****

**SAFEGUARDING**

**POLICY**

**Policy Statement**

**Reviewed**

October 2022

**Gateway College**

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Better Futures Multi Academy Trust (BFMAT) has accountability and overall responsibility for the safeguarding of Young People and vulnerable Adults across its academies and delegates such responsibilities to Local Governing Boards (LGB). BFMAT assumes a strategic responsibility to ensure compliance at a local level. (Appendix I).

Each Academy will maintain and review an individual Academy Safeguarding Policy, with detailed processes and procedures relevant to each Academies’ local context, ensuring alignment and compliance with the overarching Trust safeguarding policy.

Gateway College, as part of BFMAT, and in compliance with delegated responsibilities, has a statutory and ethical duty to ensure that the College functions with a view to safeguarding and promoting the welfare of young people and vulnerable adults receiving education and training at the College. **All** staff are responsible for safeguarding.

Throughout this policy and related procedures, reference is made to ‘young people’ which means those under the age of 18’. ‘Adults’ are aged over 18 years. A ‘vulnerable person’ includes those who have poor mental health, a learning or physical disability or impairment. They may be looked after children (CLA), students leaving care, those whose first language is not English, teenage parents, young offenders, young carers, they may be homeless, unaccompanied asylum-seekers, living independently and could be estranged from their family. Throughout this document the reference to ‘students’ includes young people and vulnerable adults.

All students have the right to be protected from abuse, exploitation and radicalisation, and the underpinning principals within the college are:

* Children’s welfare should come first.
* If anyone has a concern about a child, they should act immediately following the colleges safeguarding and child protection procedures.
* A [Designated](https://learning.nspcc.org.uk/research-resources/templates/nominated-child-protection-lead-role/) Safeguarding Lead  should always be available to deal with concerns and there should be people who are trained to deputise in their absence.
* [Safe recruitment practices](https://learning.nspcc.org.uk/news/2020/may/recruiting-safely-during-coronavirus/) should be followed, whether your staff and volunteers are working with children online or face-to-face.

**Contextual Safeguarding and Local Circumstances**

The College believes all students have the right to be able to access and enjoy a high quality and rich learning experience that both enhances and increases their life chances, and serves the needs of students from a range of backgrounds including:

* Students from socio-economically deprived areas
* High Needs and SEND students
* CLA (previously called LAC) and Young Carers

Appropriate staff should have information about the specific status of a young person, contact arrangements and levels of delegated authority to the carer. The DSL/ Safeguarding Team should have information about any external agency support that looks after the young person.

The College will ensure that all staff have an effective understanding of the local context and all safeguarding training will acknowledge and reference the local context to ensure that staff are adequately prepared to manage any issues that arise from this.

The College will ensure that staff undertake mandatory and appropriate training and have an enhanced Disclosure and Barring Scheme (DBS) certificate which includes barred list information.

The College will refer concerns that a student might be at risk of significant harm to the appropriate external agencies, regardless of the student’s age, as the agency will determine whether it needs to be passed on to Adult Social Care.

**SEND and High Needs students in College**

The College will monitor, and support SEND students through the Learner Support, LLW and Schools Teams, in order to ensure these students are appropriately identified and supported. The College recognises that:

* SEND and High Needs students may face a higher risk of peer group isolation
* Bullying has a disproportionate impact on SEND and High Needs students
* Difficulties with communication may also adversely impact SEND and High Needs students

**RESPONSIBILITIES:**

**All** staff are responsible for safeguarding students. Staff include all employees of the College, agency staff, volunteers and visitors. We recognise that a whole college approach to safeguarding and child protection should be at the forefront and underpin all relevant aspects of process and policy development across the college. All staff should work with the Designated Safeguarding Lead and their team.

The [nominated DSL](https://learning.nspcc.org.uk/research-resources/templates/nominated-child-protection-lead-role/) and their deputy DSLs are:

* Deputy Principal
* Assistant Principal Students and Progression
* DDSL Student Experience
* DDSL ALS + DSL Support x 1
* DDSL LLW + DSL Support x 1

The Safeguarding Team is responsible for:

* reviewing the Safeguarding Policy annually and making recommendations for changes to the Governing Body
* keeping up to date with legislation and good practice
* the overview of cases within the College
* making appropriate referrals to external agencies
* providing advice and support to other staff on issues relating to safeguarding
* dealing with individual cases, including attending child protection conferences and review meetings, as appropriate
* receiving training to the appropriate level in safeguarding issues and multi-agency working, from Leicester City Council
* Liaising with multi-agencies’ such as the LADO

If a concern about a student is raised and a member of the safeguarding team is unavailable the Deputy Principal should be contacted.

