

Safeguarding Procedures 2019/20

1 Procedures

1.1 Designated Senior Staff Member for Child Protection

- 1.1.1 The Designated Safeguarding Lead (DSL) with lead responsibility for child protection and safeguarding issues is Jana Smidkova – Director of Marketing, Communications and Customer Services.
- 1.1.2 The DSL has a key duty to take lead responsibility for raising awareness amongst staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the students learning within the College.
- 1.1.3 The Head of Student Services will take operational responsibility for Safeguarding and act as Deputy DSL
- 1.1.4 The Head of Student Services will oversee the referral of alleged harm or abuse to the relevant investigating agencies in line with Bristol Safe procedures.
- 1.1.5 The DSL is also responsible for ensuring that:
 - Advice and support to staff on issues relating to safeguarding and child protection, including e-safety, is provided
 - A proper record of any child protection referral, complaint or concern is maintained (even where that concern does not lead to a referral)
 - Ensuring that parents of young people or vulnerable adults within the College are aware of the College's Safeguarding and Child Protection policy.
 - The College liaises with local authorities and Keeping Bristol Safe and other appropriate agencies
 - The College liaises with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for their pupils
 - The College liaises with Youth Offending Teams to ensure that appropriate arrangements are made.
 - Staff receive initial safeguarding training and are aware of the College safeguarding and child protection procedures.
 - The College's Safeguarding Committee meets as a minimum once per term
 - A Safeguarding Operational Plan is prepared and reviewed annually and forms part of the College's annual Operational Plan, and is therefore subject to Senior Management team scrutiny.
 - Will regularly update the colleges designated governor for safeguarding
 - Regular safeguarding related updates are provided to the college's designated governor for safeguarding
- 1.1.6 The DSL will provide an annual report to the Governing Body of the College setting out how the College has discharged its duties.

1.2 Designated Staff Members for Safeguarding (Safeguarding Officers)

- 1.2.1 The College will appoint an appropriate number of designated Safeguarding Advisors. These will be based across all sites. In addition to this team key safeguarding staff also

includes Head of ICT Network and Engineering Services and Senior HR Business Partner.

1.2.2 Appropriate training and support will be provided to enable the designated staff to fulfil their role. Designated Safeguarding Advisors:

- Report to the Head of Student Services
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to Safeguarding
- Have particular responsibility to be available to listen to young people or vulnerable adults studying at the College
- Will deal with individual cases, including attending case conferences and review meetings as appropriate
- Have received training in safeguarding issues and inter-agency working, as required by the LSCB and will receive refresher training at least every 2 years

In addition to working with the designated safeguarding officers all staff members should be aware that they may be asked to support social workers to take decisions about individual cases.

1.3 Allegations of Harm or Abuse

- 1.3.1 Staff should not investigate concerns or allegations themselves, but should report them immediately to the safeguarding team via My Concern.
- 1.3.2 Written records of concerns about people or vulnerable adults will be kept, even where there is no need to refer the matter immediately.
- 1.3.3 All records will be kept securely, separate from other student files, and in secure electronic file locations by the safeguarding team.

Statutory services will be notified by a member of the safeguarding team as required

- 1.3.4 If, at any point, there is a risk of immediate serious harm to a young person or vulnerable adult a referral should be made to First Response immediately. A safeguarding officer can make a referral and inform DSL and Head of Safeguarding at the same time. If the young person or vulnerable adult's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the young person or vulnerable adult's at some point.

1.4 Specific Safeguarding Issues

1.4.1 Concerns that a student may have gone missing

Staff should be mindful that a young person going missing from an education setting is a potential indicator of abuse or neglect. Any suspicion that a young person has gone missing should be reported to the safeguarding team. Statutory guidance on children who run away or go missing from home or care is provided in DfE in its January 2014 publication.

When a 16 or 17 year old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation or involvement with gangs. A 16 or 17 year old who has run away may present as homeless. In this case, local authority children's services must assess their needs as for any other child. Where this assessment indicates that the

child is as child in need and requires accommodation under section 20 of the Children Act 1989, they will become looked after.

The Keeping Children Safe in Education September 2018 publication states:

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

The College procedure for dealing with missing young people for whom we have a concern will be to immediately contact the safeguarding team who will liaise with the next of kin and (if appropriate) then contact the police and if necessary the local authority will also be contacted. Young people who repeatedly go missing will be subject to a risk assessment and be supported via the safeguarding team.

1.4.2 Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The college works closely with Operation Topaz (the Bristol based operation regarding cases of CSE) to report our concerns and receive information regarding city wide issues which could place our students at risk.

1.4.3 So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

1.4.3.1 Female Genital Mutilation

Professionals are required to report known cases of FGM relating to children. Safeguarding team will phone 101 (999 if the child is in immediate risk of harm). It is also good practise to phone First Response to notify of this.

For suspected cases the following points need to be considered:

- All requests for extended leave or circumstances where a child or young person is known to be going to a practising country of origin for the six week holidays should be reported to First Response. Other points to be aware of are as follows:
 - She has a parent from a practicing community;
 - She and her family have a low level of integration into a community;
 - The mother or any sisters have experienced FGM;
 - She is withdrawn from her peers and social group;
 - She has talked about, or you know about, the arrival of a female family elder;
 - She talks about it to other children ;
 - She refers to a 'special procedure' or 'special occasion' or 'become a woman';
 - She is out of the country for a prolonged period (holidays of 6 weeks to two months or more);
 - She is taking a long holiday to her country of origin or another country where the practice is prevalent (parents may talk about it too).
- **Prior to referring to First Response**, the parents will be invited in to consider and discuss the following: **who is going, where are they going, when are they coming back, who are they going to visit, what is the purpose of the visit?**

An explicit conversation with the parent will need to take place about FGM, highlighting that the practice is illegal in this country and is classified as child abuse. This includes that the law in this country protects British nationals abroad so that it is also illegal to take the girl abroad to perform FGM. Parent's response and reactions are required to be recorded. Parents should also be notified that First Response will be contacted. It is good practice to seek consent to share this information. However, if a parent refuses, a member of staff speaking to the parent has an obligation to notify them that this is our professional duty to inform First Response.

- **What happens next?**

First Response will make a risk assessment based on the information provided, and the information they may already hold on the family. The likely outcome is that a joint visit with the police and social care will be made where a written agreement will be signed.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

1.4.3.2 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The safeguarding team can contact the Forced Marriage Unit if they need advice or information:
Contact: 020 7008 0151 or email fm@fco.gov.uk.

1.4.4 Knives and other weapons

No one is permitted to bring knives or any other offensive weapons to college premises. The college takes this type of offence very seriously.

Anyone who believes that they have a legitimate reason to carry a knife or another weapon, must disclose this to the college. Students are required to disclose this information to a member of the safeguarding team, employees are required to disclose this information to Human Resources.

