



# SAFEGUARDING OF CHILDREN AND ADULTS AT RISK POLICY AND PROCEDURE (Sept 20) (Excluding PEF Contract)

## 1. Introduction

This Policy and Procedure has been developed in accordance with and guided by:

- Children Acts 1989 and 2004
- Education Act (2002)
- Working Together to Safeguard Children (July 2018)
- What to do if You are Worried a Child is being Abused (March 2015)
- Keeping Children Safe in Education: Statutory guidance for schools and college (January 2021)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium October 2015)
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Counter-Terrorism and Security Act (2015)
- Revised *Prevent* Duty Guidance: for England and Wales (Home Office July 2015)
- North Somerset Prevent Partnership Board
- South West Child Protection Procedures [www.swcpp.org.uk](http://www.swcpp.org.uk)
- North Somerset Safeguarding Board

The College will regularly review this policy and procedure to take into account any new Government legislation, regulations or best practice documents. College will ensure that all staff are kept fully up to date with their responsibilities and duties regarding the safety and well-being of its Young People (children) and Adults at Risk.

Weston College recognises that any student (Young Person or Adult) in danger of radicalisation or demonstrating extremist tendencies (violent or non-violent) is deemed to be vulnerable and appropriate support under the PREVENT strategy or through CHANNEL will be sought.

Young People (children) and Adults at Risk are defined in Appendix 1.

The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2013 requires employers to carry out Disclosure and Barring Service Checks before employees are allowed to come into contact with vulnerable adults.



The College is required under this legislation to apply for an enhanced check from the Disclosure and Barring Service (DBS) for staff working with such students. It is college policy that all existing, and newly recruited staff are required to undergo a DBS enhanced check which will be renewed every 7 years. All staff will complete an annual declaration confirming whether or not their DBS status remains unchanged.

## 2. Approach

Weston College will:

- 2.1 Take a preventive approach to protecting young people and adults at risk from potential harm, damage, radicalisation or being drawn into terrorism (violent and non-violent extremism).
- 2.2 Take all appropriate actions to address concerns about the welfare of young people and adults at risk.
- 2.3 Work to agreed local policies and procedures in full and transparent partnership with other local agencies.
- 2.4 Plan, implement, monitor and review policies and procedures to ensure that the maximum is done to provide a safe environment for young people and adults at risk in the college.
- 2.5 Take all reasonable measures to ensure that risks of harm to young people and adults at risk's welfare is minimised by appropriate:
  - Risk assessment and management
  - Health and Safety procedures
  - Staff selection, recruitment, induction supervision and training
  - Creation and promotion of an open work culture "Whistleblowing"
  - Responding to and appropriately referring abuse

## 3. Policy Statement

- 3.1 Weston College holds as one of its highest priorities the health, safety and welfare of all children, young people and adults at risk enrolled on courses, engaged in activities which come under the responsibility of the College including residing in college owned or college allocated accommodation.



- 3.2 Weston College and its staff, including contractors, have a collective and individual duty of care to ensure that they:
  - 3.2.1 Fulfil their responsibilities to prevent the abuse of children, young people and adults at risk
  - 3.2.2 refer any abuse discovered or suspected
  - 3.2.3 prevent students from being drawn into terrorism
- 3.2 This Safeguarding of Children and Adults at Risk Policy and Procedure is freely available via the college website and will be made available, on request, to parents/carers who will be advised that cases may be referred to the investigative agencies in the interests of the young person or adult at risk.
- 3.3 The College will advise children, young people and adults at risk about:
  - 3.3.1 The standards of behaviour and conduct they can expect from staff and volunteers
  - 3.3.2 What to do if they experience or suspect abuse
- 3.4 The College will work with appropriate agencies, and in particular the two Safeguarding Boards (Children and Adults) of North Somerset Council People and Communities Directorate and the Local Prevent Partnership Board to ensure that children, young people and adults at risk are safeguarded through the effective operation of the College's Safeguarding Children and Adults at Risk procedures
- 3.5 The College adopts in totality the Safer Recruitment Consortium's "Guidance for safer working practice for those working with children and young people in education settings" (October 2015).
- 3.6 A consultative approach will be adopted with the North Somerset Safeguarding Officers, the Avon and Somerset Child Abuse Investigation Team (CAIT) and the Local Prevent Partnership Board to ensure good practice and the best outcomes for our learners
- 3.7 The College recognises that any child, young person or adults at risk can be subject to abuse or radicalisation. All allegations of abuse or concerns about radicalisation will be taken seriously and treated in accordance with the College's procedures.
- 3.8 The College recognises that it is the responsibility of all staff to act upon any concern, no matter how small or trivial it may seem.



