****

**2019/20 SAFEGUARDING AND CHILD PROTECTION POLICY FOR City College Peterborough:**

**Children and Adults at Risk**

|  |  |  |
| --- | --- | --- |
| Chair of Governors | Sign and Date |  |
| Principal | Sign and Date |  |
| Designated Safeguarding Lead | Sign and Date |  |

Date for review September 2020

Version 0.4

**Foreword**

This policy has been adapted from the Local Authority model Child Protection and Safeguarding Policy and the Cambridgeshire and Peterborough Safeguarding Adults Policy and Procedures. Its purpose is to enable City College Peterborough governors and staff to achieve consistent and robust arrangements for safeguarding children and adults at risk with care and support needs, and to inform key stakeholders such as learners, supported people, Ofsted and commissioners.

City College Peterborough has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of the children and adults at risk receiving education, training and day opportunity support.

* All learners/supported people regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm and abuse
* The Governing Board, all staff, including volunteers and agency staff working for City College Peterborough are responsible for the safety and welfare of children and adults at risk by following the procedures set out in this policy.
* All staff have a duty to maintain the highest standards of professional behaviour and confidentiality when dealing with children and adults at risk and personal and sensitive issues relating to these groups. *See appendix A – Safe working practice guidelines*
* All staff have a duty to identify and support people who may be vulnerable to being drawn into violent extremist activity (Preventing Violent Extremism/ Prevent strategy)
* City College Peterborough has a zero-tolerance policy to instances of abuse and other harmful behaviour affecting learners/supported people or staff within the Service
* City College Peterborough takes very seriously its responsibility to practice Safer Recruitment Procedures to protect learners/supported people and staff
* All staff have a duty to be alert to any suspicions, nagging doubts or allegations raised about the safety and welfare of children or adults at risk and to refer to or seek advice from the Designated Persons for Safeguarding.
* At CCP we recognise that learners with special educational needs and disabilities (SEND) and adults at risk can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of people. These can include:

1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learners/supported persons additional needs without further exploration
2. The potential for learners with SEND and adults at risk being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
3. Communication barriers and difficulties in overcoming those issues

Staff across CCP will remain vigilant and observant to these additional challenges.

* The Designated Persons will share information about concerns or allegations with statutory agencies, involving learners/supported people and parents/ carers appropriately
* All staff have a duty to raise concerns about the actions of other employees, employees of the colleges and Councils Partners, private contractors and/or elected members, this is enshrined in our whistleblowing policy.  This safeguarding policy should be read in conjunction with that policy.

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# Part I - Key Contacts and Responsibilities

## Key Contact list for Safeguarding in City College Peterborough

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Name | Telephone contact | email |
| Safeguarding Governor | Adrian Chapman | 01733 863887/  07920 160441 | adrian.chapman@peterborough.gov.uk |
| Designated Safeguarding Lead | Julie Bennett | 01733 293894  Ext 215 | jbennett@citycollegepeterborough.ac.uk |
| Deputy Designated Safeguarding Lead (19+) | Sharon Preston-High | 01733 761361 Ext 280 | Spreston-high@citycollegepeterborough.ac.uk |
| Deputy Designated Safeguarding Lead (Study Skills/High Needs) | Michaela Granger | 01733 555197 | mgranger@citycollegepeterborough.ac.uk |
| Deputy Designated Safeguarding Lead (Day Opportunities) | Paul Mansfield | 07983 915182 | pmansfield@citycollegepeterborough.ac.uk |

The Designated Persons are:

|  |  |  |
| --- | --- | --- |
| **Site** | **Designated Person** | **Telephone Number/Ext** |
| Brook Street  01733 761361 | Cheryl Allett | 262 |
| Vanessa Cave | 512 |
| Susan Williamson | 842 |
| Paul Mansfield (Deputy) | 502/07983 915182 |
| Julie Bennett (Lead) | 215/07762 208810 |
| Sarah Clarkson | 240 |
| Sharon Preston-High (Deputy) | 280 |
| John Mansfield/Brook Street  01733 55197 | Tash Dalton | 806 |
| Michaela Granger (Deputy) | 821 |
| Georgia Brownsword | 820 |
| Josie Crucitti | 827 |
| Carlene Osborne | 258 |
| Kingfisher Centre  01733 797720 | Debbie Hembrow | 01733 797726 |
| Dawn Nicholls | 01733 797720 |
| 441 Lincoln Road  01733 797706 | Allison Ward | 01733 797706 |
| Hampton  01733 797701 | Carla Fall | 01733 797701 |

Additional Lead Responsibilities:

|  |  |  |  |
| --- | --- | --- | --- |
| **Role** | **Name** | **Telephone contact** | **Email** |
| SPOC (for all Prevent referrals) | Julie Bennett | 01733 293894  Ext 215 | jbennett@citycollegepeterborough.ac.uk |
| Domestic Abuse | Georgia Brownsword | 01733 555197 | gbrownsword@citycollegepeterborough  .ac.uk |
| Carlene Orborne | 01733  555197 | cosborne@citycollegepeterborough.ac.uk |
| Child Sexual Exploitation | Michaela Granger | 01733 555197 | mgranger@citycollegepeterborough.  ac.uk |
| Children of Prisoners | Tash Dalton | 01733 555197 Ext 806 | [tdalton@citycollegepeterborough.ac.uk](mailto:tdalton@citycollegepeterborough.ac.uk) |
| Early Help Assessors | Tash Dalton | 01733 555197 Ext 806 | [tdalton@citycollegepeterborough.ac.uk](mailto:tdalton@citycollegepeterborough.ac.uk) |
| Michaela Granger | 01733 555197 | mgranger@citycollegepeterborough.  ac.uk |
| Georgia Brownsword | 01733 555197 | gbrownsword@citycollegepeterborough  .ac.uk |
| Carlene Orborne | 01733  555197 | cosborne@citycollegepeterborough.ac.uk |
| Mental Capacity Act (MCA) and Deprivation of Liberty (DoLs) | Paul Mansfield | 07983 915182 | pmansfield@citycollegepeterborough.ac.uk |
| Debbie Hembrow | 01733 797726 | dhembrow@citycollegepeterborough.ac.uk |

The Safeguarding Task Group members are:

|  |  |  |
| --- | --- | --- |
| **Name** | **Telephone contact** | **Email** |
| Sharon Preston-High | Ext 280 | Spreston-high@citycollegepeterborough.ac.uk |
| Paul Mansfield | 07983 915182 | pmansfield@citycollegepeterborough.ac.uk |
| Cheryl Allett | 01733 761361 Ext 262 | [callett@citycollegepeterborough.ac.uk](mailto:callett@citycollegepeterborough.ac.uk) |
| Dawn Nicholls | 01733 797720 | [dnicholls@citycollegepeterborough.ac.uk](mailto:dnicholls@citycollegepeterborough.ac.uk) |
| Carla Fall | 01733 797703 | [cfall@citycollegepeterborough.ac.uk](mailto:cfall@citycollegepeterborough.ac.uk) |
| Simon Froggitt | 01733 797718 | sfroggitt@citycollegepeterborough.ac.uk |
| Elisabeth Hamilton | 01733 761361 | ehamilton@citycollegepeterborough.ac.uk |
| Michaela Granger | 01733 555197 Ext 821 | mgranger@citycollegepeterborough.ac.uk |
| Ian Worley | 01733 761361 Ext 501 | iworley@citycollegepeterborough.ac.uk |

The following governors and members of staff have undergone Safer Recruitment training

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Governors and SLT | Study Skills and Apprenticeships | 19+ | Day Opportunities | Health and Care Sector Work Academy | Support Services |
| Adrian Chapman  Pat Carrington  Janet Bristow  Julie Bennett  Shaun Hindle  Graham Jones  Tash Dalton  Adele Fender | Debbie Chalmers  Michaela Granger  Tiana Roddis | Sharon Preston-High  Sarah Perkins  Cheryl Allett  Lisa Alexander  Sam Clarke | Debbie Hembrow  Paul Mansfield  Elaine Hovell  Christine Keating  Allison Ward  Allison Valentine  Sarah Collins | Nicola Arbon  Vanessa Cave  Sue Williamson  Natalia Urbaniak | Julie Shortland  Mark Lowey  Jenny Holmes  Tracy Preston  Sarah Clarkson  Anastasia Harvey  Anne Hornsby  Nicola Maxwell |

## 1.2 Key local contacts

### 1.2.1. Children’s

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures <http://www.safeguardingcambspeterborough.org.uk/children-board/>

Education Safeguarding Team [ECPSGeneral@cambridgeshire.gov.uk](mailto:ECPSGeneral@cambridgeshire.gov.uk)

|  |  |  |
| --- | --- | --- |
| Police Child Abuse Investigation Unit | Tel: 101/999 (in an emergency) |  |
| Early Help | 01733 863649 | helpwithcaf@peterborough.gov.uk |
| Customer Service Centre – social care referrals | 01733 864180 |  |
| Emergency Duty Team (Out of hours) | 01733 234724 |  |
| Local Authority Designated Officer (LADO)  Gisela Jarman  Jane Bellamy | 01733 864030  01733 864790 |  |

### 1.2.2. Adults

Cambridgeshire and Peterborough Safeguarding Adults Partnership Board – Safeguarding Inter-Agency Procedures <http://www.safeguardingcambspeterborough.org.uk/adults-board/>

|  |  |  |
| --- | --- | --- |
| Customer Services | 01733 747474 (9am to 5pm Monday to Friday) | [adultsocialcare@peterborough.gcsx.gov.uk](mailto:adultsocialcare@peterborough.gcsx.gov.uk) |
| Out of hours | 01733 234 724 |  |

## 2. Responsibilities

## 2.1. The Designated Safeguarding Lead responsibilities:

**2.1.1. Manage referrals**

The designated safeguarding lead is expected to:

* refer cases of suspected abuse to the local authority children’s and adults social care, MASH and police as required;
* support staff who make referrals to local authority children’s and adults social care, MASH and police;
* refer cases to the Channel programme where there is a radicalisation concern as required;
* support staff who make referrals to the Channel programme;
* refer cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required; and
* refer cases where a crime may have been committed to the Police as required.

**2.1.2. Work with others**

The designated safeguarding lead is expected to:

* act as a point of contact with the three safeguarding partners;
* liaise with the principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
* as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child concerns in cases which concern a staff member;
* liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
* act as a source of support, advice and expertise for all staff.

**2.1.3. Training**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated people, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

* understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements.[[1]](#footnote-1)
* have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
* ensure each member of staff has access to, and understands, the college’s child protection and safeguarding policy and procedures, especially new and part time staff;
* are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;[[2]](#footnote-2)
* 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, and with the three safeguarding partners, other agencies, organisations and practitioners.
* are able to keep detailed, accurate, secure written records of concerns and referrals;
* understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
* are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
* can recognise the additional risks that children with SEN and disabilities (SEND) and adults at risk face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
* obtain access to resources and attend any relevant or refresher training courses; and
* encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

**2.1.4. Raise Awareness**

The designated safeguarding lead should:

* ensure the college’s child protection and safeguarding policies are known, understood and used appropriately;
* ensure the college’s child protection and safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
* ensure the child protection and safeguarding policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and
* link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

**2.1.5. Child protection file**

Where children leave the college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

**2.1.6. Availability**

During term time the designated safeguarding lead (or a deputy or SLT member) should always be available (during college hours) for staff in the college to discuss any safeguarding concerns. Available may mean via phone and/or Skype or other such media.

The DSL or a deputy will be available in person or via phone out of hours and out of term.

**2.1.7. Reporting**

Liaising with the Governor for Safeguarding, provide quarterly and annual reports to the Board of Governors.

**2.1.8. Communication**

Ensure College staff receive timely information to maintain safeguarding awareness, vigilance and action

**2.1.9. Policies and Procedures**

Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s and adult at risk welfare

**2.1.10. Audits**

Quality assure safeguarding arrangements within the college through a range of self-assessment tools and internal audits including actual concerns raised, training database and the single central record.

* Overseeing Safeguarding processes and procedures, incidents, concerns and the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with safeguarding boards.
* Ensuring that staff receive basic training in child and adult at risk protection issues and are aware of the College child and adult at risk protection procedures
* Receiving regular training in child and adult at risk protection issues and inter-agency working, as required by the Cambridgeshire and Peterborough Safeguarding Children's Board (CPSCB) and Cambridgeshire and Peterborough Safeguarding Adults Board (CPSAB), and will receive refresher training at least every 2 years
* Providing an annual report in March to the governing body of the College setting out how the College has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the CPSCB / CPSAB to the governing body at the earliest opportunity.

**The roles of the Deputy Safeguarding Leads, Designated Persons and additional safeguarding responsibilities can be found in appendix B.**

## 2.2 Governing Board responsibilities:

2.2.1 Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for child protection remains with the DSL and cannot be delegated.

2.2.2 Ensure that the role of DSL and DDSL is explicit in the role holder’s job description.

2.2.3. Ensure that the DSL has the appropriate status and authority within the college to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See ‘Keeping Children Safe in Education, Annex B’). Ensure that the DSL and deputies have undertaken the two day training provided by the Education Safeguarding Team and that this training is updated at least every two years.

2.2.4. Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via bulletins, meetings or further reading at least annually.

2.2.5. Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the point of induction. Staff members are required to log a concern via MyConcern and submit it to the DSL/DDSL/DP immediately

2.2.6 Ensure that the DSL, DDSL or DP are always available to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL, DDSL or DP are not available.   
  
