

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

*This College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment*

**Date approved by College Executive:**

**Date approved by the Trustees:**

**Status:** Statutory

**Review period:** Annual

**Next review date:** June 2020

**Designated Safeguarding Lead:** Laura Cook and Helena Clarke

**Deputy Designated Safeguarding Leads:** Anne Jackman, Ellie MacDonald, Gina Marshall, Sophie Mngoma and Andy Pett

**Safeguarding Trustee:** Elizabeth Cussans

**Principal:** Brett Freeman

**Chair of Trustees:** Gaynor Mather

## **1.0 Introduction**

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: “Working Together to Safeguard Children” 2018, Revised Safeguarding Statutory Guidance 2 “Framework for the Assessment of Children in Need and their Families” 2000, “What to do if You are Worried a Child is Being Abused” 2015. The guidance reflects, both “Keeping Children Safe in Education” 2018, and Surrey Safeguarding Children Board (SSCB) Child Protection Procedures.
- The Trustees take their responsibility seriously under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those children who are suffering harm. The College aims to create and maintain a safe environment for young people and similarly for students who are over eighteen, staff, volunteers, and visitors. The College is committed to working with all other agencies.
- We recognise that all adults, including temporary staff, volunteers and trustees, have a full and active part to play in protecting our students from harm, and that the young person’s welfare is our paramount concern.
- All staff believe that our College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child/ young person.
- Woking College recognises that the welfare of children and vulnerable adults is paramount and takes seriously its responsibility to safeguard and promote the welfare of the students in its care.

## **2.0 Coverage**

- The policy applies to all trustees, staff, agency workers, contractors, visitors and volunteers working in the college.

## **3.0 Definitions**

For the purposes of the Safeguarding Policy:

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early Help means the providing support as soon as additional needs and support emerge at any point in a child's life.

- A 'child or young person' means any person under the age of 18 (i.e. those who have not yet reached their 18th birthday).
- A 'vulnerable adult' means any person " who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
- 'Staff' means all employees, full-time and fractional, and all agency, franchise, contract and volunteer staff working for the College.
- 'Parents' refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- 'Social Care' refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.
- 'MASH' refers to the Surrey Multi Agency Safeguarding Hub.

## **4.0 Principle, Values and Aims of the Safeguarding Policy**

The welfare of the child is paramount.

Maintain an attitude of "It could happen here"

Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

All children have a right to be protected from harm and abuse.

All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst the school will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

The aims of the policy are:-

- To promote an environment that is safe, where staff and students treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff of the need to safeguard young people and vulnerable adults and of their rights and responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of supporting young people and vulnerable adults known or thought to be at risk of harm, and ensure we, the College, contribute to assessments of need and support packages for those students.
- To ensure that relevant information about a young person or vulnerable adult at risk of harm is disseminated to appropriate staff within the College on a 'need to know' basis.
- To emphasise the need for good levels of communication between all members of staff
- To develop a structured College Procedure which will be followed by all members of the College staff in cases of suspected abuse.
- To support the development of effective working relationships with other agencies, particularly the Police and Children's Services.
- To ensure that all relevant policies and procedures within the College are linked to, and comply with, the Woking College Safeguarding Policy and Procedures.
- To support young people's and vulnerable adults' development in ways that will foster security, confidence and independence and to promote this through the curriculum, the pastoral programme and the Student Council.
- To ensure that all staff working within our young people who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory Disclosure & Barring Service (DBS) check (according to guidance) and a central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in February 2015.

## **5.0 Prevention**

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

The College community will therefore:

- Work to establish and maintain an ethos where young people feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with young people e.g. through safety questionnaires, qualitative feedback participation, focus groups and in tutorials etc.
- Ensure that all young people know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including Pastoral and Citizenship Education, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include topics such as anti-bullying and cyber bullying, e-safety, health education and preventing radicalisation.
- Ensure all staff are aware of college guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Ensure that Statements about or allegations of abuse or neglect made by young people must be taken seriously.

Woking College is further committed to applying these safeguarding principles to vulnerable adults.

## **6.0 Safe College, Safe Staff**

All trustees understand and fulfil their responsibilities, namely to ensure that:

- There is a Safeguarding and Child Protection policy together with a Staff Code of Conduct policy.
- The College operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training and disqualification by association regulations.
- The College has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- A senior leader has Lead Designated Safeguarding Lead (DSL) responsibility.
- On appointment, the DSLs undertake interagency training (SSCB Modules 1&2) and also undertake DSL 'New to Role' and the 'Update' Course every two years.
- All other staff have Safeguarding training updated as appropriate.
- Any weaknesses in Child Protection are remedied immediately.
- A trustee, usually the Chair, is nominated to liaise with the Local Authority (LA) on Child Protection issues and in the event of an allegation of abuse made against the Principal.
- Child Protection policies and procedures are reviewed annually and that the Safeguarding policy is available on the school website or by other means