- 3.9 The College recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or refer suspected abuse.
- 3.10 The College is committed to supporting, resourcing and training those who work with or who come in to contact with children, young people and adults at risk and to providing appropriate supervision.
- 3.11 The College requires its entire staff to follow the Code of Behaviour on Adults at Risk Protection (Appendix 2 of this policy document), and will draw the attention of staff to this code of conduct and procedures in induction and relevant training.
- 3.12 Members of the Corporation, the Principal and all the other staff who work with children and adults at risk will undertake training to equip them to carry out their responsibilities for Safeguarding Children, young people and vulnerable adults effectively including the PREVENT strategy. They will be kept up to date by refresher training at a maximum of three-year intervals, with subject specific annual updates as issues emerge.
- 3.13 The Designated / First Response Officers will undertake Local Authority refresher training every two years to keep their knowledge and skills up to date. There is a designated governor responsible for safeguarding and Prevent and it is corporation policy that all existing, and newly recruited, governors undergo a DBS Enhanced check.
- 3.14 The College has eight Designated Safeguarding Officers (DSOs) one of whom is a Leadership Board member, a Leadership Board Advisor and a team of First Response Officers (FROs) who are responsible for co-ordinating action within the College and liaising with other agencies.
- 3.15 The DSOs and FROs are organised into pods ensuring coverage of all college sites and will take safeguarding referrals actioning them fully in line with college procedure. All referred cases will be recorded on the secure safeguarding SharePoint site for monitoring purposes. DSO and FRO names and contact details can be found in Appendix 3.
- 3.16 The College operates safe recruitment procedures and ensures that all appropriate checks are carried out on new staff and volunteers who will work or come into contact with children including enhanced Disclosure and Barring Service (DBS) checks, Protection of Vulnerable Adults (POVA), Proceeds of Criminal Act (POCA) and list 99.



- 3.17 Any deficiencies or weaknesses with regard to safeguarding of children, young people and adults at risk arrangements will be brought to the attention of the Governing Body and remedied without delay.

## 4. Definitions of Abuse

### 4.1 Children and Young People (source Working together to safeguard children July 2018)

#### 4.1.1 Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### 4.1.2 Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 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 children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### 4.1.3 Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.



#### **4.1.4 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. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

#### **4.1.5 Female Genital Mutilation**

Female Genital Mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done.

FGM is most commonly carried out on girls between infancy and the age of 15, most often before puberty starts. It is illegal in the UK.

#### **4.1.6 Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- i. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- ii. protect a child from physical and emotional harm or danger
- iii. ensure adequate supervision (including the use of inadequate caregivers)
- iv. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **4.1.7 Significant Harm**

Some children are in need because they are suffering or likely to suffer Significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

#### **4.1.8 Extremism**



Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

## 4.2 Adults at Risk (source NHS Choices)

### 4.2.1 Physical Abuse

This can include being assaulted, hit, slapped, pushed, restrained, being Denied food or water, not being helped to go to the bathroom and misuse of medication.

### 4.2.2 Sexual Abuse

This includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that the person does not agree to or were pressured into consenting to.

### 4.2.3 Psychological Abuse

This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion or harassment. It also includes verbal abuse, cyber bullying and isolation or an unreasonable and unjustified withdrawal from services or supportive networks.

### 4.2.4 Financial Abuse

This includes theft of money or valuables, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

### 4.2.5 Neglect and Acts of Omission

This includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving the person without help to wash or change dirty or wet clothes, not getting them to a doctor when one is needed or not making sure that they have the right medicines.



#### **4.2.6 Discriminatory Abuse:**

This includes some forms of harassment, slurs or similar unfair treatment relating to race, gender, gender identity, age, disability, sexual orientation or religion.

#### **4.2.7 Self Neglect**

This is not a direct form of abuse, but staff need to be aware of it in the General context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

## **5. Safeguarding Children and Adults at Risk Procedures**

- 5.1 The purpose of these guidelines is to ensure that the rights of the child, young person or adult at risk are protected through staff awareness of the issues and the following of the statutory and local guidelines in the reporting of concerns.
- 5.2 The College will take steps to identify vulnerable young people and adults on admission to a course. Teachers will be informed, as part of the admissions procedures, if vulnerable young people or adults have been enrolled on their courses where these are not specifically designed for vulnerable learners. Additional supervision measures will be put in place for all students defined as vulnerable and such students will come under the provisions of this policy.
- 5.3 Children, young people and adults at risk can be potentially abused within the family, community, organisations by employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers and fellow students
- 5.4 Regardless of the type of abuse being disclosed there are guidelines for staff response which apply in all circumstances.
  - 5.4.1 It is the responsibility of **all** staff working within the College to:
    - a. record and refer, in a timely manner, concerns regarding the safeguarding of children, young people and adults at risk even if they are just suspicions or overheard rumours