2.2.7. The college has a team of training designated persons and duty manager guidance in the event that a designated person is not available, for example, during evening classes. If a designated person is not onsite a staff member should contact a duty manager, who will:

* Contact the out-of-hours social care team on 01733 234724 or, if the individual is in immediate danger or is hurt, call 999
* Establish if a Designated Person or member of the senior leadership team is on site and report the safeguarding concern
* If no Designated Person or SLT member is available contact the Designated Safeguarding Lead, Julie Bennett, on 07762 208810 for further guidance

2.2.8. Nominate a governor for safeguarding and child protection who has undertaken appropriate training. They will take leadership responsibility for the college’s safeguarding arrangements and practice and champion child protection issues.

2.2.9. Ensure every member of staff and every governor knows:

* the name of the designated safeguarding leads/deputies and their role;
* how to identify the signs of abuse and neglect;
* how to pass on and record concerns about a learner;
* that they have an individual responsibility to be alert to the signs and indicators of abuse; and for referring child protection concerns to the DSL/DDSL/DP;
* that they have a responsibility to provide a safe environment in which children can learn;
* where to find the Inter – Agency Procedures on the Safeguarding Children Partnership Board website;
* their role in the early help process;
* the process for making referrals to children’s social care.

2.2.10. Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required **but at least annually.**

2.2.11. Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

2.2.12. Ensure that parents are informed of the responsibility placed on the college and staff in relation to child protection by setting out these duties in the college prospectus and brochure website

2.2.13 Ensure that this policy is available publicly either via the college website

2.2.14 Ensure an annual report is made to the full governing board and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.

2.1.15 Ensure that this Safeguarding and Child Protection policy is annually reviewed and updated and shared with staff.

2.1.16 Ensure that young people’s exposure to potential risks while using the internet is limited by having in place appropriate filtering and monitoring systems. The system used in the College is Lanscool

2.1.17 Ensure young people’s wishes and feelings are taken into account where there are safeguarding concerns.

## 3. MONITORING and EVALUATION

3.1. Our Safeguarding and Child Protection policy and procedures will be monitored and evaluated by:

* Governing Body visits to the college
* SLT ‘drop ins’ and discussions with young people, adults at risk and staff
* Learner and Supported People surveys
* Scrutiny of attendance data
* Scrutiny of a range of risk assessments
* Monitoring of logs of behaviour and prejudice related incidents
* Review of parental concerns

3.2. The implementation of the policies and procedures will be monitored by:

* Call file audits completed by the DSL and Deputy DSL’s
* Audit of the Single Central Record by the Governor for Safeguarding and DSL
* A task group made up of College staff
* Monthly designated person meetings to highlight best practice
* Safeguarding reports to the Governing Board

## SAFER RECRUITMENT

The College is committed to the safer recruitment of staff, volunteers and contractors/agency staff. Recruiting staff must follow PCC Recruitment and Selection Procedure and Management Guidance for City College Peterborough which is available on SharePoint. In summary:

* 1. The job vacancy advertisement must make it clear that the college is committed to safeguarding and promoting good practice in equality and diversity
  2. A face-to-face interview must be held. The recruitment panel must:
* Include at least two interviewing panel members or which at least one must have taken safer recruitment training within the last three years.
* Explore gaps in work history and inconsistencies must be challenged ensuring all panel members are satisfied that the explanations provided are robust and can be verified
* Include a minimum of three specific safeguarding questions of which one must cover Prevent  
  1. Appropriate checks are completed before the selected staff member commences employment:
* an identity check. Identification checking guidelines can be found on the GOV.UK website;
* An Enhanced DBS Check (full details are given in the council’s policy on DBS/Vetting & Barring)[[3]](#footnote-3)
* further checks on people who have lived or worked outside the UK; this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions
* a check of professional qualifications, where required
* a check to establish the person’s right to work in the United Kingdom
* record whether the person’s position involves ‘relevant activity’, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
* At least 2 references are taken up and checked. References should always be obtained from the candidate’s current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving should be obtained from the school, college, local authority or organisation at which they were employed  
  1. The College will maintain a Single Central Record for all staff and agency workers in electronic format. This will be maintained by HR. The single central record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained. A record of the name of the person carrying out the check will also be recorded.  
       
     For agency and third party supply staff, the college will also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.
  2. The college will obtain written notification from any agency or third-party organisation that the organisation has carried out the checks in respect of the enhanced DBS certificate and all other verification checks on an individual who will be working at the college
  3. All volunteers must be interviewed by an ESLT member or above, and must be asked a minimum of three safeguarding and Prevent questions. The interview must probe the motivation of the individual to volunteer at the College and explore any gaps in work history/inconsistencies of information provided to the same level as if the interviewee is applying for a paid position. If the manager is satisfied that an individual is suitable to volunteer in the college, then the application form should be submitted for an SLT decision.   
       
     Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. Volunteers who, on an unsupervised basis teach or support young people or adults at risk regularly, or provide personal care on a one-off basis in college, will be in regulated activity. A DBS must be obtained at enhanced level for all volunteers who are new to working in regulated activity and re-checked at least every three years.
  4. The college will ensure that any contractor, or any employee of the contractor, who is to work at the college, has been subject to the appropriate level of DBS check. Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.
  5. Where young people and adults at risk are supported into paid employment, apprenticeships, traineeships, work experience, voluntary jobs and Supported Internships the college will ensure that the external business has policies and procedures in place to protect the young person/adult at risk.

## PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN AND ADULTS AT RISK

* 1. In addition to Safer Recruitment, all staff will receive three yearly DBS checks.
  2. The Colleges policy and procedures managing allegations of abuse made against a member of staff or volunteer is in appendix C.

## SAFEGUARDING CONCERN MANAGEMENT

* 1. With effect from 1st September 2019 the College will use MyConcern to record, manage and report all of its Safeguarding and Prevent incidents, nagging doubts and body maps. MyConcern will also provide one place for all local and national guidance, policies and procedures and will be available to all governors and college staff. MyConcern is an internet-based platform and will therefore be available across all sites and community bases.
  2. Training to all Governors and staff started rolling out from August 2019

## Relevant Documents

* “Guidance for Safer Working Practice for those working with children and young people in education settings” (May 2019)
* “Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)
* “Keeping children safe in education: Statutory guidance for schools and colleges” (Sep 2019)
* “The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)
* “Revised Prevent Duty Guidance: for England and Wales” (July 2015)
* “Sexting in schools and colleges: Responding to incidents and safeguarding young people” published by the UK Council for Child Internet Safety (UKCCIS) – (September 2016)
* “Sexual violence and sexual harassment between children in schools and colleges” (May 2018)
* “What to do if you’re worried a child is being abused: Advice for practitioners” (March, 2015)
* “Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)
* Care Act 2014
* Mental Capacity Act 2005

## OTHER RELATED POLICIES AND Procedures

This policy also links to the following policies and procedures:

* Allegations against staff
* *Anti-bullying Policy*
* Assisting and Moving (People Moving People) Policy
* Business Continuity
* Challenging Behaviour Policy
* Code of Conduct
* Common Working Practice
* Complaints Procedure
* Conflict Resolution and Physical Intervention Policy
* Equality and Diversity Policy
* Health and Safety Policy
* Learner Disaplinary Policy
* Learning Support Policy
* Lone Working Policy
* Medications Policy
* Personal and Intimiate Care Policy
* Safer Recruitment Policy
* Staff Grievance and Disaplinary Policies and Procedures
* Whistleblowing Policy

# Part II Introduction

City College Peterborough is committed to ensuring that the College:

* Provides a safe environment for children and adults at risk to learn, train or receive health and wellbeing or employment support
* Identifies children and adults at risk who are suffering, or likely to suffer, significant harm and
* Takes appropriate action to see that such children and adults at risk are kept safe at College and in College venues and workplaces.

In pursuit of these aims, the governing body will approve and annually review policies and procedures with the aim of:

* Raising awareness of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for them
* Aiding the identification of children and adults at risk at risk of significant harm, and providing procedures for reporting concerns
* Establishing procedures for reporting and dealing with allegations of abuse against members of staff
* The safe recruitment of staff

In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Department for Education (DfE) and the Cambridgeshire and Peterborough Safeguarding Boards and other relevant bodies and groups. This will include compliance with the Care Act (2014), the statutory guidance “Working together to safeguard Children (updated September 2018) and the “Prevent duty guidance for England and Wales” to comply with the Counter Terrorism and Security Act 2015.

Staff leading on Child and Adult at risk Protection within the College and staff working with children and adults at risk will receive adequate training to familiarise them with child and adult at risk protection issues and responsibilities and the College’s procedures and policies. All staff will receive appropriate training, updated as needed but as a minimum every two years. This will be tracked by the Designated Safeguarding Lead and the Safeguarding Task Group to ensure the right training is happening at the right time.

The governing body will receive an annual report in March, from the designated Senior Member of Staff with lead responsibility for child and adult at risk protection. This report reviews how the duties have been discharged.

Throughout these policies and procedures, reference is made to “children and young people and adults at risk”. The terms “children” and “young people” are used to mean “those under the age of 18”. City College Peterborough recognizes that some adults are also vulnerable to abuse. A adult at risk is defined in section 42 of the Care Act (2014) as an adult who has needs for care and support (whether the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

This policy applies to staff and full and part-time learners/supported people enrolled at the college who are covered by the relevant legislation.

# Part III – Safeguarding Children and Child Protection Policy

## INTRODUCTION

City College Peterborough fully recognises the responsibility it has under section 157/175 of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges ‘Keeping Children Safe in Education’ (September 2019). All staff must be made aware of their duties and responsibilities under part one of this document (set out below).

Staff should read the above document together with ‘Annex A’ of ‘Keeping Children Safe in Education’ (September 2019) and ‘What to do if you’re worried a child is being abused: Advice for practitioners’ (March 2015).

Through their day-to day contact with learners and direct work with families, all staff in College have a responsibility to:

* Identify concerns early to prevent them from escalating
* Provide a safe environment in which children can learn
* Identify children who may benefit from early help
* Know what to do if a child tells them he/she is being abused or neglected
* Follow the referral process if they have a concern

This policy sets out how the college’s governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are learners at the college. Our policy applies to all staff and volunteers working in the college, including governors. Teaching assistants, office staff as well as tutors can be the first point of disclosure for a child. Concerned parents/carers may also contact the college and its governors.

It is consistent with the Safeguarding Children Partnership Board procedures.

**There are four main elements to our policy:**

**PREVENTION,** through the teaching and pastoral support offered to learners and the creation and maintenance of a whole college protective ethos

**PROCEDURES** for identifying and reporting cases, or suspected cases of abuse. The definitions of the four categories of abuse are attached (see Appendix D)

**SUPPORTING CHILDREN,** particularly thosewho may have been abused or witnessed violence towards others

#### PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents/carers on request and is on the college website.

## PREVENTION

* 1. We recognise that for our learners, high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps to protect children.
  2. This college will therefore:
     1. establish and maintain an environment where learners feel safe, including in a digital context, and are encouraged to talk and are listened to;
     2. ensure learners know that there are adults in the college whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate;
     3. engage fully in the Early Help process to maximise the opportunity for timely intervention;
     4. include in the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse both in the real and the virtual world and information about who to turn for help;
     5. include, in the curriculum, material which will:
* help learners develop realistic attitudes to the responsibilities of adult life, particularly with regard to child care and parenting skills;
* reinforce essential skills for every learner to include self-esteem and confidence building, thinking independently and making assessments of risk based on their own judgements;
* embed online safety at every relevant opportunity;
  + 1. ensure that wherever possible every effort will be made to establish effective working relationships with parents and carers and with colleagues from partner agencies.
    2. “PRAG” rate each learner aged 14 to 19 years to identify and differentiate support needs, prioritising those most at risk of serious harm

|  |  |  |  |
| --- | --- | --- | --- |
| PURPLE | RED | AMBER | GREEN |
| An identified safeguarding concern, including suicide-risk, self-harm, current depression, a serious health issue, in the care system or in Y11 | An identified safeguarding concern, including learning difficulties, behaviour, emotional or social difficulties, depression, living independently or a care-leaver | * youth offending order * young parent * young carer | No safeguarding concerns identified |

* 1. **Prevention of Peer on Peer Abuse**

We recognise that peer on peer abuse can manifest itself in many ways. This can include but is not limited to: bullying, cyberbullying, sexual violence, sexual harassment, being coerced to send sexual images (sexting), teenage relationship abuse, physical abuse and upskirting[[4]](#footnote-4).

* + 1. **All** forms of peer on peer abuse are unacceptable and will be taken seriously.

The college will therefore:

* + 1. Create a whole college protective ethos in which peer on peer abuse, including sexual harassment will not be tolerated.
    2. Provide training for staff about recognising and responding to peer on peer abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
    3. Ensure that staff do not dismiss instances of peer on peer abuse, including sexual violence and sexual harassment as an inevitable part of growing up.
    4. Include within the curriculum, information and, materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
    5. Provide high quality Relationship and Sex Education (RSE), including teaching about consent.
    6. Ensure that staff members follow the procedures outlined in this policy when they become aware of peer on peer abuse.