- The Designated Safeguarding Lead (DSL), the Assistant Principal, **Laura Cook**, is a member of the Executive Leadership Team and will take lead responsibility for child and vulnerable adult protection and receives appropriate training and support and adequate resources to carry out this role.
- The College will, in addition, have a Safeguarding Team who will work under the supervision of the Designated Safeguarding Leads and will also lead on the implementation of this policy in the areas of the College for which they have responsibility. The Safeguarding Team will include the Colleges pastoral managers:-

#### Safeguarding Team

- The Assistant Principal- **Laura Cook (DSL)**
- The Director of Support for Learning – **Helena Clarke (DSL)**
- The Head of Year 12 – **Sophie Mngoma (DDSL)**
- The Head of Year 12 – **Andy Pett (DDSL)**
- The Head of Year 13 - **Anne Jackman (DDSL)**
- The Head of Year 13 – **Ellie MacDonald (DDSL)**
- The Head of Year (Level 2)- **Gina Marshall (DDSL)**
- Learning Support Assistant (Safeguarding) **Laura Allum**
- Learning Support Assistant (Safeguarding) **Tara Tarrant**

#### Other Senior Leaders with Safeguarding Training

- The Principal (for staff matters, including allegations)
- The Deputy Principal
- **All staff are expected to contact either Laura Cook or one of the Safeguarding and Protection Team for advice, when necessary, or to make referrals.** A flow chart illustrating the referral process is available in **Appendix 3**.
- These officers have undertaken compulsory training delivered through the SSCB or through an approved external training provider, and, for DSL/DDSLs upon appointment will undertake the DSL 'New to Role' training followed by biannual updates.
- The DSL's who are involved in recruitment and at least one member of the governing body will also complete Safer Recruitment Training (currently on-line on the DfE website or through approved external providers) to be renewed every 5 years.
- All members of staff and volunteers are provided with Safeguarding awareness information at induction, including in their arrival pack, the College safeguarding statement so that they know who to discuss a concern with
- All members of staff are trained in and receive regular updates (at least annually) in e-safety and reporting concerns.
- All other staff and governors have child protection awareness training, updated by the DSL/DDSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- All members of staff, volunteers and trustees know how to respond to a student who discloses abuse.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the College's Safeguarding Policy, and reference to it in our Parents' Handbook and on the website.
- Our lettings policy will seek to ensure the suitability of adults working with children on College site at any time.
- Community users organising activities for children are aware of the Colleges Safeguarding guidelines and procedures, and the appropriate checks are in place.

- We will ensure that Safeguarding type concerns or allegations against adults working in the College are referred, by the Principal to the LADO for advice, and that any member of staff found not suitable to work with children will be notified to the Independent Safeguarding Authority for consideration for barring, following resignation, dismissal, or in the case of a volunteer, when we cease to use their service as a result of a substantiated allegation.
- Our procedures will be regularly reviewed and up-dated.
- The name of the designated members of staff for Safeguarding will be clearly advertised in the College, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- All new members of staff will be given a copy of our safeguarding statement, and Safeguarding policy, with the DSL and Deputy DSL's names clearly displayed, as part of their induction into the College.
- The policy is available publicly on the College website and via hard copy from the main office. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the College website.

## **7.0 Responsibility for Child and Vulnerable Adult Protection**

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the MASH, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Surrey Safeguarding Children's Board and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to "keep a secret".
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of early help, and be prepared to identify and support children who may benefit from early help.

- Will identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the College's pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of school staff to act as the Lead Professional in early help cases.
- Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the role of the DSL, the college's Child Protection Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- Assist the Board of Trustees and Principal in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

**The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead are responsible for:**

- Referring a child if there are concerns about possible abuse, to the Children's Services Area Team, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call using the Multi Agency Referral Form (MARF). Definitions of abuse are included in **Appendix 2**.
- Ensuring the College fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from general students records/ main files, until the child's 25th birthday, and are copied on to the child's next school or college (if they are under 18 at the time of progression)
- Ensuring that an indication of the existence of the additional file is marked on the student's main file in Registry.
- Liaising with other agencies and professionals.
- Ensuring that either they or the appropriate staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- Holds the lead responsibility for safeguarding and child protection (including online safety) in the school, this responsibility is not able to be delegated.
- Will have an "it could happen here" approach to safeguarding.
- Will refer cases to the Channel programme where there is a radicalisation concern via the MASH and act as a point of contact and support for staff to discuss concerns.
- Will refer cases where a crime may have been committed to the Police as required.
- Will liaise with the "case manager" and Local Authority "Designated Officer" for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Will follow DfE and KCSIE guidance 'Peer on Peer Abuse' when a concern is raised that there is an allegation of a student abusing another student within the college
- Will follow KCSIE guidance on contextual safeguarding.
- Be available during term time (during college hours) for staff in college to discuss any safeguarding concerns.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2018.
- **Following a report of concerns the DSL must:**



