

SAFEGUARDING (INCLUDING CHILD PROTECTION) & PREVENTING EXTREMISM AND RADICALISATION POLICY

POLICY STATEMENT

There is a statutory and moral duty to ensure that the College safeguards and promotes the welfare of its young people and adults, who are or may become vulnerable, who receive education and training at the College.

Throughout this policy and procedure reference is made to, “young people and vulnerable adults”. This term is used to mean “those under the age of 18” and adults who are or may become vulnerable over the age of 18. The Governing Body recognises that some adults are also vulnerable to abuse, accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults.

Safeguarding, and promoting the welfare of young people is a broader term than child protection. It includes protecting young people from maltreatment, preventing impairment of health or development, and ensures young people can grow up in safe circumstances.

Child Protection is part of this definition and refers to activities undertaken to prevent young people suffering, or likely to suffer, significant harm.

When operating this policy, the College uses the following accepted Governmental definitions of extremism and radicalisation which are:

Extremism: ‘*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; and/or calls for the death of members of our armed forces, whether in this country or overseas*’.

Radicalisation: ‘*the process by which a person comes to support terrorism and forms of extremism leading to terrorism*’.

This policy should not be read in isolation, reference must be made to the Vetting Checks and Disclosure and Barring Service (DBS) policy, the Professional Relationships policy, the Safeguarding & Preventing Extremism and Radicalisation Staff Guidelines and the Safeguarding Code of Conduct for College Staff.

The Governing Body is committed to ensuring that the College:

- Provides a safe environment for young people and vulnerable adults and that students learn about safeguarding.
- Identifies young people and adults who are or may become vulnerable who are suffering, or likely to suffer, significant harm, and ensures they are kept safe.
- Safeguards young people and adults from being drawn into committing terrorist-related activity.
- Provides early intervention strategies to protect and divert students away from the risk they face
- before illegality occurs

In pursuit of these aims, the Governing Body will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of young people and adults who are or may become vulnerable and promoting a safe environment for these students when learning within the College
- Aiding the identification of young people and adults who are or may become vulnerable who are at risk of significant harm, and providing procedures for reporting and addressing concerns
- Establishing procedures for reporting and dealing with allegations of abuse.
- Ensuring the safe recruitment of staff and the maintenance of a single central record
- Ensuring that individuals at risk of being drawn into terrorism are identified and are referred to the Prevent and Channel Coordinator for appropriate support.

In developing the policies and procedures, the Governing Body will consult with, and take account of, guidance issued by the Department for Education and the Kent & Medway Multi Agency Safeguarding Policy, Protocols and Guidance, and other relevant bodies and groups. The Governing Body will act in accordance with guidance provided in the publication "Safeguarding Young people and Safer Recruitment in Education".

Safeguarding young people and adults who are or may become vulnerable is a multi-agency responsibility, and the Kent Safeguarding Young People's Board and South East Kent Social Services have reviewed this policy and procedures in 2015/2016 and in line with the ["Keeping Children Safe in Education" update, DfE September 2016](#), additional references were included.

This policy applies to all persons acting on behalf of or engaged in activities associated with the College including, for example, members of the Governing Body, staff employed by the College, visitors to and contractors working at College premises (including outreach centers and other related training centers).

The Governing Body has appointed a Governor with special responsibility for Safeguarding and Prevent. The Governor can be contacted by email through our Clerk to the Corporation

Any concerns about the conduct of other staff should be taken to the College Principal or Julia Thompson, Head of HR who will then refer to the Local Area Designated Officer (LADO).

Any concerns about the Principal should go to the Chair of Governors. In his absence Anne Leese or Julia Thompson can be contacted.