- b. maintain confidentiality by not discussing it with anyone other than a Designated Officer/First Response Officer. Out of hours referrals (after 17.30 and at weekends can be made via 01934 411464 which is redirected to the Weston College officer on duty)

- 5.4.2 If a child, young person or adult at risk comes to you with a disclosure of apparent abuse or a concern over radicalisation or extremism, you should:
- a. For **SAFEGUARDING** adopt **LISTEN, HEAR and BELIEVE**
  - b. For **PREVENT** adopt **NOTICE, CHECK and SHARE**
  - c. Focus on **APPEARANCE, BEHAVIOUR and COMMUNICATION**
  - d. Allow the young person or adult at risk to speak freely without interruption
  - e. Reassure them, let them know you are glad they have spoken up and that they are right to do so
  
  - f. Be honest, let the young person or adult at risk know that you cannot keep this a secret and that you will need to refer it on to get them the support that they need. Be clear that they know what will happen next
  - g. Do not question, coach or lead but if you need to clarify your understanding use the rule of **TEDS** (Tell Me, Describe to me, Explain to me or Show me)
  - h. Always spare the child / adult at risk having to repeat themselves over and over
  - i. Never trivialise, exaggerate the issue or make suggestions
  - j. Try to remain calm, remember this is not an easy thing for them to do
  - k. Try not to show your emotions, if you show anger, disgust or disbelief, they may stop talking because they feel they are upsetting you or they may feel your negative feelings are directed towards them
  - l. Make the young person or vulnerable adult feel secure and safe without causing them any further anxiety.
  - m. Refer in an appropriate and timely manner remembering our guiding principle:

***If a student is doing, has done or is threatening to do something to themselves REFER TO WELFARE***

*If someone else has done something or is threatening to do something to the student REFER TO SAFEGUARDING*

If the student is a Year 10 or 11 student on school link then the DSO / FRO must make the school safeguarding officer aware of any disclosure.

## 6. Disclosure / Allegation against someone outside of college

### 6a. Someone not in a position of trust

- a. Listen to the child, young person or adult at risk, hear what they are saying and believe what they are telling you
- b. Contact the Safeguarding POD (see Appendix 3 for contact details) for your area of college within two hours of disclosure to make the referral. Identify that it is a disclosure / allegation against someone outside of college not in a position of trust
- c. Outline to the FRO or DSO what has been disclosed to you, what you have overheard or your suspicions. The FRO / DSO will complete an internal disclosure form which is saved on the secure Safeguarding SharePoint site before they leave work that day.
- d. Write up, to the best of your memory, what was said to you including when, where and who else might have heard it. This should be sent to the FRO / DSO within 24 hours.
- e. The FRO / DSO will take the case forward discussing the matter with North Somerset Children's Safeguarding 01275 888808 / North Somerset Adults' Safeguarding 01275 888801 or Out of Hours 01454 645165 who will advise on next steps. In the case of FGM if there is an immediate risk to a child a referral should be made to the Police via 999, otherwise a referral should be made via 101.
- f. If required the FRO / DSO will complete a North Somerset referral form and submit it (encrypted) via email or ask the Lead DSO to submit it via EGRESS the secure email system.
- g. North Somerset Safeguarding will take control of the situation and determine if threshold has been met and what further action is needed.

- h. You will be informed of any further actions on a “need to know basis”.
  
- i. The Lead DSO or nominated DSO / FRO will represent the college at any subsequent Strategy Discussions, Core Groups or Review

## 6b. Someone in a position of trust

Examples of someone in a position of trust outside of college are: Football Coach, Piano teacher, Driving Instructor, Lifeguard, Youth Club worker, Mentor, Carer, Guide leader etc.

- a. Listen to the child, young person or adult at risk, hear what they are saying and believe what they are telling you
- b. Contact the Safeguarding POD (see Appendix 3 for contact details) for your area of college within two hours of disclosure to make the referral. Identify that it is a disclosure / allegation against someone outside of college in a position of trust.
- c. Outline to the FRO or DSO what has been disclosed to you, what you have overheard or your suspicions, the FRO / DSO will complete an internal disclosure form which is saved on

the secure Safeguarding SharePoint site before they leave work that day

- d. Write up, to the best of your memory, what was said to you, when, where and who else might have heard it. This should be sent to the FRO / DSO within 24 hours.
- e. The FRO / DSO will take the case forward discussing the matter with North Somerset’s Designated Officer for Allegations (LADO) 01275 888808 or Out of Hours 01454 645165 who will advise on next steps.
- f. If required the FRO / DSO will complete a North Somerset referral form and a LADO referral form and submit them (password protected) via email.
- g. North Somerset LADO will take control of the situation and determine what further action is needed.
- h. You will be informed of any further actions on a “need to know basis”.
- i. The Lead DSO or nominated DSO / FRO will represent the college at any subsequent Strategy Discussions, Core Groups or Review



## 7. Disclosure / Allegation against a member of staff

The primary concern of the College is to ensure the safety of the child, young person or adult at risk.