- Using the SSCB Surrey Effective Support Windscreen, decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the MASH and the police if it is appropriate.
- Normally the college should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the MASH. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
- If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the MASH. By sending a Multi-Agency Referral Form (MARF) by email to: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk) or contact the MASH on 0300 470 9100. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify MASH of the occurrence and what action has been taken
- If the DSL feels unsure about whether a referral is necessary they can phone the MASH helpline to discuss concerns
- If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider referral to Early Help services.
- Where there are doubts or reservations about involving the child's family, the DSL should clarify with the MASH or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
- When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the MASH. The DSL should seek advice about what action the MASH will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
- The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware
- ***All staff are expected to contact Laura Cook or one of the Safeguarding Team for advice, when necessary, or to make referrals.***

Advice for staff when managing a disclosure is given in **Appendix 1**.

## **8.0 Allegations against Staff**

- All College staff should take care not to place themselves in a vulnerable position with a young person. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. For additional advice please see **Appendix 4**.
- All Staff should be aware of Surrey's Guidance on behaviour issues, and the College's own Behaviour Management/ Code of Conduct policy.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction
- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information will immediately inform the Principal.
- The Principal on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) the Duty LADO can be contacted on 0300 123 1650.

- If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Trustees who will consult with the LADO, without notifying the Principal first.
- The College will follow the Surrey procedures for managing allegations against staff.
- Under no circumstances will we send a student home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.
- Suspension of the member of staff, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO and Personnel Consultant in making this decision.
- In the event of an allegation against the Principal, the decision to suspend will be made by the Chair of Trustees and the Chair will seek the advice of the LADO and Personnel Consultant in making this decision.
- We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.  
A flow chart illustrating the referral process is available in **Appendix 3**.

## **9.0 Whistleblowing**

- The vast majority of people who work with children are well motivated and would never harm a child or young person. Unfortunately, a few do and Woking College offers a culture that makes all staff and volunteers willing and comfortable to voice their concerns.
- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the AEO/LADO following the Whistleblowing Policy.
- Whistle-blowing regarding the Principal should be made to the Chair of Trustees whose contact details are readily available to staff.

## **10.0 Supporting Students**

- We recognise that a young person who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that the College may provide the only stability in the lives of young people who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

### **Our College will support all children by:**

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the College.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children
- Notifying Children's Services as soon as there is a significant concern.
- Providing continuing support to a young person about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

## **11.0 Supporting Staff**

- We recognise that staff working in the College who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

## **12.0 Staff Appointments**

Woking College will ensure that all College staff have been checked for their suitability before taking up their appointment. All applicants will be scrutinised by:-

- Verifying identity and any academic or vocational qualifications.
- Obtaining professional and character references.
- Checking previous employment history.
- Holding face to face interviews, with questions asked about Safeguarding and intentions with regards to working with young people.
- Carrying out the mandatory check of List 99 or through the Vetting and Barring Scheme.
- Where appropriate, an enhanced DBS check (Disclosure and Barring Service) before the candidate takes up the post. Guidance about the eligibility criteria is available at [www.gov.uk/disclosure-barring-service-check/overview](http://www.gov.uk/disclosure-barring-service-check/overview)

## **13.0 Work Experience**

Woking College will ensure that:-

- Appropriate health and safety checks are in place prior to establishing work experience placements.
- Employers are aware of their responsibilities in relation to safeguarding and the protection of children or vulnerable adults.
- Staff are aware of the action to be taken, and by whom, should a child or vulnerable adult protection issue be raised before, during or after the placement.
- Enhanced Criminal Records Bureau checks, as additional safeguards, will be made when there are certain risk factors present. The risk factors include:-
  - A young person or vulnerable adult is likely to be or will be alone with an adult as part of the work placement. (NB. This does not apply to short periods alone, for example, a solicitor taking a student to and from court in a properly insured car).
  - A residential component.
  - The student is vulnerable. The College will identify to the placement organiser any student who may be vulnerable, for example, because of special needs, immaturity, abuse or neglect, substance misuse, etc, and who may therefore require additional safeguards.
  - Extended Work Placement (i.e. more than 10 days)
  - Woking College will ensure that where young people or vulnerable adults are placed on a regular extended work placement, staff that are in close contact with them as supervisors or mentors in the workplace are police checked in the same way as all College staff.

## **14.0 Anti-Bullying**

- Our College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under Child Protection/ Safeguarding procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents. All staff are aware that children with Special Educational Needs and Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. We keep a record of bullying incidents on our 'anti bullying log' and the DSL provides the College Executive with an annual report.

## **15.0 Racist Incidents**

- Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents, on our 'anti bullying log'.

