

<b>Safeguarding Policy</b>		<b>Policy Ref:</b> <b>SMBP</b>
<b>1.</b>	<b>Purpose</b>	
	This policy sets out a framework through which the College will carry out its responsibilities for safeguarding its students.	
<b>2.</b>	<b>Scope</b>	
	The Policy applies to all governors, staff, agency workers, contractors, visitors and volunteers working in the college and off-site related college activities.	
<b>3.</b>	<b>Policy Statement</b>	
	The College has a legal duty to ensure that it functions with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training at the College as outlined in Keeping Children Safe in Education.	
<b>4.</b>	<b>Responsibilities</b>	
	As defined in section 2 of the policy.	
<b>5.</b>	<b>Equality and Diversity Impact Measure</b>	
	The College has considered the Equality and Diversity implications in relation to the rules and policies set out in this document. It does not consider them to unduly impact upon any protected group. Appropriate measures have been taken so as not to unduly impact on any protected group.	
<b>6.</b>	<b>Environmental Impact Assessment</b>	
	The College has considered environmental implications in relation to the rules and policies set out in this document and there is no environmental impact.	
<b>7.</b>	<b>Data Protection Impact</b>	
	The impact of this policy on an individual's data has been considered and necessary actions implemented	
<b>8.</b>	<b>Associated Policies, Processes, Procedures or Guidance</b>	
	The following are policies, processes, procedure or guidance which should be referred to alongside this policy: Prevent Strategy, Missing Students Policy, Substance Misuse Policy and Procedure, Looked After Children Policy, Student Harassment & Bullying Policy, Work Experience Policy, ICT Acceptable Use Policy, Data Protection Policy, Whistle Blowing Policy, Equality & Diversity Policy	

Person Responsible for Policy

Student Services Managers

Date Policy Written

February 2020

Date Approved by SMT

**INNOVATIVE**

**ETHICAL**

**EXCELLENT**

**SUSTAINABLE**

Date Approved by Governors

Version	Date	Status & changes	Author

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## 1 Purpose

This policy sets out the framework through which the College will carry out its responsibilities for safeguarding its students. The policy applies to young people under the age of 18 and to vulnerable adults (over 18), who may be at risk because of a mental, physical or learning disability or illness and cannot always take care of themselves, or protect themselves against harm or exploitation. The policy also applies to all College staff, contracted staff, volunteers, governors and College partners. The policy applies to work, study or living in the main College campuses or other designated areas including work experience and other off-site activity organised by the College.

## 2 Responsibilities for Safeguarding

- A nominated governor will be responsible for the oversight of the Safeguarding Policy and procedures.
- A Designated Senior Person (will take lead responsibility for safeguarding and receive appropriate training and support and adequate resources to carry out this role.
- The college will have a Safeguarding team who will deputise for the Designated Senior Person and will also lead on the implementation of this policy in the areas of the college for which they have responsibility. The Safeguarding team are listed in **Appendix 1**.
- All staff are expected to contact either the Designated Senior Person, or a member of the Safeguarding team for advice, when necessary, or to make referrals.

Further information on the roles and responsibilities of designated safeguarding staff are presented in **Appendix 1**.

## 3 Introduction

The College has a legal duty to ensure that the college functions with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training at the College as outlined in Keeping Children Safe in Education. All students have the right to be safe and protected whilst engaged in College and College-related activities. The safety, health and wellbeing of students is of paramount importance to the College. The College is committed to safeguarding and promoting the welfare of young people and vulnerable adults and expects all staff, volunteers and partners to endorse this commitment.

## 4 Scope of the policy

Safeguarding means protecting young people and vulnerable adults from abuse and neglect, promoting their health and development, ensuring their safety and optimising their life chances. It is an all-encompassing term used to describe arrangements for protecting student safety, health and wellbeing, measures to prevent bullying, harassment and discrimination, avoidance of substance misuse, e-safety, student behaviour management, safe student recruitment and training and the security of the College estate. It also includes measures to prevent people being drawn into terrorism or extremism and supporting those who might be susceptible to radicalisation (see the College's Prevent Strategy).

## 5 Policy

The policy applies to all governors, staff, agency workers, contractors, visitors and volunteers working in the college and carrying out related College activities off-site.