## PROCEDURES

* 1. We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Partnership Board ‘Inter-Agency Procedures’. A copy of these procedures can be found on their website: <http://www.safeguardingcambspeterborough.org.uk/children-board/>
  2. See Part I, page 4 for a list of designated safeguarding staff and governors
  3. See Part I, page 9 for Governing Board responsibilities
  4. All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk will be taken seriously and staff will raise and concern on MyConcern and report to a Designated Person as soon as possible or within 24 hours. If the Designated Person is not available, staff should report to a member of the Senior Leadership Team. In emergency situations, immediate medical attention will be provided. If a crime may have been committed, the concern, suspicion or allegation will be reported to the Police.
  5. The recording of concerns on MyConcern include nagging doubts and body maps. Nagging doubts are concerns regarding the welfare of a young person or adult at risk which at that point does not warrant a safeguarding investigation (appendix E). In the event that three nagging doubt concerns are raised in any one academic year, a safeguarding concern will be raised to MASH
  6. The college fully recognises the importance of the role of the Designated Safeguarding Lead (DSL). The DSL is a member of the Senior Leadership Team and the role is explicitly defined in their job description, with time, resources and training to undertake her/his duties agreed. (See Keeping Children Safe in Education 2018 Annex B).
     1. The lead responsibility for safeguarding and child protection will not be delegated, though specific activities may be delegated to appropriately trained deputies.
     2. Contingency arrangements are in place should the DSL not be available. A Deputy DSL (DDSL) or Designated Persons (DP) will be available
     3. The DSL or a Designated Person (DP) will always be available during college core hours. The out of hours contact is 01733 864612.
     4. It is the responsibility of the Designated Safeguarding Lead to ensure that all of the child protection procedures are followed within the college.
     5. The DSL, DDSL and DPs should undergo the two-day training provided by the Education Child Protection Service, and update this training every two years. Knowledge and skills in addition to this formal training should be refreshed regularly.
  7. **Liaison with Other agencies**

The college will:

* + 1. work to develop effective links with relevant services to promote the safety and welfare of all learners;
    2. cooperate as required, in line with ’Working Together to Safeguard Children (July 2018)’, with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups;
    3. notify the relevant Social Care Unit immediately if:
* it should have to exclude a learner who is subject to a Child Protection Plan (fixed term or permanently)
* there is an unexplained absence of as learner who is subject to a Child Protection Plan
* there is any change in circumstances to a learner who is subject to a Child Protection Plan.
  + 1. When a learner who is subject to a child protection plan leaves, information will be transferred to the new school/college immediately. The Child Protection Chair and Social Work Team will also be informed.
    2. follow the mandatory duty to inform the local authority of any ‘Private Fostering’ arrangements. i.e. when parents arrange for a child to stay with an adult who is not a close relative for more than 28 days.
  1. **Record Keeping**

The college will:

* + 1. keep clear, detailed, accurate written records of concerns about children (noting the date, event and action taken) via MyConcern, even when there is no need to refer the matter to Social Care immediately;
    2. ensure electronic records are stored in MyConcern, an identified, purpose-built, secure platform
    3. ensure all relevant child protection records are sent to the receiving college or establishment when a learner moves school/college in accordance with ‘Keeping Children Safe in Education’ (September 2019) and the Education Safeguarding Team’s Guidance on Keeping and Managing Child Safeguarding Records.  
       The DDSL for Study Skills will consider whether it would be appropriate to share information with the new school/college in advance of a learner leaving
    4. make parents aware that such records exist, except where to do so would place the child at risk of harm.
    5. Ensure all actions and decisions will be led by what is considered to be in the best interests of the child.
  1. **Confidentiality and information sharing**
     1. The Data Protection Act 2018 does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child.  
          
        The college will:
     2. Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately. If in any doubts about confidentiality, they should seek advice from a senior manager or outside agency as required.
     3. Whilst consent to share information will generally be sought, sharing without consent will take place should the safety of a child be at risk. Any decision not to share will be recorded.
     4. Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in ‘Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,’ DfE, July 2018).
     5. Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a learner or parent/carer they will refer the request to the DSL or GDPR Officer, Graham Jones, Vice Principal Finance and Shared Services.
     6. Ensure staff are clear with learners that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputies/Designated Persons will:

* + 1. Disclose information about a learner to other members of staff on a ‘need to know’ basis. Parental consent may be required.
    2. Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner
    3. Record when decisions are made to share or withhold information, who information has been shared with and why. (See ‘Working Together to Safeguard Children,’ July 2018)
    4. Seek advice about confidentiality from outside agencies if required. (See ‘Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,’ DfE, July 2018).
  1. **Communication with parents/carers**

The college will:

* + 1. ensure that parent/carers have an understanding of the responsibility placed on the college and staff to child protection by setting out its duties in the college prospectus/website;
    2. undertake appropriate discussion with parents prior to involvement of another agency unless specific circumstances preclude this.
    3. Seek advice from Social Care if the college believes that notifying parents could increase the risk of harm to the child. (Further guidance on this can be found in the Inter-agency procedures of the Safeguarding Children Partnership Board). Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury or where it may lead to the loss of evidence.
    4. record what discussions have taken place with parents on MyConcern (Appendix E) about a Child’s welfare. If a decision has been made not to discuss with parents, the reason should be recorded.
  1. **Dealing with Sexual Violence and Sexual harassment between children**
     1. The college recognises that sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to ‘unwanted conduct of a sexual nature’, such as sexual comments, sexual taunting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation, coercion and threats.

The college will:

* + 1. Be clear that sexual violence and sexual harassment will not be tolerated.
    2. Provide training for staff on how to manage a report of sexual violence or sexual harassment.
    3. Make decisions on a case-by-case basis.
    4. Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
    5. Implement measures to keep the victim, alleged perpetrator and, if necessary, other children and staff members safe. Record any risk assessments and keep them under review.
    6. Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
    7. Liaise closely with external agencies, including police and social care when required.
    8. Further guidance can be found in ‘Keeping Children Safe in Education - Part Five (September 2019)’, ‘Sexual violence and sexual harassment between children in schools and colleges’ (DfE May 2018) and ‘Sexting in schools and colleges: Responding to incidents and safeguarding young people’ (UKCCIS)

* 1. **Sexual Behaviour**
     1. Young people who have experienced sexual abuse may go on to display sexualised or sexually abusive behaviour but it is by no means automatic. However, if a young person is displaying sexualised behaviour, the possibility that a young person has experienced sexual abuse should always be borne in mind. Children and young people are responsible for a significant number of sexual behaviours every year
     2. The young person exhibiting sexualised behaviour may also have experienced other forms of abuse or other types of trauma including neglect, domestic violence or loss, that have played a contributory role in the development of those behaviours.
     3. Where there is a concern about a young person’s sexual behaviour the college will use the Brook Traffic Light Tool to inform decision making <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

## 3. SUPPORTING CHILDREN

The college recognises that **any** young learner may be subject to abuse and neglect and as such will support all young learners by:

3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.

3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.

3.3 Applying the college's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the young learner but does not damage the learner's sense of self-worth. The college will ensure that the learner knows that some behaviour is unacceptable, but s/he is valued and not to be blamed for any abuse which has occurred.

3.4 Liaising with other agencies which support the learner such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help Teams.

3.5 Developing productive and supportive relationships with parents/carers.

3.6 The college recognises that whilst **any** young learner may benefit from early help, staff are encouraged to consider the wider environmental factors present in a young person’s life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for:

* + 1. **Children with Disabilities, Additional Needs or Special Educational Needs**

3.6.1.1. We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. College staff who deal with young leaners with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse*.*

3.6.1.2. The college has learners with emotional and behavioural difficulties and/or challenging behaviours. The college will support staff to decide appropriate strategies that will reduce anxiety for the individual learner and raise self–esteem as part of an overall behaviour support plan agreed with parents/carers.

3.6.1.3. As part of the PSHE curriculum staff will teach young learners personal safety skills commensurate with their age, ability and needs. Learners will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

3.6.1.4. The college has learners who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead such learners will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the learner.

3.6.1.5. Where necessary the College will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the learners.

3.6.1.6. We promote high standards of practice, including ensuring that disabled learners know who to raise concerns, and have access to a range of adults with whom they can communicate.

3.6.1.7. Most learners in our High Needs Provision have an Education, Health and Care Plan and multi-agency planning and involvement to support integrated care.

* + 1. **Children Misusing Drugs or Alcohol**

3.6.2.1 The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the college will consider such action in the following situations:

3.6.2.2 When there is evidence or reasonable cause:

* To believe the young person’s substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
* To believe the learners substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
* Where the misuse is suspected of being linked to parent/carer substance misuse.
* Where the misuse indicates an urgent health or safeguarding concern
* Where the child is perceived to be at risk of harm through any substance associated criminality
  + 1. **Children Living with Substance Misusing Parents/Carers**

3.6.3.1 Misuse of drugs or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

* + - 1. When the college receives information about drug and alcohol abuse by a child’s parent/carers they will follow appropriate procedures.
      2. This is particularly important if the following factors are present:
* Use of the family resources to finance the parent’s dependency, characterised by inadequate food, heat and clothing for the children
* Children exposed to unsuitable care givers or visitors, e.g. customers or dealers
* The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
* Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
* Disturbed moods as a result of withdrawal symptoms or dependency
* Unsafe storage of drugs and/or alcohol or injecting equipment
* Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child.
  + 1. **Children Living with Domestic Abuse**
       1. Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional.
       2. The college recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.
       3. Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The college will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.
       4. At City College Peterborough we are working in partnership with Cambridgeshire Police and Peterborough City Council to identify and provide appropriate support to learners who have experienced domestic abuse in their home; this scheme is called Operation Encompass.  
            
          In order to achieve this, Cambridgeshire’s Education Safeguarding Team will share police information of all domestic incidents, where one of our learners has been present, with the DSL/Domestic Abuse (DA) Lead.  
            
          On receipt of any information, the DSL/DA Lead will decide on the appropriate support the learner may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing resulting actions will be undertaken in accordance with the ‘Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notification to Schools, Colleges and Early Years settings’.
       5. Breast ironing also known as ‘Breast Flattening’ is the process whereby young pubescent girls ‘breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. Where it is practised it is believed that girls will be protected from:
* Harassment
* Rape
* Abduction
* Early Forced Marriage
* And therefore be kept in education  
  + - 1. It is a harmful practice which originated in Cameroon but is practised in other parts of Africa. There is no particular law against it, but it is included in physical abuse. It is usually a well-kept secret between mother and daughter and often the father is completely unaware. Pubescent girls aged 9-15 from practising communities are most at risk. Some indicators include:
* Unusual behaviour after an absence from education including depression, anxiety, aggression, withdrawn
* Reluctance to undergo normal medical examinations
* Fear of physical activities due to scars or bandages showing
  + 1. **Children at risk of ‘Honour-base’ Violence, including Female Genital Mutilation (FGM)**
       1. So called ‘honour-based’ violence encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The college takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBV through training. Staff are required to treat all forms of HBV as abuse and follow the procedures outlined in this policy.
       2. FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the learners’ wishes.
       3. In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report ‘known’ cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.
    2. **Children at risk of Child Sexual Exploitation (CSE)**
       1. 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.
       2. Sexual exploitation can take many different forms from the seemingly ‘consensual’ relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.
       3. The DSL/DDSL/DP/CSE Lead will complete the Safeguarding Children Partnership Board’s [Exploitation (CSE / Criminal/Gangs) Risk Assessment and Management Tool](http://www.safeguardingcambspeterborough.org.uk/wp-content/uploads/2018/05/Exploitation-CSECCE-Risk-Assessment-Tool.docx) and refer to Social Care if there is a concern that a young person may be at risk of CSE.
       4. The college recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions (see 3.6.7)
    3. **Children at risk of Criminal Exploitation : County Lines**
       1. Criminal exploitation of children is a form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even of activity appears to be consensual. This activity can be perpetrated by groups or individuals, males or females, young people or adults.
       2. The College will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.
       3. The DSL/DDSL/DP will complete Safeguarding Children Partnership Board’s Exploitation (CSE/Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.
       4. The College recognises that young people who go missing can be at increased risk of child criminal exploitation and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions (see 3.6.7)
    4. **Children with Family Members in Prison** 
       1. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.
       2. Children may be the target of bullying or may have attendance issues. There may be problems associated with prison visits and the family may be experiencing financial difficulties.
       3. City College Peterborough is committed to supporting the children and young people who have a parent or close relative in prison, and to minimise the risk of them not achieving their full potential. Our policy can be found in appendix F
       4. Information shared by the family will be treated in confidence and will be shared on a ‘need to know basis.
       5. The college will work with the family and the child to minimise the risk of the young person not achieving their full potential.
    5. **Children Frequently Missing Education**
       1. City College Peterborough recognises that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.
       2. The college monitors attendance of individual learners closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.
       3. The College endeavours to hold more than one emergency contact for each learner to provide additional options to make contact with a responsible adult when a young person missing education is identified as a welfare and/or safeguarding concern.
       4. When a young person is missing for education, the college follows the procedure as set out in Cambridgeshire’s Child Missing Education guidance. The college will inform the Education Welfare Officer and Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.
    6. **Children who are Young Carers**
       1. The college recognises that learners who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.
       2. City College Peterborough will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.
    7. **Children who have returned home to their family from care**
       1. The college recognises that a previously looked after child potentially remains vulnerable. We will vigilantly monitor the welfare of previously looked after children, keep records and notify Social care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board ‘Inter-Agency Procedures’.
    8. **Children showing signs of Abuse and/or Neglect**
       1. The college recognises that experiencing abuse or neglect may have an adverse impact on those learners which may last into adulthood without appropriate intervention and support. College may be the only stable, secure and predictable element in the lives of young learners at risk. Young learners who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that learners may develop abusive behaviours and that these learners may need to be referred on for appropriate support and intervention.
       2. College will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix D).
    9. **Privately Fostered Children**
       1. Private fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The college will follow the mandatory duty to inform the local authority of any ‘Private Fostering’ arrangements and refer to the Specialist Fostering Team

* + 1. **Children and the court system**
       1. Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. A guide to support young people who are a witness can be found here: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/ywp-12-17-eng.pdf>
       2. 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 <https://helpwithchildarrangements.service.justice.gov.uk/>. This may be useful for some parents and carers.
    2. **Homelessness**
       1. Being homeless or being at risk of becoming homeless presents a real risk to a young person’s welfare. The DSL/DDSL/DP are aware of contact details and referral routes into the local authority housing provision and registered social landlords so that 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. Where a young person has been harmed or is at risk of harm a referral will also be submitted to the MASH/emergency services.
       2. The Homelessness Reduction Act 2017 places a new legal duty on the local authority so that everyone who is homeless or at risk of homelessness will have access to meaningful help including as 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. More information can be found at <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>.
       3. Young learners at the college may be living independently from their parents or guardians. Where this is the case and the young learner is under 18 years of age, children’s services will be the lead agency in managing the young persons living arrangements. Staff must ensure appropriate referrals are made to social care. The Department of Education and the Ministry of Housing, Communities and Local Government have published a joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>
    3. **Children at risk of Radicalisation**

3.6.12.1. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. Nationally, there have been occasions where extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Whilst City College Peterborough values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society’s values, we also recognise that free speech is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The College fully recognises its statutory duty to identify and support learners at risk and is clear that this exploitation and radicalisation should be viewed as safeguarding concern.