Contact for the LADO:

**Leicester City Council LADO based within the Safeguarding Unit**: 0116 454 2440

**Leicestershire County Council LADO**: 0116 305 7597 & 0116 305 4532

**LADO email for Referrals and New Enquiries:** **CFS-LADO@leics.gov.uk**

**Training**

All staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training will be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively

**Safer recruitment**

The college policies and procedures will reinforce our ongoing commitment to ensure that only suitable people will be recruited to work or volunteer with children, whether they are working online or face-to-face. We will do this by:

* shortlisting
* interviews
* vetting and barring checks
* induction and training
* supervision and support.

A curriculum vitae (CV) should only be accepted alongside a full application form. CVs on their own will not contain all the information required to support safer recruitment.

We will also consider conducting online searches as part of our due diligence during the recruitment process. The stated aim of this is that it “may help identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with the applicant at interview.”

**Management of Safeguarding: Local Governing Body (LGB)**

The LGB and Designated Safeguarding Governor(s) have a strategic leadership responsibility for safeguarding arrangements. They must ensure policies, procedures and training are effective and comply with the law. The Principal should ensure that policies and procedures, adopted by the LGB (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff. The LGB will have a senior board level lead to take leadership responsibility for safeguarding arrangements.

All Governors should receive safeguarding training at the point of induction, to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated. The Designated Governor will also receive role appropriate training as recommended the Principal/ and or DSL.

Governors have specific responsibility for the management and oversight of settings, therefore there is a statutory duty that be fully trained in safeguarding.

The Designated Governor is responsible for liaising with the Designated Safeguarding Lead to ensure that the:

* College has an effective policy and procedures that are consistent with Leicester City Council Safeguarding in Education procedures.
* Governing Body considers the College policy on safeguarding each year.
* Governing Body receives 3 x yearly reports informing them of how the College and its staff have complied with the policy.

The Designated Governor is responsible for overseeing the liaison between agencies such as the police and Children & Young People’s Service, in connection with allegations against the Designated Safeguarding Lead. This will not involve undertaking an investigation but will ensure good communication between the parties and providing information to assist enquiries.

In line with the statutory guidance Keeping Children Safe in Education (2022) the Chair of Governors and the Governing Body lead for safeguarding will be the first point of contact for any concerns raised about the Principal. Who will then notify the LADO.

**Safeguarding Duty Officer Rota**

The DP/ AP DSL will be main point of contact for holiday periods, and a DSL will be assigned as point of contact for any external activities and residential trips.

**Dealing with Disclosures**

1. It is the professional responsibility of all staff to observe and report any safeguarding concern. If staff have a concern that a student is at risk of abuse, harm or has been abused or is at risk of radicalisation they must:
2. immediately report the matter to a member of the Safeguarding Team.
3. keep the matter confidential, only informing people on a need to know basis.
4. write a dated note of what has been noticed, said or done, and give to a member of the Safeguarding Team for further action, as required; tell the student what action has been taken, if they have disclosed directly to you.
5. Record keeping should be clear and comprehensive summarising the concern, details of how the concern was followed up and resolved, and include a note of any action taken, decisions reached and the outcome.
6. Initials or abbreviations of a persons name should not be used and full name should be supplied.
7. It is **not** the member of staff’s responsibility to investigate, therefore the student should not be questioned. It will be the duty of a member of the Safeguarding Team to gather enough information to decide whether to contact the Children & Young People’s Service or the police.
8. The Children & Young People’s Service and the police have a duty to investigate cases of suspected abuse. Those who work in education have a duty to co-operate with any such investigation. This might involve providing information, monitoring the student or, in some cases, attending a child protection conference or strategy meeting.
9. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.’

**STUDENT ALLEGATIONS**

**Allegations of a student abusing another student (child on Child)**

* If a student has been accused of being the perpetrator of a safeguarding incident, a member of the Safeguarding Team must be contacted immediately. They will contact the Children & Young People’s Service and/or the police as it may be a criminal act.
* Both sets of parents will be informed, depending on the severity of the allegation, and it is likely that the accused student will be suspended immediately.
* If the accused student is not suspended, a risk assessment will need to take place immediately so that a judgement can be made as to that individual’s range of activity within the College, prior to the outcome of any investigation being known.
* If it is clear that a criminal act has not been perpetrated, then the procedure outlined in ‘Dealing with disclosures of abuse’ should be followed.