The college will undertake a risk assessment with the student or employee to determine the reasons and level of risk. Based on this, the college will make a decision regarding follow up actions. For students, the College Disciplinary Policy will be utilised to resolve the issue. Situations involving employees will be administered by Human Resources.

Wearing of the Kirpan for religious reasons

Kirpans are an exception to the above rule and may be worn on campus only by students and employees who are baptised observers of Khalsa Sikhism and those who observe the Sikh religion and are able to demonstrate that they must wear a kirpan as part of their religious beliefs. (e.g. a letter from their Gurdwara, or a reasonable explanation required on a case by case basis.) As it is only worn as part of the 5 K's, if it is worn on its own then it should be confiscated and parents advised asap (if the student is under 18). The 5 Ks are:

- Kesh (uncut hair)
- Kara (a steel bracelet)
- Kanga (a wooden comb)
- Kaccha (cotton underwear)
- Kirpan (steel sword)

The Kirpan should not be visible and should be worn under the clothing and secured to make removal difficult but not impossible. The Kirpan (hilt, blade and sheath) should not be greater than 7 inches/17.8 centimetres in length.

Modifications to a student's programme may be necessary, if wearing the Kirpan might inadvertently cause physical harm to the wearer or another individual. However, sensitive discussion regarding this will be acceptable to the individual. For example, for sports students, the Kirpan may be kept by the teacher for safekeeping.

The college reserves the right to periodically, in a private and sensitive manner, seek to verify that the limitations with respect to Kirpan length, security measures and concealment continue to be met. The right to wear the Kirpan will be suspended if it is misused by the wearer. For students, the College Disciplinary Policy will be utilised to resolve the issue. Situations involving employees will be administered by Human Resources.

1.4.5 Concerns of Radicalisation and Extremism

All staff are part of a multi-agency approach to protect students at risk from radicalisation, this is called Prevent. All suspicions of activity of this kind should be immediately referred to the safeguarding team via My Concern.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- Their day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
 - Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
 - Using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
 - Condoning or supporting violence or harm towards others; or
 - Plotting or conspiring with others.

(<http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy/>)

1.4.6 Domestic violence, Gender-based violence/violence against women and girls (VAWG) and teenage relationship abuse.

Incidents or pattern of incidents of controlling, coercive, threatening behavior, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality and is applicable to teenagers engaged in abusive relationships

1.4.7 Online Sexual Abuse

The use of technology to manipulate, exploit, coerce or intimidate a young person or vulnerable adult to (but not limited to): engage in sexual activity; produce sexual material/content; force a young person or vulnerable adult to look at or watch sexual activities; encourage a young person or vulnerable adult to behave in sexually inappropriate ways; or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.

1.4.8 E-safety

Online safety (e-safety) is an essential element of safeguarding young people and vulnerable adults in the digital world, when using technology such as computers, tablets, mobile phones or games consoles. Online safety is viewed by the whole College as a safeguarding issue. We therefore ensure that suitable and appropriate filtering and monitoring systems are in place to protect students from inappropriate content which meet the needs of the College whilst ensuring access to required educational material. Keeping Children Safe in Education 2018 recognises that whilst educational establishments are able to monitor information which passes through their servers there is an additional issue regarding students' use of mobile technology and networks. This guidance highlights the importance of a whole staff approach to e-safety to ensure that staff report any related concerns they may have.

The purpose of the e-safety procedure is to identify the key principles expected of all members of the College, with regards to the safe and responsible use of technology and to ensure that we are working in a safe and secure online environment. It is also intended to raise awareness with all members of the College regarding the potential risks as well as benefits associated with an online presence. It is intended to identify clear procedures to use when responding to online safety concerns that are known by all members of the college.

It applies to all access to the internet and use of information communication devices, including personal devices, or where students, staff or other individuals have been provided with College issued devices for use off-site, such as a work laptops, tablets or mobile phones.

1.4.9 Private Fostering

Private Fostering is essentially arrangements made privately for the care of a child or young person under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. A relative, under the Children Act 1989, is a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent. A private foster carer may be a friend of the family, the parent of a friend of the child or young person, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child or young person is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

The College has a responsibility to refer to Children's Services any private fostering arrangement. Children's Services will undertake an assessment to ensure the needs and welfare of the child or young person is being met and that adults caring for them have access to advice and support.

1.4.10 Peer on peer abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

1.4.11 Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include

- increased absence from school,

- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

1.5 Early Help

The Early Help Service provides integrated support to children, young people and their families. Early Help is a local authority managed 'opt in' service for families with children aged under 18. The service is about early intervention and working proactively with a family before issues reach the child protection threshold. The key objective of the service is to offer practical advice, support and direct case work to prevent issues escalating and requiring statutory intervention.

The Early Help teams consist of a range of professionals who can offer an individualised service depending on what issues a family are facing. The teams are locality based and generally consist of: social workers, youth and community workers, family support workers, family intervention workers, children and young people mental health specialist, employment advisors, domestic abuse specialist workers, and police and adult mental health specialists.

We can refer to Early Help where:

- we are working with a young person who we are worried about
- we have exhausted all support options which we can offer/access for the young person
- the level of worry has not decreased despite this intervention
- the young person/family are likely to agree to support
- the barriers include: crime and anti-social behaviour, poor attendance in education, financial exclusion, domestic abuse, health problems and/or where the child needs help due to other significant issues in the family

All staff have a responsibility to identify children who may benefit from Early Help support and should refer such cases via the safeguarding team.

1.6 Young People on School Link Programmes

1.6.1 The College has a duty of care towards young people who are studying on a school link programme whilst on College premises. In arranging school link programmes for young people of compulsory school age the College will:

- Provide schools with adequate details of provision to enable the school to obtain parental consent for their child to participate. The College will require evidence of this written consent.
- Seek to ensure that for young people with special education needs (SEN), are informed of the details of the statement that has been agreed, in order to determine the level of support needed.
- Request details from the school of any medical needs or requirements young person may have and agree with the school how the necessary support can be provided.

- Ensure that young people are made aware of the general standards of safety with which all young people and FE college students should comply.
- Inform the school of any safeguarding issues involving a school link student. Request safeguarding information regarding school link students from schools.

1.6.2 The College will take attendance registers twice each day and monitor attendance of young people on school link programmes. Young people without an authorised reason for absence from their programme and/or those with poor attendance pattern will be immediately reported to the school.

1.6.3 All concerns regarding safeguarding or child protection for students on school link programmes must be referred to the College's designated Safeguarding Officer and to the Child Protection Officer at the school where the young person is on roll (or the young person's social worker if the child is not on a school roll).

1.7 Work Experience, Work Placements and Volunteering

- 1.7.1 Work placement is defined as: students undertaking work placement over a long period of time to achieve a qualification, for example, one or two days a week in the workplace over a period of two months or more. Work experience is defined as anything that is short and clearly defined with the aim of improving employability skills as well as a curriculum focus if appropriate.
- 1.7.2 Staff who arrange, vet and monitor work experience and work placements must receive at least an annual safeguarding update as defined in section 1.12 and have appropriate competencies under the Health and Safety Procedures and Guidance for the activity.
- 1.7.3 Students who are placed with employers will be given advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse. This will be delivered in the College's tutorial or curriculum content and reminded by staff responsible for organising work experience and work placements.