Preventing Extremism and Radicalisation

As part of wider safeguarding responsibilities college staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Partner colleges, local authority services, and police reports of issues affecting learners in other colleges or settings
- Learners voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths or cultures or advocating violence towards others
- Use of extremist or "hate" terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Making remarks about being at extremist events rallies outside college
- The weekly monitoring sheet for the Reflection Rooms

Promoting British Values

In line with the provisions of [s.78 of the Education Act 2002](#) the College promotes fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. This promotion takes place through:

- Lessons and progress reviews.
- The manner in which students are treated by staff.
- The election of student representatives and Student Union Officers
- The standards of behaviour and respect students are encouraged to adopt through the 'Student Code of Conduct' and 'Our Expectations'.
- The underlying messages delivered to students at student representative meetings and the Student Union Committee meetings.
- The displays in classrooms, corridors, student centres and in the Learning Zones.
- In the manner and consistency with which students' views are challenged should they conflict with such values.

Any students displaying such behaviours will be reported to a Safeguarding Officer on the relevant campus.

Guest Speakers and Visitors

The College values the opportunities presented by external speakers for students to experience diverse opinion and to enter into debate. This is seen as an essential part of both personal and academic development.

The College values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.

The College values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal procedures.

The College recognises and supports the moral and legal frameworks of the society and community within which it works.

The College will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive "street", misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.

The College will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence.

All visitors are required to report to reception and any organisation requesting to distribute leaflets on campus must seek approval from the Principal of the campus prior to distribution. Other than the promotion of College business, staff and students must also request the permission of the Principal before distributing leaflets.

Further information can be found in the College's [Guest Speaker Policy](#).

Safeguarding Children within the College Nursery

The College will safeguard and promote the welfare of children in its care, in relation to this policy this is defined as:

- Protecting children from maltreatment
- Preventing the impairment of children's health or development

- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

(Definition taken from the HM Government document '[Working together to safeguard children 2015](#)').

The Nurseries have their own Safeguarding Policy:

Safeguarding students aged 14-16

Primary responsibility for any school pupil attending programmes in College remains with the home school and any incidents or issues with young person safeguarding implications should be referred to the College's named person. He or she will then liaise with the Senior Safeguarding Officer and the Local Authority as required.

Safeguarding issues relating to a student, under 16, attending College as their main educational provider, will be addressed by the designated College staff following the same guidelines and procedures as other students. Particular care should be taken as these learners are more vulnerable than other students because of their younger age.

All 14-16 year old students are to wear a specific lanyard that will highlight their safeguarding risk. There will be a dedicated space determined by the local college where 14-16 year old students will attend for their break and lunch periods. The local college will inform parents of the dedicated spaces which will be agreed at enrolment between the parent and the college. Each college will have a designated person on call that will be informed if:

- a 14-16 year old does not return to lesson after break or lunch
- Is seen outside of designated areas at any time
- Is seen leaving the campus

All staff that have direct contact with 14-16 year old students will have enhanced DBS checks to ensure the highest level of safeguarding is maintained.

Apprentices

All learners on Workplace Learning programmes receive an induction, which includes raising awareness of the Colleges commitment towards Safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Safeguarding Officers. The understanding of all aspects of Safeguarding, preventing extremism and radicalisation and safe working practices is checked at each review and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's well-being is safeguarded by the work placement assessors. The College has arrangements in place to ensure that, prior to work related work commencing:

- Pre-placement Health and Safety checks of employers premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant College policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

The safeguarding principles and measures apply to all Apprentices whilst on College premises. Where a concern is raised relating to the employer, the College Safeguarding Lead will liaise with the Director Business Training to address and decide on an appropriate course of action.

Work Placement

All work placement providers will be given specific safeguarding information by the Work Placement Officer/Assessor. Employers sign a work placement understanding saying they have received the information and are aware of their duty under Safeguarding.

Subcontracting

All learners on courses delivered by a College partner receive details of the support services offered and contact details for the Safeguarding Officers. The understanding of all aspects of Safeguarding including preventing extremism and radicalisation and safe working practices is checked at each partner review and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's well-being is safeguarded by the staff in the Subcontracting Team. The College has arrangements in place to ensure that, prior to a course commencing:

- A Training Facility Health and Safety check list is completed.
- A risk assessment of the premises is carried out.
- All insurance documents are checked and copies taken.
- Partners are made aware of relevant College policies.
- Annual check of Safeguarding Policy to include Prevent Strategy.