**Leading and Investigating Allegations staff**

The Deputy Principal and HR Manager will take the initial lead on all staff based Safeguarding concerns, issues, and allegations. The DSL will assess, determine and delegate whom the correct person will be to move forward with the initial concern, issue or allegation based on the application of the appropriate policy, i.e., staff disciplinary policy, behaviour for learning policy etc.

**Low Level Concerns**

Low level concerns Information has been updated in KCSIE. The definition in Appendix I contains a clear procedure for confidentially sharing concerns. Any concerns identified should be initially shared with the DP Designated Safeguarding Lead for Staff (DSL) or directly with the Principal. The Principal should ultimately be informed of all low-level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with the DP DSL for Staff.

Guidance also clarifies that low level concerns which are shared about supply staff and contractors should be notified to their employers; and schools and colleges should consult with their LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

**Allegations without foundation**

False allegations against college staff may be indicative of problems of abuse elsewhere. However, all allegations of abuse by staff should be taken seriously and discussed straightaway with the DSL who will normally consult the Local Authority Designated Officer (LADO) at the Safeguarding Unit. If it is agreed that the allegation is demonstrably false, a record should nonetheless be kept, and consideration given to a referral to Children & Young People’s Service or the Leicester Safeguarding Children Board.

The Deputy Principal and HR Manager will:

* inform the member of staff against whom the allegation was made, orally and in writing, that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
* inform the parents/carers of the alleged victim, as appropriate, of the outcomes of the investigation.
* where the allegation was made by a student, other than the alleged victim, consideration should be given to informing the parents/carers of that student.
* prepare a summary report for the Safeguarding Records, outlining the:
* allegation
* investigative process
* conclusions, with reasons
* action taken, if appropriate.

**Allegations against a member of staff**

* Staff may have safeguarding allegations made against them. The College recognises that such an allegation may be made for a variety of reasons, the facts of which may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and ensure that investigations are thorough and not subject to delay.
* The College recognises its statutory duty to safeguard and promote the welfare of its students which is of paramount importance. It also acknowledges that hasty or ill-informed decisions in connection with a member of staff can irreparably damage the individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with the greatest sensitivity and will act in a careful, measured and discreet manner.
* A member of staff who receives an allegation about another member of staff should follow the procedure in ‘Dealing with disclosures of abuse’.
* The allegation should be reported immediately to the Deputy Principal/ HR Manager, unless the Deputy Principal is the person against whom the allegation is made, in which case the report should be made to the Principal or Designated Governor. If the Deputy Principal is not available, then it should be reported to a member of the SLT who will follow the procedure as outlined below. The appropriate lead will:
* obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Deputy Principal on receipt and stored securely in the Human Resource office
* record information about times, dates, locations and names of potential witnesses
* always seek advice straightaway from the Local Authority Designated Officer.

### Record keeping

### It is important that documents relating to any allegation or investigation are kept in a secure place, together with a written record of the outcome. It is essential that the college SLT, and Safeguarding team are clear what information child protection records should contain. Records should include:

### details of how the concern was followed up and resolved

### a note of any action taken, decisions reached and the outcome.

### a clear and comprehensive summary of the concern

* All concerns discussions and decisions made and the reasons for those decisions should be recorded in writing.
* If disciplinary action is taken against a student or member of staff the details should be retained on the individual’s confidential file.
* If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College’s statutory duty to inform the Secretary of State for Education.

This will also help if/when responding to any complaints about the way a case has been handled by the school or college.

**Initial assessment**

* The DP, or member of SLT, should make an initial assessment of the allegation, consulting with other members of the SLT as appropriate and external agencies e.g. the Leicester Safeguarding Children Board, as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter should be reported **immediately** to the Local Authority Designated Officer at the Children & Young People’s Service.
* It is important that the DP and SLT, does not investigate the allegation. The initial assessment should be based on the information received and a decision should be made as to whether or not the allegation warrants further investigation.
* If the initial assessment reveals that there has been inappropriate behaviour or poor practice by the member of staff that is neither a crime, nor likely to cause significant harm to the student, the matter should be addressed in accordance with the College disciplinary procedure.

**External enquiries**

Occasionally enquiries are made by external agencies about students or staff. These should be referred to a member of the Safeguarding Team for students and to DP for staff. The correct documentation should be received prior to revealing any information to ensure adherence to data protection protocols. However, where the request or enquiry relates to a matter of child protection, relevant information should be provided by College managers without delay.