For the purposes of the Safeguarding Policy

- a 'young person' means any person under the age of 18 (i.e. those who have not yet reached their 18<sup>th</sup> 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.

### 5.1 Policy Aims

In exercising its safeguarding duty the College will seek to:

- Raise awareness of issues relating to the welfare of young people and vulnerable adults.
- Provide a safe environment for young people and vulnerable adults to learn in.
- Ensure the safe recruitment of staff, volunteers and students.
- Identify and support young people and vulnerable adults who are suffering, or likely to suffer, significant harm.
- Take appropriate action to ensure that such young people and vulnerable adults remain safe, at College or elsewhere.
- Develop effective relationships with external partners to support the safeguarding of students.

### 5.2 Policy Principles

The College policy is based on five main principles:

- Prevention - ensuring a safe learning environment by, for example, robust staff recruitment policies, support for student health and wellbeing, zero tolerance of bullying, harassment and discrimination and a culture which promotes security and confidence.
- Protection – identifying and taking appropriate action to deal with students who are suffering, or likely to suffer, significant harm or abuse.
- Support – providing support and guidance to students who may have been subject to abuse or neglect.
- Partnership - working with external partners and local communities in preventing, detecting and reporting harm and abuse.
- Equality – ensuring all students have equal rights to protection regardless of age, sex, ability, culture, ethnicity, language, religion or belief, sexual orientation, gender identity and socio-economic status.

### 5.3 Raising awareness of safeguarding issues

- Parents/carers of students under eighteen will be made aware of the responsibilities of staff members with regard to safeguarding procedures by publicising this on the college website.
- All students will be supported to understand safeguarding issues through:
- Induction and tutorial programmes will support young people's and vulnerable adults' development in ways that will foster security, confidence and independence, including raising their awareness of online safety.
- The creation of a climate in which responsible behaviour is encouraged and where students feel safe to ask for help if threatened or at risk of abuse.
- A healthy lifestyle will be promoted that includes consideration of diet, sexual relationships, alcohol and drug abuse.
- Staff will receive regular safeguarding updates to provide them with relevant skills and knowledge to safeguard children and vulnerable adults effectively.
- The College will have appropriate filters and monitoring systems in place to ensure that children and vulnerable adults are safeguarded from potentially harmful and inappropriate online material.

### 5.4 Guidance on students at risk

The College will:

- Provide guidance on types of possible abuse against students (**Appendix 2**)
- Provide guidance on Identifying students at increased risk of abuse (**Appendix 3**)

Abuse and neglect often involve multiple issues that cannot be covered by one definition or label. Safeguarding incidents are also often associated with factors outside the College. All staff should consider the context within which such incidents occur. Known as contextual safeguarding, this means that assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

### 5.5 Guidance on relationships with students

The College will:

- Provide staff with guidance on appropriate relationships with students (**Appendix 4**).
- Provide guidance on how staff and volunteers may raise concerns about poor or unsafe safeguarding practice - referred to as whilst blowing (see Whistle blowing Policy).

### 5.6 Reporting allegations or suspicions of abuse

The College will:

- Have procedures in place for staff to report allegations or suspicions of abuse against students, using a standard report form.
- Have procedures in place for dealing with allegations of abuse against members of staff and volunteers (**Appendix 7**).



## **5.7 Confidentiality, information sharing and record keeping**

The College recognises the need to comply with relevant legislation and guidance in relation to data protection and confidentiality. It is also recognised that, where there are concerns about abuse or safeguarding, data sharing with appropriate agencies may be necessary even when it is contrary to the wishes of an individual. (See **Appendix 5**).

## **5.8 Staff Appointments and Training**

The College will ensure that appropriate safeguarding checks are carried out before persons are appointed to staffing positions and that all staff are given appropriate training in safeguarding matters. (See **Appendix 6**)

## **6 Monitoring and Review of the Policy**

The College will review its policies and procedures to ensure that they comply with the relevant legislation and the agreed procedures.

The Safeguarding Policy will be reviewed annually, or more frequently, and updated to remedy any deficiencies or weakness in regard to safeguarding arrangements that are identified without delay.