All staff in contact with learners under the age of 18 years are DBS checked and details monitored and updated as necessary.

All delivery staff are required to complete Safeguarding training.

ESOL Students

The College will ensure that for students where English is their second language the induction on safeguarding is delivered so they gain a full understanding. There will be a strong focus on the promotion of values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Students with a Learning Difficulty or Disability

Students with learning difficulties and/or disabilities can face additional safeguarding challenges. The College will ensure that students who have a learning difficulty or disability are made fully aware of the safeguarding procedures during their Additional Learning Support interview. This will ensure that the information is delivered and adapted so it is accessible and meets their individual need. Information on how to contact a safeguarding officer will also be adapted i.e. numbers, names and locations in Braille; for deaf students, Visual loss and students with a speech disorder the safeguarding e-mail address is available. The expectation would be that their support practitioner, Progression Mentor/Student Mentor and Personal Tutor would act as their first line of contact. This is particularly important for those students with communication barriers.

All relevant College staff working with young people and adults who are or may become vulnerable will receive training which adequately familiarises them with safeguarding young person and adult issues, their responsibilities and relevant College procedures and policies. These staff will receive refresher training every year. The College will ensure that in addition there are designated and trained senior management and Safeguarding Officers, these staff will receive update training every year. In addition, the Governing Body will designate one governor with specific responsibilities for young people and vulnerable adults. The College will refer concerns that a young person or vulnerable adult might be at risk of significant harm to appropriate external agencies.

The Governing Body will review the policy on an annual basis.

It is important that all staff are aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely—but not limited to – bullying, gender based violence/sexual assaults and sexting.

PROCEDURES:

Types of Abuse

The Governing Body recognises the following as definitions of abuse:

- “Abuse is a violation of an individual’s human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when a young person or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it” taken from guidance document Working Together to Safeguard Young people. It is every young person and adult’s right to live free from abuse in accordance with the principles of respect, dignity, autonomy, privacy and equity.
- An Adult 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 significant harm or exploitation”. (Definition from “No Secrets” March 2000 Department of Health).
- This could include young people and adults with learning disabilities, mental health problems, and people with a physical disability or impairment. Their need for additional support to protect themselves may be increased when complicated by additional factors, such as domestic violence, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems social or emotional problems, poverty or homelessness.

It is important to recognise that some young people or adults who are or may become vulnerable may reveal abuse themselves by talking about or drawing attention to physical signs or displaying certain actions / gestures. This may be their only means of communication. It is important for staff to be alert to these signs and to consider what they might mean.

The following categories of abuse are not mutually exclusive and a young person or vulnerable adult may be subjected to more than one type of abuse at the same time, whatever the setting

Definitions of Abuse

Physical Abuse

- Hitting, slapping, scratching, shaking, throwing
- Pushing or rough handling
- Poisoning, burning or scalding, drowning, suffocating
- Assault and battery
- Restraining without justifiable reasons
- Inappropriate and unauthorised use of medication
- Physical harm caused by feigning the symptoms of, or deliberately inducing injury in a young person or vulnerable adult
- Using medication as a chemical form of restraint
- Inappropriate sanctions including deprivation of food, clothing, warmth and health care needs

Sexual Abuse

- Sexual abuse which involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person is aware of what is happening, the risks involved or the consequences
- Rape or attempted rape
- Sexual assault and harassment
- Non-contact abuse e.g. voyeurism, exposing children to pornography, grooming (including via the internet), accessing or creating indecent images of children.