## **16.0 Staff Induction Training on Woking College Procedures**

The initial training will ensure that all staff:-

- Know who to contact if they have a concern that a young person or vulnerable adult is at risk of serious harm.
- Know where to go for advice in relation to safeguarding or child/ vulnerable adult protection issues or when they are uncertain about whether to refer a concern about a child or vulnerable adult.
- Know the College procedure for referrals on child and vulnerable adult protection issues, including referrals to external agencies and partner organisations.
- Understand that they have the right to contact the appropriate agencies if they feel that concerns are not being passed on appropriately by designated College staff.
- Are aware of the requirement to keep detailed, accurate, secure written records of any referrals or concerns.
- Understand the College Prevent Strategy and understand the signs of extremism and referral process to the Safeguarding Team.
- Understand e-Safety, and how to minimise the risks of harm to young people.
- Are able to recognise and respond to safeguarding and welfare concerns.
- Understand their responsibilities in being alert to the signs of abuse.
- Know how to respond to a student who discloses abuse or is at risk of self-harm.
- Know the College's Policy and Procedures on Confidentiality and Disclosure in Child and Vulnerable Adult Protection cases.
- Understand that there is a need to take special care when working with young people with special needs or vulnerable adults and to be alert to signs of abuse as these members of the College may not be able to raise concerns themselves.
- Are aware of appropriate approaches to confidentiality and disclosure of information.
- Guidance on relationships with students

Woking College will:

- Provide staff with a code of conduct along with guidance on appropriate relationships with students.

## **17.0 Confidentiality, Reporting and Disclosure**

- We recognise that all matters relating to child protection are confidential.

- The Principal or DSLs will disclose any information about a child to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise young person to keep secret information which might compromise the child's safety or wellbeing.
- We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with an Assistant Team Manager at the Children's Services Area Team on this point.
- The circumstances when data should or should not be shared are outlined in a flow chart in **Appendix 3**.
- The principle of 'proportionality' applies to sharing confidential information, i.e. when disclosing information without consent the member of staff limits the extent of the disclosure to that which is absolutely necessary to protect the young person or vulnerable adult.
- Woking College recognises that young people aged 16 or 17 will have the understanding to make decisions about their own lives and their views and wishes will be respected unless they are deemed to be at risk of harm which is a serious threat to their personal safety or they are the victim of a crime. Young people under 16 may be sufficiently mature to understand and consent to the disclosure of information. The young person's ability to make such decisions should be assessed on a case-by-case basis.
- Referrals to other agencies such as Children's Social Care should be made with the young person's agreement where practicable. However, it may not be practicable to seek their agreement where, for example, seeking permission might place them or another person at risk of serious harm or where they are not mentally competent to give their agreement. There may also be cases where the young person's agreement is sought but they refuse to give that agreement. Disclosure of information can take place without consent in cases where this is justifiable in the overriding public interest – e.g. to protect the young person from significant harm.
- In the context of child protection the welfare of the young person outweighs the family's right to privacy.
- Vulnerable adults may choose to remain at risk in dangerous situations. Professional staff may find they have no statutory powers in cases where the adult is judged to have sufficient capacity to make his or her own choices and refuses the help which staff feel is needed and where public interest considerations do not apply. In these cases, where a member of the College staff considers that the decisions of the vulnerable adult should be respected they must immediately seek advice from the Designated Safeguarding Lead.
- Decisions about the capacity and the ability of the vulnerable adult to give informed consent are a matter of medical judgement and multi-disciplinary assessment. There should be no abandonment of the duty to care under the guise of "choice".

## **18.0 Prevention of Violent Extremism – The 'Prevent' Agenda**

- Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have "*due regard to the need to prevent people from being drawn into terrorism*". The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.
- **Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.**

- College staff should be aware, through training, of signs of radicalisation and have the confidence to report their concerns to the Designated Safeguarding Lead (Laura Cook, Assistant Principal) or in her absence, any member of the Senior Management Team.
- The Designated Safeguarding Lead will liaise with the contact at Surrey Police, Oliver Greenaway and Alamgir Sheriyar, the FE/HE Regional Prevent Coordinator for the South East, following the procedures in the joint protocol, which may include referral to other external agencies.
- The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.
- The college has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the college and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the College and could constitute misconduct. External speakers are risk- evaluated by the College Operations Group on a regular basis.
- The College will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation. The Designated Safeguarding Officer will make the decision whether to involve the police or other external agencies, including the Surrey Safeguarding Children's Board.
- The College uses filtering as a means of restricting access to harmful internet content. The College subscribes to Palo Alto online filtering. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT network team and the LRC Manager continuously monitor activity on the network utilising the surveillance software 'AB Tutor Control'. This is also available to Teachers in the classroom. As some students and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.
- The College, in liaison with other local sixth form providers and the Surrey Police has developed a comprehensive *Prevent Strategy and Action Plan*. This strategy details the Colleges role in preventing the radicalisation of its students.

