, looked after Children (LAC) and those who have been bullied or isolated by their peers is recognised and early intervention strategies put in place as soon as possible using information shared as part of the transition process or flagged up on enrolment. The College seeks to support those students who may be especially vulnerable to abuse through sensitive monitoring, sharing of information and a contextualised approach to safeguarding and by ensuring that all students have around them a network of people they can go to for help when necessary.

The College recognises that young people can be at particular risk of being radicalised and drawn into extremism and this will include all students in Further and Higher Education. Students will be supported by:

- Encouraging respect and tolerance, building self-esteem through the curriculum and enrichment, whilst not condoning aggression or bullying.
- Promotion of the College's Safe and Respectful campaign and the embedding of British Values into teaching and learning and Student Life programme.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and young people.
- Providing continuing support to a student about whom there have been concerns who leaves the College by ensuring that appropriate information is copied under confidential cover to the student's new College or other educational setting where known and forwarded as a matter of priority.
- Using the Prevent procedure and the Channel process to identify and support any young person/adult at risk from being drawn into radicalisation or extremism.

### 3.2 Students with Special Education Needs and Disability (SEND)

Students with SEND are more likely to be abused and/or neglected. The College will monitor and support these students in order to ensure they are appropriately identified and supported. The College will ensure that guidance is available so that all staff have an awareness that: -

- behaviour, mood and injury may relate to potential abuse and not just as a result of SEND
- SEND students face a higher risk of group isolation

- that bullying can have a disproportionate impact on SEND students
- that difficulties with communication may also adversely impact SEND students

### 3.3 Confidentiality

The College recognises that all matters relating to child protection need to be handled sensitively but confidentiality should not be promised.

The DSL or DDSLs will disclose any information about a student to other members of staff on a 'need to know' basis only.

All staff must be aware that they have a professional responsibility to share information with appropriate College staff (DSL, DDSL) so that other agencies can be informed in order to safeguard children, young people and adults at risk.

All staff must be aware that they cannot promise a young person to keep secrets which might compromise the young person's safety or wellbeing or that of others who may be at risk.

The College will always undertake to share its intention to refer a young person to Social Care with their parents/carers unless to do so could put the young person at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the relevant MASH team.

### 3.4 Supporting Staff

We recognise that staff working in the College who have become involved with a young person who has suffered harm, or appears to be 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 DSL, DDSLs, Head of HR and/or their immediate line manager, and to seek further support as appropriate.

## 4 Roles and Responsibilities

The Governing Body of the College recognises that under section 175 (section 157 for the Independent sector) of the Education Act 2002, and section 26(1) of the Counter-Terrorism and Security Act 2015 it has a statutory duty to make arrangements to ensure all its functions are discharged with regard to safeguarding and promoting the welfare of young people

The Governing Body recognises that the Local Authority and the WSVPP has a statutory responsibility to monitor schools'/FE Colleges' compliance with the statutory guidance.

### 4.1 Role of Governing Body

In order that duties under legislation are complied with, the Governing Body has nominated a Link Governor for Safeguarding and Residential (fulfilling the role recognised by the DfE with the title Designated Governor for Safeguarding & Child & Adult at Risk Protection ) who works with the DSL to ensure that through regular updates and training fellow governors have a clear understanding of their duties with regard to safeguarding; liaises with the DSL and the Principal, who is the member of the Senior Management Team with lead responsibility for safeguarding young people; and has a place on the Safeguarding Board.

The Governing Body executes its duty to ensure that the policies, procedures, and training at the College are effective and always comply with the law by:

- Delegating operational responsibility to the Principal for the purpose of safeguarding and promoting the welfare of children receiving education or training at the College
- Ensuring a whole college approach to safeguarding and that where there is a safeguarding concern ensuring that the child's wishes are taken into account when determining what action to take and what services to provide
- Ensuring that in addition to regular safeguarding training, including online safety for both staff and students that staff training is integrated, aligned, and considered as part of the whole college approach to safeguarding and wider staff training and curriculum planning
- Giving scrutiny to regular reports provided by the Safeguarding Board which provides an update on the College Safeguarding action plan and details numbers and types of incidents and concerns which have arisen, along with updates from the counselling and wellbeing service, health & safety, and HR (recruitment and staff training).
- Remedying any deficiencies or weaknesses in safeguarding arrangements without delay
- Ensuring that the College has a safeguarding policy and procedures which are updated annually and satisfy statutory requirements as outlined in 'Keeping Children Safe in Education 2021, 'Working Together to Safeguard Children' 2018 (updated in 2020), and the Prevent Duty Guidance 2015.
- Ensuring that the College has a staff code of conduct which provides staff/volunteers/agency workers/contractors with clear guidelines about expected behaviour and handling of allegations made against staff/volunteer's agency workers/contractors and complies with WSVPP procedures, balance the need to protect children whilst protecting staff/volunteer's agency workers/contractors from false/unfounded accusations.
- Ensuring that a senior staff member is appointed to lead on safeguarding, advise/support staff/liase with the LA and other agencies. He/she will have status/authority to carry out role e.g., commit resources to safeguarding and direct staff as appropriate
- Ensuring safer recruitment procedures are followed and DBS checks are carried out as required in a timely manner.