Psychological & Emotional Abuse

- Persistent emotional maltreatment
- Emotional and verbal abuse
- Humiliation and ridicule which may convey that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person
- Threats of punishment, abandonment, intimidation or exclusion from services
- Isolation or withdrawal from services or supportive networks
- Deliberate denial of religious or cultural needs
- Removing opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Failure to provide access to appropriate social skills and educational development training
- Imposing age or developmentally inappropriate expectations
- Interactions beyond the person's developmental ability, overprotection, limitation of exploration or learning, prevention of normal social interaction
- Seeing or hearing ill-treatment of another, serious bullying (including Cyber bullying) causing the person to frequently feel frightened or in danger
- Exploitation, corruption and enticed into illegal activity, especially Gang related

Neglect and acts of omission

- Failure to meet medical, physical care and psychological and emotional needs
- Failure to access care or equipment for functional independence
- Failure to ensure adequate supervision including the use of inadequate care-givers or the failure to ensure access to appropriate medical care or treatment
- Failure to provide access to appropriate health, social care or educational services
- Failure to provide adequate food, shelter, heating, lighting and clothing (including exclusion from home or abandonment) etc.
- Failure to protect from physical or emotional harm or danger
- Failure to give prescribed medication
- Failure to give privacy and dignity
- Professional neglect

Financial

- Misuse or theft of money
- Fraud and / or extortion of material assets
- Misuse or misappropriation of property, possessions or benefits
- Exploitation, pressure in connection with wills, property or inheritance

Discriminatory Abuse

- Discrimination demonstrated on any grounds including sex, race, colour, language, culture, religion, politics or sexual orientation

- Discrimination that is based on a person's disability or age
- Harassment and slurs which are degrading
- Hate crime

Trafficking and Sexual Exploitation

The Safeguarding procedure will raise staff awareness of the increased concerns of trafficking and sexual exploitation with reference to the Safeguarding Children and Young People from Sexual Exploitation: Supplementary guidance to Working Together to Safeguard Children (2015) and the non-statutory duty designed to help local authorities when dealing with cross-border child protection cases under the 1996 Hague Convention, which was implemented in the UK on 1 November 2012. Trafficking of children is a form of human trafficking and is defined as the "recruitment, transportation, transfer, harboring, and/or receipt" of a child for the purpose of slavery, forced labor and exploitation and categorised as child abuse. Child Sexual Exploitation (CSE) Child sexual exploitation of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Photography, Images and video

Staff should not use personal devices such as mobile phones or cameras to take photos or videos of students and should only use work-provided equipment following the procedures in the Image Use Policy. Students will have identified on their learning agreement as to whether they give consent for their photograph or video footage to be taken.

Bullying, including cyberbullying

Bullying is repeated and intentional behaviour and can have a devastating effect and must be addressed immediately. Further information can be found in the College anti -Bullying Policy. Type of bullying such as:

- **Physical bullying** is bullying that takes the form of physical abuse, such as pushing, shoving, hitting, fighting, spitting, and tripping. Emotional bullying is bullying that involves insults, derogatory remarks, name calling, and teasing. Also included are attempts to ostracize the victim, such as being left out or ignored, which is sometimes referred to as social bullying, as distinguished from verbal bullying. Emotional bullying can be done in person or through cyberbullying.
- **Face-to-face bullying** is bullying in which students confront each other in person.
- **Cyberbullying** is bullying that takes place online, through either email, chat rooms, social networking services, text messages, instant messages, website postings, blogs, or a combination of means. Cyberbullies may conceal their identity so that their victim experiences an anonymous attack. The content of cyberbullying can consist of all of the types of content including posting insulting and derogatory comments about someone or sending such comments to someone; sending mean or threatening messages; gossiping about someone online including posting sensitive or private information; impersonating someone in order to cast that person in a bad light; and excluding someone from an online page or group. Unwanted contact, also known as harassment, is another form of cyber bullying.

Sexting

The Safeguarding procedure will raise staff and student's awareness of the implications self-generated indecent images ('Sexting') can have and the procedures that need to be followed when dealing with such cases in line with police guidelines

- The implications of opening offensive images on a computer

- Images should never be viewed or printed and the device secured

Definition of 'Sexting'

There are a number of definitions of sexting but for the purposes of this advice sexting is simply defined as:-

- Inappropriate offensive images or videos generated
 - by children under the age of 18, or
 - of children under the age of 18 that are of a sexual nature or are indecent.
- These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know.
- There are many different types of sexting and it is likely that no two cases will be the same. It advises that it is necessary to carefully consider each case on its own merit apply a consistent approach when dealing with an incident to help protect staff, the College and the student. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response. All staff and students should be familiar with the seriousness of 'sexting' and the safeguarding procedures should such situations arise.
- A flowchart is attached at the end of this policy (adapted from 'Medway Local Authority Response Process for Professionals') is recommended to help safeguarding officers to make a decision about the actions they may need to take.