## Appendix 1

### ROLES OF DESIGNATED SAFEGUARDING STAFF

Responsibilities for the oversight of safeguarding matters at the College are established at four levels:

#### 1 Designated Safeguarding Governor

A Designated Governor will be appointed to liaise with the Principal and Designated Senior Safeguarding Person on safeguarding matters.

The Designated Governor will ensure that:

- The College has procedures and policies, consistent with DfE Keeping Children Safe in Education
- The governing body reviews the College safeguarding policy each year.
- The governing body is informed each year of how the College and its staff have complied with the policy, including a safeguarding report.

The Designated Governor may also be a key link in the liaison between agencies such as the police, social services – as defined by the Leicestershire Safeguarding Children Partnership Board (LSCPB) in connection with allegations against the Principal or the Designated Senior Safeguarding Person. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and the provision of information to assist enquiries. To assist in these duties, the Designated Governor shall receive appropriate training.

#### 2 Designated Senior Safeguarding Lead

The Designated Senior Safeguarding Person has the lead responsibility for safeguarding within the College. This will be the responsibility of the Vice Principal Curriculum & Quality, who is a member of the College Management Team.

The Designated Senior Safeguarding Person will:

- Take lead responsibility for raising awareness of safeguarding within the College and for promoting a safe learning environment.
- Ensure that all staff are aware of the College Safeguarding Policy and receive basic training in safeguarding issues.
- Keep up to date with developments in safeguarding issues.
- Deal with allegations of abuse against members of staff.
- Oversee and where deemed necessary deal with, allegations of abuse against students.
- Refer safeguarding incidents to relevant investigating agencies as appropriate.
- Undertake training in safeguarding issues and interagency working, receiving refresher training at least every two years.

The Designated Senior Safeguarding Person will provide annual reports to the Governing Body of the College setting out how the College has discharged its duties. He/she is responsible for reporting deficiencies in procedure or policy to the governing body at the earliest opportunity.

### 3 Deputy Designated Safeguarding Leads (Safeguarding Managers)

The Designated Safeguarding Managers are responsible for the management and development of safeguarding policy and practice within the College. This will be the responsibility of Student Services Managers.

The Designated Safeguarding Managers will:

- Report to and Deputise for the Designated Senior Safeguarding Person.
- Develop arrangements for promoting safeguarding awareness within the College.
- Provide advice and support to staff and students on safeguarding matters.
- Provide training to staff and where appropriate to students on safeguarding matters.
- Deal with allegations of abuse against students, referring to relevant external agencies and review bodies as appropriate.
- Ensure proper records of safeguarding referrals, complaints or concerns are maintained.
- Attend case conferences and review meetings for individual safeguarding cases.
- Liaise with and attend meetings of external safeguarding agencies.
- Liaise with parents, schools and employers on safeguarding matters (ensuring that appropriate safeguarding arrangements are in place for student work placements).
- Receive training in safeguarding issues and inter-agency working, as required, receiving refresher training at least every 2 years.

### 4 Designated Safeguarding Officers

Designated Safeguarding Officers support the Designated Safeguarding Managers.

The Designated Safeguarding Officers will:

- Report to the Designated Safeguarding Managers.
- Raise awareness of safeguarding matters within the College.
- Provide advice and support to staff and students on safeguarding matters.
- Deal with allegations of abuse against students, referring cases to the Designated Safeguarding Manager as appropriate.
- Ensure proper records of safeguarding referrals, complaints or concerns are maintained.
- Receive training in safeguarding issues and inter-agency working, as required, receiving refresher training at least every 2 years.



## SAFEGUARDING TEAM

### Designated Senior Person

Name	Job Title	Telephone Ext No
Simon Kibble	Vice Principal Curriculum and Quality	276

### Brooksby Melton Campus

Name	Job Title	Telephone Ext No
Lorraine Cox	Student Services Manager/Safeguarding Manager	114
Amanda Williamson	Learning Resources and Careers Co-ordinator	148

### Stephenson Campus

Name	Job Title	Telephone Ext No
Lynette Parker	Student Services Manager/Safeguarding Manager	241
Phil Clooney	Assistant Student Services Manager	236
Andy Allsop	Health & Safety Officer	237
Rebecca Bellamy	Senior Administrator/Student Advisor	145