The term 'member of staff' applies to all contracted personnel within the College, volunteers and people employed by other agencies that are providing services for the College.

If you suspect any other member of staff is abusing a student or breaching their position of trust in a safeguarding capacity it is your responsibility to whistle blow

- a. Refer your concern / knowledge to the Lead DSO or the Leadership Board lead for Safeguarding (see Appendix 3)
  - If the allegation is against the Principal the Lead DSO / Leadership Board lead will also discuss with the Chair of Governors
  - If the allegation is against both the Lead DSO and the Leadership Board lead the allegation should be referred to the Principal who will act as Lead DSO or nominate a leadership board member
- b. In ALL cases the Lead DSO / Leadership Board lead must not work in isolation. They will consider whether a concern / allegation indicates that a member of staff may have behaved in a way that has harmed or may have harmed a child, young person or adult at risk, or possibly committed a criminal offence against or related to a child, young person or adult at risk; or behaved towards a child, young person or adult at risk in a way that indicates s/he is unsuitable to work with them prior to making contact with the LADO
- c. Together the Lead DSO and Leadership Board lead will consult with and take advice from the Local Authority LADO on all cases in order to ensure that even apparently less serious allegations are seen to be followed up and examined objectively by someone independent of the college.
- d. The LADO will advise if college procedures in terms of discipline should be followed alongside any LA / Police investigation or that an outcome of the latter is needed first.
- e. The LADO will advise if the member of staff should be suspended with pay pending any external investigation.
- f. The LADO will advise if a referral to DBS is required.
- g. The Lead DSO will represent the college at any subsequent Strategy Discussions, Core Groups or Review



***College responsibilities to the member of staff following an allegation***

- a. Staff who are accused of a breach of the code set out in **Appendix 2** may be subject to disciplinary procedure.
- b. Where an allegation from a child or adult at risk occurs, an investigation will be carried out in accordance with procedure (available from HR). The Investigating Officer will be required to liaise with the DSO / FRO officer to clarify whether there are any relevant records or relevant information in relation to the individual.
- c. The College should inform the accused member of staff as soon as possible after initial consultation has taken place. However this should not be before the Strategy Discussion or police discussion, if needed, has taken place and agreement has been reached as to what information can be disclosed to the member of staff.
- d. The member of staff should be advised to:
  - Contact union representative
  - Keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.
- e. Whilst the case is ongoing, Weston College must arrange to provide appropriate support to the member of staff.
- f. Where it is subsequently found that an allegation has been made maliciously, the College may refer the matter to be dealt with under disciplinary procedures.
- g. Weston College may also take the decision to pursue an allegation of abuse through the College Disciplinary Procedure. Discussion should be held with the relevant Social Care Team to ensure that their investigation is not compromised by doing so. Employees should not automatically be suspended and should not be suspended without careful thought.
- h. If the accused member of staff tenders their resignation or ceases to provide their services the allegation must continue to be investigated in accordance with the procedures. Compromise agreements by which a person agrees to resign, or the College agrees not to pursue the disciplinary action **must not** be used in these cases.

## **8. Referral concerning radicalisation or extremism**

- a. The referral process is same as for 6a
- b. If the FRO / DSO judges the student to be in immediate danger or likely to act imminently then they must contact the college's PREVENT Single Point of Contact (SPOC) see Appendix 3

## 9. Consideration for admission of student with Sex Offences

Students /potential students with sex related offences / cautions wishing to be considered for admission to the college will be subject to risk assessment.

Risk assessment enables due consideration to be given to the risk they pose to the college community which has significant numbers of minors and vulnerable learners. Equally college needs to be sure that the applicant can be kept safe in the college environment whilst meeting any licence or conditions they may be bound by.

The types of scenarios that will require risk assessment are:

- Those on the Sex Offenders Register
  - Those with Child Sexual Offences (convicted, cautioned, reprimanded or warned for an offence under Schedule 34A of the Criminal Justice Act 2003)
  - Those subject to a Sexual Harm Prevention Order (SHPO)
  - Those subject to a Sexual Risk Order (SRO)
  - Those subject to a Community Order or Youth Caution
- a. If a student / potential student makes you aware of sexual offences at enrolment or once on programme an immediate referral to the Lead DSO (Appendix 3) should be made
  - b. The Lead DSO will convene a Safeguarding Panel (Lead DSO, Leadership Board Lead and Leadership Board Advisor) to discuss the potential student and the way forward prior to making contact with any Probation Officers or other named contacts
  - c. Following information gathering from appropriate authorities (Police, Probation, YOT etc.) a subsequent Safeguarding Panel will convene to decide whether or not they can recommend a student can be enrolled in college. The panel may at this stage ask to meet with the potential student. The safeguarding panel's recommendation will be notified to the Principal for consideration.
  - d. The Principal's decision, which is final, will be communicated with the applicant in a timely manner

## 10. Consideration for admission of student with PREVENT related concerns

Students /potential students with PREVENT related offences / cautions or concerns wishing to be considered for admission to the college will be subject to risk assessment.