* Safeguarding enquiries by Children & Young People’s Service or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct the College to act in a particular manner, however, the College should assist the agencies with their enquiries.
* The College will hold its internal enquiries in abeyance while the formal police or Children & Young People’s Service investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will follow the College’s disciplinary procedures.

**The investigation**

The investigation should be conducted in accordance with the existing staff disciplinary procedures. It will be informed by the outcome of any enquiries made by the police or Children’s Social Care.

* The member of staff should be informed of the allegation against them and their entitlement to be accompanied by a trade union representative, colleague or friend.
* Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
* The student making the allegation and/or their parents/carers should be informed, as appropriate, of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff, if suspended. A student aged under 18 years should be accompanied by a responsible adult.
* The DP should consider what information should be made available to the College, if any.
* Subject to objections from the police or other investigating agencies, the DP will:
* inform the student alleging that the investigation is taking place and what the likely process will involve.
* ensure that the parents/carers of the student, if aged under 18, making the allegation have been informed that it has been made and what the likely process will involve. If the student is aged 18 and over, we are not obliged to inform parents, but this is on a case by case basis.
* inform the member of staff against whom the allegation was made that the investigation is taking place and what the likely process will involve.
* inform the Designated Governor of the allegation and the investigation.
* keep a written record of the action taken in connection with the allegation.

**Suspension of staff**

Throughout any proceedings, staff should be advised to seek independent advice via, for example, a trade union.

* + Suspension should not be automatic. In respect of staff, other than the Principal, suspension can only be carried out by the Principal, or a delegated authority. In respect of the Principal, suspension can only be carried out by the Chair of Governors or in their absence, the Vice Chair. If the DSL is other than the Principal, it is essential that pending suspension the DSL notifies the Principal of intention.
	+ Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act, and will be on full pay. Consideration should be given to alternatives e.g. change of, or withdrawal from, specified duties.
	+ Suspension should only occur for a good reason, for example where:
* a young person is at risk.
* the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
* it is necessary for the good and efficient conduct of the investigation.

Depending on the nature of the allegation, prior to making the decision to suspend, the Principal or Chair of Governors, or their delegated authorities, should meet the member of staff. If there is a need for an external investigation, for example, by the police or Local Authority Designated Officer, there should be prior consultation with the agency.

It should be made clear that the meeting is not a formal disciplinary hearing, but solely for raising a serious matter that has led to suspension pending the outcome of an investigation. The likely process of the investigation should be outlined with an approximate timescale.

If the Principal or Chair of Governors considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, based on the allegation, should be despatched as soon as possible, ideally within one working day.

Where a member of staff is suspended, the Principal or Chair of Governors should address the following issues:

* the Chair of Governors and Designated Governor should be informed of the suspension in writing, which includes electronic communication.
* where the Principal has been suspended, the Chair of Governors will need to take action to address the leadership of the College.
* as appropriate, the parents/carers of the student making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension.
* senior staff who need to know of the reason for the suspension should be informed.
* depending on the nature of the allegation, the Principal should consider, with the Designated Governor, whether a statement should be made to staff, students and/or parents/carers, taking due regard of the need to avoid unwelcome publicity.
* The Principal will consider carefully and review the decisions as to who is informed of the suspension and investigation including external investigating and regulatory authorities such as the Leicester Safeguarding Children Board, police, Children & Young People’s Service, Local Authority Designated Officer and the Department for Education.
* The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.
* If a member of staff has been dismissed or removed due to safeguarding concerns, or would have been, had they not resigned, a referral should be made to the Disclosure and Barring Service. It is advisable that the LADO should be contacted in advance of this to seek professional, objective advice.

**Monitoring effectiveness**

* Where an allegation has been made against a member of staff, the Principal, Designated Governor and other members of staff involved in the investigation, should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of College procedures.
* An anonymised annual report will be available for presentation to the LGB at its first meeting in the subsequent year.
* The Safeguarding Policy will be reviewed and updated annually by the Safeguarding Team and approved by the Governing Body.
* A yearly Safeguarding audit will be implemented to assess all internal record keeping.

**Anonymous Reporting**

If members of the public, staff and students are worried, or have fears regarding an individual that studies or works at the college, they are able to report safeguarding concerns anonymously through the Gateway College email helpline - help@gateway.ac.uk. This is shown on the college website, on the Safeguarding noticeboard, and included in the parent and student handbook.

**Appendix I**

**Abuse**

Someone may abuse a young person by inflicting harm or by failing to act to prevent harm. Abuse may occur in a family, community, institution or via the internet and be perpetrated by other young people or adults.