Work experience

- 1.7.4 Organisations / individuals who offer work experience will be vetted for their suitability before a student is allocated a place by ensuring that the provider has policies and procedures in place to protect young people from harm. The process for completing this assessment under the colleges duty of care is set out in the Procedure and Guidance for Health and Safety Assessments of Workplaces for Work Experience Learners, under the Health, Safety and Welfare policy.
- 1.7.5 The college will consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations include whether the person providing the teaching/training/instruction/supervision to the student on work experience will be:
- unsupervised themselves; and
 - providing the teaching/training/instruction frequently (more than three days in a 30 day period).
- 1.7.6 The college is not able to request an enhanced DBS check with barred list information for people supervising students on work experience aged 16 and above. However, if the person working with the student is unsupervised and the same person is in frequent contact with that student, the work is likely to be regulated activity. In this instance, the

College has a right to ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Work placements

- 1.7.7 Organisations / individuals who offer work placements will be vetted for their suitability before a student is allocated a place by ensuring that the provider has policies and procedures in place to protect young people from harm. The process for completing this assessment under the college's duty of care is set out in the Procedure and Guidance for Health and Safety Assessments of Workplaces for Work Based Learners, under the Health, Safety and Welfare policy.
- 1.7.8 The vetting arrangements for employers used for work placements will be:
- A Workplace Risk Assessment check will be carried out on each employer
 - Heads of Departments will oversee this activity within their teams.
 - The completed Health and Safety Assessments of Workplaces for Work Based Learners.
 - This policy will be made available to all those involved in placements.

Volunteering

- 1.7.9 If the college is the main organiser (or significant partner) of a volunteering event and the activity is part of the timetabled study period then a risk assessment of the event or activity will need to be undertaken. In this case the College's DBS policy and public liability insurance should apply.
- 1.7.10 If the College is signposting students to a volunteering opportunity which is outside of the timetabled study period, and not organised by the College, then a risk assessment will not be undertaken by the College.

Making a referral

- 1.7.11 When a Health and Safety Assessments of Workplaces check suggests that an employer does not have safeguarding and child protection policies, or awareness or safeguarding and child protection issues, or where there is any evidence of risks to child safety, appropriate members of staff will be instructed to ensure that no students are placed with that employer until a College Safeguarding Officer has made an appropriate assessment.
- 1.7.12 If an employer is deemed unsuitable for work experience placements, the College will make the Keeping Bristol Safe or LADO aware of that fact.

1.8 Visiting speakers and external guests / room bookings

- 1.8.1 The College has a Visiting Speakers, Organisations and Events Protocol which staff should refer to and adhere to when making arrangements with visiting speakers.
- 1.8.2 Organisations/individuals who provide/are external speakers for College students or users of the College facilities will be vetted for their suitability before the visiting speaker is agreed to present to students or use/hire the College facilities.

1.8.3 The vetting arrangements for external speakers or users of College facilities will be:

- A Risk Assessment check will be carried out on each visiting speaker / user of College facilities by a member of staff who deals with a particular booking
- The College will communicate to each visiting speaker / user of College facilities its values and inform the speaker/user that they are required not to contradict or undermine these values.
- All visiting speakers / external users will be assigned a member of staff to accompany them while on College premises or provided with guidance and rules and regulations about College access and student interaction. Visiting speakers / external users are expected to fully comply with these.
- If a visiting speaker / user of College facilities is deemed unsuitable, the College reserves the right to reject the speaker / user and may make the Keeping Bristol Safe or LA Designated Safeguarding Officer aware of that fact.

1.9 Criminal Record Checks for students and alleged criminal offences

- 1.9.1 The College will ask all students to disclose during application and at enrolment any unspent criminal convictions. Students with convictions for minor offences may be allowed to continue with the enrolment process, while more serious concerns will be referred to an internal panel where a risk assessment is carried out by the appropriate team of people as outlined by the college's Student DBS Procedures. Admissions Policy and Student DBS Procedures for more details.
- 1.9.2 Where a new Criminal Conviction or police investigation occurs during the academic year, the case should be referred to The Safeguarding team via My Concern.
- 1.9.3 If any criminal activity is suspected the College reserves the right to involve the police and pursue such matters through the legal process.
- 1.9.4 The College will co-operate and not prejudice any police enquiries. Any student involved in alleged criminal activity may be suspended until the outcome of any police enquiry is complete. Any failure to co-operate with the police will be taken into account during the College's disciplinary procedure.
- 1.9.5 If work experience or placement takes place in a 'specified place' which gives the student opportunity for contact with children, the work experience / placement provider may request a DBS enhance check on the student aged 16 years or over.

1.10 Support for Students and Parents

- 1.10.1 Students will be made aware of possible risks to their safety, including e-safety, through tutorial, and in the course of studying in the College, with the intent that they are better able to protect themselves from situations of potential harm.
- 1.10.2 The College will ensure that parents have an understanding of the responsibility placed on the College and staff for safeguarding and child protection by setting out its obligations in corporate publications.

1.11 Subcontractors

- 1.11.1 The College has clear information sharing agreements with its subcontracting partners. This involves a single central record kept for all partner DSLs. This group receives annual face to face training. The Head of Student Services communicates with partner DSLs throughout the year to share other training materials ensuring that all partner organisations have the same access to training and materials as college staff.
- 1.11.2 Partner DSLs have access to My Concern to report and record new concerns and the college asks that they record all safeguarding concerns and the actions taken on this system, with the additional support of the Head Of Student Services and the college DSL, if required.

1.12 Recruitment of Staff and Volunteers

- 1.12.1 The College will ensure that procedures are in place to ensure that all appropriate checks are carried out on staff, volunteers and external agencies who have substantial access to children and students, including DBS (Criminal Records Bureau (enhanced) checks), and that records are kept of such checks as per the Recruitment and Selection Policy.
- 1.12.2 Keeping Children Safe in Education 2018 also highlights the importance of safer recruitment processes, including having a trained member of staff on all recruitment panels and telephone contact with all referees.

1.13 Staff Training and Development

- 1.13.1 The College will provide safeguarding and child protection training for all staff (and Governors). The training will:
- Help staff to recognise the signs of possible harm to children and young people.
 - Outline roles and responsibilities.
 - Ensure staff know how to proceed when possible harm is suspected and whom to contact.
- 1.13.2 Safeguarding and child protection training is included within the induction programme for all new staff. Managers will not be permitted to confirm new staff in post if the staff member has not completed the college safeguarding training package.
- 1.13.3 All Safeguarding Officers must attend the BSCB safeguarding training
- 1.13.4 Regular safeguarding update will be available to all staff at least annually through college days of Continuous Professional Development, Team Collaboration Time and/or bespoke arrangements based on departmental need.
- 1.13.5 Refresher training for all staff will be undertaken at least every 2 years. Governors will attend safeguarding refresher training if they are reappointed as a Governor for a second term of 4 years within 12 months of their reappointment.

