

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: September 2022

Date approved by the Trustees: September 2022

Status: Statutory

Review period: Annual

Next review date: September 2023

Designated Safeguarding Lead: Helena Clarke and Sophie Mngoma

Deputy Designated Safeguarding Leads: Laura Olrod, Anne Jackman, Laura Thomas, Andy Pett, Victoria Wood and Tess Ledingham.

Safeguarding Trustee: Anne Middleton

Principal: Brett Freeman

Chair of Trustees: Tim Stokes

POLICY STATEMENT

This Policy applies to anyone working on behalf of Woking College including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students. Its purpose is to protect and enhance the safety and well-being of all children and young people by actively promoting awareness, good practise and sound procedures.

We believe the safety and well-being of children and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We fully recognise our statutory responsibility for safeguarding: the safety, protection and well-being of all children and young people that Woking College supports and interacts with, is paramount and has priority over all other interests. This includes responding immediately and appropriately where there is a suspicion that any young person under the age of 18 years old may be a victim of bullying, harassment, abuse (including physical, sexual, emotional) or neglect.

Woking College encourages a culture of listening to and engaging in dialogue, with children seeking their views in ways that are appropriate to their age, culture and understanding.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England including the Children's Act 2004 and "Working Together to Safeguard Children 2018". [Working together to safeguard children \(PDF\)](#) (DfE), 2018 provides the key statutory guidance for anyone working with children and young people. All procedures and policies pertaining to safeguarding are regularly reviewed and updated on an annual basis.

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 Parent/carer Handbook and on the website.

The name of the designated members of staff for Safeguarding will be clearly advertised in the College.

All new members of staff will be given a copy of the Safeguarding Policy, with the DSLs and Deputy DSLs' 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.

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.

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 mental and physical 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 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/carers'** refers to birth parents and other adults who are in a parenting role, for example stepparents, 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.
- **'C-SPA'** refers to the Children's Single Point of Access and the Child Protection Consultation Line.
- **RFS** refers to the Request for Support from Surrey Safeguarding Children's Partnership
- **MAP** refers to the multi-agency partnership
- **CPOMS** refers to the safeguarding software used by the College to record, monitor and analyse safeguarding incidents.

ROLES AND RESPONSIBILITIES:

TRUSTEES:

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.
- Online safety is a running and interrelated theme whilst devising and implementing the College's approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- A senior leader has Lead Designated Safeguarding Lead (DSL) responsibility.
- On appointment, the DSLs and DDSLs undertake interagency training (Surrey Safeguarding Modules 1&2) and also undertake DSL 'New to Role' and the 'Update' Course every two years.

(More information can be found here; [SSCP Partnership Training Programme; Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](#))

- All other staff have Safeguarding training at induction and updated as appropriate (and at least annually).
- Trustees should ensure that all trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole
- Woking College will work in accordance to guidance and good practice from the Surrey Safeguarding Children Partnership. More information can be found at: [Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](#)
- 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 College website or by other means.

SENIOR LEADERS:

- The Principal will ensure that policies and procedures, adopted by the Board of Trustees and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- At least two members of the Senior Leadership team will have complete Safer Recruitment Training.
- The Principal will ensure that Safeguarding concerns or allegations against adults working in the College are referred 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.
- The Designated Safeguarding Lead (DSL), the Assistant Principal Support for Learning and Wellbeing **Helena Clarke**, is a member of the Senior Leadership Team and takes lead responsibility for child and

vulnerable adult protection and receives appropriate training and support and adequate resources to carry out this role.

DESIGNATED SAFEGUARDING LEAD:

The Designated Safeguarding Lead is 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 Request for Support Form (RFS).
- Ensuring the College fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- Ensuring that all members of staff/ volunteers have timely and relevant safeguarding training.
- Keeping written records of concerns on CPOMS 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.
- Holding the lead responsibility for safeguarding and child protection (including online safety) in the College, this responsibility is not able to be delegated.
- Having have an "it could happen here" approach to safeguarding.
- Referring cases where there is a radicalisation concern following the Prevent referral process and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk
- Referring cases where a crime may have been committed to the Police as required.
- Following 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.
- Following KCSIE guidance on contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families.
- Being available during term time (during college hours) for staff in college to discuss any safeguarding concerns.
- Meeting all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2022.

