

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	1 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

Quality Assurance Policies & Procedures

SAFEGUARDING AND PREVENT POLICY CHILD AND VULNERABLE ADULT PROTECTION

1. Aims

Hartlepool College of FE holds as one of its highest priorities the Health, Safety and Welfare of all children, young people and vulnerable adults involved with courses or activities which come under the responsibility of the College. Safeguarding/Prevent are front and centre of our thinking and working practices.

1.1 This policy and the associated procedures have been developed in accordance with and under the guidance of key legislation:

- Department for Education (DfE) 1st September 2022: Keeping children safe in education; statutory guidance for schools and colleges
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- HM Government July 2018: Working Together to safeguard children; a guide to inter-agency working to safeguard and promote the welfare of children Last updated 1st July 2022
[Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/working-together-to-safeguard-children)

2. Key personnel and their roles

Senior Manager with Operational Oversight	<u>Darren Hankey, Principal and Chief Executive</u> <ul style="list-style-type: none"> • Strategic co-ordination of individuals with significant roles in safeguarding including Health & Safety, Mental Health and IT safety • Enforcing the company's safeguarding policy • Maintaining review of guidance from DfE, ESFA and other sources in ensuring that the College's procedures are up to date; • Ensuring the application of safeguarding procedures to employers and other organisations that receive children or young people on long term external placements.
Governor with special responsibility for Safeguarding	<u>Sally Robinson Director of Children's Services Hartlepool Borough Council.</u> In liaison with the Clerk of the Board of Governors to place a greater emphasis on governors knowing and fulfilling their strategic and legislative responsibilities, including about the role of the DSL.

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	2 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

	<ul style="list-style-type: none"> • To ensure governors lead a whole college approach to safeguarding • Ensuring all governors and trustees to receive safeguarding training at point of induction, which is regularly updated • Ensuring governors recognise their role in online safety • Ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including, but not limited to, a report on the training that staff have undertaken. • Ensuring governors are keeping up to date with college and local/ contextual safeguarding issues
<i>Designated Safeguarding Lead</i>	<p><u>Deborah Caygill, Designated Safeguarding Lead</u></p> <ul style="list-style-type: none"> • Oversight of the referral of cases of suspected abuse to the relevant Children's Hub and Safeguarding Adults team • Providing advice and support to other staff on safeguarding matters; • working with children's social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners • Information sharing, both within the college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners • Uphold relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), • To keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping • Liaise with staff (especially teachers, pastoral support staff, IT technicians and special educational needs coordinators (SENCO)) • Liaising with relevant support agencies and the police • Production of an annual report to the Principal & Governors on the operation of safeguarding policies. • Updating College policies and practice aligning with key Government policies and guidance

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	3 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

	<ul style="list-style-type: none"> Staff CPD- Ensuring that all staff receive training and induction in safeguarding issues and are aware of the College's safeguarding and child protection procedures
Deputy Designated Safeguarding Lead Team leader welfare and Safeguarding	<u>Debbie Hill Deputy Designated Safeguarding Lead</u> <ul style="list-style-type: none"> Deputising for the designated person, as above and coordinating the WARMS team operations Coordinating operational mental health support for students
Prevent and welfare officer	<u>Ronnie Bage</u> <ul style="list-style-type: none"> Prevent lead for the College and deputy chair of the local prevent board Drugs and Alcohol support Coordination of welfare services and education
Support deputy for the Designated Person	<u>Liz Lawton, Student Finance & Transitions Team Leader</u> <ul style="list-style-type: none"> Supporting the designated person, as above Coordinating the allocation of bursary support including Pupil Premium Plus and free school meals (FSM)
Support deputies for the Designated Person WARMS <i>Welfare, Retention. Attendance Mentors</i>	<u>Graeme Reynolds, Sharon Gray, Beth Sinclair & Mary Kernan</u> <ul style="list-style-type: none"> Supporting for the designated person, as above.

2.1 Monitoring and Reporting Safeguarding and Prevent

Regular reports are provided to College Leadership Committee and there's an annual Governors' report that summarises the academic years cases and safeguarding action.