Other terminology: Youth produced sexual imagery

Private Fostering

A private fostering arrangement is one that is made privately, without the authority of the local authority for the care of a child under the age of 16 or 18 if disabled, by someone other than a parent or close relative. These young people may be vulnerable, particularly if they have come from another country. In some cases they are affected by abuse and neglect, or be involved in trafficking or child sexual exploitation. There is a mandatory duty to inform the local authority of children in such arrangements.

Child Missing Education

The College will ensure that all students, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. The College recognises its duty to establish, as far as it is possible to do so, the reasons why students are missing from their programme. The College recognises that when a 16 or 17 year old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation, involvement with gangs or radicalisation. Every "missing" episode will attract proper attention from the staff involved.

The College understands that missing from education particularly on repeat occasions is a potential indicator of abuse or neglect including sexual exploitation.

- Staff will report any students where attendance is erratic or cause for concern to the Mentors so appropriate support can be put in place to help prevent the risks of their going missing.
- College staff will inform the Safeguarding Officer immediately of any student who is missing from College without notification and is on the Vulnerable risk register
- College staff will inform the Safeguarding Officer immediately of any students that are missing for 5 consecutive days without contact with the College.
- The College will inform the local authority after 28 days of any student under 18 who is to be removed from the College role.

When a Child is Missing or their Whereabouts are Unknown

All students under 18 or who are vulnerable adults who go missing or their whereabouts are unknown will be reported to the Police immediately. If the student is deemed to be at immediate risk the Safeguarding Officer will ring 999 on the day of referral. If not at immediate risk they will report to the police by ringing 101 within 24 hours. Any relevant information that might help to find or support the child will be shared. If the student is a looked After Child, a Care Leaver or an Unaccompanied Young Person the College will immediately contact the Police and Social Services (particularly in the case of Vulnerable Adults (see Absconding procedure) and the Parents will be notified by Social Services.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation (FGM) and forced marriage.

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. This practice is illegal and must be reported to the Police as soon as possible.

The Female Genital Mutilation Act 2003 was brought into force on 3 March 2004 and makes it an offence for the first time for UK nationals or permanent UK residents to carry out female genital mutilation (FGM) abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal. FGM is extremely harmful. It is not like male circumcision. It causes long-term mental and physical suffering, difficulty in giving birth, infertility and even death. It cannot be justified as a cultural or religious practice. Leaders of all the main faiths have spoken out against it. Girls under 15 are at most risk. Concerns regarding FGM must be reported to the Safeguarding team for an immediate referral to the police.

Forced marriages

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. It is an entirely separate issue from arranged marriage, and the two things should not be confused. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage are usually experiencing emotional and/or physical abuse at home.

The majority of forced marriages involve a young female victim, but young men can also be victims. Around one-third of the cases handled by the FMU (Forced Marriage Unit) involve children under 18 years of age

Concerns regarding any students must be reported to the Safeguarding team without delay. Staff must be aware there may be only one opportunity to speak to a potential victim of forced marriage, so an appropriate initial response is vital. The victim's family, friends or members of the community MUST NOT be informed. The victim has sought help and this will likely increase the risk to the victim significantly. Forced marriage is closely linked to honour-based violence and honour killings. All those involved will want to bear in mind that mediation as a response to forced marriage can be extremely dangerous. There have been cases of victims being murdered by their families during mediation. Mediation can also place someone at risk of further emotional and physical abuse.

Victims should be reminded of their rights – they have the right to choose who they marry and the right to make decisions about their lives. The Designated Officer will contact the Forced Marriage Unit, they have a

public helpline that provides confidential advice and support to victims, and to practitioners handling cases of forced marriage.