## **19.0 Raising Awareness of Safeguarding and Protection Issues**

- All parents/carers of students under eighteen will be made aware of the responsibilities of staff members with regard to child protection procedures by publicising this in an induction and information pack that is sent to students and parents. Information will also be made of available through the College website: **[www.woking.ac.uk](http://www.woking.ac.uk)**.
- All students will be supported to understand safeguarding and protection issues through:-
  - A tutorial programme that will support young people's and vulnerable adults' development in ways that will foster security, confidence and independence.
  - The creation of a climate in which responsible behaviour is encouraged and where students feel safe to ask for help if threatened or at risk of abuse.
  - The promotion of a healthy lifestyle that includes consideration of diet, sexual relationships, alcohol and drug abuse.
  - A list of the specific Safeguarding areas of focus, as detailed in 'Keeping Children Safe in Education' is available in **Appendix 5**.

## **19.0 Health & Safety**

- Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our young people both physically within the College environment, and for example in relation to e-safety, and when away from the school and when undertaking College trips and visits.

## **20.0 Monitoring and Evaluation**

- Woking College will review its policies and procedures to ensure that they comply with the relevant legislation and the agreed procedures in Surrey. The Safeguarding Policy will be reviewed annually and updated to remedy any deficiencies or weakness in regard to child and vulnerable adult protection arrangements that are identified without delay.
- Our Safeguarding Policy and Procedures will be monitored and evaluated by:
  - Trustee visits to the College
  - Senior Management 'drop ins', learning walks and discussions with students and staff
  - Student surveys and questionnaires
  - Scrutiny of Attendance data
  - Scrutiny of a range of risk assessments
  - Scrutiny of Trustee minutes
  - Logs of bullying/racist/behaviour incidents for Principal and Trustees to monitor
  - Review of parental concerns and parent questionnaire

## **21.0 Looked After Children, Previously Looked After Children and Care Leavers**

- The Designated Teacher will act as key contact and adviser for a Looked After Child or a previously Looked After Child during their time at the College. The Designated Teacher will meet on a termly basis with the student, their social worker and carers to update a Personal Education Plan.

## **22.0 Restraint**

- We do not anticipate needing to use restraint on students. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.
- Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.
- When applying disciplinary measures such as physical intervention or isolation for children with SEND the college will consider the risks, given the additional vulnerabilities of these children.

## **23.0 Fitness to Study**

- Woking College is an educational institution for full time students. It has included in its mission statement the commitment to tailoring its education to individual needs and promoting inclusivity and tolerance. This philosophy underpins how we strive to make 'reasonable adjustment' and provide 'best endeavour' for any student. In doing so we fully comply with the Equality Act 2010 and the Children and Families Act 2014.

- It is important, however, to be clear about what is reasonable in an educational setting and the limits to the individual support that can be provided within a sixth form college. Our staff provide outstanding care for all students, but there will be times when a student's physical or mental health are so affected that they are no longer able, despite support both internal to the College and externally, to maintain a reasonable academic progress. The procedures for managing a student's fitness to study are contained within the Fitness to Study Procedures.

## **24.0 Related Policies and Procedures**

- Health and Safety Policy
- College Prevent Strategy and Action Plan
- Safer Recruitment Procedures
- e-Safety Procedures
- Anti-Bullying Policy
- Looked After Children Strategy
- Fitness to Study Procedures



## Appendix 1

### Managing a Disclosure

- If a student makes a disclosure, you must follow the steps outlined below:-
  - Never promise confidentiality – it is not possible to guarantee to a student that a disclosure of abuse will be kept confidential. Inform the student that you are bound by law to report what they disclose to the College’s designated person.
  - Listen and reassure – Listen carefully to what the student is telling you. You are able to ask open questions such as ‘how did that happen?’ or ‘what was happening at the time?’
  - Do not probe or make accusations – remember you are not there to investigate a disclosure. This could also compromise any further criminal investigation.
  - Make notes and record the disclosure – as soon as possible, record the conversation with the student. Remember to use the student’s own words as far as possible. Use the disclosure reporting/referral system - CPOMS.
  - Refer the disclosure to the Designated Leads. The designated staff will then make arrangements to see the student and organise further support as necessary and notify appropriate authorities. Where contact is made with external agencies, the designated person will record this on CPOMS.

## Appendix 2

### **Definitions of Abuse**

#### Physical abuse

This may take many forms e.g. hitting, shaking or poisoning a young person or vulnerable adult. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person or vulnerable adult.

#### Emotional abuse

This is the persistent emotional ill treatment of a young person or vulnerable adult such as to cause severe and persistent effects on their emotional development. Some level of emotional abuse is involved in most types of ill treatment of young people or vulnerable adults, though emotional abuse may occur alone.

#### Sexual abuse

This involves forcing or enticing a young person or vulnerable adult to take part in sexual activities. This may include non-contact activities such as looking at or producing pornographic materials, watching sexual activities or encouraging young people or vulnerable adults to behave in sexually inappropriate ways.

#### Neglect

Involves the persistent failure to meet a young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

### **The Context of Abuse**

#### Family Circumstances: Domestic Violence

Where there is domestic violence the implications for the vulnerable adult or young person at College and for younger children in the household must be considered. Young people from families with a history of domestic violence often have behavioural difficulties, absenteeism, ill health, bullying, and drug and alcohol misuse.