Risk assessment enables due consideration to be given to the risk they pose to the college community. Equally college needs to be sure that the applicant can kept safe in the college environment.

The types of scenarios that will require risk assessment are:

- Those charged or cautioned with a Terrorism related offence even if the outcome was non-custodial
  - Students who have previously had their studies suspended at Weston College due to PREVENT related concerns
- a. If a student / potential student makes you aware of PREVENT related offences / cautions / concerns at enrolment or once on programme an immediate referral to the Lead DSO (Appendix 3) should be made
  - b. The Lead DSO will convene a Safeguarding Panel (Lead DSO, Leadership Board Lead and Leadership Board Advisor) to discuss the potential student and the way forward prior to making contact with any Probation Officers or other named contacts
  - c. Following information gathering from appropriate authorities (Police, Probation, YOT etc.) a subsequent Safeguarding Panel will decide whether or not they can recommend a student can be enrolled in college. The panel may at this stage ask to meet with the potential student. The safeguarding panel's recommendation will be notified to the Principal for consideration
  - d. The Principal's decision, which is final, will be communicated with the applicant in a timely manner

## 11. Confidentiality

- 11.1 Confidentiality and trust should be maintained as far as possible. The degree of confidentiality will be governed by the need to protect the child, young person or adult at risk who is always the primary concern. The child, young person or adult at risk must at the earliest opportunity in the disclosure be informed of the need to pass information on.
- 11.2 All conversations regarding a safeguarding disclosure made by a child or adult at risk should always be held in private.

11.3 The College complies with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) May 2018 but also recognises the principle set out in Keeping Children Safe in Education which is "Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children".

## **12. Record Keeping and Timekeeping**

12.1 Weston College will keep clear and comprehensive records of any allegations made, details of how the allegation was followed up and resolved, as well as details of any actions taken and decisions reached.

Student disclosures are filed on the secure Safeguarding SharePoint site under the academic year and in a folder for the learner.

Allegations against staff are filed under Secure Documents on the secure Safeguarding SharePoint site to which only the Lead DSO and the Leadership Board lead have access.

12.2 In the interests of all parties it is important to resolve cases as quickly as possible whilst ensuring a consistent, fair and thorough investigation.

12.3 Interpretation of this policy shall be made by the Principal, the Leadership Board lead for Safeguarding or the lead DSO if required. Any challenges to the policy by students or staff will be considered by the Safeguarding Committee who will respond to the challenge.

12.4 Safeguarding records will be retained for 30 years in order to allow ex-students to come back to college to re-trace their story and understand what happened to them at college.  
This should be noted that in safeguarding cases a student or staff member's right to be forgotten or objection to processing of their data under GDPR is limited. It is unlikely that they can "force" college to delete such data as the college can justify our retaining it.

## **13. Escalation**

13.1 If you consider that a FRO / DSO has not acted in the best interests of the Young Person or Adult at Risk who has made a disclosure and following further discussion with them it is still not resolved to your satisfaction then you have the right to escalation.

13.2 You should raise your concern with the Lead DSO (Appendix 3) unless your concern is about them when you should raise them with the Leadership Board Lead for Safeguarding



- 13.3 If a FRO / DSO considers the practice of the respective Local Authority is placing a Child, Young Person or Adult at Risk at risk of harm they must be assertive, act swiftly and ensure that they challenge the relevant professionals.
  
- 13.4 If the FRO / DSO doesn't feel they are being listened to by the external partner agencies then they should consult immediately with the Lead DSO or the Leadership Board Lead for Safeguarding
- 13.5 If the Lead DSO or Leadership Board Lead for Safeguarding agrees with the level of concern they will escalate the concern to the respective Local Authority Manager for Safeguarding Children or Safeguarding Adults
- 13.6 If this escalation still does not receive appropriate resolution or explanation the college will escalate to the Independent Chair of the respective Safeguarding Children or Safeguarding Adults Board
  