SAFEGUARDING TEAM:

The College Safeguarding Team work under the supervision of the Designated Safeguarding Lead and will also lead on the implementation of this policy in the areas of the College for which they have responsibility. The Safeguarding Team includes the following pastoral managers:-

- Assistant Principal Support for Learning and Wellbeing – **Helena Clarke (DSL)**
- Associate Director Pastoral - **Sophie Mngoma (DSL)**
- Head of Year Level 2 - **Andy Pett (DDSL)**
- Head of Year 12 – **Laura Olrod (DDSL)**
- Head of Year 12 – **Laura Thomas (DDSL)**
- Head of Year 13 - **Anne Jackman (DDSL)**
- Head of Year 13 – **Victoria Wood (DDSL)**

These officers have undertaken compulsory training delivered through the Surrey Safeguarding Children Partnership or through an approved external training provider. DSL/DDSLs upon appointment will undertake the DSL 'New to Role' training followed by biannual updates.

ALL STAFF:

- All staff have a duty to safeguard students and a responsibility to keep themselves up to date with the latest guidance. All staff and trustees have child protection awareness training, updated by the DSL/DDSL as appropriate, to maintain their understanding of the signs and indicators of abuse and reporting concerns.
- All members of staff, volunteers and trustees know how to respond to a student who discloses abuse. Advice for staff when managing a disclosure is given in **Appendix 1**.
- All staff should familiarise themselves with the **Woking College Safeguarding Guide** which gives detailed information on different Safeguarding issues and types of abuse including what to look out for in terms of risky behaviours and concerns. This includes detailed information on types of peer-on-peer abuse and indicators of abuse.
- All staff should know who the DSL is and who the rest of the College Safeguarding team are, in order to make contact with any safeguarding concern. **All staff are expected to contact either Helena Clarke or one of the Safeguarding Team for advice, when necessary, or to make referrals.** A flow chart illustrating the referral process is available in **Appendix 3**.

REPORTING PROCEDURES:

Disclosure or evidence for concern may occur in a number of ways including a comment made by a child, physical evidence such as bruising, a change in behaviour or inappropriate behaviour or knowledge.

In all cases it is vital to take every action which is needed to safeguard the child, children and young person(s).

Following a report of concerns the DSL must:

- Use the Surrey Effective Family Resilience – Levels of Need to decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA 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 consent before making a referral to the C-SPA. 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 C-SPA by sending a Request for Support Form (RFS) by email to: csmash@surreycc.gov.uk or contact the C-SPA 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 C-SPA of the occurrence and what action has been taken.
- If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA 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 C-SPA 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 C-SPA. The DSL should seek advice about what action the C-SPA 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.
- The DSL/DDSL, will be responsible for informing the employee who reported the disclosure of any action taken and any outcome if this is appropriate.
- It is also the responsibility of the DSL/DDSL to ensure any partner agencies involved with the young person are made aware of the disclosure and the action taken where relevant and where information sharing guidance permits this.
- It is important to remember that often only when information held by a number of workers is put together, that a picture of child abuse emerges. All staff & volunteers must adhere to the information sharing protocol published by HM Government, adopted by the Children's Trust and endorsed by SSCP. Details can be found here; [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk). In addition to this, whilst respecting cultural differences, the basic requirement for children is that they are kept safe across social, ethnic and cultural boundaries.

CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

- All staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child sexual violence and sexual harassment and know how to identify it and respond to reports.
- All staff should understand, that even if there are no reports in College, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse, they should speak to Helena Clarke or Sophie Mngoma (DSLs) and log their concerns on CPOMS.
- All staff are expected to challenge inappropriate behaviours between peers, that are actually abusive in nature to ensure that we actively fight against the normalisation of a culture of sexual violence and harassment.
- All staff should familiarise themselves with the detailed information on types of child-on child sexual abuse and sexual harassment and indicators of abuse in the **Woking College Safeguarding Guide** and should use this guide to help them identify and refer any concerns related to child-on child sexual abuse and sexual harassment.

Reporting process for Child-on-child sexual abuse and sexual harassment:

- All concerns raised by students relating to sexual harassment or assault inside or outside of College are logged on CPOMS and followed up with actions also logged on CPOMS.
- Where incidents relate to inappropriate comments made by students (including sexual comments, remarks, jokes and online sexual harassment), this will be addressed through conversations with the student and their parents/carers with the goal of making it clear that such comments are unacceptable and inappropriate and to action disciplinary measures as appropriate. This may also involve ongoing education related to acceptable language.
- Where incidents relate to criminal behaviour onsite, the DSL will report this to the Police and will contact C-SPA to inform them that this report has been made.
- Where incidents relate to criminal behaviour that has occurred offsite or online, the DSL will advise the student (and parents where appropriate) to make a report to the Police. If appropriate, the DSL may also make a direct report to the Police and will seek advice from other professionals via the C-SPA consultation

line (0300 470 9100), NSPCC helpline for professionals, or the link community Police Officer on the appropriate next steps.