#### Drug/alcohol abusing parents

There is an increased risk of violence in families where this occurs. A young person at College may have to take on responsibilities for younger children in the family.

#### Forced Marriages

Forced marriage is an entirely separate issue from arranged marriage. 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 may also be experiencing physical and/or emotional abuse at home.

## Mental Health Issues

Self-harm, suicide threats and gestures by a young person or vulnerable adult must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

### Abuse by peer group: bullying, racism and abuse

Bullying is a common form of deliberately hurtful behaviour, which is usually repeated over a period of time, when it is difficult for the victims to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting); verbal (e.g. threats); and emotional (e.g. isolating the individual).

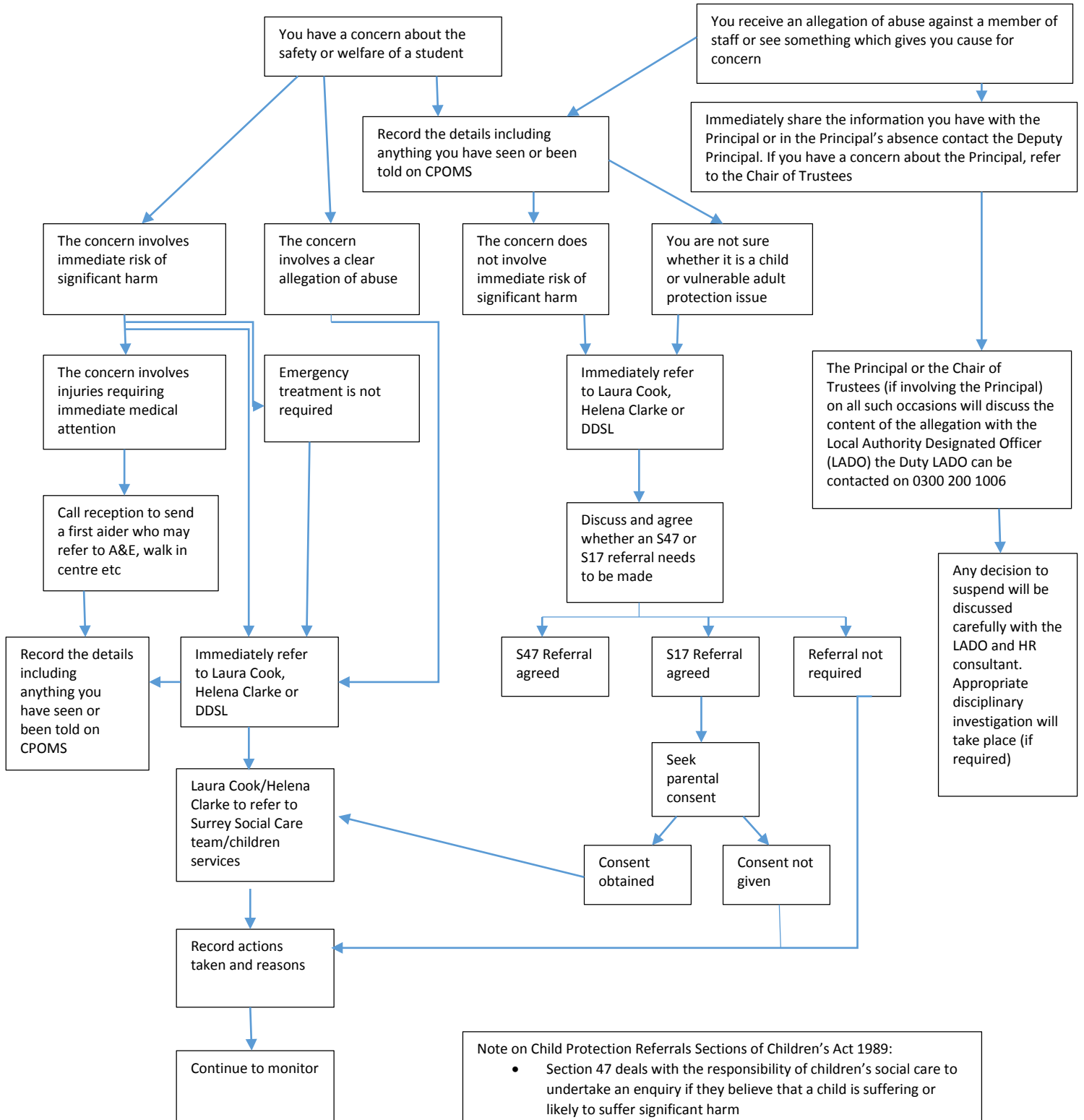
It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities. We are clear that sexual violence and sexual harassment is not acceptable and will never be tolerated.

Severe harm may be caused to young people and vulnerable adults by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases it can cause significant harm, including self-harm.

