

SAFEGUARDING AND PREVENT POLICY

1. Introduction

1.1 City College is committed to providing an environment where students, staff and all members of the College community are safe.

1.2 We recognise our statutory duty to safeguard children (all students under the age of 18) and vulnerable adults¹. This includes:

- Protecting children from abuse and maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Ensuring the safety of vulnerable adults
- Providing training to all staff so that they are confident in recognising, reporting and supporting students and apprentices who may be at risk of harm
- Upholding a zero tolerance to any form of peer-on-peer abuse or bullying and will seek to use college disciplinary policies to eradicate any form of unwanted behaviour
- Ensuring that sexual violence and sexual harassment is not acceptable and will never be tolerated.

1.3 We recognise our responsibility under the PREVENT duty to discourage students from developing extremist views and being drawn into terrorism.

2. Scope of this policy

2.1 This policy applies to all Governors, Staff and Volunteers of City College.

2.2 The College is responsible for safeguarding:

- Students present at the St Mary's campus and the Marine Skills Centre in Woolston
- Students who are employed as apprentices where the College is the

¹ The broad definition of a 'vulnerable adult' is given in the 1997 Consultation Paper "Who decides?" issued by the Lord Chancellor's Department. It is a 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".

training provider

- Students who are in the workplace on work experience arranged by the College
- Students on off-site trips and visits organised by the College

3. Statement of Policy:

- 3.1 City College is committed to maintaining a secure environment where all students and staff feel safe.
- 3.2 Any member of staff concerned about the safety of a child or vulnerable adult must report their concern as set out on the College's **Staff Guide to Safeguarding** poster which is displayed in all staff areas. All staff will receive appropriate training at induction via the DSL and during the academic year. Training will be regularly refreshed. Staff will be encouraged to report any concerns about another member of staff under the same procedures.
- 3.3 City College has a statutory and moral duty to commit to practices that protect young people and vulnerable adults from abuse, neglect or significant harm. Staff accept their responsibility to develop awareness of the risks and issues involved in safeguarding.
- 3.4. City College maintains an attitude of 'it could happen here' as this always promotes staff and student vigilance.
- 3.5 Students are not permitted to be on the campus if they are under the influence of drugs or alcohol. We encourage students to disclose any information they may have about such matters.
- 3.6 City College is an inclusive organisation that seeks to offer opportunities to all potential students, however where students declare a criminal conviction they are risk assessed to ensure it is appropriate for them to be within the college.
- 3.7 Personal information is only shared appropriately and normally only with the student's consent. Where there is a safeguarding concern, or information is legally obliged to be shared, information will always be shared with appropriate agencies,

even if the individual has not given consent. Wherever possible, more than one emergency contact is collected for each student. Whilst we work openly with parents and carers, as far as possible, we reserve the right to contact children's social care or the police, without notifying parents /carers, if this is believed to be in the child's best interests.

3.8 The College also recognises that it has a responsibility to support staff if there are unfounded allegations of abuse.

3.8 City College ensures that its policy and procedures comply with statutory duties, that they reflect guidance and good practice in safeguarding children and vulnerable adults.

4. Definitions of abuse

The College recognises the following as definitions of abuse. This list is not exhaustive.

- Peer on peer abuse
- Emotional
- Physical
- Neglect
- Sexual harassment
- Sexual violence
- On line abuse

Further detailed information on definitions of abuse can be found in Annex 4 of this policy and in Keeping Children Safe in Education (KCSiE) Part 1.

5. Safeguarding and Prevent Structure and Responsibilities:

5.1 The College Board has designated member who leads for the Board on Safeguarding and Prevent and is responsible for ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children Board's (LSCB) procedures.