1.14 Reporting and Dealing with Allegations of Abuse made against Members of Staff

- 1.14.1 Where there is an allegation of harm or abuse against staff, both inside and outside the work setting, the College will work to ensure allegations are dealt with quickly, fairly and consistently. Procedures under this policy apply to all staff, as well as volunteers. The procedures are detailed under Section 3.

1.15 Staff relationships with Students

- 1.15.1 As per the staff code of conduct “Should a relationship with a student be in place when a student enrolls at the College it is the responsibility of that member of staff to report the matter to their immediate line manager for the DSL or another member of Strategic Leadership Team to risk assess, and if suitable, to approve so that alternative teaching, tutoring, supervising or assessing arrangements should be made. If this is not immediately reported then this may lead to disciplinary action being taken against the member of staff”
- 1.15.2 In no circumstances should a sexual relationship develop between a young student or vulnerable adult and a member of City of Bristol staff. This will be considered gross misconduct and a serious breach of this Code. Where a person aged 18 or over is in a specified position of trust with a child under 18 or a vulnerable adult, it is a criminal offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

1.16 Photographs and third party leaflets

- 1.16.1 This should be read in conjunction with the guidance regarding photographs on the intranet and college’s privacy notice. Photographs may be taken of events and activities that occur at the College for work and marketing purposes. The consent of individuals will need to be sought when they are the main focus of the photograph. For large groups consent forms will not need to be sought for photographs, however, appropriate public notices will be displayed with a reference to the college’s privacy notice.
- 1.16.3 Students are informed of the College’s privacy notice during enrolment. Photography is always based on consent. Students have the right to withdraw their consent at any time as per guidelines provided in the college’s privacy notice.
- 1.16.2 The College reserves the right to procure any third party promotional literature/information (printed and electronic) and subsequently endorse or reject to share their contents with its students and/or staff based on their suitability (suitability will be assessed in light of safeguarding and beyond). Any third party information which contains extremist or otherwise suspicious content will be reported to Avon and Somerset Police or another suitable agency and/or Prevent Regional HE/FE Co-ordinator – South West.

1.17 Student Exceptional Travel

- 1.17.1 If the student is under 18 and needs to be provided with exceptional travel (such as a taxi or ambulance) the parent/carer must be contacted. If the parent is not available to accompany the student they must be accompanied to their home address in the taxi or if an ambulance is called, to hospital by a member of staff. Students under the age of 18 may only travel on their own if their parent has given the College suitable permission.

1.18 Reporting unauthorised individuals discovered on a college site

- 1.18.1 Any suspected individuals / groups on college premises should be approached immediately and lanyards requested. If the individual does not have college identification, or there is a

concern that the identification presented has not been officially granted by the college, they should be questioned and escorted to reception to sign in correctly or removed from the premises.

- 1.18.2 If additional concerns are present such as aggressive or dangerous behaviour, the urgent incident response number 5333 should be called. All cases of suspected intruders should also be logged via the My Concern system and to health and safety.
- 1.18.3 For the purposes of preventing crime or supporting police investigation, the college will contact police and/or Prevent team to log the concern, sharing CCTV footage where appropriate.

2 Health, Safety & Wellbeing

- 2.1 The College reserves the right to refuse entry of a student where health and safety issues may be compromised as a result of that admission.
- 2.2 In line with the College's Equality and Diversity Policy and recognising the College's duties in the Equality Act 2010, the College seeks to have due regard to those students who present with issues related to their wellbeing either at the admissions phase or during their studies.
- 2.3 The College has a duty of care to respond appropriately to situations where there are substantial concerns relating to a student's mental and/or physical functioning and the impact upon the individual and/or other students and staff.
- 2.4 The College reserves the right to suspend any student whose wellbeing is being affected (or the wellbeing of other students and staff) by signs of illness, mental health difficulties, personality or emotional disorders, and unusually disruptive behaviour. This will be done in accordance with the College's Fitness to Study / Fitness to Practice Policy. The responsibility for cases such as this will be with the Senior Designated Lead for Safeguarding. If appropriate, the College may need to consider the views of representatives from the medical profession and other key workers to inform this decision (student consent will be sought, whilst noting that safeguarding our students and staff may override data protection issues).
- 2.5 During a period of suspension, the College will take all reasonable steps to ensure that the student concerned is able to keep up-to-date and is able to progress with their course through remote access to the College's Virtual Learning Environment and via telephone / e-mail / postal mail contact with tutors and Student Support staff. The College cannot guarantee that full access to all learning resources and services will be possible remotely.

During suspension, the student's submitted work will be assessed as normal. A suspended student may request access to assessment opportunities within the College premises during their suspension period. In this circumstance the Senior Designated Lead and Assistant Principal, will consider the risk and confirm whether permission is given or not. In either case Assistant Principal will confirm appropriate or alternative arrangements for assessment so as to not disadvantage the student or other students, as far as is possible.

The length of suspension may vary in these cases (for example whilst a student awaits the outcome of new treatment). The Assistant Principal will make contact with the student, parents/guardians throughout the process at intervals of no more than 10 working days. Where a suspension means that a student misses too much College to be able to continue with the course the College reserves the right to withdraw the student. Right of appeal for

exclusion (or suspension which leads to withdrawal) applies in the same way as it would for any other exclusion.

3 Reporting and Dealing with Allegations of Abuse Against a Member of Staff

3.1 Introduction

3.1.1 The procedures apply to all College students, contracted staff, whether they work in the main College campuses, outreach centres or other designated areas, volunteers or governors. The word “staff” is used for ease of description. These procedures only apply to current staff. Any allegations against a staff member who is no longer employed by the College will be referred to the police and the Local Authority Designated Officer LADO.

3.1.2 Because of their frequent contact with young people and vulnerable adults, staff in educational institutions may have allegations of child abuse made against them and, in rare instances, such allegations may be true. The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

3.1.3 The College recognises that the Children Act 1989 (updated 2004) states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

3.2 Receiving an Allegation from a Young Person or Vulnerable Adult

3.2.1 A member of staff who receives an allegation about another member of staff from a young person or vulnerable adult should follow the guidelines under 1.3 for dealing with disclosure

3.2.2 The allegation should be reported immediately to the Director of Human Resources and Organisational Development (DHROD) or Head of Human Resources and Organisational Development.

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Principal (or designated person).
- Record information about times, dates, locations and names of potential witnesses.
- Where the Principal or another senior post holder is the person against whom the allegation is made the Chair of Governors should be informed immediately.

3.3 Initial Assessment by HR

3.3.1 DHROD or HR Senior Business Partner should make an initial assessment of the allegation, consulting with the DSL and the LADO as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LADO.