## Appendix 3

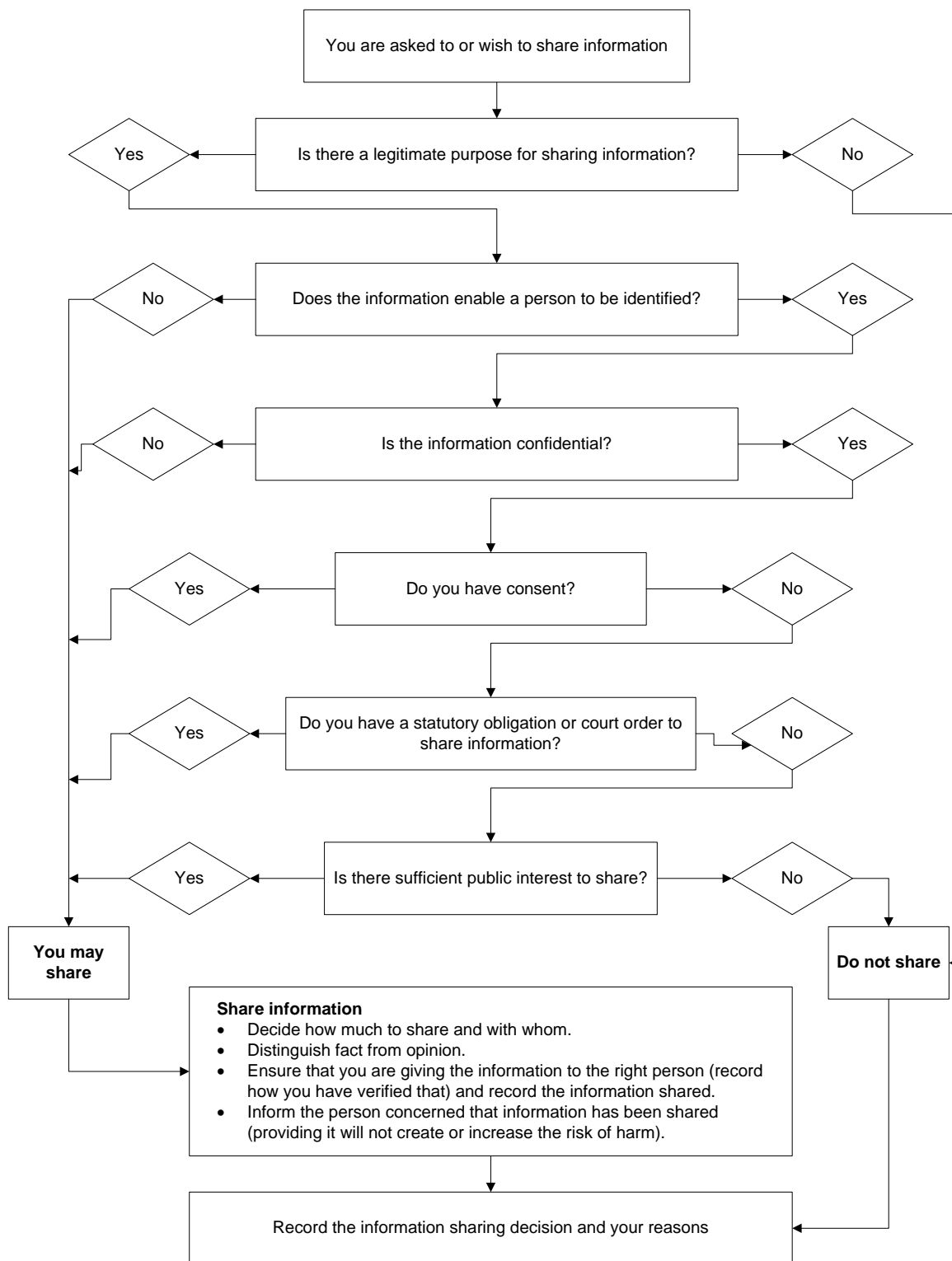
### Referral and Information Sharing flowchart

#### Child Protection and Protection of Vulnerable Adults Referral Flow Chart



**Note on Child Protection Referrals Sections of Children's Act 1989:**

- Section 47 deals with the responsibility of children's social care to undertake an enquiry if they believe that a child is suffering or likely to suffer significant harm
- Section 17 deals with the obligation on children's social care to assess and provide for the needs of children deemed to be in need. Parents can request an assessment, agencies eg colleges can ask for an assessment if parents agree



### Guidance on Relationships with Students

The vast majority of staff who work with young people and vulnerable adults in educational settings act professionally and seek to provide a safe and supportive environment for students. It is recognised that achieving this aim is not always straightforward. Much relies on student and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This guidance should not be interpreted to mean that, in order to avoid misplaced allegations, all forms of physical or close contact with students should be avoided. There will be occasions where physical contact is appropriate, e.g. in situations where a degree of physical intervention is required. The guidance is concerned with avoiding sexual activity in a relationship of trust and other contact which may be inappropriate.

### Relationships of Trust

A relationship of trust exists where a teacher, member of staff or volunteer is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken. Those in a position of trust must carry the responsibility of ensuring that they do not abuse their position or put themselves in a position where allegations of abuse of trust, whether justified or unfounded, could be made.