#### 4.2 The Role of the Principal

The Principal will ensure, through the Senior Leadership Team:

- Policies and procedures are fully implemented and followed by all staff.
- Sufficient resources and time are allocated so that the DSL and staff can attend strategy discussions, inter-agency meetings, contribute to assessments etc.
- Staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with whistle blowing policies.
- Policy/procedures are available to parents/carers on request.
- Safer recruitment is adhered to and checks on new staff and volunteers carried out.
- Cases are reported to the Disclosure and Barring Service (DBS) if a person ceases to

work in an education setting and there are grounds for believing he/she may be unsuitable to work with children or may have committed misconduct.

### 4.3 Role of Safeguarding Board

The Safeguarding Board will:

- Raise awareness of developments in Safeguarding good practice.
- Ensure the quality assurance of provision of safeguarding information and practices.
- Monitor the staff training record.
- Review and update action plans and risk assessments for Safeguarding and Prevent.
- Develop initiatives which maintain the highest profile for Safeguarding in the College and its partners.

The Safeguarding Board will meet a minimum of 3 times a year.

On a serious safeguarding concern, a safeguarding panel meeting will be convened. A panel meeting must comprise of a minimum of three members of the Safeguarding Board and not including the Designated Governor.

In addition to the safeguarding board a termly meeting takes place between the DSL and HR department to discuss safeguarding training and safer recruitment and any other emerging issues

### 4.4 Role of DSL

The DSL is the Safeguarding and Tutorial Manager.

The DSL will: Given the geographical location of the College and its campuses the DSL will be supported in carrying out the defined duties shown below by four appointed Deputy Designated Safeguarding Leads:

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Understand the assessment process for providing early help and statutory intervention.
- Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies.
- Refer cases to the Channel programme where radicalisation is a concern.
- Liaise with managers to inform of any issues/ongoing investigations and ensure there is always cover for the role.
- Arrange training in how to recognise signs of abuse, and when it is appropriate to make a referral.
- Use working knowledge in how WSVPP work, the conduct of case conferences, and be able to attend and contribute to these when necessary.
- Ensure all staff have access to and understand the College Safeguarding Policy.
- Ensure all staff have induction training and can recognise and report any concerns as they arise.
- Provide annual update training for all College staff including significant contractors.
- Ensure that detailed, accurate and secure written records of referrals/concerns are kept.



- Ensure the Safeguarding Policy is updated and reviewed and approved by SMT annually.
- Ensure students/parents/carers see copies of the Safeguarding Policy, which alerts them to the fact that referrals may be made, and the role of the College.
- Where a young person leaves the College and progresses or transfers within an educational establishment, ensure that file/information is transferred to the new establishment.
- Refer a child if there are concerns about possible abuse, via the relevant referral process and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call.
- Keep written, chronological records of concerns about a child even if there is no need to make an immediate referral.
- Ensure that all such records are kept confidentially and securely, separate from student records, until the young person's 25<sup>th</sup> birthday, and are copied on to their next education provider.
- Liaise with other agencies and professionals as necessary and appropriate.
- Ensure that either the DSL, Deputy or a member of the safeguarding team attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report which has been shared with the parent/carers.
- Ensure that any student currently with a child protection plan who is absent without prior notification is referred to their key worker's Social Care Team.
- Ensure that any staff who are regularly on site with students (teachers accompanying pre 16s) or as part of a subcontract (cleaning and catering,) have relevant and Checked DBS status.
- Provide an annual report for the Governing Body, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Governors; number and type of incidents/cases, and number of children with child protection plans (anonymised).
- Meet termly with the Head of Human Resources to ensure quality processes for Safer recruitment are up to date and rigorous including the use of DBS checks and the use of the Teachers Barring Service as an additional cross reference for staff.