- 5.2 The College has a Designated Lead Officer for Safeguarding and Prevent, who is the Head of Student Support and DSL. Contact details for Lorraine Wheeler are: E: DSL@southampton-city.ac.uk T: 02380 577326. The College has 2 Deputy DSLs who cover in the absence of the DSL.
- 5.3 The College has a Safeguarding and PREVENT Panel that meet every term. The Panel is made up of the Governor for Safeguarding, Vice Principal, DSL and 2 Deputy DSLs. *See Annex 2: TOR Safeguarding and PREVENT Panel*
- 5.4 The College maintains a Safeguarding and PREVENT Operational Group that meet every term, led by the DSL and Deputy DSLs, this consists of trained staff who operate as first responders to any safeguarding concerns. *See Annex 3: TOR Safeguarding and PREVENT Operational Group*
- 5.5 Human Resources staff are trained in Safer Recruitment practice and appropriate pre-employment checks are always carried out. Any member of staff who is dismissed, or resigns before dismissal, as a result of a substantiated safeguarding concerns will be referred to the Disclosure and Barring Service.
- 5.6 Appropriate IT filters and monitoring systems are installed in the College and maintained by the IT team.
- 5.7 All college staff are responsible for reporting safeguarding concerns and responding appropriately to a student disclosure and for reporting these to the Safeguarding Panel as outlined on the Staff Guide to Safeguarding poster.
- 5.8 Allegations against members of staff including the Clerk of the Corporation. There are 2 sections describing two levels of allegations/concerns and the appropriate responses:
- High Level concerns (KCSiE Part 4: KCSiE Section One)**
- Allegations of a serious nature which without intervention could put a young person or vulnerable adult at serious risk of harm. All High Level concerns require investigation and must be reported to the DSL who will liaise with the Local Authority Designated Officer (LADO). Contact details: T: 023 8091 5535 E: LADO@southampton.gov.uk.
- Examples of High Level concerns that may meet this criteria are listed below:

- Behaved in a way that has harmed a young person/vulnerable adult or may have harmed a young person/vulnerable adult
- Possibly committed a criminal offence against or related to a young person or vulnerable adult
- Behaved in a way that indicates they pose a risk of harm to a young person / vulnerable adult
- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people or vulnerable adults

Concerns may also arise in the context of the member of staff and their life outside work or at home. It is essential that in all cases of suspected abuse by a member of staff, action is taken quickly and professionally, whatever the validity. It must be made clear however that suspension is not an indicator of guilt.

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information.

5.9 Low Level Concerns (KCSiE 2021 Part 4: Section Two)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a young person or vulnerable adult does not meet the criteria for high level concerns as outlined in 5.8. A low level concern is any concern - no matter how small and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not necessarily warrant further investigation initially, but may form the basis of a wider concerning picture.

Low Level concerns should be reported to the DSL or Deputy and shared with HR, recorded and dealt with appropriately. If in doubt the DSL should seek advice from the LADD0.

Examples of Low Level concerns include:

- Being over friendly with children
- Having favourites

- Engaging with a young person / vulnerable adult on a one to one basis in a secluded area
- Using inappropriate sexualised, intimidating or offensive language

5.10 Allegations against the Principal and any member of the governing body (with the exception of the Safeguarding Governor) must be reported immediately to the Governor for Safeguarding Jeyanthi John at: safeguardinggovernor@Southampton-City.ac.uk who will liaise with the LADO and will be supported by the DSL.

5.11 Allegations against the Safeguarding Governor should be reported immediately to the Clerk of the Corporation at: E: clerk@southampton-city.ac.uk

5.12 Allegations against the Designated Safeguarding Lead should be reported immediately to the Principal & Chief Executive Sarah Stannard at: Principal@southampton-city.ac.uk

5.13 The College works in close partnership with relevant agencies and organisations including the Multi Agency Safeguarding Hub (MASH), the Southampton Local Safeguarding Children Board (LSCB), and Hampshire Constabulary.

5.14 Procedure for dealing with 14-16 students

The overall responsibility for the safeguarding of 14-16 students remains with the referring schools or authority. This does not negate the responsibility placed on staff to act immediately and appropriately if a disclosure is made. Schools and Local Authorities must be informed immediately to ensure a collaborative and transparent approach. All safeguarding concerns relating to 14 - 16 students should follow College Safeguarding procedures as set out in Staff Guide to Safeguarding.