It is important to recognise that a variety of circumstances can arise, including a sexual relationship at one end of the scale, through close friendships, to, at the other end of the scale, an innocent situation which has been entirely misconstrued. Staff and volunteers should take steps to minimise the risk of circumstances being misconstrued or misunderstood and relationships with language and conduct which could give rise to comment and speculation.

All staff should clearly understand the need to maintain appropriate boundaries in their dealings with students. Intimate or sexual relationships between staff and students will be regarded as a grave breach of trust. Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong. A sexual relationship will be intrinsically unequal within a relationship of trust and is therefore unacceptable. Abuse of trust involving sexual activity with a young person under 18 or a vulnerable adult who is a student at the College may be a criminal offence under the Sexual Offences Act 2003. It is also inappropriate since the professional relationship of trust would be altered.

From time to time staff may encounter students who display attention-seeking behaviour, profess to be attracted to them or begin to develop a relationship of emotional dependency. Particular care should be exercised if the student is vulnerable. Staff should aim to deal with those situations sensitively and appropriately, but ensure that their behaviour cannot be misinterpreted. The member of staff or volunteer should inform their line manager if they have any concerns or if there is a concern that a young person is becoming attracted to him or her, or that there is a developing attachment or dependency. If a member of staff or volunteer is concerned that s/he might be developing a relationship with a young person, which could have the potential to represent an abuse of trust, the first advice must be to ensure that the relationship does not develop further. Arrangements should be made by the line manager to minimise direct contact between the student and member of staff or volunteer and to prevent all contact if possible. Where contact must take place another member of staff should be present at all times.

Staff should be aware that private meetings with individual students might give rise to concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews

should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another student should be present or nearby. Where such conditions cannot apply, staff should ensure that another adult knows that the interview is taking place.

Students should not be asked or encouraged to visit the home of a member of staff or socialise informally outside College. These contacts or visits can place staff in a vulnerable position and can in some case lead to allegations being made against staff. Private or additional tuition for students should be conducted on College premises or, if at the young person's home, in the presence of a parent. Meetings away from the College premises or arrangements for private tuition in a student's home should only be arranged with the specified approval of the Principal. Staff should adhere to the guidance regarding outside commitments in the Code of Conduct for Employees.

The following are examples of actions, albeit not overtly abusive, that could be interpreted as a member of staff 'grooming' a student or allowing a dependent relationship to begin or continue:-

- Inviting students to their home.
- Visit students at their home.
- Giving students gifts.
- Offering students lifts outside normal duties.
- Singling individual students out for special attention.
- Seeing students socially.

Staff should not give students their personal mobile or home telephone number, personal e-mail address or access to their own personal social media accounts (not adding students as friends on Facebook, for example).

The frequency, nature and degree of such behaviour may justify the need for further investigation.

## **Physical Contact**

Physical contact may be misconstrued by a student, parent or observer. Touching students, including well-intentioned gestures such as putting a hand on a shoulder, can, if repeated regularly, lead to serious questions being raised, particularly if this occurs when a member of staff is alone with a student. As a general principle, staff must not make gratuitous physical contact with their students. It is particularly unwise to attribute touching to their teaching style or as a way of relating to students. Teachers and other staff do however have the right to use reasonable physical intervention to restrain students in certain circumstances. Staff should be aware of the College's policy on the use of physical intervention.

There may also be occasions where a distressed student needs comfort and reassurance which may include physical comforting such as a caring parent would give. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact, particularly with the same student over a period of time. Where a member of staff has particular concern about the need to provide this type of care and reassurance they should seek the advice of the Assistant Principal (Support for Learning).

Some staff are also likely to come into physical contact with students from time to time in the course of their duties. Examples of this could include sports coaching which may involve non-sexual physical contact. Contact of this type should not take place when a member of staff is alone with a student.

**Staff should comply with the expected standards of professionalism as detailed in the Staff Code of Conduct.**

Were changes made to the Policy when received? If YES complete the Partial Equality Analysis table.

Questions for all Policies Is it likely that the Policy Revision could have a negative impact:-		Please Tick Box	
		YES	NO
1.	On minority ethnic groups?		X
2.	Due to gender?		X
3.	Due to disability?		X
4.	Due to sexual orientation?		X
5.	Due to their religious beliefs (or none)?		X
6.	On people due to them being transgender or transsexual?		X
Additional questions for Policies relating to Staff Is it likely that the Policy Revision could have a negative impact:-			
7.	On people due to their age?		X
8.	On people due to their marital or civil partnership status?		X
9.	On people with dependants/caring responsibilities?		X
Date of Review	Jun 2019	Did you make changes?	X

If YES please speak with The Assistant Principal as a full Equality Analysis may be required.

LCO/Safeguarding: Jun 2019  
 Last reviewed: Jun 2019  
 Next review: Jun 2020