Parental involvement

The College is committed to ensuring that all parents/carers of under 18's have an understanding that the Colleges have a duty to safeguard and promote the welfare of children who are their students. Parents/carers will receive information via their young person during induction, making it clear that the College may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. Parents/carers will be asked to sign to confirm they have received this information.

Safeguarding Officers will contact Parents/carers to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referrals to children's social care, unless it is deemed that it may place the student at greater risk. Where possible the College Safeguarding Officer will keep the parent/carer informed of actions progress.

E-Safety

E-Safety covers issues relating to young people as well as adults and their safe use of the Internet, mobile phones and other electronic communications technologies, both in and out of College. It includes awareness raising for all members of the College community on risks and responsibilities and is part of the 'duty of care', which applies to everyone working with young people and vulnerable adults. All members of staff will be made aware of the importance of good e-Safety practice in the learning environment in order to educate and protect the young people and vulnerable adults in their care.

Staff awareness will be raised about managing their own professional reputation online, including how to demonstrate appropriate online behaviours compatible with their role. Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour will be outlined in the College Acceptable Use Policy and the Safeguarding Guidelines for Staff. Staff will only use official college provided email accounts to communicate with students and parents/carers.

E-Safety awareness will also be part of student induction. Safe and responsible use of the Internet and technology will be reinforced across the curriculum and subject areas. Students will be advised never to give out personal details of any kind which may identify them and / or their location. Particular attention to e-Safety education will be given where students are considered to be vulnerable. The Designated Child Protection Officer will be informed of any e-Safety incidents, and any incidents involving Child Protection or vulnerable adult concerns will then be escalated appropriately. Any material that the College believes is illegal will be reported to appropriate agencies such as Internet Watch Foundation (IWF), Kent Police or CEOP(Child Exploitation & Online Protection Centre)

The College will record e-Safety incidents and manage concerns in accordance with the College disciplinary policies where appropriate.

Designated Staff with Specific Responsibility for Safeguarding Young People and Adults who are or may become vulnerable

Governing Body

The Governing Body has a designated governor with specific responsibilities for the safeguarding of young people and vulnerable adults. The designated governor will receive appropriate Safeguarding Young People and Vulnerable Adult training.

The designated governor is responsible for liaising with the Principal and Senior Staff with lead responsibility over matters regarding safeguarding young people and vulnerable adults', including:

- Ensuring that the College has procedures and policies which are consistent with the area safeguarding young people and vulnerable adult procedures.
- Ensuring that each year the governing body reviews the College policy relating to the safeguarding of young people and vulnerable adults.

The designated Governor is responsible for overseeing the liaison between external agencies such as the police, social services – as defined by the Kent Safeguarding Young People’s Board in connection with allegations against the Principal or the Senior Staff Member with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the designated governor shall receive appropriate training and refresher training every year. The governing Body will receive an annual report from the Independent Chair of the Safeguarding Board.

Senior Management

The College has a designated member of the Senior Management Team to take lead responsibility for safeguarding young people and vulnerable adults’ issues – the Designated Safeguarding Lead (DSL).

The post holder has a key duty regarding the promotion of a safe environment for the young people and adults who are or may become vulnerable learning within the College and for ensuring that relevant staff are aware of their duties and obligations. The post holder will ensure that deficiencies in procedural policy identified by the Kent Safeguarding Young people’s Board (or other agencies) are brought to the attention of the Governing Body at the earliest opportunity.

The post holder has received appropriate training in safeguarding young person and vulnerable adult issues as required by the Kent Safeguarding Young People’s Board, and will receive refresher training every year. In addition, the Lead Safeguarding Officers of campuses will ensure that the Designated Senior Officer is kept up to date with developments in safeguarding young person and vulnerable adult issues on an on-going basis.