### Nominated Governor for Safeguarding

Name	Job Title	Telephone Ext No
Chris Brown		105

## Appendix 2

### 1 TYPES OF ABUSE AND NEGLECT

#### a) Abuse

This is a form of maltreatment. Somebody may abuse or neglect a young person or vulnerable adult by inflicting harm or by failing to act to prevent harm. They may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

#### b) Physical abuse

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

#### c) Emotional abuse

This is the persistent emotional maltreatment of a young person or vulnerable adult such as to cause severe and persistent effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on them. These may include interactions that are beyond their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing them to feel frightened or in danger. Some level of emotional abuse is involved in most types of maltreatment of young people or vulnerable adults, although emotional abuse may occur alone.

#### d) Sexual abuse

This involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. This may include non-contact activities such as looking at, or in the production of sexual images, watching sexual activities or encouraging young people or vulnerable adults to behave in sexually inappropriate ways, or grooming them in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### e) Neglect

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

## 2 ADDITIONAL INFORMATION ABOUT SPECIFIC FORMS OF ABUSE

### f) Domestic Violence and Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### g) Psychological Abuse

This can include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

### h) Bullying including cyberbullying

Involves behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a young person is adopted or has caring responsibilities. It might be motivated by actual differences between young people, or perceived differences.

### i) Discriminatory Abuse

Including racist, homophobic, transphobic and sexist abuse or harassment, abuse or harassment based on disability, faith abuse or other forms of harassment, slurs or similar treatment.

### j) Financial Abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

### k) Drug/alcohol abusing parents

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

### l) Forced Marriages

Forced marriage is an entirely separate issue from arranged marriage. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic

violence. Young people at risk of a forced marriage are usually experiencing physical and/or emotional abuse at home. Some communities use religion and culture as a way to coerce a person into marriage.

**m) Female Genital Mutilation (FGM)**

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; this is a mandatory requirement.

**n) Mental Health Issues**

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

**o) Fabricated or Induced Illness**

This is where a parent or person in loco parentis fabricates an illness in a young person. The young person is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the young person is separated from the perpetrator..

**p) Trafficking**

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force, or other forms of coercion, for the purpose of exploitation shall be considered 'trafficking in persons'. This can involve abduction, fraud, deception, sexual exploitation, forced labour/services, slavery or practices similar to slavery, servitude or the removal of organs and the abuse of power or of a position of vulnerability, or of the giving/receiving of payments of benefits to achieve the consent of a person having control over another person.

**q) Peer on peer abuse**

This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence, sexual violence/harassment, sexting (also known as 'youth produced sexual imagery') and initiation/hazing type violence and rituals

Bullying is a common form of deliberately hurtful behaviour, usually repeated over a period of time, when it is difficult for the victims to defend themselves.

It can take many forms, but the three main types are physical (e.g. hitting); verbal (e.g. threats); and emotional (e.g. isolating the individual).

It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities.

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

**r) Sexual violence and sexual harassment between children in schools and colleges**

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risk normalising them.

**s) Sexual Violence and Sexual Harassment**

It is important that college staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

**Sexual Harassment:** When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

**t) Upskirting**

‘Upskirting’ 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. It is now a criminal offence.

**u) 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 college, a change in friendships or relationships with other 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.

**v) Child Sexual Exploitation (CSE)**

Sexual exploitation of children involves situations where young people receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common.

**w) Sexting**

This is also known as ‘youth produced sexual imagery’. This is when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message.

**x) Honour-based violence (HBV)**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

**y) Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

### **3 EARLY HELP**

**Any** young person may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a young person who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

### **4 HOMELESSNESS**

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a young person has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

## **5 ONLINE SAFETY**

As students increasingly work online, it is essential that they are safeguarded from potentially harmful and inappropriate online material. The College has ICT policies and procedures that cover what is and is not permissible in the use of College IT equipment by students and staff. It also has filtering systems to prevent individuals from accessing inappropriate websites and monitoring systems to ensure compliance.