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. 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 known bullying incidents on CPOMS and the DSL provides the College Executive with an annual report.

ONLINE SAFETY

Woking College recognises that it is essential that children are safeguarded from potentially harmful and inappropriate online material.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College's Online Safety Policy details the responsibilities of staff and students in respect to Online Safety.

In addition, all students read and sign an online safety code of conduct each year alongside the student code of conduct. This details both risks and expectations in relation to online safety.

Staff also read and sign an IT acceptable use agreement detailing their responsibilities and expectations regarding online safety.

The tutorial programme and wider curriculum provide a range of opportunities to educate students about online safety concerns and parents and carers are informed about key online safety issues and support options.

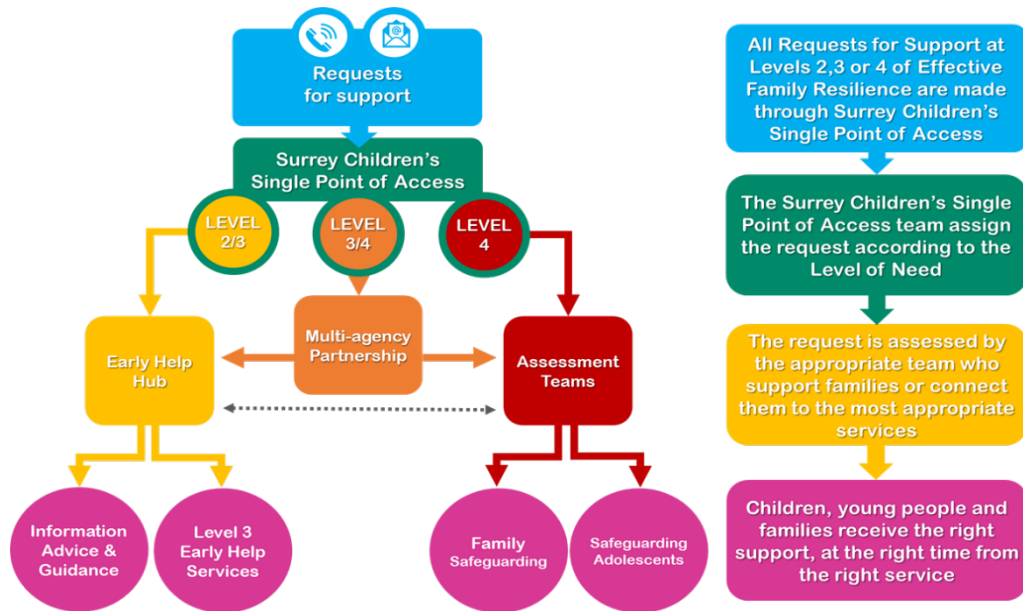
The College use Smoothwall as a filtering and monitoring resource and AB tutor for monitoring student screens in the LRC.

Other helpful contacts

- **Children’s Single Point of Access (C-SPA)**, a front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families. C-SPA is available **9am-5pm, Monday – Friday**

Phone: 0300 470 9100

Email: cspa@surreycc.gov.uk



- **Emergency Duty Team (EDT)**, provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**

Phone: 01483 517898

Email: edt.ssd@surreycc.gov.uk

- The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, please contact the LADO on 0300 123 1650
Email: LADO@surreycc.gov.uk
- NSPCC Helpline 0808 800 5000

ESCALATION POLICY:

Effective working together depends upon an open approach and honest relationships between agencies and a belief in genuine partnership working. Any disputes about the safety and well-being of a child should be resolved in a timely way with all agencies working together in the best interests of the child so that the welfare of the child remains paramount.

The Partners recognise that complexity of need and range of intervention/support will not always fit into a simple formula that leads to *‘the right solution’*. Often there may be no right or wrong answer and quite legitimately practitioners may exercise their professional judgement differently. It is also the case that exceptionally, the needs of some young people and families may not easily fit within a conventional application

of thresholds. The purpose of the SSCP Escalation Policy is to create a transparent process that enables multi-agency practitioners to exercise their professional judgement and provide the best possible service in a timely and safe way.