6. Training and Development

6.1 DSL

The Designated Safeguarding Lead is required to provide training in safeguarding and receives refresher training at least every year. The Deputy DSL and those staff on the Safeguarding and PREVENT Operational Panel are also required to have training in safeguarding and receive refresher training

at least every year.

6.2 Governors

All Governors are sent the updated KCSiE every year to read and undertake refresher safeguarding training to ensure they are aware of their responsibilities and are kept updated on any changes relating to safeguarding.

6.3 New staff

All new staff will undertake an induction with the DSL or Deputy on their first day as a new employee at City College, this will ensure they are familiar with reporting procedures and responsibilities in keeping young people safe. All new staff are sent a copy of KCSiE to read prior to starting at City College. In addition all new staff must complete the mandatory online Safeguarding training module within 6 weeks. They will also be issued with the Safeguarding and PREVENT Policy and the Staff Code of Conduct.

6.4 Current staff

All members of staff are sent a copy of the most up to date “Keeping Children Safe in Education” Part 1 in the Autumn term. This will be followed by the completion of a knowledge check assessment to confirm they have read and understood KCSiE. The DSL will keep records of this and share with HR. In addition all staff **must** complete an online safeguarding module refresher training every 2 years to raise awareness of current issues.

6.5 Students

The College will deliver training to its students that covers areas of safeguarding as we recognise the importance of awareness and knowledge as a tool to safeguard our students. We deliver this training through student induction at the start of the academic year and during tutorials.

7. National Guidelines and Legislation:

City College aims to meet the legislation requirements and good practices in safeguarding. There are a number of statutory regulations which place a

responsibility to protect young people including:

Keeping Children Safe in Education 2021: This is statutory guidance from the Department for Education. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children

The Children's Act 2014: which is fundamental to people working with children and young adults in the UK

The Protection of Children Act 1999: Requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children and young adults

The Counter Terrorism Security Act 2015: Places a statutory duty on specified authorities to 'have due regard to the need to prevent people from being drawn into terrorism'

The Sexual Offences Act 2003: Makes it is an offence for a person over 18 (e.g. a teacher or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach the child

Working Together to Safeguard Children 2018: Statutory guidance on interagency working to safeguard and promote the welfare of children

The Protection of Freedoms Act 2012: which changed the definition of Regulated Activity including who is eligible for a barred list check.

Sexual violence and sexual harassment between children in schools and colleges, May 2018: This guidance highlights the advice to prevent and deal with sexual violence and sexual harassment between students

FGM Act 2003: Section 5b of this Act introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18's which they identify in the course of their professional work to the police. The duty came into force on 31st October 2015

8. Related College Policies and Procedures:

- Whistleblowing Policy (Staff Intranet - Key College Documents)
- Disciplinary Policy and Procedure
- Acceptable Use of IT Policy
- External Speakers Policy (Staff Intranet - Policies)
- Staff Code of Conduct (Staff Induction)
- Student Code of Conduct (Student Induction)
- Prevent Risk Assessment (Safeguarding - Intranet)
- Staff Guide to Safeguarding Essentials - Intranet - Safeguarding

It is important to note that when staff are writing or updating policies and procedures, reference must be made to the Safeguarding Policy to ensure that compliance is adhered to.

9. Status of this Policy

This policy was approved by the Board of the Corporation in November 2021.

The operation of this policy will be kept under review by the Head of Student Support and DSL.

The policy will be reviewed annually by the Board of Corporation.

Date approved: 13 November 2021
Approved by: Board of the Corporation
Date of next review: November 2022

Annex 1 - COVID19 safeguarding arrangements
Annex 2 - Terms of Reference Safeguarding Panel
Annex 3 - Terms of Reference Safeguarding and PREVENT Operational Group
Annex 4 - Definitions of abuse

ANNEX 1

COVID-19 interim changes to Safeguarding Policy

1 Introduction

1.1 Response to COVID-19

There have been some significant changes at City College in response to the COVID-19 outbreak. All students and staff are now engaging in remote working with limited exceptions.