## **6 CONTEXTUAL SAFEGUARDING**

Staff should be aware that abuse and neglect often involve multiple issues that cannot be covered by one definition or label. Safeguarding incidents are also often associated with factors outside the College. All staff, but especially the designated safeguarding leads should consider the context within which such incidents occur. Known as contextual safeguarding, this means that assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

All staff should be aware of indicators of abuse and neglect so that they are able to identify young persons or vulnerable adults who may be in need of help or protection. When concerned about the welfare of a student, staff should always act in the best interests of that person and where unsure, they should always speak to one of the designated safeguarding leads.

## Appendix 3

### STUDENTS AT INCREASED RISK

#### a) **Looked After Children/Care Leavers**

The most common reason for children becoming 'looked after' is as a result of abuse and/or neglect.

#### b) **Children with Special Educational Needs (SEN) and Disabilities**

Children with special educational needs and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

#### c) **Children missing from education**

Children going missing from education, 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. Staff should be aware of their college's unauthorised absence and children missing from education procedures.

#### d) **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders ([NICCO](#)) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

#### e) **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process and support, and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online *child arrangements information tool* with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## Appendix 4

### GUIDANCE ON RELATIONSHIPS WITH STUDENTS

The majority of staff who work with young people and vulnerable adults in education 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 recognize 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 minimize 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 cases lead to allegations being made against staff. Private or additional tuition for students should be conducted on college premises.

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.
- Visiting students at their home.
- Giving students gifts.
- Offering students lifts outside normal duties.
- Singling individual students out for special attention.
- Seeing students socially.
- Giving students their mobile or home telephone number

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.

There may also be occasions where a distressed student needs comfort and reassurance which may include physical comforting such as 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 Vice Principal Human Resources & Organisational Development.

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.

In care situations where a student may require assistance with personal care such as toileting. Staff should respect the student's right to dignity and the level of support needed agreed with the student. Staff should be aware of the limits within which such contact should properly take place and of the possibility of such contact being misinterpreted. Staff should inform their line manager of the level of support they have agreed with the student.

## Appendix 5

### INFORMATION SHARING, CONFIDENTIALITY AND RECORD KEEPING

The college recognises the need to comply with relevant legislation and guidance in relation to data protection and confidentiality. It is also recognised that, where there are concerns about abuse or safeguarding, data sharing with appropriate agencies may be necessary even when it is contrary to the wishes of an individual.

The College will ensure that in the training for staff, the issue of confidentiality is clarified so that staff know they cannot promise confidentiality in all cases as they may have to pass on information to other professionals to keep the young person or vulnerable adult safe.

The principle of 'proportionality' applies to sharing confidential information, i.e. when disclosing information without consent the member of staff limits the extent of the disclosure to that which is absolutely necessary to protect the young person or vulnerable adult. This means only involving those who need to be involved, such as the designated safeguarding lead (or deputy) and children's social care.

The College recognises that young people aged 16 or 17 will have the understanding to make decisions about their own lives and their views and wishes will be respected unless they are deemed to be at risk of harm which is a serious threat to their personal safety or they are the victim of a crime.

Young people under 16 may be sufficiently mature to understand and consent to the disclosure of information. The young person's ability to make such decisions should be assessed on a case-by-case basis.

Referrals to other agencies such as Children's Social Care should be made with the young person's agreement where practicable. However, it may not be practicable to seek their agreement where, for example, seeking permission might place them or another person at risk of serious harm or where they are not mentally competent to give their agreement. There may also be cases where the young person's agreement is sought but they refuse to give that agreement.

Disclosure of information can take place without consent in cases where this is justifiable in the overriding public interest – e.g. to protect the young person from significant harm. In the context of safeguarding the welfare of the young person outweighs the family's right to privacy.

Vulnerable adults may choose to remain at risk in dangerous situations. Professional staff may find they have no statutory powers in cases where the adult is judged to have sufficient capacity to make his or her own choices and refuses the help which staff feel is needed and where public interest considerations do not apply. In these cases, where a member of the college staff considers that the decisions of the vulnerable adult should be respected they must immediately seek advice from the college's Designated Safeguarding Officers.

Decisions about the capacity and the ability of the vulnerable adult to give informed consent are a matter of medical judgement and multi-disciplinary assessment. There should be no abandonment of the duty to care.



The College DSLs will ensure safeguarding files are transferred to any new College a student may be attending as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. Any other relevant safeguarding information will also be passed to the receiving College if this would allow the College to continue supporting victims of abuse.