**Discriminatory, Domestic and Violent Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

**Cyber-bullying**

Cyber-bullying is defined as ‘the use of information and communications technology, particularly mobile telephones and the internet to deliberately upset someone else.’ It can be an extension of face-to-face bullying with technology providing another mechanism for harassing the target. It differs from other forms of bullying because of its invasion of the target’s home and personal space, the difficulty in controlling messages that have been electronically generated and circulated, the potential size of the audience, the bully’s perception of anonymity, the potential feeling of isolation of the target.

**Controlling behaviour & Coercive behaviour**

Controlling behaviouris a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviouris an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

**Emotional abuse**

Emotional abuse is the persistent emotional ill-treatment of a young person to cause severe and persistent adverse effects on their emotional development. It may involve:

* conveying to young people that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.
* not giving them an opportunity to express their views, deliberately silencing them or making fun of what they say or how they communicate.
* age or developmentally inappropriate expectations being imposed on a young person, including over-protection.
* witnessing the ill treatment of another person.
* bullying, including cyber-bullying, causing young people to frequently feel frightened or in danger.
* the corruption, exploitation or radicalisation of young people.

Some level of emotional abuse is involved in all types of ill-treatment, though it may occur alone.

**Faith abuse**

Certain kinds of abuse can be linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through young people or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of young people is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in young people to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where young people have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

**Female genital mutilation (FGM)**

Female genital mutilation (FGM) is a collective term for procedures which include the removal of part or all the external female genitalia for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and later in life. The procedure is typically performed on girls aged between 4 and 13 years old, but in some cases, it is performed on new-born infants or on young women before marriage or pregnancy.

**Financial abuse**

This includes theft, fraud, exploitation, scams, the misuse of possessions and pressure applied in relation to financial transactions.

**Forced marriage**

Forced marriage is different from, and should not be confused with, an arranged marriage. It is where a person does not (or in case of young people with learning disabilities cannot) consent to marriage which is an abuse and a criminal offence. It is recognised as a form of violence against women and men, domestic/child abuse and an abuse of human rights.

The pressure put on people to marry against their will can be physical, including threats, actual physical violence and sexual violence, or emotional and psychological, for example, when someone is made to feel like they are bringing shame on their family. Financial abuse, taking wages or not giving any money, can also be a factor.

If there is a suspicion that a student is being placed in a potential forced marriage situation it must be referred to a member of the Safeguarding Team immediately.

**Neglect**

Neglect is the persistent failure to meet a young person’s physical and psychological needs, likely to result in the serious impairment of their health or development. It may involve a failure to:

* provide adequate food, shelter and clothing (basic needs)
* protect a young person from physical or emotional harm or danger
* ensure access to appropriate medical care or treatment
* to provide basic emotional needs
* ensure the provision of a satisfactory education.

**Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating and any other action that could cause physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person known as fabricated or induced illness.

**Radicalisation**

Radicalisation is a process by which an individual or group adopts increasingly extreme political, social, or religious ideals and aspirations that either reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. The government’s Prevent Strategy works with individuals and organisations to prevent ‘radicalised’ individuals from being drawn into committing acts of terrorism.

**Sexting**

It is the sharing of inappropriate or sexually explicit images on-line or through mobile telephones; it can include written messages. Most young people see it as flirting and a normal part of life. There is no control over the images and how they might continue to be shared. It is not harmless as it can make the young person vulnerable to blackmail, bullying or harm. It is illegal.

**Sexual abuse**

Forcing or enticing a young person to take part in sexual activities, whether the young person is aware of what is happening. The activities may involve:

* physical contact including penetrative or non-penetrative acts.
* non-contact activities, such as involving young people in looking at, or in the production of, pornographic material or watching sexual activities, or in inappropriate discussion on sexual matters, grooming in preparation for abuse, including via the internet.
* encouraging young people to behave in sexually inappropriate ways, including involvement in prostitution and trafficking.
* **Child Sexual Exploitation** is a form of sexual abuse. Victims are forced into taking part in a sexual act as part of a seemingly consensual relationship or in return for attention, gifts, money, alcohol, drugs or somewhere to stay. The young person sees the abuser as a friend, girl or boyfriend; there is an imbalance of power in the relationship. The abuser creates a form of dependency between themselves and the young person often with verbal or physical threats. They try to isolate them from family and friends so that they can control and manipulate them.Sexual exploitation can involve carrying degrees of coercion, intimidation or enticement including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming.