The DSL and SENDCO meet every term with lead governors.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe. Where possible, share information with consent, and where

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	4 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

possible, respect the wishes of those who do not consent to having their information shared. *Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so.*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Where children leave the college, the designated safeguarding lead should ensure their child protection file is transferred to the new college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.

2.2 Steps staff take if a disclosure is made or they suspect something. In all cases a referral must be made to the College's Principal, DSL and Deputy DSL following guidelines outlined in appendix A.

2.3 Recruitment and selection process

Safer recruitment processes are applied following QAP 4.3.1 to deter unsuitable applicants from applying for roles within the College, and to identify and reject them if they do. Successful applicants are given an induction programme that fully outlines their roles and responsibilities in relation to Health & Safety and Safeguarding.

2.4 Student Recruitment

The College does not wish to debar individuals with criminal records from taking advantage of the opportunities provided by the College. In general, a criminal record is not to be regarded as an obstacle to study. In any event, the College will take into account, when dealing with existing students and selecting applicants for admission, criminal convictions which are deemed spent, unspent or pending under the terms of the Rehabilitation of Offenders Act 1974 unless such convictions are deemed as "exceptions" under the terms of The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013. Applicants will be interviewed by the DSL and the final approval will be made by the Principal.

2.5 Staff CPD The Principal is responsible for agreeing an annual staff development programme that ensures staff are kept up to date with current safeguarding guidance, contextual safeguarding issues and e-safety. The College ensures that, as part of the requirement for staff to undergo regular updated safeguarding training, including in relation to online safety.

2.6 Student Induction/ Taught tutorial programme - During the induction period in September, students are given details of what to do if they need to report abuse - including being given names and contact details of our trained and experienced Safeguarding Team. The Reception team holds details of the lead member of staff on Safeguarding Duty and any student with concerns in College hours can access support. Students are taught about safeguarding, including in relation to online safety, that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.

2.7 RESPECT The College prides itself on treating every student as an individual, whilst helping them to achieve their individual goals. We embrace diversity and we also believe that every person who passes through our doors deserves and will get our unconditional help and respect. The College has clear and high

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	5 of 10
FORMS	0
REVIEWED	Sep 2022
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expectations of learners in terms of their behaviour, attitude and quality of work demanded. The HARTS campaign is promoted: -

- Hard working
- Ambitious
- Resilient
- Thankful and Respectful
- Self-aware and regulating

2.8 Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. The College's on-line safety policy QAP 3.11 appendix M outlines staff responsibilities.

3. Key definitions

3.1 Child: for the purpose of these procedures, a child is a person under the age of 18 years. However, with respect to matters notifiable to Social Services, a child is defined as a person under the age of 16 years.

3.2 Young Person: a child aged 16 or 17 years.

3.3 Vulnerable Adult: has needs for care and support (whether or not the local authority is meeting any of those needs) is experiencing, or at risk of, abuse or neglect 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 (The Care Act 2014)

3.4 Designated Safeguarding Lead: Making sure all staff are aware of how to raise safeguarding concerns
Ensuring all staff understand the symptoms of child abuse and neglect
Referring any concerns to social care
Monitoring children who are the subject of child protection plans
Maintaining accurate and secure child protection records
Work with and support children's social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners

3.5 Abuse of children and young people

Neglect: persistent or severe neglect, or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

Physical injury: actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child including deliberate poisoning, suffocation, hitting, shaking, throwing, burning, scalding, drowning, deliberate failure to prevent injury and Munchausen's syndrome by proxy.

Emotional abuse: actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill-treatment or rejection.

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	6 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

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

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

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.
- making clear that up-skirting is against the law and will be reported to the police
- challenging and reporting teenage abusive relationships in any form

Keeping Children Safe in Education 2022: Part five: Child on child sexual violence and sexual harassment

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Serious violence All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

3.11 Appendix Q

Female Genital Mutilation (FGM) Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. ¹

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	7 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem

Children who may be LGBT

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by others. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The College provides support and Relationships Education, Relationship and Sex Education and Health Education. There is a range of support available via the WARMS team and the College has a zero tolerance to homophobic, biphobic and transphobic bullying and abuse.