#### 4.5 Role of the Deputy Designated Safeguarding Lead

- Take responsibility for the day-to-day operational management of safeguarding issues under the direction of the DSL
- Maintain and keep accurate records of all safeguarding cases
- Create effective strategies in conjunction with the DSL to ensure safeguarding is embedded throughout the College
- Act as Designated Teacher for Looked After Children and previously looked after children.

#### 4.6 Role of all staff and duty of care

Staff must:

- prioritise safeguarding and adopt a preventative and early help approach to creating a

safe and respectful culture

- identify students who are experiencing or are likely to experience significant harm
- identify students who they consider may be in danger of becoming radicalised or engaging in extremist behaviour
- seek assistance from the DSL when appropriate as stated in the Safeguarding Policy
- promote the welfare of young people and adults at risk
- promote a safe and respectful culture, Prevent and British Values
- promote the ethos of the College that students feel secure, valued and listened to
- promote student health and safety at induction and throughout their period of study
- access first aid/medical resources when required
- promote the student's well-being via Key Messages and Student Life Enrichment.
- recognise students experiencing distress and to act to support
- challenge behaviour where it isn't appropriate e.g., bullying, peer on peer abuse (sexual harassment, abusive relationships) substance misuse and to use the DSL/DDSLs and relevant College policy to address such instances.
- never share their personal contact details with existing students, or to seek to befriend/accept friend requests from existing students on any social media platform. This includes the sharing of personal mobile telephone details, personal e-mail addresses and any personal contact information. Any member of staff found in breach of this may be liable to disciplinary action.

#### 4.7 Duty of Care Responsibility

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and young people from discrimination and avoidable harm

Staff should develop respectful, caring and professional relationships between themselves and young people. Staff behaviour should demonstrate integrity, maturity and good judgement. e.g., management of risk in external visits/residential visits.

#### 4.8 Breach of Trust

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the child. Where a sexual relationship exists between a staff member and a student aged 18 or over, it is required that the staff member discloses this to HR immediately.

#### 4.9 Students aged 14-16 on school roll

- Where young people are on the roll of another education establishment there should be protocols in place between the DSL or DDSL, via the School Links Co-ordinator and the designated teachers at these establishments for communication regarding unexplained absence or other concerns.
- There will also be liaison with the parent/carer and the schools.
- The School Links Co-ordinator will identify individual young people of statutory school

age who are attending college to ensure appropriate curriculum and safeguarding in College.

- The School Links Co-ordinator must be informed when a safeguarding issue concerns a pre-16 student. Either the DSL, DDSLs or the School Links Co-ordinator will contact the relevant member of staff at school without delay.

#### 4.10 Students who may pose a risk

Where a student's history indicates that they pose a risk to other students/staff, a risk assessment must be undertaken by appropriate professionals. This will establish whether College is an appropriate environment for that person, and if so, what arrangements can be put in place to support that person to ensure the safety of others and their own safety. The DSL or DDSL will complete the risk assessment and where there is concern about safety a Safeguarding Board Panel consisting of at least three members of the Board will be held to assess the level of risk and decide if the student can be enrolled on a College course. The DSL to call and chair these meetings ensuring that relevant Board members are invited, e.g.: for students that have an EHCP the Head of LSDS should be invited whilst for Apprenticeship students the Apprenticeship and Performance Manager should be invited. The outcome of the panel will be feedback to the student and/or parents by the DSL or DDSL.

#### 4.11 Wiltshire SCB Case Resolution Protocol

Where a dispute emerges concerning the action taken by fellow agencies with responsibilities for specific aspects of safeguarding, the College will engage with the procedure set out in WSCB "Case Resolution Protocol"

<http://www.wiltshirescb.org.uk/wp-content/uploads/2018/07/WSCB-FINAL-Case-Resolution-Protocol-.pdf>

#### 4.12 Whistleblowing

We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff and students should be aware of their duty to raise concerns, where they exist, about the management of child protection and the protection of adults at risk, which may include the attitude or actions of colleagues, and are encouraged to do so.

#### 4.13 Physical Intervention

We understand that physical intervention may be required where a student, staff member or visitor may be at risk but understand that physical intervention of a nature which causes injury or distress may be considered under child/adult at risk protection or disciplinary procedures.

#### 4.14 Bullying

The College procedure on bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under safeguarding/child protection procedures. This includes cyber, racist, homophobic and gender-related bullying.

#### 4.15 Racist Incidents

The College takes allegations of racism seriously and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding/child protection procedures.