**Substance abuse**

Substance abuse refers to the abuse of any drug which includes alcohol, illegal drugs and medicines, psychoactive substances (legal highs) and volatile substances.

**Child Criminal and Sexual Exploitation and Supporting victims of abuse**

Support will be given to all staff in understanding and recognising child criminal and sexual exploitation. The vulnerability of children involved in criminal exploitation is not always recognised by adults and professionals and indicators of exploitation are different for boys and girls. Child sexual exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people can experience child sexual exploitation. It is essential that all staff feel confident and able to reassure victims of abuse that they are being taken seriously and will be supported and referred to appropriate agencies.

**CLA (Looked After Children)**

The most common reason for a young person being looked after is abuse and/or neglect. Appropriate staff should have information about the looked after status of a young person, contact arrangements and levels of delegated authority to the carer. The DSL and Deputies should have information about their social worker and the virtual school head in the authority that looks after the young person, and should work closely to ensure the young person is fully supported.

**Children Missing from Education and Recording Non-attendance**

Students who have not attended for a period of 3 days, without contact with the College, should be reported to a DSL. Schools team, teaching staff and support staff should check on a student’s welfare if they don’t arrive at college or attend an appointment (physically, by phone or online). This should include passing on to the safeguarding team who will follow up with parents, carers, the local authority and/or children’s social care as appropriate.

As per statutory guidance ‘Safe and Well Checks’can be used when a learner does not present at college and the learner and/ or no relevant adult can be contacted, after attempting communication for a period of 3 days. On day 4, appropriate Designated Safeguarding Lead and one other can make a visit to the family home, at their discretion, if there has already been a safeguarding risk identified. Following this statutory guidance should be followed with regards to contacting the appropriate authorities to raise a concern e.g. Referral, Assessment & Intervention Service

**Keeping Children Safe in Education (KCSIE) 2020 (Sept 2022) Updates**

**Online Safety**

The guidance has been updated to reflect the latest guidance on sharing nude and semi-nude images and videos published by the UK Council for Internet Safety

All staff will be trained to be aware of and sensitive to this area of activity and the College will ensure that suitable IT policies are in place to address access and monitoring of social media activity. **It is expressly forbidden for staff to either 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 to be in breach of this will be liable to disciplinary action.

**Child on Child Abuse**

Staff should understand the importance of challenging inappropriate behaviour between children and young people. Staff should also recognise that downplaying certain behaviours as “just banter” or “boys being boys” can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalises abuse. Staff should understand that even if there are no reports of Child on Child abuse in their school, this doesn’t mean it is not happening. If staff have any concerns about Child on Child abuse, they should speak to the designated safeguarding lead (DSL) or a deputy. A statement making it clear that there is a zero-tolerance approach to Child on Child abuse • the systems in place for children to report abuse • a recognition that even if there are no reported cases of Child on Child abuse, this doesn’t mean it’s not happening within the school or college.

### Mental health

The phrase ‘mental health problem’ is an umbrella term to describe the full range of diagnosable mental illnesses and disorders, including personality disorders. Mental health problems may be common, may be acute or longer lasting and may vary in severity. They manifest themselves in different ways at different ages and may, for example in young people, present as behavioural problems. Some people object to the use of terms such as ‘mental health problems’ on the grounds that they can be viewed as medical ways of thinking and feeling and do not acknowledge the many factors that can prevent people from reaching their potential. The College recognises these concerns and the stigma attached to mental ill health; however, there is no universally acceptable terminology that can be used as an alternative. The impact can lead to anxiety, depression, self-harm and hospitalisation.

Staff should recognise that some young people’s mental health may have suffered more during the pandemic and additional mental health and welfare strategies have been implemented. These include wellbeing tutorials and workshops, additional counselling sessions, the use of Ed. Psych services, 1-1 meetings with identified vulnerable learners – both high- and low-level anxiety, timeout cards are to allow learners with anxiety issues to step out from the classroom, and the use of identified wellbeing/ quiet areas.  The pastoral team are working to highlight and cascade mental health tutorials to all students to encourage them to reach out and seek help if needed. All staff will undertake training to be able to spot signs and signals of poor mental health.

### Low Level Concerns

For the purposes of this policy, a **low-level concern** is defined as any concern had about an adult’s behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Appropriate and inappropriate behaviour subsection of this policy.