Responsibilities of the Senior Safeguarding Officers include:

- Overseeing the referral of cases of suspected abuse or allegations to Social Services and police. Providing advice and support to staff on issues relating to safeguarding young people and vulnerable adults.
- Maintaining an accurate record of any referral, complaint or concern relating to any young person or vulnerable adult (even where such a concern does not lead to a referral) and ensuring that these records are kept securely.
- Ensuring that parents / carers of young people and adults who are or may become vulnerable within the College are aware of the College’s Safeguarding policies and procedures.
- Liaising with the LEA and Kent Safeguarding Young People’s Board and other appropriate agencies such as Police, Social Services, and the Prevent Coordinator etc.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for their pupils.
- Where appropriate liaising with residential care establishments.
- Liaising with employers and training organisations that receive young people and adults who are or may become vulnerable from the College on long term placements to ensure that appropriate safeguards are put in place.

- Ensuring that staff receive basic training in safeguarding young person and vulnerable adults issues and are aware of the College procedures
- Being available to provide advice and support to other staff on issues relating to safeguarding young people and adults who are or may become vulnerable and to listen to young people and adults who are or may become vulnerable studying at the College
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Undertaking training in safeguarding young people and vulnerable adult's issues and inter-agency working, as required by the Kent Safeguarding Children Board (KSCB), and will receive refresher training at least every year.

Safeguarding Officers

The role of the Safeguarding Officers at each campus is to be the first point of contact for an initial safeguarding concern for both students and staff. Safeguarding Officers will refer the concern to Lead Designated Safeguarding Officer in the first instance and then follow up with Social Services and/or the Police if directed to do so.

As part of their role they will meet with students and staff where follow up action is required and in doing so maintain accurate records of such action. Liaison with agencies, parents, schools or other such organizations may necessitate attendance at Case Reviews, Early Intervention and PEPs/CHIN meetings.

Training

All staff involved in Safeguarding Roles are required to undertake Designated Safeguarding Officer training every two years, and refresher training every year thereafter. For all other staff there is a requirement to undertake Safeguarding Awareness training every three years and thereafter, annual updates on safeguarding and Prevent.

Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

A member of staff may suspect that a learner is being abused or is at risk of significant harm. A learner may disclose to a member of staff that s/he is being abused. In these circumstances, the following procedure should be followed:

Assessing Risk

Where a risk is identified when a learner joins or return to the College, a Risk Assessment must be completed prior to enrolling them on a program of study. This assessment must be in the form of a support plan and clearly outline the actions and measures in place to mitigate the risk. Risks may include:

- Medical
- Physical
- Mental Health
- Social, Emotional and Mental Health (SEMH)

Significant concerns

If a member of staff has concerns about a learner and believes that they are being abused, at risk of immediate harm, at risk of being radicalized or are missing, the member of staff should:-

- Speak to the individual about the concerns
- Speak to a designated Safeguarding Officer

Disclosure of Abuse

If a disclosure is made or abuse is suspected, staff should :

- Listen carefully and stay calm
- Question without pressure to be sure that what is being said is properly understood by the member of staff
- Reassure the individual concerned that s/he has done the right thing
- Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it.
- Note the main points promptly and carefully
- Make a note of the date, time and place, what the individual said /did, the questions asked by the member of staff

Staff must not:

- Ask leading questions or put words into the mouth of the disclosing individual
- Investigate concerns/ allegations
- Promise confidentiality

Reporting to designated staff:

Staff should report concerns, suspicions or disclosures of abuse, risk of radicalisation or missing students immediately to one of the on-duty Designated Safeguarding Officers.

Whistleblowing

The College is committed to operating in an ethical and principled way. The college has a Whistleblowing Policy and Procedure to provide employees with a means for raising genuine concerns. Where a member of staff does not feel able to raise an issue with their employer or feels that genuine concerns are not being addressed, other whistleblowing channels are open to them:

- General advice can be found at : [Advice on whistleblowing](#)
- The NSPCC whistleblowing hotline – 0800 028 0285 or email help@nspcc.org.uk

Reporting and dealing with allegations against Staff:

An allegation made against a member of staff might indicate:

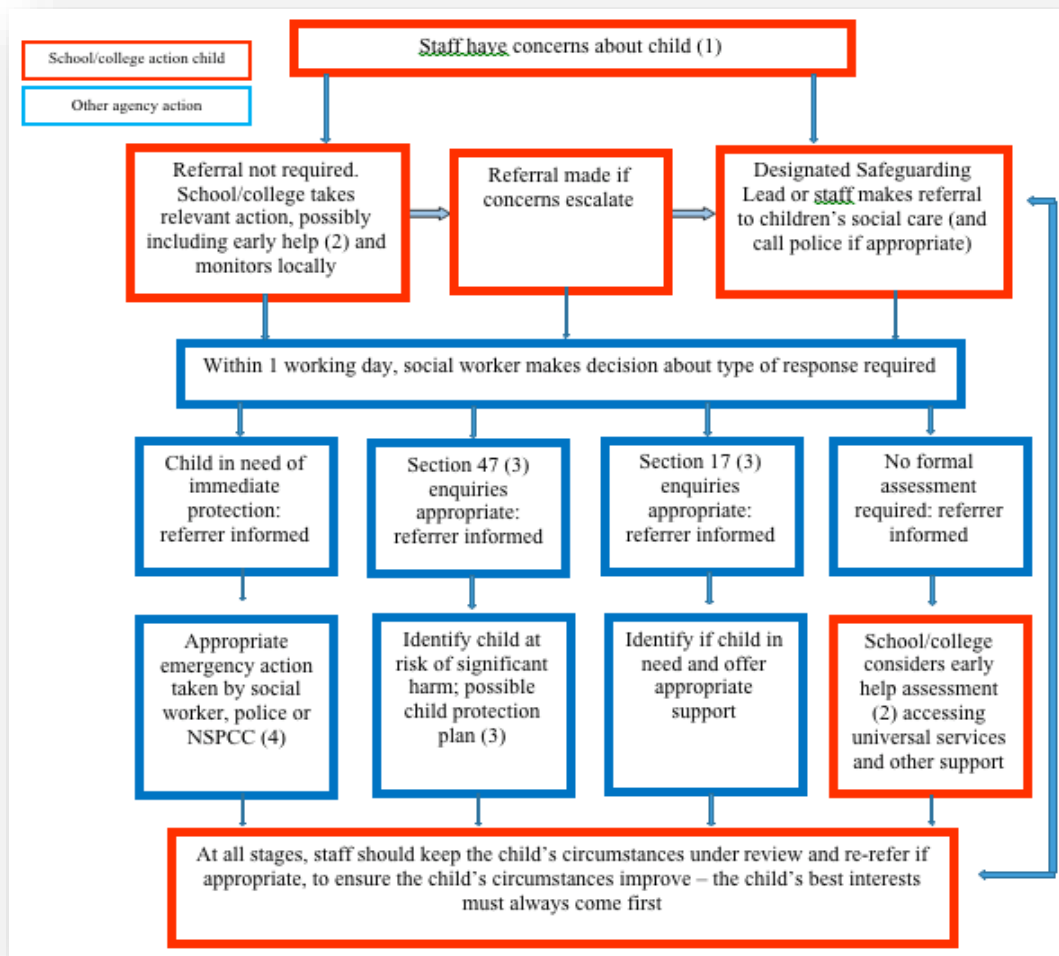
- the possibility that a criminal act against or relating to a young/vulnerable person has been committed
- that there is reasonable cause to believe that a young or vulnerable person is suffering or may suffer significant harm
- that the alleged perpetrator is unsuitable to work with you
- Young /vulnerable people.

The response to such an allegation might lead to:

- police investigation of a possible criminal offence
- enquiries by Children's or Adult Services about whether there is a need for protection or some other action
- the possibility of disciplinary action or dismissal by the employer.

Due to the potential seriousness of such an allegation the case must be immediately referred to the Designated Senior Lead or the Head of HR and must not be discussed with the alleged perpetrator.

Dealing with Disclosure of Abuse and Procedure for Reporting Concerns



This Policy should also be read in conjunction with:

- Nursery Safeguarding Policy
- Health and Safety Policy
- Absconding Procedures