The college governors, the Principal and the Designated Safeguarding Lead will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment may include consideration of the college’s curriculum, SEND policy, the use of college premises by external agencies, anti-bullying policy, online-safety and other issues specific to the college’s profile, community and philosophy.

The College’s SPOC (Single Point of Contact) will be the lead for safeguarding in relation to protecting individuals from radicalisation, sharing relevant information in a timely manner with the appropriate agency, including Channel.

City College Peterborough Prevent strategy is can be found in Appendix G.

## PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

4.1 The college will operate safer recruitment practices including ensuring pre-employment checks, and appropriate DBS and reference checks are undertaken according to Part three “Keeping Children Safe in Education”. (DfE 2019). This section should be read in conjunction with the college’s Safer Recruitment Policy on page 11.  
  
5. Extended College and Before and After College Activities

The College provides Breakfast Club and after college activities at John Mansfield Centre. The arrangements for child and adults at risk as written in this policy shall apply.

# Part IV – Safeguarding Adults at risk

## Introduction and Making Safeguarding Personal

The six key principles of making safeguarding personal underpin all adult safeguarding work:

**Empowerment**

People being supported and encouraged to make their own decisions and informed consent.

“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”

**Prevention**

It is better to take action before harm occurs.

“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”

**Proportionality**

The least intrusive response appropriate to the risk presented.

“I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.”

**Protection**

Support and representation for those in greatest need.

“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

**Partnership**

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

**Accountability**

Accountability and transparency in delivering safeguarding.

“I understand the role of everyone involved in my life and so do they.”

Source: Department of Health Care and support statutory guidance

* 1. **Making Safeguarding Personal[[5]](#footnote-5)**
     1. The underpinning philosophy for safeguarding under the Care Act is provided by “Making Safeguarding Personal”. Making safeguarding personal means it should be person-led and outcome-focused.
     2. Making safeguarding personal requires engagement with people throughout the safeguarding episode and consulting with them about the outcomes to achieve. The extent to which the person felt those outcomes were realised should be ascertained at the end.
     3. To ensure safeguarding is personal it is necessary to ensure that people have an opportunity to discuss the outcomes they want at the start of safeguarding, and to ascertain at the consultation to what extent the desired outcomes have been met.
     4. The strengths of the person in dealing with the abuse or neglect should be recognised.
     5. Outcomes will be recorded to inform practice and provide aggregated outcomes information for CPFT and for the Safeguarding Adults Boards
  2. Roles and responsibilities of all agencies
     1. The Care Act 2014 states that local authorities must cooperate with each of their relevant partners, as described in section 6(7) of the Care Act, and those partners must also cooperate with the local authority, in the exercise of their functions relevant to care and support including those to protect adults.
     2. City College Peterborough (a partner agency) will work to the following principles:
* Ensure people accessing services, visitors and relatives receive information about how to raise concerns if they suspect or experience abuse in all its forms including neglect
* Empower individuals with knowledge and understanding so that they will be aware of what is appropriate or inappropriate behaviour towards them
* Raise awareness amongst people with care and support needs, who may cause harm, of what constitutes abuse and why
* Provide the support that may be necessary to ensure adequate levels of understanding, and adequate skills to ensure that rights and responsibilities are recognised and asserted
* Enable staff and volunteers to recognise poor practice, or abuse and respond appropriately
* Raise awareness of how staff and volunteers can use their routine processes (e.g. single assessment, risk assessments, care planning, and triage) to enable people to acknowledge that they are at risk of abuse, and signpost them to effective support
* Raise the profile of adult safeguarding in all relevant internal and inter-agency meetings
* Promote relevant advocacy and advisory services
* Ensure that when commissioning, contracting, or monitoring services that service providers are aware of, and adhere to the multi-agency procedures
* Recognise that children may also be at risk when working with families and adults with care and support needs. Referrals must be made to relevant children and families departments where appropriate.

## Prevention

* 1. City College Peterborough will
     1. Provide information for people with care and support needs and their carers, in a range of media in different, user-friendly formats. This should be easily accessible.
     2. Promote adult protection within their agencies and ensure these are considered for inclusion in all appropriate strategies and policies.
     3. Ensure rigorous recruitment and selection practice and adhere to pre-appointment checking requirements e.g. references will always be taken up, Criminal Records Bureau checks made and the Disclosure and Barring process followed.
     4. Ensure clear service standards are maintained and where relevant staff and volunteers should receive clear operational guidance and appropriate training in such areas as:
        + Serious Incidents
        + Accidents
        + Health and Safety
        + Dealing with Violent behaviour
        + Managing challenging behaviour
        + Providing Personal and intimate care
        + Same gender personal care
        + Physical interventions
        + Moving and handling
        + Tissue viability, falls prevention and hydration
        + Risk assessment and management
        + Control and administration of medicines
        + Involvement with the property and finances of people accessing services
        + Approaches to sexuality
        + Personal and professional boundaries
        + Standards of care for excellence
        + Managing or supporting finances
        + Managing visitors
        + Chaperoning

## Procedures

* 1. We will follow the procedures set out in the Cambridgeshire and Peterborough Local Safeguarding Board ‘CPSAB Procedures’ A copy of these procedures can be found on the LSAB website: <http://www.safeguardingcambspeterborough.org.uk/adults-board/>
  2. All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk will be taken seriously and staff will report to a Designated Person as soon as possible or within 24 hours. If the Designated Person is not available, staff should report to a member of the Senior Leadership Team. In emergency situations, immediate medical attention will be provided. If a crime may have been committed, the concern, suspicion or allegation will be reported to the Police.
  3. The College has a nagging doubt procedure enabling staff members to log concerns regarding the welfare of a young person or adult at risk on MyConcern which at that point does not warrant a safeguarding investigation (Appendix E). In the event that three nagging doubt concerns are raised in any one academic year, a safeguarding concern will be raised to MASH
  4. The Care Act guidance for the categories of abuse is provided in Appendix H
  5. The College will monitor the quality of its safeguarding revision through
     1. Provision of an annual report to governors
     2. Quarterly collation of safeguarding and nagging doubts, reviewing types of abuse/concerns occurring, support and action provided and outcomes. Report to be discussed with the governor responsible for safeguarding and submitted to the governing board
     3. Annual learner surveys
     4. Providing monitoring and audit information to the safeguarding adults board as required

## Prevent

* 1. Prevent is part of a Government initiative to develop a robust counter-terrorism programme – CONTEST. City College Peterborough Prevent strategy is can be found in Appendix G.

## Mental Capacity Act

5.1 The Mental Capacity Act (MCA) 2005 came into force during 2007. The MCA is designed to protect and restore power to those vulnerable people who lack capacity. The MCA also supports those, over the age of 18, who have capacity and choose to plan for their future.

5.2. The ‘MCA code of practice’ is available under the safeguarding tab on SharePoint. It provides guidance to anyone who is working with and / or caring for adults who may lack capacity.

At the heart of the MCA in terms of concepts and values are the five ‘statutory principles. Consider the five principles as the benchmark. They should be used to underpin all acts done and decisions taken in relation to those who lack capacity.

* **Principle 1**: A presumption of capacity. Every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise. Do not assume that someone cannot make a decision for themselves just because they have a particular medical condition or disability.
* **Principle 2**: Individuals being supported to make their own decisions. Make every effort to encourage and support people to make the decision for themselves. If lack of capacity is established, it is still important to involve the person as far as possible in making decisions.
* **Principle 3**: Unwise decisions. People have the right to make what others might regard as an unwise or eccentric decision.
* **Principle 4**: Best interests. If a person has been assessed as lacking capacity then any action taken, or any decision made for, or on behalf of that person, must be made in his or her best interests.
* **Principle 5**: Less restrictive option. Someone making a decision or acting on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person’s rights and freedoms of action, or whether there is a need to decide or act at all.

Further information is available at <http://safeguardingcambspeterborough.org.uk/>

## ADULTS AT RISK AND CONSENT

6.1. Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding, consent to share safeguarding information, e.g. make a referral, with agencies such as MASH or the Police should be gained from the individual. In certain circumstances these rights can be overridden:

* the person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the [Mental Capacity Act](https://www.scie.org.uk/safeguarding/adults/practice/sharing-information#mentalcapacityact)
* other people are, or may be, at risk, including children
* sharing the information could prevent a crime
* the alleged abuser has care and support needs and may also be at risk
* a serious crime has been committed
* staff are implicated
* the person has the mental capacity to make that decision but they may be under duress or being coerced
* the risk is unreasonably high and meets the criteria for a [multi-agency risk assessment conference referral](https://www.scie.org.uk/files/safeguarding/adults/practice/sharing-information/MARAC-referral-form.doc)
* a court order or other legal authority has requested the information.

6.2 If none of the above apply and the decision is not to share safeguarding information with other safeguarding partners, or not to intervene to safeguard the person:

* support the person to weigh up the risks and benefits of different options
* ensure they are aware of the level of risk and possible outcomes
* offer to arrange for them to have an advocate or peer supporter
* offer support for them to build confidence and self-esteem if necessary
* agree on and record the level of risk the person is taking
* record the reasons for not intervening or sharing information
* regularly review the situation
* try to build trust and use gentle persuasion to enable the person to better protect themselves.

# PART V: Resolving Professional Differences

Effective working together depends on an open approach and honest relationships between agencies. This could include (and is not limited to) care agencies, other education providers, health or statutory provision. Problem solving, and resolution is an integral part of professional co-operation and joint working to safeguarding children, young people and adults at risk.

Transparency, openness and a willingness to understand and respect individual and agency views are a core aspect of multi-agency working. However, there may be occasions where individuals and/or agencies working with children, adults at risk and families/carers disagree on how best to keep young people and adults at risk safe and promote their welfare.

Disagreements can arise in a number of areas, but are most likely to arise around:

* Perceived levels of risk
* Levels of need and whether a young learner/adult has met the threshold for a service or intervention
* Roles and responsibilities
* Level of quality of communication/information sharing
* Provision of services
* Action or lack of action progressing plans
* Cases being/not being stepped up or down and/or closed

The College will respectfully challenge whenever it has a concern about the action or inaction of another professional or agency. Our aim is to resolve a professional disagreement at the earliest possible stage, always keeping in mind that the young learners or adult at risk safety and welfare is paramount.

**If a young learner or adult at risk is thought to be at immediate risk of harm, the Police or a designated safeguarding lead should be informed immediately.**

Any employee who feels that a decision is not safe, or is inappropriate, should initially speak to their line manager. A record should be made confirming the nature and source of the concerns. If the concern is in relation to a decision, action or inaction of a College employee, volunteer or governor, it should be raised immediately with the line manager and/or the whistleblowing policy should be

followed.

**Stages of Resolution**

***Stage One:*** Discussion between workers

A staff member who disagrees should have a discussion to try to resolve the problem. This discussion must take place as soon as possible and could be a telephone conversation or a face to face meeting. If the staff member is not confident then support should be sought from the line manager.

***Stage Two:*** Discussion between Line Managers

If the problem is not resolved and concerns remain, the staff member should contact their line manager or Designated Person to consider the issue raised, what outcome they would like to achieve and how differences can be addressed. The line manager should contact their respective counterpart to try to negotiate an agreed way forward. This could involve a professionals meeting if deemed appropriate.

***Stage Three:*** Discussion between Senior Managers

If the issue is not resolved at stage two, the line manager should report the concern and actions taken to date to a SLT member or Lead/Deputy Designated Person who will liaise with the SLT member of Lead Designated Person of the other organisation to attempt to resolve professional differences.

***Stage Four:*** Resolution by Cambridgeshire and Peterborough Safeguarding Board’s Chair

If there is no resolution, and having exhausted all other routes, the matter should be escalated by the Lead Designated Person/Principal to the Chair of the Cambridgeshire and Peterborough Safeguarding Board. The Chair may either seek to resolve the issue directly with the relevant senior managers or convene a Resolution Panel.

**Escalation Flowchart**



# PART VI Friends Against Scams

1. Friends Against Scams is promoted by Trading Standards across the UK to raise awareness of scams and to help people recognise what may be a scam. All too often scammers target people who are vulnerable and who may not be have family or friends to support them.

2. City College Peterborough is registered as an organisation that will support the work of Cambridgeshire and Peterborough Against Scams partnership. Staff will complete a short on-line training course and become ‘Friend against Scams’ promoters.