3.3.2 Undertaking the Working Together to Safeguard Children (2015) guidance and 2018 Guidance on Keeping Children Safe in Education, the designated person will refer to the Local Authority Designated Officer for Safeguarding an allegation of abuse or maltreatment made against a person who works with children where that person who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a young person or vulnerable adult
- Behaved towards a young person or vulnerable adult in a way that is unsuitable to work with young people or vulnerable adults, in connection with the person's employments or voluntary activity.

3.3.3 It is important that the designated person does not investigate the allegation. The initial assessment should be on the basis of the information received. The designated person should make a decision based on whether or not the allegation warrants further investigation.

3.4 Potential outcomes are:

3.4.1 The allegation warrants further investigation

3.4.2 The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the young person or vulnerable adult. The matter should be addressed in accordance with the College disciplinary procedures.

3.4.3 The allegation can be shown to be false because the facts alleged could not possibly be true.

4 Enquiries and Investigations

4.1 Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College will assist the agencies with their enquiries.

4.2 The College shall hold in abeyance its internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures. The member of staff will be made aware of these rights under the College's disciplinary procedures.

4.3 If there is an investigation by an external agency, the designated person will be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the College gives every assistance with the agency's enquiries. The Principal (or designated person) will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

4.4 Subject to objections from the police or other investigating agency, DHROD or Head of Human Resources and Organisational Development Partner shall:

- Inform the young person/vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
 - Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process shall involve.
 - Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
 - Inform the Chair of Governors of the allegation and the investigation.
- 4.5 The Designated person shall keep a written record of the action taken in connection with the allegation.

5 Suspension of Staff

- 5.1 Suspension will not be automatic. In respect of staff other than the Principal or another senior post holder, suspension can only be carried out by a senior post holder (e.g. the Principal, Vice Principals). In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Deputy Chair).
- 5.2 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration will be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- 5.3 Suspension will only occur for a good reason. For example:
- 5.3.1 Where a young person or vulnerable adult is at risk.
 - 5.3.2 Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
 - 5.3.3 Where necessary for the good and efficient conduct of the investigation.
- 5.4 If suspension is being considered, the member of staff will be encouraged to seek advice, for example from a trade union.
- 5.6 The member of staff will be informed that an allegation has been made and that consideration is being given to suspension. It will be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.
- 5.7 Where a member of staff is suspended following an allegation of abuse against a young person or vulnerable adult, the Principal (or Chair or Deputy Chair of Governors) will address the following issues:
- 5.7.1 The Chair of Governors should be informed of the suspension.
 - 5.7.2 The Governing Body should receive a report that a member of staff has been suspended pending an investigation, the detail given to the Governing Body should be minimal.
 - 5.7.3 Where the Principal has been suspended, the Chair or Deputy Chair of Governors will need to take action to address the management of the College.

5.7.4 Depending on the nature of the allegation, the Principal will consider whether a statement to the students of the College and/or parents/carers should be made.

5.8 The suspended member of staff will be given appropriate support during the period of suspension. He/she will also be provided with information on progress and developments in the case at regular intervals.

5.9 The suspension will remain under review in accordance with the College disciplinary procedures.

6 The Disciplinary Investigation

6.1 The internal disciplinary investigation should be conducted in accordance with the existing College disciplinary procedures.

7 Allegations without Foundation

7.1 False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to the LADO in order that other agencies may act upon the information.

7.2 DHROD or Head of Human Resources and Organisational Development will:

7.2.1 Inform the member of staff against whom the allegation is made both orally and in writing that no further disciplinary or child protection action will be taken.

7.2.2 Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.

7.2.3 Where the allegation was made by a young person or vulnerable adult other than the alleged victim, consideration will be given to informing the parents/carers of that young person or vulnerable adult.

7.2.4 Prepare a report outlining the allegation and giving reasons for the conclusion and confirming that the above action had been taken.

7.2.5 Consider whether the allegation made against the member of staff was malicious. In such an event if the young person or vulnerable adult is a student at the College, an investigation under the College's Student Disciplinary Procedures or another related policy may be undertaken.

8 Allegations against the Principal

The chair of the governing body on the advice of the Clerk, is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the principal of the college.

9 Records

9.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

- 9.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the College's statutory duty to inform the Secretary of State for Education under the "List 99" procedures.

10 Referral Procedure for 'Serious' Cases

- 10.1 All reports of Child Protection issues must be referred to the designated Safeguarding Officer as soon as possible after disclosure has been made. See 1.4.1 for procedure on missing children.
- 10.2 All referrals should be clearly identified or marked 'Safeguarding Issue' and can be made by My Concern, telephone, email or any other appropriate method. The following procedures refer to safeguarding concerns a student may have about themselves, another student, parents or guardians or any other adults (not including staff which are dealt with in Section 3).
- 10.3 Once the initial referral has been made the designated College Safeguarding Officer will talk the case through with the referrer and others involved then make a decision regarding further appropriate action.
- 10.4 The safeguarding officer will ensure the young person's or vulnerable adult's wishes or feelings are taken into account when determining what action to take and what services to provide to protect them. Students will be supported to express their views and give feedback on the service wherever possible.
- 10.5 If an allegation has been made by one student against another then an investigation will be conducted. The Designated Lead for Safeguarding will oversee any investigations of this nature and reserves the right to suspend students were necessary during an investigation.