- 14 **Safeguarding in Partner Organisations**
  - 14.1 Weston College expects all partner organisations to have the following in place:
    - a. A safeguarding policy including PREVENT or two separate policies which is reviewed at organisational level on an annual basis and by Weston College Group Lead Designated Safeguarding Officer every two years
    - b. At least one staff member who has completed the respective Local Authority Advanced Inter Agency Child Protection Training who can act as named Designated Safeguarding Officer for their organisation
    - c. At least one staff member who has completed the college face to face training for both Safeguarding and PREVENT and evidence that the knowledge has been disseminated
    - d. A robust procedure for dealing with and recording allegations
  - 14.2 Weston College expects, when an allegation is made by one of our learners, to receive a copy by secure means of the disclosure recording paperwork including actions taken within 24 hours of the disclosure in order to:
    - a. Ensure appropriateness of actions taken by our partner organisations
    - b. Maintain a central record of all safeguarding disclosures
    - c. Include partner numbers in our reporting to safeguarding committee and to the corporation
  
- 15 **Safeguarding for Commercial and very short (less than 1 week) Adult Courses**

Weston College runs commercial work and very short adult courses alongside core ESFA funded 16-19 provision and adult provision which presents a unique environment in terms of safeguarding  
Weston College expects:

- a. all tutors, at the start of the course, to read out the "Safeguarding Notice for Commercial and very short Adult courses" (see Appendix 3)
- b. Dean to maintain records that this has been completed
- c. Safeguarding team to audit the delivery and compliance

This Policy was agreed by the Safeguarding Committee: 04/02/2021  
This Policy was approved by the Corporation: 04/02/2021



Andrew Leighton Price – Chair of Corporation

The Policy will next be reviewed: 01/09/2021

## Appendix 1

### Young People

Young People (children) are defined as those students who have not yet reached their 18<sup>th</sup> birthday who may be:

- On a full or part time classroom based course
- On a traineeship
- On an apprenticeship
- On an Early College Transfer programme (Year 11)
- On a Year 10 or Year 11 School Link programme or other bespoke course

We also recognise that our students may have their own children, maybe pregnant or may undertake placements which involve the care of children. In all of these scenarios we remain open minded that there may be safeguarding needs to appropriately refer.

### Adult at Risk (vulnerable adult)

Weston College uses the term Adult at Risk as an exact replacement for Vulnerable Adult as the term "vulnerable adult" may wrongly imply that the fault for abuse lies wholly or in part with the victim of abuse.

Adults at Risk are defined (Care Act 2014) as those students who:

- have care and support needs (whether or not some or all of them are being met by the Local Authority)
- are experiencing or are at risk of abuse or neglect

and

- as a result of those care or support needs are unable or less able to protect themselves from experiencing abuse or neglect or the risk of it

We also recognise that our students may undertake placements which involve the care of Adults at Risk.

## Appendix 2

### Code of Behaviour for Safeguarding Children and Adults at Risk

Weston College recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with children and to guarantee the protection of children and staff.

However, below are the standards of behaviour required of staff in order to fulfil their roles within the College. This code should assist in the protection of children, adults at risk and members of staff.

These guidelines also apply to volunteers who work in an unpaid capacity in College premises.

#### **Staff must:**

- implement the Safeguarding of Children and Adults at Risk Policy and Procedures at all times

#### **Staff must never:**

- engage in inappropriate rough, physical games including horseplay with children/ students.
- allow or engage in inappropriate touching of any kind. The main principles of touch are:
  - touch should always be in response to the child's need
  - touch should always be appropriate to the age and stage of development of the child
  - touch should always be with a child's permission
- do things of a personal nature for children that they can do for themselves or that their parent can do for them.
- physically restrain a child unless the restraint is to prevent physical injury of the child/other children/visitors or staff/yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a child.
- have children on their own in a vehicle. Where circumstances require the transportation of children in their vehicle, another member of staff/ volunteer must travel in the vehicle. Also it is essential that there is adequate insurance for the vehicle to cover transporting children as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child on their own, it is essential that another leader and the parent is notified immediately.



- take a child to the toilet unless another adult is present or has been made aware (this may include a parent, group leader)
- spend time alone with a child on their own, outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a child, make sure that you can be clearly observed by others.
- engage in a personal relationship with a child/student, or a child who becomes a student, beyond that appropriate for a normal teacher/student relationship.

**Staff who breach any of the above may be subject to the Disciplinary Procedure.**

- If an allegation against a member of staff has occurred then an investigation may be carried out in accordance with the procedure for dealing with such allegations against staff: copies of this procedure are available **on the Extranet** or from the Human Resources Department or Clerk to the Corporation.



## Appendix 3

### Safeguarding Notice for Commercial and very short Adult courses

Weston College is a college of Further and Higher Education meaning you will be studying alongside and share facilities with learners of all ages. The Weston College Group is committed to safeguarding and meeting the needs of our learners. This includes responsibility under the PREVENT Duty to protect our learners from radicalisation and extremism ensuring you are not exposed to or promote extremist or violent views. Whilst with us we expect that you adopt our Safeguarding Policy in totality.