Despite the changes, City College's safeguarding policy is fundamentally the same: children and young people's safety and well-being remains our priority and staff must respond robustly to safeguarding concerns and report these in line with our established safeguarding procedure.

This annex sets out the adjustments we are making in line with advice from Department of Education as outlined in the DfE document: *Coronavirus (COVID-19): safeguarding in schools, colleges and other providers dated 27 March 2020*

1.2 The current College position and local advice

We have followed guidance from government on how to support Vulnerable and EHCP (Educational Health Care Plan) students during this time and will remain open for a small number of students for who it is deemed necessary.

1.3. Reporting arrangements

The College arrangements continue in line with our safeguarding policy. The Designated Safeguarding Lead (DSL) is: Lorraine Wheeler and Deputy DSL Kate Miles are working remotely and accessible for referrals.

Telephone: 0790 0684 493 or Email: safeguarding@southampton-city.ac.uk within the College working hours of 8.30-5pm Monday-Thursday and 8.30-4.30 pm on Friday.

2. Supporting students

2.1 Supporting EHCP and Vulnerable Students

We have undertaken an exercise to identify the most vulnerable students. All EHCP students, Looked After Children and those with social workers were contacted as closure began and a discussion was had as to whether they should continue to attend college.

These students are contacted every two weeks to ensure that they are safe and making progress in their learning.

In addition, the Student Advisers have identified any students who have been deemed as vulnerable as a result a recent safeguarding/welfare referral - these students are being contacted weekly and have been offered the opportunity to access the Learning Resource Centre (LRC) during the lockdown period.

Other students may be added to the vulnerable list in response to concerns raised with the safeguarding team.

2.2. Supporting Students to continue their engagement in learning

Student engagement is now being monitored remotely. Attendance and Engagement offices are following up on non-engagement and working closely with teachers to support students.

2.3 Supporting students to stay safe online

The peer on peer response remains unchanged as outlined in City College Safeguarding Policy and within the Acceptable Use of IT procedure.

Further links and resources on how students can keep themselves safe online are being added, to City Bit. Link to: www.saferinternet.org.uk is highlighted as a useful guide for students, parents/guardians and teachers.

3. Status of this Annex

The operation of this Annex will be kept under review by the Head of Student Support and DSL.

ANNEX 2

Name of group: Safeguarding Panel

Safeguarding and PREVENT Terms of reference

Role of the Safeguarding and PREVENT Panel:

- To provide assurance to the College Senior Management Team (SMT) and relevant authorities that City College is fulfilling its statutory responsibilities as outlined in the prevailing legislation around Safeguarding and PREVENT, including Keeping Children Safe in Education (KCSIE)
- To maintain strategic oversight across the College with respect to responsibility and accountability arrangements and ensure that these are effective and clearly communicated to all staff, students and stakeholders.
- To ensure that all relevant policies and procedures are regularly updated, implemented and monitored as needed.
- To ensure that the safeguarding workforce is trained and supported to provide services which are in line with the prevailing guidance and local needs. To receive updates and reports from the Safeguarding Operational Sub Group and provide advice and support as necessary, including in relation to escalation of any issues.
- To provide regular updates and reports to the College Senior Management Team (SMT) and, where appropriate, to the College Board.

Membership

- Vice Principal for Curriculum and Quality (Chair)
- Governor with Board responsibility for Safeguarding
- Designated Safeguarding Lead
- Deputy Designated Safeguarding Leads

Accountability

The Safeguarding Panel is accountable to the College's SMT.

Frequency of Panel meetings

The Safeguarding Panel will meet once a term. Additional meetings may be called if required.

Format

The DSL will co-ordinate meetings. An agenda will be shared with Panel members at least 48 hours before each meeting. Action notes will be shared after the meeting.

Dissemination

The outcomes of the termly Safeguarding Panels will be reported and discussed at a Senior Management Team Meeting. Where appropriate, reports will be prepared and presented to the Board. The Safeguarding Panel will approve the Annual Safeguarding Report before its presentation to the Board.