3. Further training will be available to some staff to become a scam-bassador which means they will be a point of support and guidance for people who feel they may need help with a potential issue. The College will receive regular updates from ‘Friends against Scams’ of current scams impacting in the UK.

# PART VII Glossary

CSE Child Sexual Exploitation

DfE Department for Education

DoL Deprivation of Liberty

DP Designated Person

DSL Designated Safeguarding Lead

DDSL Deputy Designated Safeguarding Lead

EHA Early Help Assessment

FGM Female Genital Mutilation

LAC Looked After Child

LADO Local Authority Designated Officer

LSCB Local Safeguarding Children Board

MARAC Multi-Agency Risk Assessment Conference

MASH Multi-Agency Safeguarding Hub

MCA Mental Capacity Act

CPSAB Cambridgeshire and Peterborough Safeguarding Adult’s Board

CPSCB Cambridgeshire and Peterborough Safeguarding Children's Board

RSE Relationship and Sex Education

SEND Special Educational Needs and Disabilities

SPOC Single Point of Contact

UKCCIS UK Council for Child Internet Safety

# Appendix A: Safe Working Practice Guidelines

Staff should

* be aware that the welfare of the child / adult at risk is paramount
* be responsible for their own actions and behaviour
* not use any kind of physical punishment such as hitting
* not smoke in front of children, young people or adults at risk
* not use any kind of sexist, racist, discriminatory or offensive language
* not give or receive presents
* avoid any conduct which would lead any reasonable person to question their motivation and intentions. Work, and be seen to work, in an open and transparent way. Discuss and/or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise to concern
* make records of any such incident and of decisions made/further actions agreed, in accordance with college policy for keeping and maintaining records. Apply the same professional standards regardless of gender or sexuality
* know the name of their Designated Person, Deputy Designated Safeguarding Lead and Designated Safeguarding Lead
* be familiar with the Safeguarding and Child Protection Policy and procedures
* understand their safeguarding responsibilities
* be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them
* ensure their behaviour remains professional at all times, including their dress and use of language
* be clear about when information can be shared and in what circumstances it is appropriate to do so
* treat information they receive about child and adult at risk learners/supported people in a discreet and confidential manner
* seek advice from a senior member of staff if they are in any doubt about sharing information they hold, or which has been requested of them
* never use their power and influence over children/adult at risk to their own advantage
* not engage in personal email or telephone contact with learners/supported people including text messaging
* never engage in any sexual relationship with young or ar risk learners/supported people
* The Sexual Offences Act 2003 makes it an offence for adults working in a position of trust to have a sexual relationship with a young person up to the age of 18
* communication with learners/supported people should never be sexually suggestive
* any out of college contact should be planned and agreed with senior staff, parents or carers
* physical contact with learners/supported people should be minimal, time limited and age appropriate. Intimate care and first aid should only be administered according to CCP policy. Physical intervention should never be used as punishment and should follow CCP policy – recorded and reported. Staff working in one to one situations should ensure there is visual access and remote or secluded areas should be avoided areas of the curriculum/day opportunities support should not include any sexually explicit or other sensitive material. Staff should take advice from senior staff if there is any chance of misinterpretation.
* there should be no unauthorised use of images of children, young people or adults at risk.
* internet use should be according to CCP appropriate internet use policy and there should not be any access to inappropriate material
* guard against any learner/supported person forming an infatuation with them and report any such concerns to senior staff
* not receive gifts other than small tokens of appreciation – staff should not give gifts other than as part of an agreed award system or given to all learners/supported people equally
* Additionally, the governing body notes and draws to the attention of the college staff the criminal offences that may be committed in connection with the welfare of children and adults at risk (in particular, those involving abuse of trust) which prohibit staff from engaging in or encouraging sexual activity with learners/supported people under the age of 18 or adults at risk.

# Appendix B: Role of Deputy Designated Lead, Designated Persons and additional Lead responsibilities

**Deputy Designated Safeguarding Lead Responsibilities**

**Manage referrals**

The Deputy Designated Safeguarding Lead is expected to:

* refer cases of suspected abuse to the Local Authority children’s and adults’ social care, MASH and police as required;
* support staff who make referrals to Local Authority children’s and adults’ social care, MASH and police;
* refer cases to the DSL (Designated Safeguarding Lead) for referral to Channel programme where there is a radicalisation concern as required;
* support staff who make referrals for the Channel programme;
* where DSL is not available, refer cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required;
* refer cases where a crime may have been committed to the Police as required; and,
* inform the DSL of all referrals and ensure the referral is recorded on the organisations safeguarding management information system.

**Work with others**

The Deputy Designated Safeguarding Lead is expected to:

* act as a point of contact with the three safeguarding partners;
* liaise with the DSL to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
* as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
* liaise with staff (especially pastoral support staff, IT Technicians, and the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
* act as a source of support, advice and expertise for all staff.

**Training**

Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Deputy Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Deputy Designated Safeguarding Leads and designated persons, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

* understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements;[[6]](#footnote-6)
* have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
* ensure each member of staff has access to, and understands, the College’s Safeguarding Policy and Procedures, especially new and part time staff;
* are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;[[7]](#footnote-7)
* understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and associated legislation;
* understand the importance of information sharing, both within the College, and with the three safeguarding partners, other agencies, organisations and practitioners;
* are able to keep detailed, accurate, secure written records of concerns and referrals;
* understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
* are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
* can recognise the additional risks that children and adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
* obtain access to resources and attend any relevant or refresher training courses; and
* encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

**Raise Awareness**

The Deputy Designated Safeguarding Lead should:

* ensure the College’s Safeguarding Policies are known, understood and used appropriately;
* ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and
* link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

**Child protection file**

Where children leave the College, the Deputy Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the Deputy Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

**Availability**

During term time a Deputy Designated Safeguarding Lead (or the DSL or a SLT member) should always be available (during college hours) for staff in the College to discuss any safeguarding concerns. Available may mean via phone and/or Skype or other such media.

A Deputy Designated Safeguarding Lead or the DSL will be available in person or via phone out of hours and out of term.

**Reporting**

Provide monthly, quarterly and annual data and information to the DSL to inform governor and SLT reports and action plans

**Audits**

Quality assure safeguarding arrangements within the college through a range of self-assessment tools and internal audits including actual concerns raised, training database and the single central record.

**Task Groups**

With the other Deputy Designated Safeguarding Leads, lead the Designated Persons and Safeguarding task group meeting to drive best practice across the organisation.

**Designated Person Responsibilities**

**Manage referrals**

The Designated Person is expected to:

* refer cases of suspected abuse to the Local Authority children’s and adults’ social care, MASH and police as required;
* support staff who make referrals to Local Authority children’s and adults’ social care, MASH and police;
* refer cases to the DSL (Designated Safeguarding Lead) for referral to Channel programme where there is a radicalisation concern as required;
* support staff who make referrals for the Channel programme;
* refer cases where a crime may have been committed to the Police as required; and,
* inform the DSL of all referrals and ensure the referral is recorded on the organisations safeguarding management information system.

**Work with others**

The Designated Person is expected to:

* act as a point of contact with the three safeguarding partners;
* liaise with the DSL, or Deputy DSL to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
* as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
* liaise with staff (especially pastoral support staff, IT Technicians, and the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
* act as a source of support, advice and expertise for all staff.

**Training**

Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Person should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated persons, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

* understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s and adult social care referral arrangements;[[8]](#footnote-8)
* have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
* are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;[[9]](#footnote-9)
* understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and associated legislation;
* understand the importance of information sharing, both within the College, and with the three safeguarding partners, other agencies, organisations and practitioners;
* are able to keep detailed, accurate, secure written records of concerns and referrals;
* understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
* are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
* can recognise the additional risks that children and adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
* obtain access to resources and attend any relevant or refresher training courses; and
* encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

**Child protection file**

Where children leave the College, the Designated Person should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the Designated Person should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

*Additional Lead responsibilities – to be added as required*

**Mental Capacity Act Responsibilities** (Paul/Debbie)

As named lead for the Mental Capacity Act (MCA) ensure:

* the Mental Capacity Act is embedded within the practices of the college and seek expert advice when issues are complex, or concerns need to be escalated.
* Ensure all staff have access to policies and procedures on the Mental Capacity Act and Deprivation of Liberty Safeguards (DoLS) implementation and know who to go to access expert advice on Mental Capacity Act issues.
* Staff know how and when to access an Independent Mental Capacity Advocate (IMCA’s) where supported people and learners have no family members or significant others to advocate for them. Family are involved (when a person lacks capacity) in Best Interest decision making, MCA and DoLS processes.

**Children in Care Lead Responsibilities** (Tash)

As named lead for Domestic Abuse ensure:

* the progress of children in care are monitored
* participate fully in the care planning process and submit reports as requested
* support children who are previously looked after

**Domestic Abuse Lead Responsibilities** (Georgia)

As named lead for Domestic Abuse ensure:

* act as lead for all concerns raised regarding Domestic Abuse
* ensure all staff have access to policies, procedures and information on Domestic Abuse and know who to contact to get access to expert advice on Domestic Abuse
* support young people and adults at risk who have been the victims or witnessed, domestic abuse

**Child Sexual Exploitation Lead Responsibilities** (Michaela)

As named lead for Child Sexual Exploitation ensure:

* act as lead for all concerns raised regarding Child Sexual Exploitation
* ensure all staff have access to policies, procedures and information on Child Sexual Exploitation and know who to contact to get access to expert advice on Child Sexual Exploitation
* support young people and adults at risk who have been the victims or witnessed, child sexual exploitation

**Designated Person for Young Learners of Prisoners** (Tash)

As named lead for Young Learners of Prisoners:

* Keep the Deputy Principal and DSL fully informed of learners with a parent in prison
* Liaise with other relevant college staff on a ‘need to know’ basis
* Provide a point of contact in the college for external agencies in order to share information
* Liaise with the family and seek their consent to provide additional support for the learner as necessary
* Liaise with other statutory and voluntary agencies as appropriate
* Promote the use of the Early Help Assessment (EHA) to identify the needs of the learner unless a Core Assessment has been completed
* Consider calling a multi-agency meeting to address the needs of the learner and to identify a key worker for that learner following the completion of an EHA
* Consider the use of an individual education plan for the learner concerned
* Monitor the achievement, attendance and behavior of the learner with a parent in prison
* Act as an advocate for young learners with a parent in prison, particularly if the learner is a Looked After Child (LAC) as LAC have poor levels of visiting a parent in prison.
* Consider purchase of books and resources on the subject of prisons and prisoners for the college library
* Keep appropriate and current records with reference to information sharing guidance

**Early Help Assessor Lead Responsibilities** (Tash/Michaela/Georgia)

As named lead for Early Help Assessments ensure:

* act as lead for all concerns raised regarding Early Help Assessments
* ensure all relevant staff have access to procedures and information on Early Help Assessments and know who to contact to get access to expert advice on Early Help Assessments

# Appendix C: Staff guidance on procedure for reporting and dealing with allegations of abuse or concerns against members of staff, agency workers and volunteers

These procedures apply to all staff. The word “staff” is used for ease of description*.* The word LADO refers to a nominated (nominated by Children’s Services) Local Authority Designated Officer, whose role is to attend all complex strategy meetings, be involved in the management and oversight of individual cases and monitor their progress, provide advice and guidance to the College and liaise with police and other agencies for Children and Young Learners under the age of 18 (or 25 where the learner has an Education Health and Care Plan (EHCP)). This guidance refers to the procedures aligned to Cambridgeshire and Peterborough Safeguarding Boards and KCSiE (2019).

The college will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with learners and parent/carers as advised within the Local Authority’s Code of Conduct: Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (May 2019)’. As part of the induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

All staff have been given a copy of Guidance for safer working practice for those working with children and young people in education settings (May 2019) as part of their induction and have signed as an undertaking that they will comply with this guidance. All staff are aware of their whistle blowing responsibilities and will promptly report any concerns in the interests of protecting children and staff from poor practice and/or unsuitable behaviour. This includes the requirement to self-disclose any personal issues which may impact on their suitability to work in an education setting.

The college will ensure that staff and volunteers are aware that sexual relationships with learners aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust). Staff will also be aware of the need to report inappropriate sexualised behaviour to Children’s Social Care.

The college will ensure that communication between learners and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

**Introduction**

The aim of this procedure is to afford greater safeguarding to children and adults at risk with regard to those working with them and to allow for allegations and concerns to be dealt with expeditiously, fairly and thoroughly and avoiding delays. Compliance will help to ensure that allegations of abuse are dealt with consistently using a thorough and fair process.

**Definition of an allegation**

These procedures apply when an allegation or concern has arisen that a person who works with children/adult at risk has:

* behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk
* possibly committed a criminal offence against or related to a child or adult at risk
* behaved towards a child, children or adult at risk in a way that indicates he/she is unsuitable to work with children

It should be noted that although some behaviours may not constitute a criminal offence or not reach the threshold of Significant Harm, consideration will need to be given as to whether they may indicate unsuitability to work with children or adults at risk

**Initial Response to an Allegation or Concern**

Allegations against a member of staff, carer or volunteer may arise from a number of sources e.g. a report from a child or adult at risk, a concern raised by another adult in the College or a complaint by a parent/carer.

Any allegation of abuse made against a member of staff or volunteer will be reported straight away to the Executive Principal. In cases where the Executive Principal is the subject of an allegation, it will be reported to the Chair of Governors. Where the allegation involves a young person under 18 (or under 25 for those learners with an Education Health and Care Plan) the college will follow the procedures set out in Part four of ‘Keeping Children Safe in Education (2019)’.