You should remember that students aged under 18 are still children in safeguarding terms and that many adults have vulnerabilities which most often are not visible.

We appreciate your life experience and know that many of you will work alongside apprentices and young people every day.

If a disclosure is made to you or you have any concerns please refer them to a safeguarding officer, before you leave, either in person, by ringing 01934 411464 or emailing [safeguarding@weston.ac.uk](mailto:safeguarding@weston.ac.uk)

The types of things that you may refer are suspicion or knowledge that a student is being:

- under the influence of alcohol or other prohibited substance
- sexually exploited
- subjected to Modern slavery
- trafficked
- groomed
- radicalised to support terrorism or non-violent extremism
- abused Physically, Emotionally, Financially or Sexually
- neglected
- coerced by an older learner or teacher

Common incidents we deal with are banter and bullying. Whilst your intention may be good humoured remarks or actions the interpretation of them may offend particularly when it relates to protected characteristics (age, disability, gender reassignment, marriage or civil partnership, pregnancy, race, religion or belief, sex and sexual orientation).



## Appendix 4

Leadership Board Lead           Andrea Greer  
Leadership Board Advisor       Leah Palmer

Lead DSO & SPOC                Fiona Waters

### POD 1 Knightstone Campus 07866816246

DSO: Lynda Neate  
FRO: Laura Link (Puxton Park Animal Care)  
FRO: Sadie Skellon (HE)  
FRO: Natalie Curry  
FRO: Ben Knocks  
FRO: Jon Hofgartner  
FRO: Greg Thomas  
FRO: Fiona Robertson  
FRO: Dan Humphries  
FRO: Abby Dobson (HE)  
FRO: Clem Williams (HE)  
FRO: Jeremy Plumley

### POD 2 Knightstone Campus (Foundation Learning, Sensory Learning Base and The Bay) 07866816271

DSO: Lorna Whitford  
FRO: James Summerhayes  
FRO: Andy Girling  
FRO: Sam Latouche  
FRO: Nick Chadwick  
FRO: Karen Worthington  
FRO: Ben McConkey  
FRO: Zoe Bodley  
FRO: Laura Milsom (The Bay)  
FRO: Heidi Martini (The Bay)  
FRO: Leigh Murray (The Bay)  
FRO: Laura Farr (The Bay)  
FRO: Nyika Suttie (The Bay)  
FRO: Sarah Hunter (The Bay)  
FRO: Charlotte Judd (The Bay)

### POD 3 Loxton Campus 07866816245

DSO: Mark Hilton



WESTON  
COLLEGE

FRO: Sandra Somers

FRO: Harry Davis

FRO: Katie Gates

FRO: Joel Parker

FRO: Racheal Heath

FRO: Jack Gadd

**POD 4 South West Skills Campus 07866816243**

DSO: John Fowler

FRO: Andy Davidson

FRO: Iain Forster

FRO: Steve Harris

FRO: Louisa Pinkstone

FRO: Claire Knapp

FRO: George Fake

FRO: Emma Hoyal

FRO: Donna Kenny

**POD 5 Construction Training Centre 07866816262**

DSO: Heidi Oliver

FRO: Chris Dewhurst

FRO: Julia Rihan

## **Safeguarding of Children and Adults at Risk Policy and Procedure Addendum Jan 2021: Coronavirus COVID-19**

Following the government announcement on 4<sup>th</sup> Jan 2021 that the country was returning to a National Lockdown to try and stem the rapid rise in the number of Coronavirus cases Weston College will remain closed to all students between Mon 4<sup>th</sup> Jan 2021 and Fri 15<sup>th</sup> Jan 2021. From Mon 18<sup>th</sup> Jan 2021 college campuses will reopen to students who are vulnerable or whose parents are key workers. Weston College defines vulnerability in its widest possible sense and includes, but is not limited to, students who:

- have an EHCP
- are subject to a Child Protection, Child in Need or Team Around the Family plan or for whom college has a safeguarding / welfare concern
- are Children Looked After, a previously looked after child or are aged 18 and under and living independently
- face digital poverty (limited or no access to a reliable IT device or internet at home through which to access online learning)
- enrolled on a Level 1 provision

This addendum details the safeguarding arrangements in place at Weston College from Mon 4<sup>th</sup> Jan 2021 until such time as the government allows the full re-opening of Weston College.

### **Safeguarding arrangements for full closure of the college estate**

Safeguarding arrangements for the students enrolled at Weston College remains the responsibility of the Lead Designated Safeguarding Officer (Lead DSO). If the Lead DSO (Fiona Waters) is unavailable for any reason the Corporate Lead for Safeguarding (Andrea Greer) will nominate one of the other DSO to act as Lead DSO.