It is of vital importance that children; young people and their families do not become entangled in professional disagreements. Neither should disputes detract from the focus on the child, delay effective decision making, nor lead to protracted disputes that negatively impact upon the child and/or family and on inter-agency relationships and working practice. In reaching resolution, it is essential that at all times disputes are approached in a considerate manner and one which both respects and seeks to understand the views and concerns of others from their experience and perspective when engaging with the young person/family.

Disagreements should be resolved through child centred discussion between agencies. This escalation policy outlines the process to be followed when professionals are unable to agree about what is in the best interests of the child. The detailed policy can be accessed here: [SSCP-Escalation-Procedure-Final-1.pdf \(surreyscp.org.uk\)](https://www.surreyscp.org.uk/wp-content/uploads/2019/05/SSCP-Escalation-Procedure-Final-1.pdf)

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 College 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.

ALLEGATIONS MADE AGAINST STAFF AND VOLUNTEERS:

- 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 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. Further information can be found here: [3.2 Managing allegations against people that work or volunteer with children | Surrey Safeguarding Children Partnership \(procedures.org.uk\)](#).
- 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.
- Where an allegation is made against a supply teacher, the Principal will immediately contact both the agency concerned and the LADO. The college will continue to support any investigation that is required.
- 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**.

LOW LEVEL CONCERNS

Staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with Woking College's Staff Behaviour and Code of Conduct,
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, are shared responsibly and with the right person, and recorded

and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this should be reported as soon as possible to the Principal. However, it is never too late to share a low-level concern if this has not already happened. Where the Principal is not available, the information should be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SLT acting in this role.

Low-level concerns about the Designated Safeguarding Lead should be reported to the Principal and those about the Principal should be reported to the Chair of Trustees. Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Principal of the details as soon as possible.

Recording concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of concerns must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Recorded concerns should be retained at least until the individual leaves employment.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice from the Finance Director may also need to be taken) Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.

The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Finance Director.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Finance Director. In this case the College's Staff Behaviour and Code of Contact with the Child Protection and Safeguarding Policy and Disciplinary Policy will be followed.

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

Anonymity:

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Individuals reporting concerns about themselves:

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

References:

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

Role of Trustees:

The Principal will regularly inform the Trustees about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data.

The Safeguarding Trustee may also review an anonymised sample to ensure that these concerns have been handled appropriately.

CONFIDENTIALITY AND WHISTLE BLOWING:

- Woking College operates a confidentiality policy. However, under no circumstances will information be kept confidential that raises concern about the safety and welfare of a child or young person.
- 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 College, 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.

- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and young people in accordance with the Information Sharing Policy published by HM Government, adopted by the Children's Trust and endorsed by SSCP. The Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm.
- All staff must be aware that they cannot promise a child that they will keep secrets/ not disclose potentially harmful information.

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.

STAFF INDUCTION TRAINING ON WOKING COLLEGE SAFEGUARDING 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 create an accurate, detailed written log of all concerns and referrals on CPOMS.
- 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.
- Understand that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the DSL or DDSL alerted to the concern.

- Understand that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
- 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.
- Provide staff with regular additional training and guidance on specific safeguarding concerns.

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 (Helena Clarke, Director of Support for Learning) or in her absence, any member of the Senior Management Team.
- The Designated Safeguarding Lead will liaise with Surrey Police and with 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. External speakers are risk- evaluated by the College Operations Group on a regular basis.
- The College uses filtering as a means of restricting access to harmful internet content. The College subscribes to Bitdefender 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.

LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN AND CARE LEAVERS

- The Designated Teacher and member of staff with allocated responsibility for Looked after children will act as key contacts and advisers 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.

RESTRAINT:

- Our 'Searching, confiscation and restraint procedures' set out in a separate document, outlines the College's procedures for managing situations where physical intervention may be required as a last resort when a child is at immediate risk of harming him /herself or others.

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.

SAFER RECRUITMENT POLICY STATEMENT:

Woking College will apply the Working Together to Safeguard Children 2018 and SSCP Guidelines using the framework for safer recruitment and employment practice.

This will apply to all staff and volunteers undertaking activities with children and young people including teaching, training or instruction, care or supervision, providing guidance or treatment, fostering and childcare. It could also include specific positions such as school governor, Director of children's social services, and any work carried out in a limited range of specific settings such as schools where children should always be able to build relationships of trust with the people working with them.