#### 4.16 Prevention

We recognise that the College plays a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College community will therefore work together to create a safe and respectful culture:

- Work to establish and maintain an ethos where children, young people and adults at risk, feel secure and are encouraged to talk and are always listened to.
- Ensure that all children, young people and adults at risk in the College know who they can approach if they are worried or in difficulty.
- Include across the curriculum, enrichment opportunities which equip young people with the skills they need to stay safe from harm and to know to whom they should turn for help.

#### 4.17 Health & Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safety and security of our students both within the College environment, and when away from the College when undertaking College placements and educational visits.

#### 4.18 Counsellors' discretion

The Counsellors of the student counselling service have a duty of confidentiality to students/clients of the counselling service (*British Association for Counselling and Psychotherapy, Ethical Framework 2002 pp 3-7*).

Therefore, where the first person to become aware of a case of physical, sexual, emotional abuse or neglect is a Counsellor within the student counselling service, the Counsellor will exercise his or her professional judgement and discuss the situation with the DSL after initial discussions with the student.

In all cases the Counsellor will discuss both the disclosure of abuse and the decision to report with the DSL.

### 5 Associated Documents

The College recognises that a Safeguarding Policy does not in isolation summarise its absolute commitment to safeguard, protect and promote the welfare of children, young people, and adults at risk.

This policy should therefore be read alongside the following policies and protocols:

- Children Looked After Policy

- The Equality and Diversity Policy and Procedure
- The Health and Safety Policy
- The Risk Assessment Procedure
- The Workplace Vetting Procedure
- The Work Experience Policy
- The Data Protection Policy
- The Acceptable Use Policy (AUP)
- The Student Code of Conduct and Disciplinary procedure
- Fitness to Study Procedure
- The Staff Code of Conduct and Disciplinary procedure
- The 'Minimum Standards' for the supervision of under 18 students in residential care
- The College Complaints procedure
- Staff Recruitment and Selection Policy
- Teaching and Learning Policy
- Public Disclosure Policy
- Prevent and Channel Procedure
- The External Speakers Policy
- The Social Media Policy
- The Bullying Procedure

## 6 Equality Statement

It is intended that this policy is 'fair to all'. Where any part could potentially lead to unequal outcomes, the procedure then justifies why this is a proportionate means of achieving a legitimate aim.

## 7 Policy Review and Ownership

This document is owned and managed by the Safeguarding and Tutorial Manager. The policy will be reviewed and amended as required, and at least every two years by the Safeguarding and Tutorial Manager or appropriate substitute and submitted for final approval and adoption by the Senior Leadership Team and the Governing Body.

## Appendix 1



**A safe and respectful culture while home learning**

Wiltshire College & University Centre is committed to keeping you safe while home learning.

We aim to ensure you understand what is expected of you and that you feel safe, respected and valued.

We expect all our students and apprentices to display appropriate behaviour at all times as detailed below:

**Learning:** Dress appropriately and be in the best possible space available ready to learn.

**Respect:** Your virtual classroom, the College staff and your peers.

**Participation:** Join in learning as required, be on time if requested and keep to deadlines as set. This includes English, maths and tutorial.

**Safe:** Actively participate in your learning giving everyone a safe space to belong. Please follow health & safety good practice and any advice staff may give.

(Please note: Learning and support online may be recorded and monitored as part of the College's safeguarding procedures)

If you have any concerns during the time we are home learning please contact your lecturer, tutor or Jo Kelly, Safeguarding and Tutorial Manager – [jo.kelly@wiltshire.ac.uk](mailto:jo.kelly@wiltshire.ac.uk)

## Appendix 2



**A safe and  
respectful  
culture  
while home working**

**Wiltshire College & University Centre is committed to keeping you safe while home working**

During online 1:1 video conferencing please follow this guidance:

- If your safeguarding training is not up to date you **MUST NOT** conduct a 1:1 video conferencing session. Refer to your line manager for further guidance
- Advise parent/carer of when you are making a 1:1 video call prior to it taking place
- End the video call as soon as possible if at any time you feel uncomfortable with a situation
- Always report any welfare/safeguarding concerns to your line manager and/or the safeguarding team
- Conduct video calls to students, apprentices or colleagues from a desk or other appropriate location. Check what you can see when you first log in as this is what others will see when viewing
- Remind students/apprentices that all calls/videos may be recorded - this is to safeguard both parties and wouldn't routinely be shared

Remember don't conduct a video call if it would be improper for a face-to-face meeting.

**Useful further guidance**  
<https://www.wiltshire.ac.uk/covid19>  
<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>  
<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>  
<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>