As teaching, pastoral and support staff remain in contact with their students through online learning platforms, email and by phone, they must continue to discharge their safeguarding responsibilities referring any concerns immediately to the safeguarding team using the existing, 24/7, out of hours number 01934 411464.

Staff are aware that home is not always the safest place for learners and that the situation may have an impact on the mental health of students, their parents and their staff colleagues. Information and support is available through the college Welfare and Human Resources teams.

The Welfare, Mental Health, Safeguarding and Additional Learning Support teams will remain in regular contact with students for whom there are existing concerns including, but not limited to, Children Looked After (CLA), Previously Looked After Children (PLAC), students who are subject of a Child Protection (CP) or Child in Need (CiN) plan, students receiving mental health support, students entitled to Free Meals in FE and those on Guaranteed Bursary.

Staff, students and their parents have been made aware, through the college website, of how to raise a safeguarding concern during this period.

The college's Lead DSO and Corporate Lead for Safeguarding will remain available via email, telephone and Microsoft Teams to receive any concerns and to co-ordinate a response include making referrals to the Local Authority and / or The Police.

The college's Lead DSO is aware of the local arrangements for contacting the duty intake team and the Local Authority Designated Officer (LADO) for the local authorities for our student population.

The college's marketing team will ensure that all emergency numbers and alternatives are kept up to date on our website.

The Welfare, Mental Health and Safeguarding Teams have ensured that electronic copies of such things as Safety Plans, EHCPs, CP / CiN plans and safeguarding records are accessible from home using college logins.

The college has arrangements in place for remote support for IT services and its online teaching and learning strategy has considered safeguarding.

The college has a plan in place to handle bereavement including access to college counselling services and external support services provided by national charities and the Local Authority.

The college Corporation has been made aware of the updated safeguarding arrangements.

**Safeguarding arrangements for re-opening parts of the college estate for specific vulnerable students, students with an Education Health and Care Plan (EHCP) or students who are the children of key workers and not able to stay at home alone.**

The Weston College estate will be open as follows for students invited and booked to attend:

- Knightstone Campus 09.30 – 15.30 Mon to Fri
- The Bay 09.30 – 15.30 Mon to Fri
- Loxton Campus 09.30 – 15.3 Tues and Thurs
- South West Skills Campus 09.30 – 15.30 Tues and Fri
- Winter Garden 09.30 – 15.30 Thurs
- Parkside for emergency welfare intervention when students have not got an "in date" negative LFT

Students who are due to attend one of the college campuses will need evidence a negative Lateral Flow Test result within the last 6 days. College has made available a free LFT testing centre (Mon to Fri) in the Winter Gardens. Their Dean of Faculty will have added their name to the expected attendance register so that they can be logged in on arrival. A small number of students are not able to undertake the Lateral Flow Test due to sensory hypersensitivity for each of these learners a COVID Risk Assessment has been undertaken and is held by the faculty and Campus Lead, the attendance booking register is marked as "EXEMPT RA authorised".

All staff are expected to undertake two Lateral Flow Tests each week so that, at short notice, they can attend college to support learners.

The college, on a daily basis, will keep a record of all students and staff in attendance and will put in place arrangements to follow up on any student who is due to attend but fails to do so.

Each campus will designate a Senior Manager to act as duty manager for each of the days the campus is open. The duty manager will be on site all day and will be responsible for contacting the Lead DSO or Corporate Lead for Safeguarding, if needed, via telephone, email or Microsoft Teams.

The college will ensure that its safer recruitment processes are clear and adhered to by not allowing volunteers not known to the college to come in and help.

Arrangements for students not required to attend the college under this situation remain the same as the arrangements outline for full closure of the college estate.

### **Safeguarding staff**

It is important that staff members are aware of their behaviours during this period. Staff should ensure that they remain professional at all times.

Staff must not share any personal contact details with students in particular personal phone numbers, personal email addresses or home addresses. Staff should use their college email addresses, college phone number via Skype or college mobile phone when contacting students. Permission is not given to any staff member to use their personal mobile number to contact a student.

When presenting online lessons staff must consider:

- Appropriateness of dress, as should anyone else in their household
- Computers should be used in appropriate areas with the background blurred or in a situation which does not give students insight to their private lives
- Language must be professional and appropriate, including family members in the background
- Staff should record the length, time, date and student attendance of any sessions held online

### **Peer to Peer abuse**

Weston College recognises that during the closure that students may be engaging online even more than usual with their peers and that the likelihood of peer to peer abuse is intensified.

Our response to such incidents is guided by the principles set out in Keeping Children Safe in Education (Statutory Guidance for schools and colleges) Jan 2021. The college will listen to and work with the young person, their parents / carers and any multiagency partner required to ensure the safety and security of that young person.

Concerns must be referred through the usual Safeguarding channels.