Low-level concerns are differentiated from concerns that can cause **harm**. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

* Behaved in a way that has harmed a child or may have harmed a child.
* Possibly committed a criminal offence against, or related to, a child.
* Behaved towards a child in a way that indicates they may pose a risk of harm to children.
* Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the college understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The college will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

**Appropriate and inappropriate behaviour**

As with all safeguarding information and updates, the college will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Low level concerns can be identified as:

**Being overly friendly with learners** – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member’s personal life or are of a sexual nature.

**Having favourites** – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.

Humiliating pupils

**Taking photographs of children on their personal mobile phones or devices**.

**Engaging with a child on a one-to-one basis in a secluded area or behind a closed door**.

**Using inappropriate, sexualised, intimidating or offensive language**.

Staff should be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported correct this behaviour in line with the Staff Code of Conduct. The DSL for Staff and/or Principal will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

Staff will address any questions they have regarding safeguarding to the DSL for Staff. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. students are not treated as friends and an appropriate professional distance is maintained by staff.

## **Reporting Concerns**

Staff members will report their concerns to the Principal or DP DSL for Staff verbally. When submitting concerns, staff will take care to ensure that they observe confidentiality and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the college will endeavour to respect this as far as possible. The college cannot, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Principal, it should be reported to the chair of governors.

## **Evaluating Concerns**

Where the Principal/ DP DSL for Staff is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, they will discuss the concern and will seek advice from the Local Area Designated Officer (LADO) where there is any doubt about how seriously to take the concern.

To evaluate a concern, the Principal and DP DSL for Staff

* Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
* Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
* Consult with, and seek advice from the LADO
* Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
* Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

**Where the concern is low-level**

Where the Principal/ DP DSL for Staff determines that a concern is low-level, the college will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

* The Principal and/ or DP DSL for Staff will hold a meeting with the individual about whom the concern was reported, during which they will:
	+ Talk to the individual in a non-accusatory and sympathetic manner.
	+ Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
	+ Clearly state what about their behaviour was inappropriate and problematic.
	+ Discuss the reasons for the behaviour with the individual.
	+ Inform the individual clearly what about their behaviour needs to change.
	+ Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
	+ Allow the individual the opportunity to respond to the concern in their own words.

The Principal and/ or DP DSL for Staff will ask the individual to re-read the Staff Code of Conduct, will consider whether the individual should receive guidance, supervision or any further training, and where considered appropriate in the circumstances, will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual’s behaviour and any other support measures implemented to ensure the staff member’s behaviour improves.

* Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
* Where any pupil or other individual has been made to feel uncomfortable by the individual’s behaviour, they will be offered pastoral support, where appropriate.

The Principal and/ or DP DSL for Staff will ensure that all details of the low-level concern, including any resultant actions taken, are recorded, and securely stored in line with the HRI Policy and the GDPR Policy. They will ensure, via HR that these records are kept organised and up-to-date, and that it is easy to refer to them if any other concerns are reported about the same individual.

It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention.

## **Record keeping**

As in all Safeguarding cases relating to staff behaviours, HR will retain all records of low-level concerns, including those that were found to be unfounded. The Principal and/ or DP DSL for Staff will ensure that all records include the most accurate and up-to-date information and will store them via HR department.

The Principal and/ or DP DSL for Staff will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The headteacher will keep records of these reviews, and where any concerning patterns of behaviour have been identified with regard to a member of staff, the headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. Records will be kept confidential and securely destroyed **after the staff member to whom the concerns pertain has left the College**.

The College will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

**Learning Lessons**

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

### Equality legislation

### The significance of the role of the Equality Act 2010 to safeguarding is recognised within the Safeguarding policy. The college considers each Safeguarding case on an individual basis, to ensure that it does not:

### • unlawfully discriminate against pupils because of their protected characteristics

### • considers how it is supporting pupils with protected characteristics

### • takes positive action, where proportionate, to deal with the disadvantages these pupils face.

### The college will also look at the implications of the Public Sector Equality Duty (PSED) for education settings, with a need to be conscious that pupils with protected characteristics may be more at risk of harm.