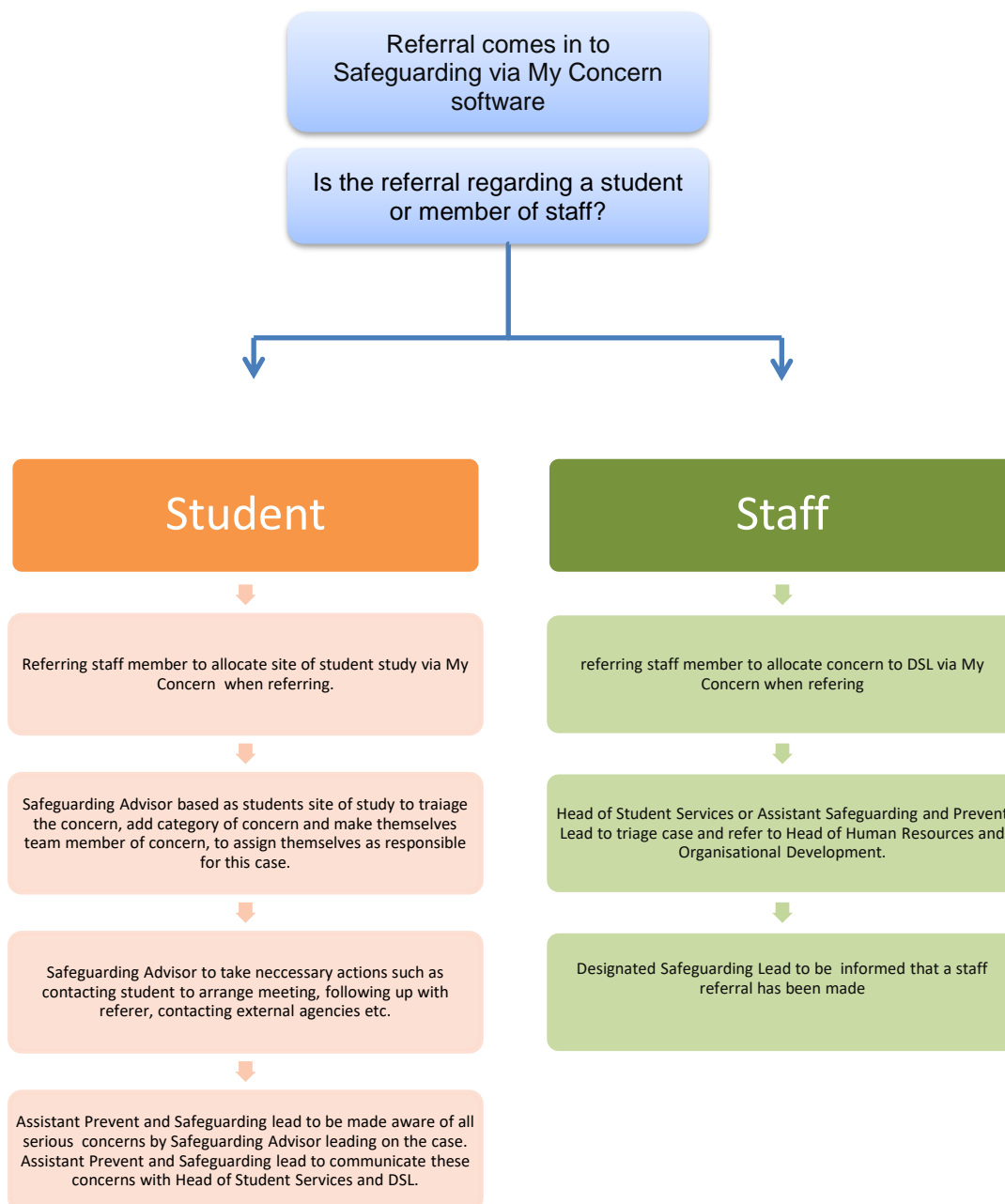
The College's responsibility is not confined to the protection of College students. If any member of staff is made aware of any harm to any child, a referral to the Safeguarding Team must be made.

- 10.6 For those non-emergency issues which require a serious safeguarding response; (e.g. referral to the Police, the local authority, social services) examples include: serious domestic violence; threat of forced marriage; sexual assaults; serious incidents involving mental health issues; witness protection; (this list is not exhaustive), the police communication procedure regarding students should be followed (Appendix 5).

Parents will be contacted (for under 18 year olds and over 18 if genuine concern of mental well-being, or vulnerable person) unless to do so would put the student 'at risk' of harm.

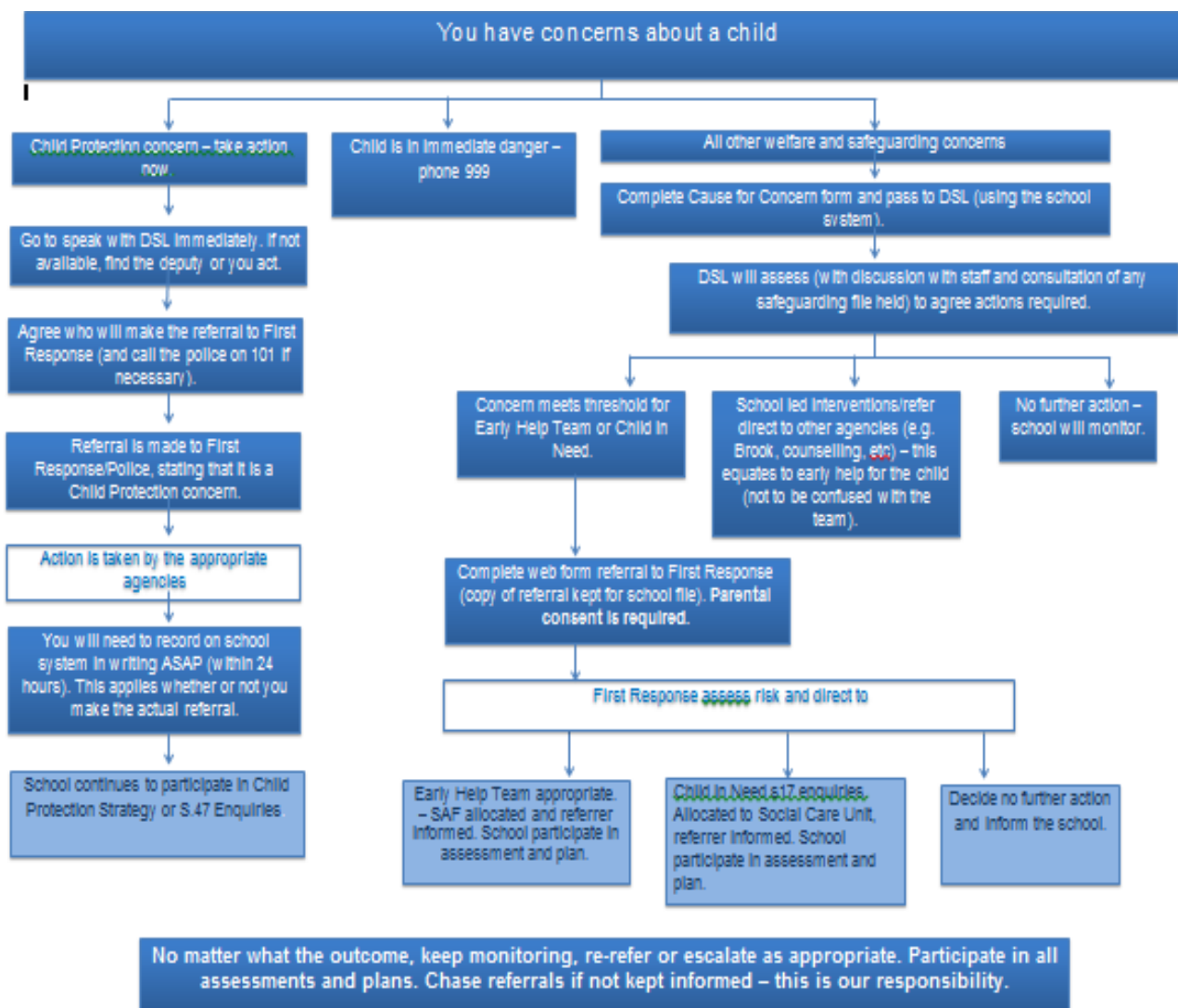
- 10.7 The safeguarding team will provide feedback, where appropriate, on outcomes of cases for staff and students. They will support case conference or core group meeting requests from local authorities and contribute to any Education Health Care Plans as requested. All serious cases will be recorded on My Concern. In addition to working with the designated safeguarding lead, staff members should be aware that they may be asked to support social workers to take decisions about individual young people or vulnerable adults.