The member of staff who receives the allegation or concern should treat the matter seriously and keep an open mind. He/she must:

* Provide written details of the information and allegation, where possible using the child / adult’s own words, including times, dates, locations and names of potential witnesses and sign and date the record. The written details should be countersigned and dated by the Principal (or Designated Person).

He/she must not:

* investigate or ask leading questions if seeking clarification.
* promise confidentiality but give an assurance that information will be shared only on a “need to know” basis.
* Make assumptions or offer alternative explanations

**Initial action by the Principal (or Designated Safeguarding Lead)**

Where the allegation involves a young person under 18 (or under 25 for those learners with an Education Health and Care Plan) the college will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff or volunteer and adhere to the relevant procedures set out in ‘Keeping Children Safe in Education’, (2019)

The Executive Principal or Chair of governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken. Please note that the Executive Principal or Chair of Governors should **not** seek to interview the young person(s) or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary

The Principal or Designated Safeguarding Lead (DSL) must not investigate the matter or interview the member of staff, child/adult at risk concerned or potential witness/es.

He/she should:

* obtain written details of the concern/allegation, signed and dated by the person receiving the allegation (not the child/adult at risk making the allegation)
* countersign and date the written details
* record any information about times, dates and location of incident(s) and names of any potential witnesses
* record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions

If an allegation requires immediate attention, but is received outside of normal hours, the Principal or DSL should consult the Children’s Services emergency duty team or local police and inform the LADO as soon as possible.

Where the allegation does not involve a learner under the age of 18 (or 25 if they have an EHCP) a full investigation will commence and conclude as quickly as possible. Immediate consideration will be given on how to safeguarding the adult at risk and provide support. This may include ensuring that the staff member/volunteer is not in the same premises as each other whilst the investigation is completed.

Immediate consideration must be given on how to best safeguard the young person/adult at risk e.g. suspension or not working unsupervised.

**Initial evaluation by the DSL and the LADO**

There are up to 3 strands in the consideration of an allegation

* A police investigation of a possible criminal offence
* Social Services enquiries and/or assessment about whether a child in need/adult a risk is in need of protection or services
* Consideration by the College of disciplinary action

The Principal, DSL (and LADO) need to consider whether further details are required and whether there is evidence or information that establishes the allegation is unfounded or false. Special care needs to be taken to ensure the child/adult at risk is not confused as to dates, times, locations or identity of the member of staff

Consideration must be given to the needs of the child/adult at risk and a recognition that a young person/adult at risk may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child/adult at risk to make an entirely false or malicious allegation, although misunderstanding and misinterpretations of events do happen

If the allegation is not demonstrably false and there is cause to suspect that a child/adult at risk is suffering or is likely to suffer Significant Harm, the LADO/Principal/DSL should refer to the Childrens/Adults Services and ask them to convene an immediate complex strategy meeting, which will be chaired by Social Care Team Managers.

At the conclusion of the section 47/42 Enquiry, it may be decided that there is no further need for police action and the police and/or Crown Prosecution Service decide not to charge the individual. The outcome of the enquiry should be passed to the Principal or DSL as it may be relevant to any disciplinary action.

The person who is the subject of the allegation must be informed of the final outcome of the conclusion of the investigation in writing within 7 days of the final strategy meeting.

The college will ensure that any disciplinary proceedings against staff or volunteers relating to child protection and adult at risk matters are concluded in full even when the member of staff or volunteer is no longer employed at the college and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable

**Persons to be notified**

As soon as possible after an allegation is made or a concern of suitability is raised, the Principal or DSL should inform the parent(s) or carer(s) of the child/ren or adult at risk(s) involved. For young people under 18 (25 if they have an EHCP) the LADO should be contacted first to ensure that this does not impede the disciplinary or investigative processes. There may be some circumstances where the parent(s) or carer(s) need to be told straight away e.g. if a child is injured and requires medical treatment.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 206-207). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children’s social care services, or the police as appropriate, should consider what support the child or children involved may need.

The parent(s)/carer(s) and the child/adult at risk, if they have capacity, should be helped to understand the processes involved and need to be kept up to date about the progress of the case and of the outcome where there is no criminal prosecution. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence

City College Peterborough has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Unless an objection is raised by social care or the police, the Principal or DSL will as soon as possible, inform the accused person about the nature of the investigation, how enquiries will be conducted and the possible outcome e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body.

In all cases the member of staff should:

* be treated fairly and honestly and helped to understand the concerns expressed and processes involved
* be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
* if suspended, be kept up to date about events in the workplace
* be informed of the outcome in writing within 7 days of the final strategy meeting
* receive information on independent support that is available via Health Assured, a free 24 hour employee assist programme, telephone number 0800 030 5182, or Occupational Health

A named representative will be appointed and will keep the person who is subject to the allegation informed of the progress of the case and consider what other support is appropriate for the individual.

In all cases the relevant regulatory body for the setting should be informed of the allegation and the outcome.

**Confidentiality**

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered.

**Suspension**

The need for suspension should be given consideration at the complex strategy meeting. Only the Principal or DSL has the power to suspend an accused member of staff/carer/volunteer. Staff or volunteers who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that young people/adults at risk are protected.

**Resignations and “Compromise Agreements”**

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures.

So called compromise agreements, by which a person agrees to resign, must not be used in these cases. In any event, such an agreement will not prevent a referral to the Independent Safeguarding Authority where there is a duty to do so and/or a thorough police investigation where that is appropriate.

**Allegations against staff in their personal lives**

Childrens: The general principles outlined in these procedures still apply if the concern or allegation arises about a member of staff outside his/her area of work.

The complex strategy meeting should decide on whether the concern justifies approaching the College for further information or inviting the Principal or DSL to the meeting.

Adults: The College will follow the Cambridgeshire and Peterborough Safeguarding Adult Boards policies and procedures when an allegation is made against a Person in a Position of Trust (PiPot). In relation to this process the person in a position of trust will have had an allegation raised that they may pose a risk to adults at risk because, in their life outside of their work environment, they are alleged to have:

* behaved in a way that has harmed, or may have harmed an adult or child
* possibly committed a criminal offence against, or related to, an adult or child
* behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs”

Information can be found at <http://www.safeguardingcambspeterborough.org.uk/adults-board/information-for-professionals/pipot/>

**Disciplinary processes**

The Principal/DSL (and LADO) should discuss whether disciplinary action is appropriate in all cases where

* It is clear at the outset that a police investigation or Adults/Childrens Services enquiry is not necessary
* the Principal/DSL (or LADO) is informed by the police or Criminal Prosecution Service that a criminal investigation and subsequent trial is complete, or that an investigation is to be closed without charge, or prosecution discontinued

The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff and take into account

* information provided by the police or Adults/Childrens Services
* the result of any investigation or trail
* the different standard of proof in disciplinary and criminal proceedings

In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. The LADO and/or Principal/DSL should act jointly with the providing agency, if any, in deciding whether to use the person’s services, or provide future work with children/adults at risk, and if not, whether to make a report for consideration of barring or other action.

If at any stage, new information emerges that requires a child protection referral, the investigation should be held in abeyance and only resumed if agreed with Children’s services and police.

**Record keeping**

The LADO will write a summary at the conclusion of the enquiry involving a young person under 18 (or 25 with an EHCP), the Principal or DSL will write a summary for investigations involving adults. The Principal or DSL should keep a summary on the member of staff’s confidential personnel file and give a copy to the individual. The record should include details of how the allegation was followed up and resolved, the decisions reached and action taken. It should be kept at least until the person reaches retirement age or for 10 years if longer.

**Monitoring progress**

The LADO should monitor and record the progress of each case, either fortnightly or monthly depending on its complexity. For allegations involving adults at risk the Principal/DSL will do this.

Data about allegations made against education staff show that it is reasonable to expect that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months. However, it is unlikely that cases which require a criminal prosecution or complex police investigation can be completed in less than three months.

**Referral to barring lists and bodies**

In cases where the allegation is substantiated, and individual is dismissed, or the person resigns, the Principal/DSL (and LADO) will determine whether a referral should be made to the Independent Safeguarding Authority for inclusion on the relevant barring lists. If a referral is to be made it should be submitted within 1 month.

**Learning lessons**

The Principal or DSL (and LADO) should review the circumstances of the case to determine whether there are any improvements to be made to the College’s procedures or practice. This meeting should take place within one month following the conclusion of the investigation. Actions arising from the meeting will be monitored by the LADO until the actions are completed.

**Managing an Allegation Against a Member of Staff or volunteer involving a Young Person**

Might arise as a complaint, grievance, suspicion, concern, during discussions from child, parent, member of staff or member of the public.

All staff must know how to recognise an allegation and who to report to

ALLEGATION

* Do not tell anyone, particularly the staff Involved
* Make initial enquiries only
* Do not investigate or interview
* Usual principles of confidentiality apply
* Deal objectively with everything
* Existing loyalties must be put to one side
* Think the unthinkable, believe the unbelievable

If an allegation concerns the Principal, the Chair of Governors takes action

Executive Principal

Record and date your assessments of known facts

The next course of action and timescales are agreed at this point. Consider also:

* information for the adult, witnesses, child/young person and parents/carers
* on-going support for the member of staff, learner and parents/carers
* statements, if needed, for the whole staff, community and press

Allegation Management Meeting (AMM)

Refer back to college

Keep detailed records of actions and statements at all stages

Discussion between Principal and Local Authority Designated Officer (LADO)

# Appendix D: Four categories of abuse (Children)

**Physical Abuse** - 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.

**Neglect** - 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.

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child’s basic emotional needs.

It also includes parents or carers failing to:

* Provide adequate food, clothing and shelter including exclusion from home or abandonment
* Protect a child from physical and emotional harm or danger
* Ensure adequate supervision including the use of inadequate care-givers
* Ensure access to appropriate medical care or treatment

**Emotional Abuse** - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child’s emotional development.

It may involve conveying to a child that they are:

* Worthless
* Unloved
* Inadequate
* Valued only insofar as they meet another person’s needs

It may include:

* not giving the child opportunities to express their views
* deliberately silencing them
* ‘making fun’ of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including:

* interactions that are beyond the child’s developmental capability
* overprotection and limitation of exploration and learning
* preventing participation in normal social interaction.

It may involve:

* Seeing or hearing the ill-treatment of another
* Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
* The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may

occur alone

**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.

This may involve:

* physical contact including assault by penetration (e.g. rape or oral sex)
* non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
* non-contact activities involving:
  + children in looking at, or in the production of, sexual images,
  + children in watching sexual activities
  + or encouraging children to behave in sexually inappropriate ways
  + grooming a child 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.

# Appendix E: Staff guidance on dealing with and reporting disclosure and concerns of abuse

**Who do I report to?**

All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk must be taken seriously and reported on MyConcern and discussed with a Designated Person as soon as possible or within 24 hours.

If the Designated Person is not available, staff should report to a member of the Senior Leadership Team.

In emergency situations, seek any necessary medical attention. If a crime may have been committed, the concern, suspicion or allegation should be reported to the Police. The Child or Adult at risk Protection Coordinator can advise about this.

* Staff must record the following on MyConcern
* Name of learner/supported person
* Date of birth (if unknown, enter 01/01/2000)
* Nature of concern
* Location of concern
* Detail of concern including what immediate action has taken place

If the concern is urgent please tick the relevant box. This must be followed up with a phone call or immediate face to face discussion with a designated person.

**Child Safeguarding reporting**

If the complaint, disclosure, allegation or suspicion involves a child or young person and should no member of the Senior Leadership Team be available, staff have a personal responsibility to contact Childrens Social Care (and the Police and / or Ambulance Service as required).

Child Protection issues in relation to school pupils attending College provision should be referred to the lead on Child Protection in the child’s school.

**Adult Safeguarding reporting**

If the complaint, disclosure, allegation or suspicion involves an adult at risk, and should no member of the Senior Leadership Team be available, staff have a personal responsibility to contact the relevant safeguarding team

**Situations**

There may be three different types of situations staff will encounter:

**1.** **A disclosure or allegation of abuse**

If a child or adult at risk tells a member of staff about possible abuse:

1. Ensure that the victim of the alleged abuse is safe
2. Ensure that any necessary emergency medical treatment is arranged
3. Ensure that no forensic evidence is disturbed, lost or destroyed. If it is felt that a crime has been or may be committed, the Police should be contacted
4. Listen carefully and stay calm.
5. Do not put words into the child’s or adult at risk’s mouth or ask leading or closed questions or judge or condemn the alleged abuser.
6. Note the main points carefully, including any key phrases used and record the date, time, place, what the child / adult at risk said, did and your questions etc.
7. Do not discuss the allegation of abuse with the alleged perpetrator
8. Reassure the person that by telling you, they have done the right thing.
9. Inform the child or adult at risk that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter If a child or adult at risk says they will tell you only if you promise not to pass on the information, explain that this is not possible – even if this means they refuse to say any more.
10. Update MyConcern and refer immediately to a Designated Person, or if not available, to a Senior Leadership Team member or a line manager. In the highly unlikely event that none of these are available, the member of staff has a personal responsibility to contact the appropriate Peterborough Agency

Even in the case of no consent for reporting being gained, if the concern, suspicion or allegation of possible abuse is serious and risks being continued or happening to others, then the information should still be reported to the relevant agency

***Staff should not investigate concerns or allegations themselves, but should report them immediately to a Designated Person or other Senior Manager.***

In the event of a ‘Prevent’ concern or nagging doubt, this should be passed on to the Police for consideration to send to Chanel by the Designated Person.