All reports together with any correspondence dealing with the matter should be viewed as confidential and kept secure at all times. Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

## Appendix 6

### STAFF APPOINTMENTS AND TRAINING

The College endeavours to ensure that it employs 'safe' staff by following statutory guidance for the recruitment and selection of staff. Procedures are reviewed in line with the policy review timetable, and any legislative changes, in order to ensure that they take account of the following:

- The procedures apply to all staff and volunteers who may work with young people or vulnerable adults.
- The post or role is clearly defined, and the level of contact with young people or vulnerable adults is definable.
- The key selection criteria for the post or role are identified.
- Vacancies are advertised widely in order to ensure a diversity of applicants.
- Documentary evidence of academic/vocational qualifications are required, either before or on commencement of employment.
- Professional and character references are required, before confirmation of the offer of a contract of employment.
- Previous employment history is verified, through references as detailed on the College Staff Application Form.
- A variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks) are utilised.

#### Staff Training

Designated safeguarding staff will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding leads should also undertake Prevent awareness training. In addition to formal training set out above, DSLs should regularly refresh their knowledge and skills to allow them to understand and keep up with any developments relevant to their role.

As a result of their training Designated safeguarding staff should be able to:

- Understand the assessment process for providing early help and statutory intervention, including the local authority children's social care referral arrangements.
- Understand how local authorities conduct a child protection case conference and review conference and be able to contribute to these effectively when required.
- Be alert to the specific needs of persons at particular risk of abuse and neglect.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the College, with other agencies or practitioners.
- Be able to keep detailed, accurate, secure written records of safeguarding cases.
- Understand and provide advice on the College's Prevent duty.
- Understand and provide advice on the risks associated with online safety, particularly for those deemed to be a safeguarding risk.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture which encourages staff to listen to those who may be a safeguarding risk and to take account of their wishes and feelings.



All staff will receive training to familiarise themselves with safeguarding issues, their responsibilities and the College procedures and policies, with refresher training at least every 3 years. Safeguarding information will be regularly updated on the Staff Intranet site and relevant documentation emailed to staff. ***Part One of "Keeping Children Safe in Education" will be circulated to all staff (as legally required). Staff and governors will be given the opportunity for structured discussions on safeguarding matters, on a regular basis.***

## Appendix 7

### REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word “staff” is used for ease of description.

#### **1 Introduction**

1.1 In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. 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 that investigations are thorough and not subject to delay.

1.2 The College recognises that the Children Act 1989 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.

#### **2 Receiving an Allegation**

2.1 A member of staff who receives an allegation about another member of staff should follow the guidelines in Part C for dealing with disclosure

2.2 The allegation should be reported immediately to the Vice Principal Human Resources & Organisational Development unless this is the person against whom the allegation is made, in which case the report should be made to the Senior Staff Member with Lead Responsibility [or the Designated Governor]. The Vice Principal Human Resources & Organisational Development (or designated person if the allegation is against the Principal) should:

2.2.1 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.

2.2.2 Record information about times, dates, locations and names of potential witnesses

#### **3 Initial Assessment by The Vice Principal Human Resources & Organisational Development**

3.1 The Vice Principal Human Resources & Organisational Development should make an initial assessment of the allegation, consulting with the Principal, Senior Staff Member with Lead Responsibility, the Designated Governor and the local social services department or agency as determined by local arrangements 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 local social services department.

3.2 It is important that the Vice Principal Human Resources & Organisational Development does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

3.3 Other potential outcomes are:

3.3.1 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 child. The matter should be addressed in accordance with the College disciplinary procedures.

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

#### **4 Enquiries and Investigations**

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

4.2 The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

4.3 If there is an investigation by an external agency, for example the police, the Vice Principal Human Resources & Organisational Development should normally be involved in, and contribute to, the inter-agency strategy discussions. The Vice Principal Human Resources & Organisational Development is responsible for ensuring that the College gives every assistance with the agency's enquiries. At this stage agreement should be reached that police and/or social services information gathered during their inquiries, including witness statements, will be made available to the college to assist with any internal inquiries. He/she 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. The Vice Principal Human Resources & Organisational Development shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

4.4 The Vice Principal Human Resources & Organisational Development (or designated person) will consult with the police or other investigating agency (e.g. social care), particularly in relation to timing and content of the information to be provided, and shall:

4.4.1 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.