APPENDIX 1: Safeguarding Process Chart



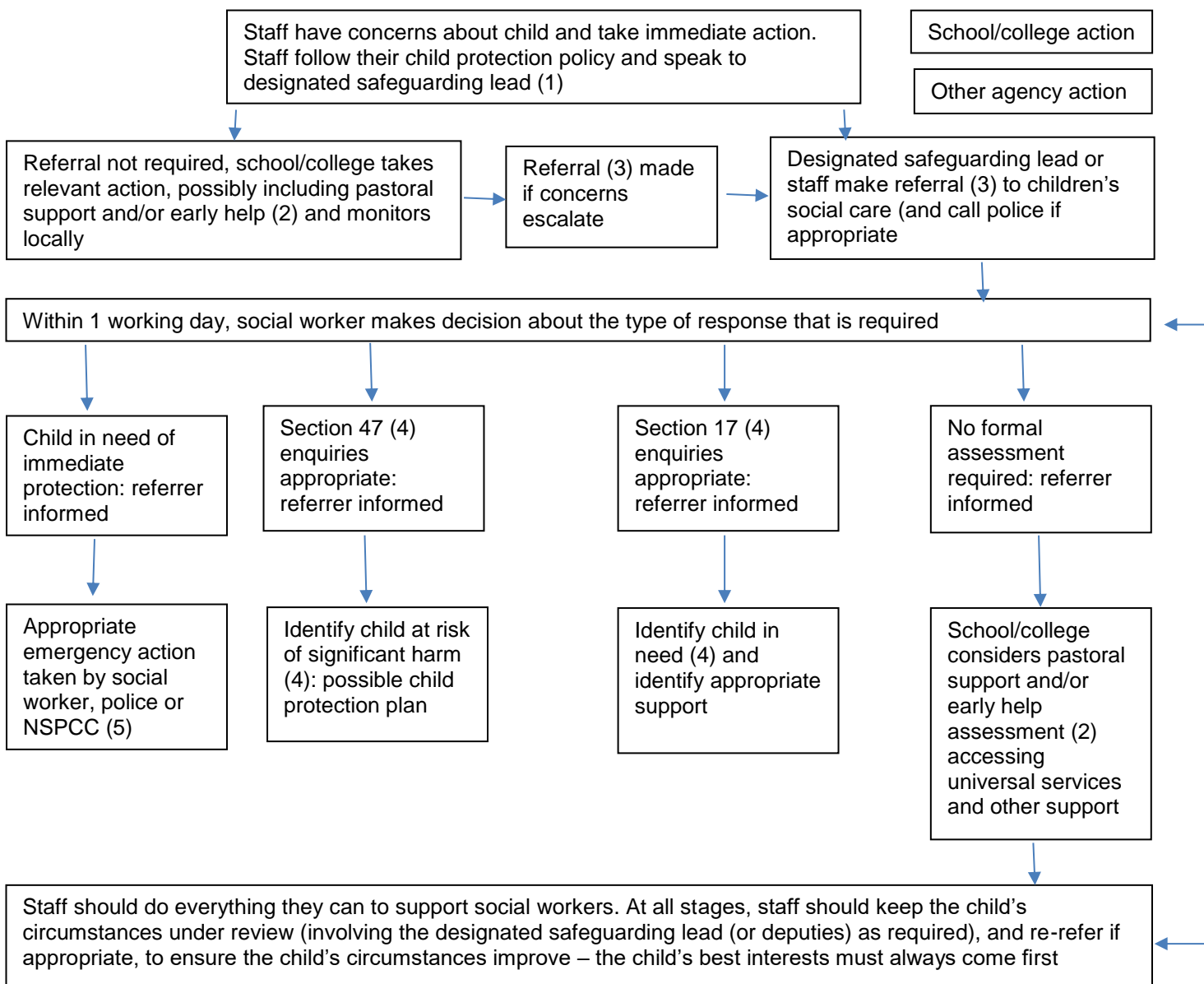
APPENDIX 2

If you are concerned about a child living in Bristol



APPENDIX 3

The diagram below shows the flow of actions following a disclosure from the Department for Education and Skills published statutory guidance document “Keeping Children Safe in Education”, 2018.



1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

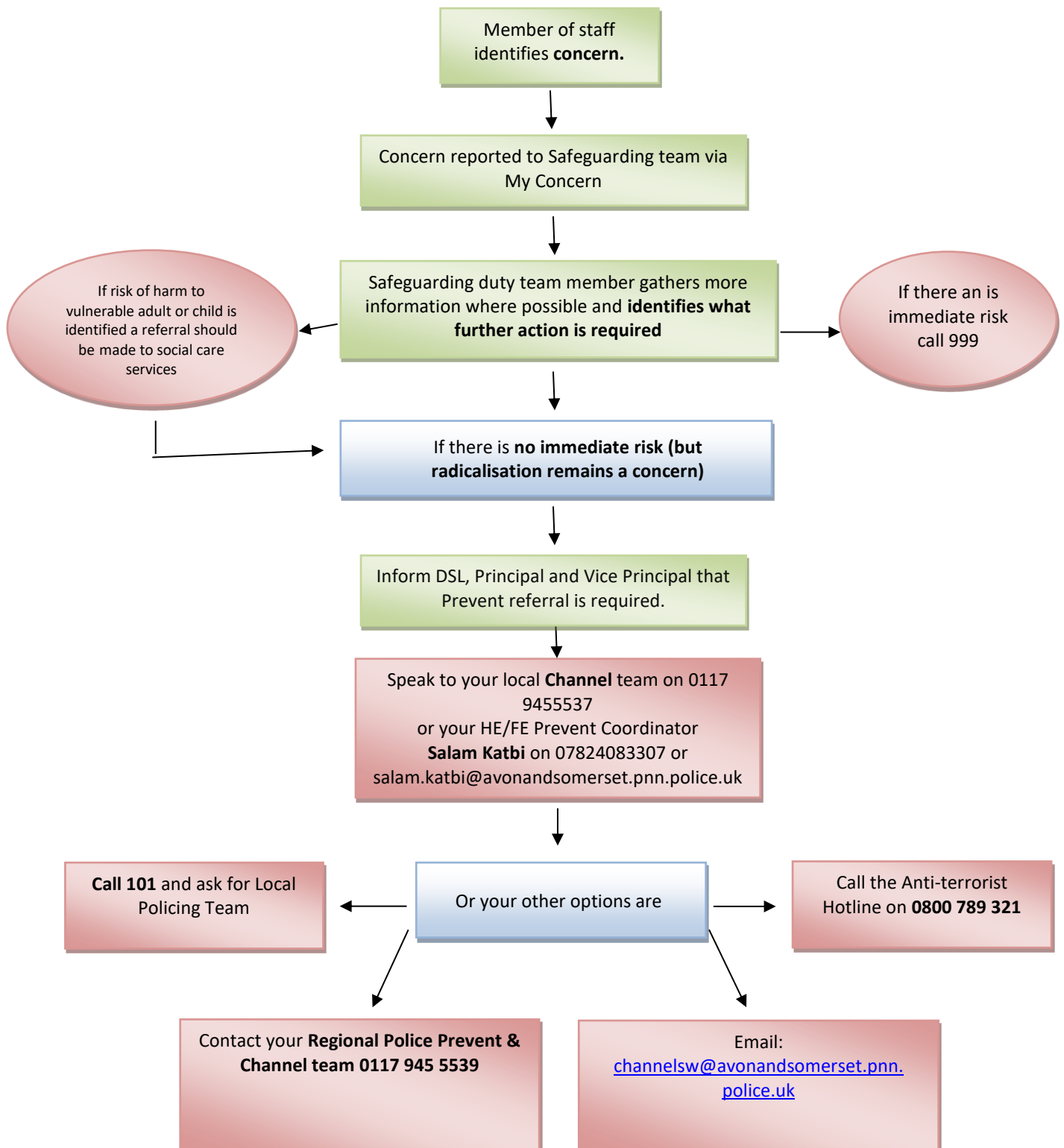
(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