**Appendix Ia**

**Insert Website link**

**Appendix II**

**SAFEGUARDING TEAM**

|  |  |  |  |
| --- | --- | --- | --- |
| **Role** | **Contact Number** | **Name** | **Email** |
| Designated Safeguarding Lead - Staff | 07442-503092 | Nicola Martin - Safeguarding | nmartin@gateway.ac.uk |
| Designated Safeguarding Lead - Students | 07944-856852 | Sam Keen - Safeguarding | skeen@gateway.ac.uk |
| Deputy Designated Safeguarding Leads | 07442-503089 | Helen Herries - Safeguarding | hherries@gateway.ac.uk |
| Deputy Designated Safeguarding Leads | 07436-530542 | Marcus Benjamin – Safeguarding | mbenjamin@gateway.ac.uk |
| Deputy Designated Safeguarding Leads | 07944-856849 | Kerry Reeve - Safeguarding | kreeve@gateway.ac.uk |
| Deputy Designated Safeguarding Leads | 07399 904775 | Hannah Bishop - Safeguarding | hbishop@gateway.ac.uk |

**If a member of the Safeguarding Team is not available, contact a member of the SLT:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Principal** | James Bagley | Via Teams extension  | A206 |
| **Deputy Principal (DSL)** | Nicola Martin | Via Teams extension  | A207 |
| **Assistant Principal Students and Progression (DSL)** | Sam Keen  | Via Teams extension  | A209 |
| **Assistant Principal TLA** | Laura Rawson | Via Teams extension  | A209 |
| **Assistant Principal Quality** | Josette Moss | Via Teams extension  | A209 |

**Appendix III**

**PROCEDURE FOR DEALING WITH AN INCIDENT THAT ARISES DURING AN EDUCATIONAL VISIT**

If the alleged abuser and person abused are both members of the educational visit away from the College site, the primary consideration is the initial protection of the student alleging abuse. If the allegation is against a member of staff on the visit, that person should leave the group as a neutral act. Immediate action to ensure this should be taken by the member of staff in charge of the visit or the nominated deputy.

It is also important to note that all offences need to be reported. If an offence is thought to have been committed, staff should contact local police in the first instance, especially when the alleged abuser is a member of the local population.

Careful consideration should be given to how best to inform the student’s parents/carers, if they are under 18 years or a vulnerable adult, and whether any or all of the students should be returned home. This will depend on the seriousness of the incident, the effect on the students and the level of risk. The Designated Safeguarding Lead, a member of the Safeguarding Team, Senior Leadership Team or the Duty Principal, should be consulted for advice; the Designated Safeguarding Lead should be informed as soon as possible. Details of the event should be noted, signed and dated. A copy should be passed to the Designated Safeguarding Lead as soon as feasible.

When the allegation disclosed on the educational visit away from the College relates to abuse of the student at their home, the standard procedure should be followed. Staff should notify the Designated Safeguarding Lead at the earliest opportunity.

**SEX OFFENDERS**

Whilst the College has a positive view of the rehabilitation of offenders, the safeguarding of students must take a greater priority. If any member of staff or student has concerns that a sex offender may be accessing the College, the information must be passed to the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead will contact external agencies to verify any accusation and decide on the action to be taken.

Awareness of a previous safeguarding concern or disclosure about a potential student would lead to a risk assessment by the Safeguarding Team and a final decision by the Designated Safeguarding Lead.

**Appendix IV**

**GENERAL ADVICE**

Staff in education are well placed to notice possible signs of students who are causing safeguarding concerns, because of their regular contact. Signs of safeguarding incidents may be:

1. obvious and sudden evidence of injury
2. part of a picture over a long period, perhaps including:
3. behaviour which is unusual for the student

 \* academic under-performance or lack of interest

 \* isolation or introversion

Alternatively, concern may be raised when

1. a student reveals ill-treatment to themselves, a sibling or friend
2. an adult claims that a student has been mistreated

In all these cases there are things you should do:

1. treat the matter seriously and reassure the student if necessary
2. react to what the student tells you with belief
3. make it clear that you will have to inform others for the student’s own sake
4. tell only those who need to know
5. seek advice from a member of the Safeguarding Team
6. keep a careful watch on the student
7. make an accurate dated record of what you have noticed, what has happened and what you have done. You may need to justify a decision later to refer on
* if a student has made a disclosure to you, tell the student what action you will take

There are things you should not do:

* promise to keep the matter secret
* contact parents: this is the job of a member of the Safeguarding Team, Executive Team or the Children & Young People’s Service
* interrogate students or ask leading questions
* speak with anyone about whom allegations are made, even if they are about a colleague or another adult: this is the Principal’s responsibility
* keep a copy of any confidential notes

If there are circumstances in which you feel you cannot refer to the Principal, you have the right as an employee to contact the Designated Governor, and as a citizen to contact the Children & Young People’s Service yourself. If in doubt about any aspect of safeguarding, seek advice from any of the following:

* + the Principal
	+ a member of the Safeguarding Team
	+ a member of SLT
	+ the Designated Governor

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