ANNEX 3

Safeguarding and PREVENT Operational Group

Safeguarding and PREVENT Terms of reference

Role of group:

- To ensure that City College actively promotes the safety and welfare of students and staff.
- To ensure appropriate action is being taken to protect and safeguard the welfare of students and adults at City College
- To monitor the number of safeguarding and PREVENT referrals
- To identify any specific themes and take appropriate action to address
- To review case studies and discuss lessons learnt
- The group will engage in regular training workshops delivered by the Southampton Safeguarding Children Partnership
- To ensure that relevant safeguarding information and updates are shared and communicated within the group and the wider college including teachers and support staff.
- To provide regular reports and updates to the Safeguarding Panel and SMT

Membership

- DSL (Chair)
- Deputy DSLs (Deputy Chair)
- Student Support teams including Pastoral, Futures and LRC
- Representatives from Curriculum Areas
- Representatives from Admissions
- Other members invited as appropriate

Accountability

The Safeguarding Operational Group is accountable to the Safeguarding Panel.

Frequency of Sub group meetings

Every term

Format

DSL or Deputy DSL will chair Safeguarding Operational Sub-group meetings. An agenda will be set and minutes taken and shared with actions.

Dissemination

DSL will update the Safeguarding Panel. The DSL will also update SMT after each meeting.

ANNEX 4:**Definitions of Abuse**

City College recognises the following as definitions of abuse (this list is not exhaustive). You can also refer to KCSiE Part 1 for further details on any of the below mentioned forms of abuse.

Physical Abuse - This may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Peer on peer abuse- All staff should be aware that children can abuse other children and that it can happen both inside and outside of the college environment. Staff should understand that even if there are no reports of Peer on Peer abuse within the college, it does not mean that it is not happening. It is important that staff challenge inappropriate behaviours between students that are abusive in nature and making someone feel threatened or uncomfortable. Peer on peer abuse is most likely to include but may not be limited to:

- bullying (including on-line, prejudice and discriminatory bullying)
- sexual violence, such as rape, assault by penetration and sexual assault. This may include an on-line element that facilitates, threatens, or encourages sexual violence.
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of behaviours.
- Abuse in an intimate relationship
- Consensual or non-consensual sharing of nudes and semi-nude images
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.

Neglect - is the persistent or severe failure to meet a child's, young persons or vulnerable adult's physical and/or psychological needs. It can result in serious impairment of their health or development.

Sexual Abuse - involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or vulnerable adult to be aware that the activity is sexual and the apparent consent of the child, young person or vulnerable adult is irrelevant.

Emotional Abuse - occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person's and vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive electronic communications

Financial Abuse - Financial abuse in intimate relationships is a way of controlling a person's ability to acquire, use, and maintain their own money and financial resources.

Significant Harm - Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the

children.

Forced Marriage - This term is used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

Extremism and Radicalisation - We will help support individuals who may be vulnerable to radicalisation and where we believe an individual is being directly influenced by extremist materials or influences, we will ensure that the student / apprentice is referred to the 'Channel' process through direct liaison with the Multi Agency Safeguarding Hub (MASH). In such instances, the DSL / Deputy DSLs will seek external support from the Local Authority and Prevent Coordinator. The college may exercise the right to initiate any college policy in the event of needing to safeguard other students and staff within the college.

Female Genital Mutilation - FGM is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Child Criminal Exploitation - County Lines- Criminal exploitation is a geographically widespread form of harm, that is a typical feature of county lines criminal activity: drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas. CCE also involves enticing or grooming young people into crime or gang activity for illicit gains.

Children Missing in Education - is often an indicator for other potential safeguarding concerns. The College should have measures, through its attendance reporting and follow up procedures, to ensure it is following up on students, who could potentially be 'missing in education' Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

Domestic abuse - 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.

Homelessness - Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (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.

Up-skirting - the taking of surreptitious, sexually intrusive photographs - is a criminal offence punishable by up to two years in prison.

Wider Mental Health - mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have experienced childhood trauma, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff should be aware of how these experiences can affect their mental health, behaviour and education.

Please contact the Safeguarding team on: 07900 684 493 if you need any further advice or guidance relating to Safeguarding.