**Confidentiality: It is not possible to guarantee to a learner/supported person that a disclosure of abuse will be kept confidential. It is possible to guarantee that any information/notes will be kept in a confidential location with strictly limited access.**

Role of Designated Person

On receiving a referral, a Designated Person will make arrangements to see the young person or adult at risk and the member of staff to whom they have disclosed within 24 hours.

After speaking with the young person or adult at risk, a decision will be made on what action is to be taken. Actions will be assigned on MyConcern and may also be followed up verbally. It is important that if you receive an action via MyConcern, the action is completed and recorded on MyConcern.

The Designated Person will act on the advice given by the referral agency, including whether the parents / carers should be informed.

The Designated Person will inform the Principal or, if not possible, another member of the Senior Leadership Team within 24 hours. If the Police have been contacted and are due to attend a site, the Designated Safeguarding Lead or Executive Principal must be informed

The Designated Person will inform the referrer of their decision and update as appropriate.

The Designated Person will then decide if further support is required such as counselling, mentoring etc.

**2. A significant concern**

If you have a significant concern about a child, young person or adult at risk create a record on MyConcern and discuss this concern with your line manager. After discussing the concern, you or your manager should (if the manager also has concerns) speak to the learner/adult at risk and decide to either:

* refer to a Designated Person or,
* consider offering support such as Counselling or Mentoring etc.

If you are still unsure of what action to take after discussing it with a colleague, a Designated Person will be happy to talk it over with you.

Parents / Carers will be consulted, if appropriate, and their consent obtained before any referral is made about their child to any other agency under local “children in need” procedures. With older young people, it may be appropriate to act on their consent alone. However, even if asked to do so, staff cannot guarantee to consult parents or carers first, or to keep children’s or adult at risk’s concerns confidential, if referral must be made to the appropriate agencies in order to safeguard the child's or adult at risk’s welfare.

**3. A nagging doubt or low-level concern**

Sometimes, things that seem to be insignificant or trivial at the time, turn out to be vital pieces of information later.

Examples could be a learner/supported person whose behaviour has changed, or who seems preoccupied or unable to concentrate; who looks obviously unwell or has injuries. Other examples include:

* Poor-quality, unappetising food provided by the parent/carer
* Personal care needs not being met
* Changes in the behaviour and demeanour
* Signs of neglect such as clothes being dirty

If there has been no specific incident or information, create a MyConcern record recording the nagging doubt/low level concerns form. Try to identify what is really making you feel worried.

# Appendix F: Policy for the Education of Young People under the age of 18 with a Parent or Close Relative in Prison or at Risk of a Custodial Sentence

**Context**

Young learners with a parent in prison should be regarded as true victims of their parents’ crimes, often achieving poor outcomes and a high probability of them growing up in poverty and disadvantage. Some of them have complex needs and are from socially excluded families. Research[[10]](#footnote-10) identifies this group as having high level risks of vulnerability and safeguarding with the potential for future offending behaviour, exclusion from college, poor attendance and poor academic achievement.

**Purpose**

City College Peterborough is committed to support the young people who have a parent or close relative in prison. This policy has been endorsed by Cambridgeshire and Peterborough LSCB and subsequently the college body on 20th September 2018

The aims of this policy are:

* to raise awareness of the needs of the learners of City College Peterborough with a parent or close relative in prison
* to secure the educational achievement and attendance of those learners during their time in our college
* to promote their social inclusion and equal opportunities within our college community

How will we achieve these aims?

1. All staff and parents will be informed of this policy and the college’s commitment to support learners with a parent/close relative in prison. This policy will be available on the college website and to parents on request
2. The document ‘Risks to Learners of Prisoners’ information (Appendix 1) will be available on the college website
3. Guidance on ‘Information Sharing and the Seven Golden Rules (Appendix 2) will be available on the college website
4. A member of the college staff will be appointed as ‘Designated Person for Young Learners of Prisoners’ and their role will include:

* Keeping the Deputy Principal fully informed of learners with a parent in prison
* Liaise with other relevant college staff on a ‘need to know’ basis
* Provide a point of contact in the college for external agencies in order to share information
* Liaise with the family and seek their consent to provide additional support for the learner as necessary
* Liaise with other statutory and voluntary agencies as appropriate
* Promote the use of the Early Help Assessment (EHA) to identify the needs of the learner unless a Core Assessment has been completed
* Consider calling a multi-agency meeting to address the needs of the learner and to identify a key worker for that learner following the completion of a EHA
* Consider the use of an individual education plan for the learner concerned
* Monitor the achievement, attendance and behavior of the learner with a parent in prison
* Act as an advocate for young learners with a parent in prison, particularly if the learner is a Looked After Child (LAC) as LAC have poor levels of visiting a parent in prison.
* Consider purchase of books and resources on the subject of prisons and prisoners for the college library
* Keep appropriate and current records with reference to information sharing guidance

1. If a parent informs our college that the parent or other close relative of one of our learners is in prison, we will provide information on the support available to them (Appendix 3)
2. Wherever appropriate our college will include a parent with parental responsibility who is in prison, in the education of the young person by making and maintaining contact with that parent. This will be done by forwarding copies of any college report or newsletter, supplying photographs of examples of work and encouraging the learner to suggest other ways that contact may be maintained

**Guidance for Teachers and staff on practical measures to support**

All staff have a vital role to play in ensuring that a young learner affected by imprisonment is supported within our college. The secure, stable and consistent routines of college can provide reassurance for a learner who is experiencing difficulties in their personal life and an awareness of the emotional health and well-being of our learners will enable all learners to feel valued and safe, including those with a parent in prison.

Staff will not necessarily be aware that a learner has a relative in prison. In some cases a learner may confide in a member of staff or drop hints and clues through college work or in conversation.

A member of staff does not need to let the learner know that he or she knows that their parent is in prison as the learner may be unwilling to discuss the issue with anyone in college. It may be that the family of the learner merely wish the learner’s performance and behaviour be monitored for any change.

**Confiding**

If a learner raises issues concerning the imprisonment of a parent during college time, the following responses may be helpful:

* Allow the learner to express him or herself
* Listen carefully
* Acknowledge what is said
* Reassure the learner
* Agree future action with the learner

Adhere to the basic principles of responding to any disclosure

* See the learner as an individual with their own specific needs
* Be non-judgmental – the learner has not committed a crime
* Don’t ask about the crime
* Acknowledge the learner’s preferences
* Follow safeguarding principles if appropriate

**Who to inform – Need to know**

If a learner does disclose sensitive information about a parent in prison, it is important to acknowledge their situation and be clear with them about who needs to be told in order to support them. It may be useful to explain the role of the designated/named person in college, and to negotiate and agree with the learner what steps need to be taken

.

Recognising the signs – changes in behaviour and performance

Children of prisoners may exhibit changes in behaviour and performance that can be likened to a young person’s emotional response as in divorce or bereavement. Clearly, the experience of having a parent in prison is about ‘loss.’ The learner’s, and the family’s resilience to this loss will determine how it impacts on the learner in their behavior and performance at college. There are certain events that can make these changes in a learner more apparent and these can include:

* The arrest of parent, carer or sibling
* Finding out about the imprisonment
* A visit to a parent in prison
* A home visit by a parent from prison
* The release of a parent from prison

The following are possible changes in learners with a parent in prison

* Moodiness
* Chattering
* Bullying
* Difficulty with peers
* Appearing upset
* Appearing withdrawn
* Showing a lack of concentration
* Showing a lack of interest
* Antagonism towards authority
* Tiredness

However, for some young people, the removal of a parent to prison may be beneficial to the learner and behaviour and performance in the classroom may improve.

**Bullying**

Many children of prisoners report being teased or bullied at college. Any form of bullying will be dealt with in accordance with the college’s anti-bullying policy.

**Attendance issues**

Our college takes attendance very seriously and will always promote the importance of attendance. However, we will be considerate of the difficulties that a learner with a parent in prison, or at risk of imprisonment may face e.g.

* The learner is in court with, or visiting the prisoner some distance from home
* The learner is providing support for the remaining parent or siblings, as a young carer
* The learner is having difficulty coping with college or is being teased or bullied about having a parent in prison and is becoming disaffected

Attendance will be monitored and if it becomes a concern the college will refer to appropriate agencies for support.

**Problems**

Prison visits

Teachers say that performance and behaviour of children of prisoners can become more erratic at the time of a prison visit.

If teachers or other staff, have good relationships with learners who are happy to confide in them, there may be opportunities to allow learners to take samples of work to show parents when visiting. However, reports or written work, drawings or artwork can be sent by post or email. Although prisoners do not have open access to email, it may be possible for the learner to send email from college to a prison email address for the information of their parent. Photographic attachments or college work or events may also be sent in this way.

Financial implications

A family may experience significant loss in income with a parent in prison and face severe hardship. Teachers would be aware of the potential difficulties for children of prisoners finding the money for college trips and resources in college. An EHA may have identified these issues and support already put into place.

**Children of prisoners held overseas**

This is a relatively rare occurrence for our community but can be all the more distressing with a lack of access, distance and unanswered concerns about a prisoner’s welfare.

Organizations and individuals that can provide support in these circumstances include

* Amnesty International
* Local councilors and member of Parliament
* Prisoners Abroad

**Date: 19th September 2019**

**Policy review date: 19th September 2020**

**Appendix 1**

*What are the risks to children of prisoners achieving their full potential?*

* Children of prisoners have about three times the risk of mental health problems

compared to their peers.

* The sudden removal of a parent from the family creates feelings of separation and loss and may affect the emotional health of the learner
* Parental imprisonment can lead learners to experience stigma, bullying and teasing
* Young person’s caregivers often experience considerable distress during parental imprisonment, and learners are often subject to unstable care arrangements
* During the consultation with parents in prison bullying of their children was the greatest concern. Several parents also voiced their concerns that their own children had bullied other children
* Discrimination from members of the local community can have major implications for the children of parents in prison
* Children of parents in prison may be exposed to substance misuse by family members and their peers
* Children of prisoners may experience higher levels of social disadvantage than their peers
* Some families choose not to inform schools and colleges that a learner has a parent in prison. Yet, having a parent in prison can lead to poor attendance, lack of support and isolation for the young person
* Children of prisoners may have to take on more responsibility in the household or take on a caring role
* Children of prisoners may have higher levels of anxiety or worry that prevent them from participating fully in learning
* Children of prisoners have three times the risk of anti-social/delinquent behaviour compared to their peers
* 65% of boys with a convicted parent, go on to offend
* Imprisonment has a negative financial impact on families, leaving families vulnerable to financial instability, poverty and debt and potential housing disruption
* 72% of prisoners were in receipt of benefits before coming into prison
* Costs of visiting the parent in prison may prevent the child from visiting their parent

**Appendix 2**

**Information Sharing**

Seven golden rules for information sharing

1. Remember that the General Data Protection Regulations are not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

2. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.

4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

**Appendix 3**

**Education of a Young Person with a Parent or Close Relative in Prison – Information for Parents and Carers**

**The impact on a child**

A family has to deal with many changes when a parent or relative goes to prison. Initially there may be a delay in finding out where they have gone or before any visits can be arranged. For a child there may be a sense of confusion and loss and this could affect their behaviour and ability to learn

One difficulty is deciding what to say to the children to explain where the parent is. Some families want to protect the children from distress and create a story such as the parent is working away but this could be difficult to continue if a prison visit is possible. There is also the possibility that the children will find out the truth from someone else

Action for Prisoners’ Families recommends that the key question parents should ask themselves is, ‘When and what shall I tell the children?’ rather than, ‘Shall I tell the children?’ Although difficult, the advice from groups who work with families of prisoners is to be truthful but to be prepared for questions. Action for Children’s Families have produced a useful guide ‘Telling the Children – a guide for the partners and families of prisoners’ that gives practical advice on how to tell children.

Research and experience tells us that children who are worried, upset or anxious can find it very difficult to concentrate and learn in the classroom. They may be embarrassed or angry about having a parent in prison and this may affect the way that they behave in college. Living arrangements and financial circumstances may also change leading to money difficulties in the payment for equipment or college trips and events. This may lead to new emotions and feelings for the child concerned and could have a negative impact on their education and attendance at college.

**Who can help?**

City College Peterborough is committed to supporting young learners with a parent in prison so that they can continue and succeed with their education.

There are also a number of other national charities and organisations that can offer advice and support for young people and families of someone in prison.

Schools and Colleges can offer children of prisoners a stable environment where routines and staff generally remain the same at a time when their personal life could be one of change and uncertainty. All college staff are experienced in keeping confidential information about their learners and will support learners in order for them to achieve the best that they can during their time at our college.

Therefore, it is advisable to inform the Deputy Principal or other member of staff that you know, if a parent or relative of one of our learners is in prison. It may be that you can arrange a meeting to discuss ways that your child can be supported. This support could range from staff monitoring the learner to offering more individual support with open discussion and support about their parent or relative in prison.

Once you have informed a member of staff, we may suggest additional support that can be obtained through an early help assessment process. This is commonly known as ‘EHA’ which stands for ‘Early Help Assessment’. If you agree to this assessment being completed you can state which agencies you are prepared to share the assessment information with, so you are in control of who has access to the information. An ‘EHA’ may identify additional support for you or your family.

As a college we have to monitor the attendance and punctuality of all learners. Please inform the college of any absence in advance so that consideration may be given to classifying the absence as an ‘authorised absence.’ Working with the college on attendance may avoid the risk of incurring any fixed penalty fines for the learner’s absence from college.