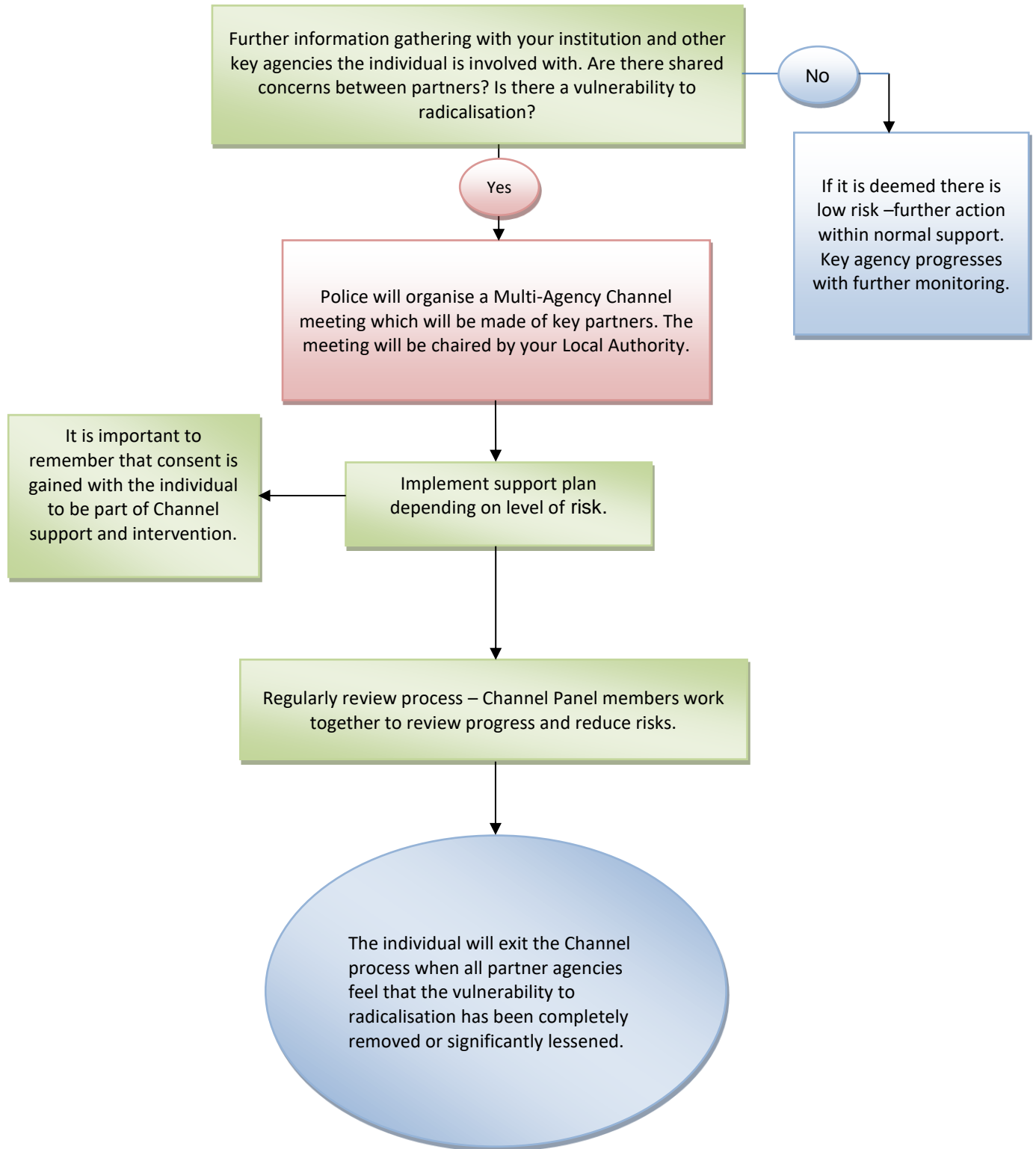
APPENDIX 4

Process map for reporting a concern of a vulnerable individual at risk of radicalisation.

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:



Once a referral has been made and enters the Channel process, the below process map illustrates what happens next...



Once a referral has exited the process it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.

APPENDIX 5 – Police communication procedure regarding students

The purpose of this procedure is to provide information to all staff on how to appropriately manage the college's communication with police whilst providing a high level of support to our students.

1 Background

The college is committed to providing a safe place to study for all students and therefore it is vital that communication with police only happens if absolutely necessary and that in all cases information is only shared as appropriate. To achieve this it is important to outline clear processes which need to be followed in the cases of any such communication and identify the most appropriate individuals to carry out and authorise contact with police.

2 Police requests for information about our students

Requests for information by police can come to the college either via email or telephone communication or due to officers attending the premises. It is important that all staff are aware that no information can be shared without the appropriate data release documentation and that these documents need to be approved by either the college's Data Protection Officer (DPO), the Head of Student Services or via a member of the Strategic Leadership Team (SLT). These individuals will decide the validity of the request and the appropriate level of information which can be shared. No member of staff should share any information without consultation with those authorised above.

3 Concerns which may result in police being called

To support our students the college may need to contact police, however it is vital that our students are not criminalised unnecessarily and that only information vital to the investigation is shared.

In a non-emergency situation, contact with police should only be made by the DPO, the safeguarding team, student services staff or a member of SLT. Staff are required to gain consent from the college's Data Protection Officer (DPO), the Head of Student Services or a member of the Strategic Leadership Team (SLT) before contact with police is made. Should none of the above be available, please dial extension 5333 who will be able to put you in touch with the appropriate authoriser.

In cases of emergency, staff should call 999.