The purpose of safer recruitment is to ensure:

1. Applicants who may wish to harm adults at risk, children or young people are deterred from applying for jobs or volunteering opportunities.
2. Any unsuitable applicants are rejected by scrutinising applications and exploring potential areas for concern at interview
3. Unsuitable appointments are not made by having at least one member of the interview panel trained in safer recruitment; carrying out all relevant pre-employment checks* and ensuring all new staff and volunteers are given an appropriate induction.
4. To identify and manage any identified risks.
5. Maintain a safe and vigilant culture.

Multi-agency training on safer recruitment is available through the Surrey Children's Services Academy: [Surrey Children's Services Academy \(SCSA\) - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/childrens-services-academy)

*Disclosure and Barring Service (DBS) Checks

All new staff and volunteers are to have a DBS check before commencing employment. Any failure to disclose convictions may result in disciplinary action or dismissal. Any positive disclosures will be discussed with the Safeguarding Lead, Principal and/or trustees. All this information will be kept on the personnel file. The DBS number and date of processing will be held on a secure database.

A risk assessment will be completed if there is a positive DBS check sent back.

ADDITIONAL RELEVANT POLICIES/ PROCEDURES

This safeguarding policy should be read alongside the following organisational policies, procedures and guidance:

- Prevent Strategy
- Woking College Safeguarding Guide
- Staff Code of Conduct
- Staff IT Acceptable Use Agreement
- Confidential Reporting (Whistleblowing) Policy
- Student Code of Conduct
- Online Safety Policy
- Health and Safety Policy
- Learning Support and Send Policy
- Fitness to Study Procedure

References

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)

Appendix 1

Managing a Disclosure:

- Listen carefully rather than asking leading questions.
- Never *promise* any particular action or NOT to disclose any information shared.
- Allow silence and/or allow child, young person to be upset.
- Try to relate to the age, understanding or special needs of the child or young person.
- Write down carefully the information you have been given as soon as possible, preferably within 24 hours and only including what you have been told.
- Discuss this as soon as possible with the safeguarding lead/ manager.
- Any decision not to tell the parents must be discussed with the safeguarding lead/ line manager unless the child or young person is in immediate danger.

Parents/ carers

It is good practise to be as open and honest as possible with parents/carers about any concerns. However, you must not discuss your concerns with parents/ carers in the following circumstances:

- Where sexual abuse or exploitation is suspected.
- Where organised or multiple abuse is suspected.
- Where fabricated or induced illness is suspected.
- Where female genital mutilation is a concern.
- In cases of forced marriage.
- Where contacting parents / carers would place a child / young person or others at immediate risk.

General safeguarding advice for all staff and volunteers:

- Remember not to be a young people's friend, always maintain a professional manner when working with them.
- Do not accept a young person as a friend on any social networking site that you use.
- Always keep a record of any text or email exchanges with a young person (staff will use work telephones where available).
- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.
- Do not meet a young person alone, this is for the safety and well-being of the young person but also yourself. Where this is necessary, try to use public spaces for one-to-one meetings if you are not meeting in the [insert name of group/organisation] office or premises.
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.
- Never speak to the press about a child or young person without permission from the Principal.

Appendix 2

Definitions of harm (see *Woking College Safeguarding Guide for more detailed information*)

For the purpose of this policy, harm is defined as:

- Neglect - the persistent failure to meet the basic physical and physiological needs of the young person that results in serious impairment of their health and development, including the failure to provide adequate food, clothing, shelter and failure to respond to basic emotional needs, such as being cared for when sick.
- Abandonment - leaving a child alone and unattended in circumstances that are inappropriate for their age and/ or level of ability.
- Emotional abuse – persistent, emotional ill treatment that has a severe adverse effect on the emotional development of children and young people. It may involve conveying to them that they are not wanted, not loved or worthless. It may involve inappropriate expectations (such as taking on the responsibility of an adult within the family) being placed on the young person leaving them frightened and unable to cope. It may also involve the threatening, exploitation or corruption of children and young people.
- Physical abuse – hitting, kicking, shaking, slapping, and throwing, scalding, burning, poisoning, drowning, suffocating, or other action intended to cause physical harm or ill health to the child or young person. Physical harm may also be caused when a parent or carer covers up the symptoms of, or deliberately causes ill health to a child or young person within their care.
- Racial abuse – any type of verbal or physical abuse that is directed at an individual or group because of their racial or ethnic background.
- Witnessing ill treatment, including domestic abuse of another person- this may impact the health or development of a child or young person.
- Sexual abuse or sexual exploitation - forcing or enticing a child or young person to participate in sexual activities, whether or not the child or young person is aware or has knowledge of what is happening. It includes child prostitution, encouraging children or young people to watch or participate in the production of pornographic material, online grooming, encouraging children and young people to behave in sexual inappropriate ways. Sexual acts include penetrative (rape or buggery) and non-penetrative acts such as touching or stroking.

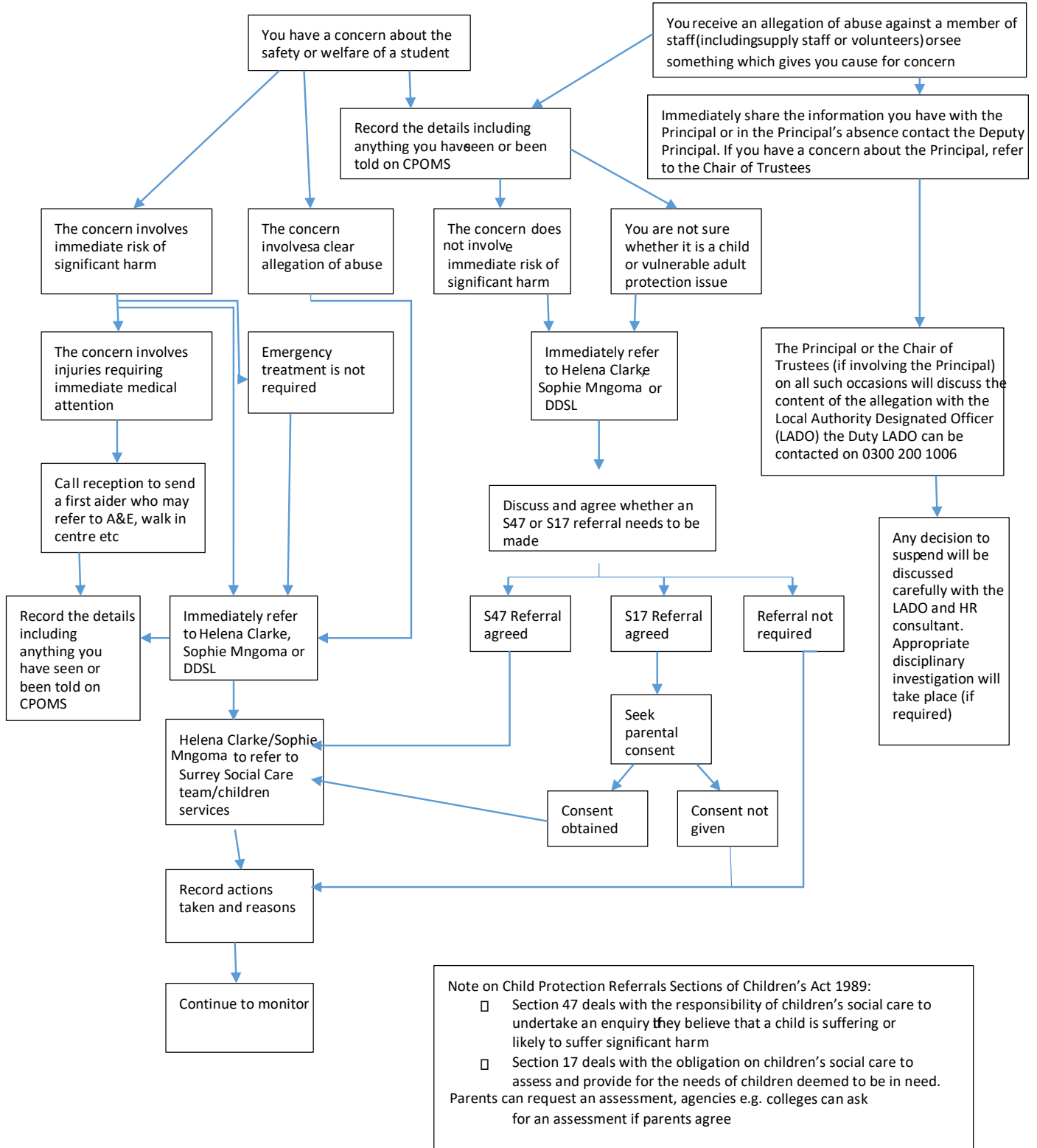
The Sexual Offences Act 2003 defines 'consent' as '*if he agrees by choice and has the capacity to make that choice*'. The Act, removes the element of consent for many sexual offences for:

- Children/young people under 16 (including under 13).
- Children/ young people under 18 having sexual relations with a person of trust (for example: teachers, youth workers, foster carers, police officers).
- Children / young people under 18 involved with family members over 18.
- Persons with a mental disorder impeding choice or who are induced, threatened or deceived.
- Persons with a mental disorder who have sexual relations with care workers.

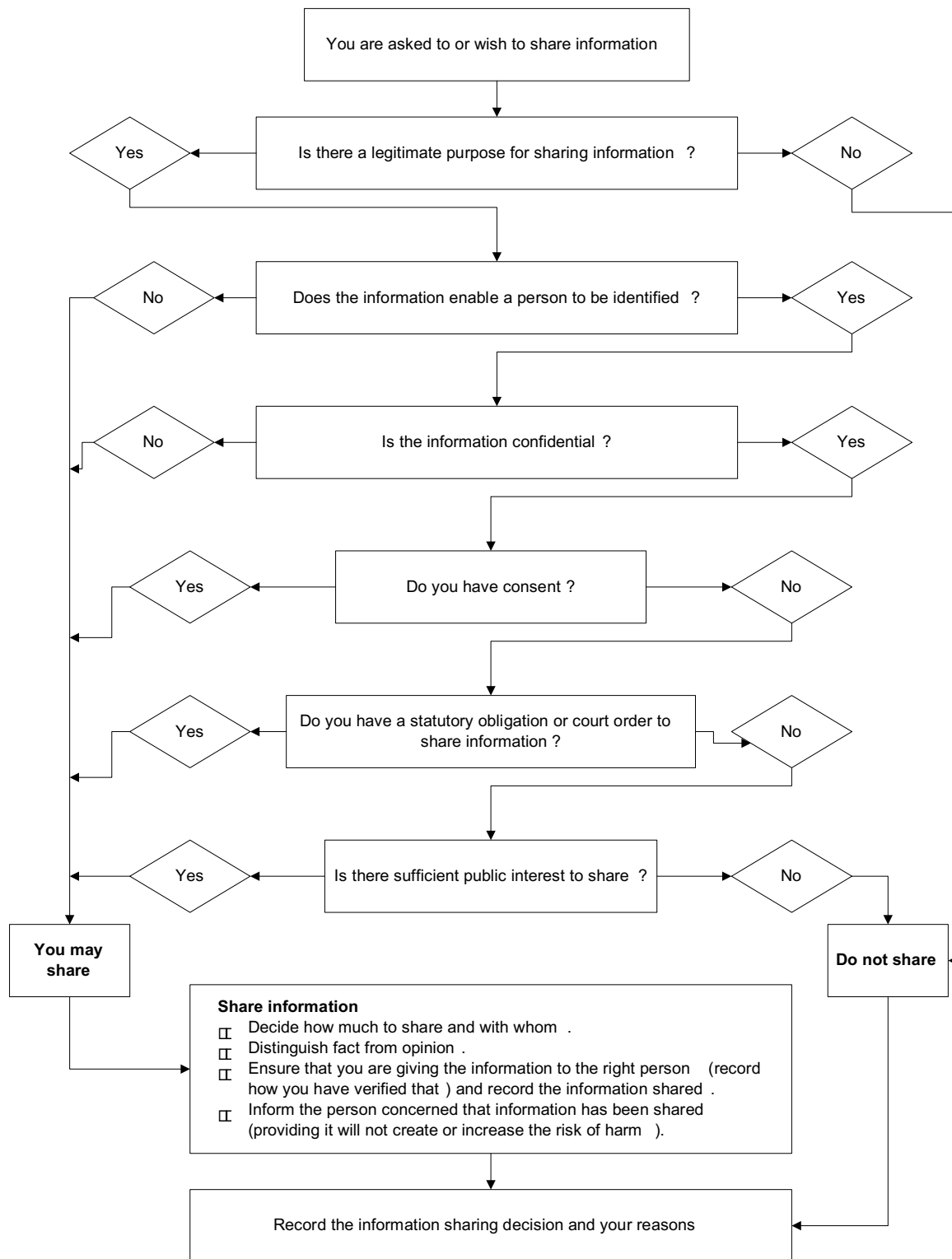
Appendix 3

Referral and Information Sharing flowchart

Child Protection and Protection of Vulnerable Adults Referral Flow Chart

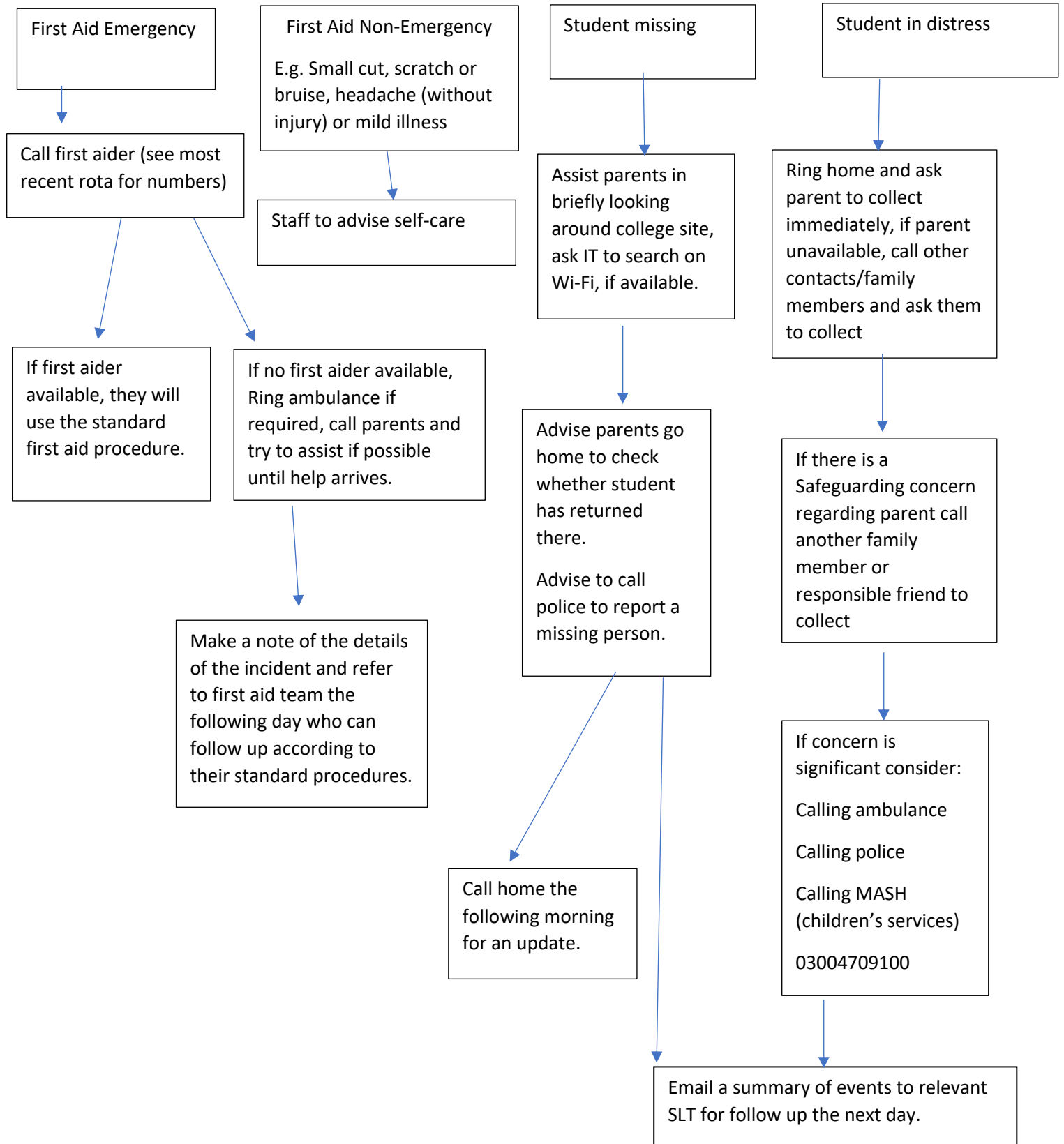


**Child Protection and the Protection of Vulnerable Adults
Principles for information sharing**



Appendix 5

After Hours Incidents



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 Director of 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

Aug 2021

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

HCL Safeguarding Policy: Sep 2022
 Last reviewed: Sep 2022
 Next review: September 2023