**In summary**

* The education of a learner with a parent or relative in prison can be disrupted
* Advice from experts is for families to tell the young person the truth about their parent or relative being in prison
* Life for the learner and family following the parent being sent to prison could change radically
* All staff and governors of City College Peterborough are committed to supporting young learners with a parent or relative in prison
* Informing a member of staff at our college that you have a relative in prison will help the learner as we will be able to offer appropriate support and monitor the young person’s education and attendance
* We will treat this information in confidence
* Staff of our college will work with you to find the best ways to support the learner
* An ‘EHA’ may be suggested as a way to get extra support tailored for yourfamily’s needs. You control who shares this information

# Appendix G: Prevent Strategy

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. Nationally, there have been occasions where extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Whilst City College Peterborough values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society’s values, we also recognise that free speech is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The college fully recognises its statutory duty to identify and support learners at risk and is clear that this exploitation and radicalisation should be viewed as safeguarding concern.

The college governors, the Principal and the Designated Safeguarding Lead will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment may include consideration of the college’s RE curriculum, SEND policy, assembly policy, the use of college premises by external agencies, anti-bullying policy, online-safety and other issues specific to the college’s profile, community and philosophy.

The College’s SPOC (Single Point of Contact) will be the lead for safeguarding in relation to protecting individuals from radicalisation, sharing relevant information in a timely manner with the appropriate agency, including Channel.

The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

* Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
* Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
* Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

* Critical - an attack is expected imminently
* Severe - an attack is highly likely
* Substantial - an attack is a strong possibility
* Moderate - an attack is possible but not likely
* Low - an attack is unlikely

The current threat level from international terrorism in the UK and is SEVERE[[11]](#footnote-11) which means that a terrorist attack is high likely. The local Prevent concerns include:

1. Animal Rights
2. EDL
3. Football violence

City College Peterborough has a part to play in fostering shared values and promoting cohesion and should understand the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings. This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner/supported person's voice.
2. To break down segregation among different communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all in playing a full and active role in wider engagement in society
3. To ensure learner/supported person safety and that the College is free from bullying, harassment and discrimination
4. To provide support for learners/supported people who may be at risk and appropriate sources of advice and guidance
5. To ensure that learner/supported person and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives, the strategy will concentrate on four areas:

1. **Leadership and Values**

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners/supported people, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

* Promoting core values of respect, equality and diversity, democratic society, learner/supported person voice and participation
* Building staff and learner/supported person understanding of the issues and confidence to deal with them
* Deepening engagement with local communities
* Actively working with local schools, local authorities, police and other agencies

1. **Teaching and Learning**

To provide a curriculum and support provision which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

* Embedding equality, diversity and inclusion, wellbeing and community cohesion
* Promoting wider skill development such as social and emotional aspects of learning
* A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights through promoting “British Values"
* Encouraging active citizenship/participation and learner voice.

1. **Learner Support**

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

* Establishing strong and effective learner support services
* Listening to what is happening in the College and the community
* Implementing anti-bullying strategies and challenging discriminatory behaviour
* Helping learners/supported people and staff to know how to access support in College and or through community partners
* Supporting at risk learners through safeguarding processes
* Focussing on narrowing the attainment gap for all learners

1. **Managing Risks and Responding to Events**

To ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

* Completing an annual assessment and creating an action plan
* Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College
* Understanding and managing potential risks within the College and from external influences
* Responding appropriately to events in local, national or international news that may impact on learners and communities
* Ensuring measures are in place to minimise the potential for acts of violent extremism within the College
* Ensuring plans are in place to respond appropriately to a threat or incident within the College
* Developing effective ICT security and responsible user policies.

In the event of a concern involving links or acts of terrorism staff members should complete a nagging doubts or safeguarding referral form and report to their Designated Person or line manager immediately. The Designated Person will refer concerns via normal safeguarding concerns route or to

|  |
| --- |
| For advice and to make a referral Tel: 01480 847743  Fax: 01480 425924  e-mail: maru.cp@cambs.pnn.police.uk  or by contacting the Prevent team: [Prevent@cambs.pnn.police.uk](mailto:Prevent@cambs.pnn.police.uk) |

Referral will NOT mean criminalising or adversely affecting people’s future.

For more information please refer to :

* The Prevent Duty Guidance published in March 2015, updated March 2016, and available at [www.gov.uk/government/publications/prevent-duty-guidance](http://www.gov.uk/government/publications/prevent-duty-guidance)
* The Prevent Strategy published in June 2011 is available at [www.gov.uk/government/publications/prevent-strategy-2011](http://www.gov.uk/government/publications/prevent-strategy-2011)

# Appendix H: Categories of abuse: Adults at risk

The guidance for the Care Act (2014) identifies areas that may constitute abuse and neglect

**Physical Abuse**

Physical abuse causes harm. It includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

**Domestic Violence**

This includes psychological, physical, sexual, financial, emotional abuse and so-called ‘honour’ based violence.

The terms “honour crime” or honour-based violence” or “izzat” embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder, where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour. In transgressing this correct code of conduct, the person is perceived as having brought “shame” or dishonour” to the family or community.

The age range for this abuse type covers everyone 16 years and over. It can be a single event of a number of incidents and can include coercion or controlling behaviour as well as violence and abuse.

**Neglect and Acts of Omission**

Neglect is the persistent or severe failure to meet a person’s basic physical and / or psychological needs. This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect is not always intentional and may be due to carers not coping or struggling to cope.

**Self-neglect**

This covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding. Self-neglect, albeit recognised for many years, is now specifically identified in the Care Act (2014) and the statutory guidance. Addressing the issue at both a practice and managerial level can be extremely complex and challenging. Self-neglect and Adult Safeguarding: Findings from research (Braye el al, 2011) is a report to government concerning the issues and will be useful to practitioners in this difficult area

**Sexual Abuse**

Sexual abuse involves a child, young person or adult at risk being forced or coerced into participating in or watching sexual activity. It includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography\*, subjection to pornography or witnessing sexual acts, sexual acts or sexual assault to which the person has not consented or was pressured into consenting*.*

*\*Sending or posting sexually suggesting images (sexting)*

*All learners/supported people should be aware that making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if you are under 18.*

*All members of staff (including non-teaching) will be made aware of how to recognise and refer any disclosures of incidents involving ‘youth produced sexual imagery’.*

*CCP will follow UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2016) to assess the risk and to determine the most appropriate course of action. This may include police involvement.*

**Emotional or psychological abuse**

Emotional or psychological abuse occurs where there is persistent emotional ill treatment or rejection. It includes emotional abuse threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or material abuse**

Financial or material abuse occurs where there is deliberate misappropriation of another’s possessions. This can include theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs to arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Modern Slavery**

This encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers ad slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory Abuse**

Discriminatory abuse is motivated by oppressive or discriminatory attitudes towards a person’s disability, race, gender, age, religion, cultural background or sexual orientation and it may manifest itself as unequal treatment, verbal abuse, inappropriate use of language, derogatory remarks, harassment and deliberate exclusion

**Organisational/Institutional Abuse**

Institutional abuse can occur within an institution charged with the care of a person. This can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provide in one’s own home. This may be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Radicalisation**

Radicalisation is the process by which people come to support terrorism and violent extremism and, in some cases, then to participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or single indicator of when a person might move to adopt violence in support of extremist ideas. Potential diagnostic indicators may include use of inappropriate language, possession of violent extremist literature, behavioural changes and so on. If members of staff do have concerns about a young person, they should seek advice from the Safeguarding Officer immediately.

**Forced Marriage**

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.

This is not the same as an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses.

Who is at risk?

Learners/supported people, male or female, from as young as 11 may be at risk of being forced into marriage by parents. They may be pressurised and then agree to marry one of the prospective candidates without time for reflection. The younger learners/supported people may be betrothed with the expectation that they will enter full married state at a later stage of their lives.

In the UK, young people can be forced into a legal marriage from age 16 or undergo a religious ceremony at an earlier age and suffer sexual abuse.

The key motives for forcing a learner into marriage have been identified as:

* Controlling unwanted behaviour and sexuality (including perceived promiscuity such as kissing or hand holding, or being gay, lesbian, bisexual or transgender) - particularly the behaviour and sexuality of women
* Controlling unwanted behaviour, for example, alcohol and drug use, wearing make-up or behaving in a ‘westernized manner’
* Preventing ‘unsuitable’ relationships, e.g. outside the ethnic, cultural religious or caste group
* Protecting ‘family honour’ or ‘izzat’
* Rejecting a proposal of marriage
* Responding to peer group or family pressure
* Attempting to strengthen family links
* Achieving financial gain
* Ensuring land, property and wealth remain within the family
* Protecting perceived cultural ideas
* Protecting perceived religious ideals that are misguided
* Ensuring care for a learner or adult at risk with special needs when parents or existing carers are unable to fulfil that role
* Assisting claims for residence and citizenship.
* Long standing family commitments

# Appendix I: Whistle blowing policy – guidance for employees

This guidance is written for staff working with children and adults at risk working in education and day opportunity settings and should be read in conjunction with Peterborough City Council Confidential Reporting Policy and Procedures.

Staff must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation; these feelings, however natural, must never result in a child or adult at risk continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or adults who are targeted. These people need someone like you to safeguard their welfare.

**Don't think what if I'm wrong - think what if I’m right**

**Reasons for whistle blowing**

* Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
* To prevent the problem worsening or widening
* To protect or reduce risks to others
* To prevent becoming implicated yourself

**What stops people from whistle blowing**

* Starting a chain of events which spirals
* Disrupting the work or project
* Fear of getting it wrong
* Fear of repercussions or damaging careers
* Fear of not being believed

**How to raise a concern**

* You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner it is possible for action to be taken
* Try to pinpoint what practice is concerning you and why
* Approach someone you trust and who you will believe will respond
* Make sure you get a satisfactory response - don't let matters rest
* Ideally you should put your concerns in writing.
* A member of staff is not expected to prove the truth of an allegation

……but you will need to demonstrate sufficient grounds for the concern.

“Any employee who suspects that a child or adult at risk is suffering significant harm or that a child or adult at risk has abused another child or adult at risk should report their concerns and seek advice from Intake and Assessment at Bayard Place, NSPCC or the Police”

**Peterborough City Council Confidential Reporting Policy and Procedures**

*What happens next*

* You should be given information on the nature and progress of any enquiries
* Your employer has a responsibility to protect you from harassment or victimisation
* No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
* Malicious allegations may be considered as a disciplinary offence

*Self-reporting*

There may be occasions where a member of staff has a personal difficulty maybe a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned.

Confidentiality cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children or adults at risk.

*Further advice and support*

Full details of the Peterborough City Council's Confidential Reporting Policy and Procedures are obtainable from the HR department

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from your line manager, the HR department and/or your professional or trade union

"Absolutely without fail- challenge poor practice or performance. If you ignore or collude with poor practice, it makes it harder to sound the alarm when things go wrong"

With acknowledgement to Sounding the Alarm - Barnardo’s

# Appendix J: Transporting young people and adults at risk

Where organisations make arrangements for the transportation of young people and adults at risk, the members of staff and volunteers involved will undertake a risk assessment of the transportation required. This will include an assessment of the following areas:

* Ensuring that all vehicles are correctly insured for the purpose.
* Ensuring the driver has a valid and appropriate license for the vehicle being used.
* All reasonable safety measures are available i.e. fitted, working seatbelts.
* An appropriate ratio of adults per young person; recommendation of 1 adult to 10 young people or adults at risk
* Ensuring drivers have adequate breaks
* When transporting young people and adults at risk, wherever possible they should be in the back of the car for health and safety reasons.
* Where practicable and planned, written parental or carer consent will be requested if staff or volunteers are required to transport young people and adults at risk.

To safeguard the member of staff or volunteer the following good practice is required:

* Agree a collection policy with parents or carers which will include a clear and shared understanding of arrangements for collection at the end of a session.
* Always tell another member of staff that you are transporting a young person or adult at risk, give details of the route and anticipated length of the journey.
* Take all reasonable safety measures e.g. Young person or adult at risk in the back seat, seatbelts worn.
* Where possible, have another adult accompany you on the journey.
* Call ahead to inform the young person / adult at risk’s parents or carer that you are giving them a lift and inform them when you expect to arrive.

All adults should:

* + ensure they have up to date and appropriate insurance
  + ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive
  + be aware that the safety and welfare of the child/vulnerable person is their responsibility until they are safely passed over to a parent/carer
  + record details of the journey in accordance with agreed procedures
  + ensure that their behaviour is appropriate at all times
  + ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven
  + ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned

1. Full details in Chapter one of Working Together to Safeguard Children [↑](#footnote-ref-1)
2. Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children [↑](#footnote-ref-2)
3. If, on a rare occasion, it is critical that a person starts in a role before a DBS is obtained, a full risk assessment must be completed and authorised by the Executive Principal and Governor for Safeguarding, and the new recruit will be barred from working with any young person or adult at risk until the DBS is received. [↑](#footnote-ref-3)
4. 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 [↑](#footnote-ref-4)
5. Making Safeguarding Personal: Guide 2014 Local Government Association & Association of Directors of Adult Social Services [↑](#footnote-ref-5)
6. Full details in Chapter one of Working Together to Safeguard Children [↑](#footnote-ref-6)
7. Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children [↑](#footnote-ref-7)
8. Full details in Chapter one of Working Together to Safeguard Children [↑](#footnote-ref-8)
9. Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children [↑](#footnote-ref-9)
10. The Bromley Briefings published by The Prison Reform Trust December 2011 [↑](#footnote-ref-10)
11. As a September 2017 [↑](#footnote-ref-11)