3.6 Abuse of vulnerable adults

Physical abuse including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions

Domestic violence including psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence

Sexual abuse including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault, sexual acts to which the adult has not consented or was pressured into consenting

Psychological abuse including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Discriminatory abuse including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion

Organisational abuse: Including 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 provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission including: 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

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. It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	8 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

their own behaviour. There may come a point when they are no longer able to do this, without external support.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm, just as the CCG, as the regulator of service quality, does when it looks at the quality of care in health and care services. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include: Serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse. Long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse. Opportunistic abuse, such as theft occurring because money or jewellery has been left lying around.

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

- psychological
- sexual
- financial
- emotional

Coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015.

The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention and prevention.

The offence criminalising coercive or controlling behaviour was commenced on 29 December 2015.

Financial abuse: Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults and children at risk. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility. Potential indicators of financial abuse include:

- change in living conditions
- lack of heating, clothing or food
- inability to pay bills/unexplained shortage of money
- unexplained withdrawals from an account
- unexplained loss/misplacement of financial documents
- the recent addition of authorised signers on a client or donor's signature card
- sudden or unexpected changes in a will or other financial documents

This is not an exhaustive list, nor do these examples prove that there is actual abuse occurring. However, they do indicate that a closer look and possible investigation may be needed.

Contextual safeguarding - incidents and/or behaviours can be associated with factors outside the school or college or home can occur between children outside the school or college. All staff, but especially the

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	9 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. Known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Examples include Gangs, County-lines, trafficking, teenage abusive relationships, and on-line abuse.

Mental Health

The College recognises that it has an important role to play in supporting the mental health and wellbeing of all of its students and that in some cases mental health problems can be an indicator that a young person or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, College staff are well placed to observe students and identify and refer to services those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Immediate action should be taken by speaking to one of the safeguarding team.

<https://www.hartlepoolfe.ac.uk/student-support>

4. Prevent

From 1 July 2015 specified authorities, including all colleges as defined in the are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies

The statutory Prevent guidance summarises the requirements on colleges in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- a. The safeguarding team will assess the risk of children and vulnerable adults being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- b. To engage in relevant, Prevent awareness training to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individuals who may be at risk of radicalisation and what to do to support them.
- c. The College has clear procedures in place for protecting those at risk of radicalisation. The Prevent duty builds on existing local partnership arrangements taking into account the policies and procedures Hartlepool and Stockton-on-Tees Safeguarding Children Partnership (HSSCP)
- d. The College's IT Strategy ensures that individuals are safe from terrorist and extremist material when accessing the internet in College. The College has suitable filtering in place.
- e. Online safety is promoted and is embedded into curriculum delivery.
- f. The College has a PREVENT risk assessment that is reviewed by leadership at regular monitoring points.

QAP	3.11
ISSUE DATE	Jul 2005
AUTHOR	D Hankey
SHEET	10 of 10
FORMS	0
REVIEWED	Sep 2022
REVIEWED BY	D Caygill
CHECK BY	Sep 2023

5. Homelessness for 16-17 year olds

A young person does not have to be living on the streets to be classed as homeless. A child or young person may be considered homeless when their home is not suitable or they do not have the right to stay where they live. In addition, they may be living somewhere that is dangerous or overcrowded, and therefore be considered homeless.

Action that can be taken a child or young person aged 16- or 17-years old take when they are faced with homelessness.

The child or young person aged 16 or 17 should contact their Local Authority Children's Services department. This can be done **with the support of the College's safeguarding team**. The Local Authority may discuss the matter with the child or young person to see what services it could provide to enable them to stay at home.

If this is not possible, the Local Authority may try to find a relative to look after the child or young person or may offer to accommodate the child or young person. The Local Authority also has the power to take the child or young person into care if he/she is at risk of suffering significant harm.

Children's Services and the Local Authority has a duty to provide accommodation to a child or young person who meets the criteria for being homeless.