4.4.2 Ensure that the parents/carers of the young person/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.

4.4.3 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.

4.4.4 Inform the Principal of the allegation and the investigation.

4.4.5 Inform the Chair of Governors (and/or the designated governor) of the allegation and the investigation.

4.5 The Vice Principal Human Resources & Organisational Development shall keep a written record of the action taken in connection with the allegation.

## **5 Suspension of Staff**

5.1 Suspension should not be automatic. In respect of staff other than the Principal, suspension can only be carried out by the Principal or a designated Senior Post Holder as defined in the Articles of Government. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Vice 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 should 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 should 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 should be encouraged to seek advice, for example from a trade union.

5.5 Prior to making the decision to suspend, the Principal (or Designated Senior Post Holder or Chair or Vice Chair of Governors) should interview the member of staff. This should occur with the approval of the appropriate agency [identified by the LSCB]. In

particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

5.6 The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a trade union representative or work colleague. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should 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 During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but given the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

5.8 If the Principal (or Designated Senior Post Holder or Chair, or Vice chair, or Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, and ideally within one working day.

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

5.9.1 the Chair of Governors should be informed of the suspension in writing.

5.9.2 the Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal

5.9.3 where the Principal has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the College

5.9.4 the parents/carers of the young person or vulnerable adult making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the young person or vulnerable adult making the allegation of the suspension

5.9.5 senior staff who need to know of the reason for the suspension should be informed

5.9.6 depending on the nature of the allegation, the Principal should consider [with the nominated Governor] whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity

5.10 The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted.

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

5.12 The suspension should remain under review in accordance with the College disciplinary procedures.

## **6 The Disciplinary Investigation**

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

6.2 The member of staff should be informed of:

6.2.1 the disciplinary allegations(s) against him/her.

6.2.2 his/her entitlement to be accompanied or represented by a trade union representative or work colleague.

A senior member of staff will be appointed to conduct the investigation or an independent investigation may be commissioned. Where there has been police and/or social services inquiries, information from these should be sought to prevent the need to re-interview the complainant or witnesses.

The senior member of staff/independent investigator should assess the information available and determine how the matter should be dealt with in accordance with the disciplinary procedures.

The outcome of police inquiries should inform, but should not determine the approach to be taken. It is important to bear in mind the difference between a criminal investigation and trial, where the proof must be 'beyond reasonable doubt' and a civil process such as the discipline procedures, where the college's primary duty is to safeguard the welfare of children and vulnerable adults. In such processes decisions are reached on the balance of probabilities. It should be remembered that there are many reasons why a prosecution may not be pursued or may fail, while there is sufficient evidence to indicate that there are continuing risks.

Advice about such situations should be sought from Local Authority Social Services (LADO).

The outcome of the investigation and/or formal consideration of the information could be:

- no disciplinary action
- referral to a formal Disciplinary Hearing in accordance with the College's Disciplinary Procedure.

6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

6.4 The child/children or vulnerable adult(s) making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

6.5 The Vice Principal Human Resources & Organisational Development should give consideration to what information should be made available to the general population of the College.

## **7 Allegations which are considered not proven**

7.1 False allegations are extremely rare. There are many reasons why a young person or vulnerable adult may withdraw an allegation once made. They may also have misinterpreted actions by the member of staff. Investigators should be cautious in assuming that an allegation is false or malicious. Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the local social services department or agency as determined by local arrangements in order that other agencies may act upon the information.

7.2 In consultation with the designated senior member of staff [and/or the designated Governor], the Vice Principal Human Resources & Organisational Development shall:

7.2.1 inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.

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 child or vulnerable adult other than the alleged victim, consideration to be given to informing the parents/carers of that child or vulnerable adult.

7.2.4 prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

## **8 Records**

8.1 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. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.



8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the Secretary of State for Education in accordance with the Statutory Guidance for Schools and Colleges "Keeping Children Safe in Education".

## **9 Monitoring Effectiveness**

Where an allegation has been made against a member of staff, the nominated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies.