

SAFEGUARDING, CHILD & VULNERABLE ADULT PROTECTION POLICY

Overview

This policy applies to all learners who receive funding under the following funding streams: Education and Skills Funding Agency; 16-18; 19+; Adult Education Budget; Advanced Learner Loans; Apprenticeships; Cambridgeshire and Peterborough Combined Authority Devolved Budget; Higher Education Learners funding through Anglia Ruskin University and Commercial and/or Self-funded Learners

The College of West Anglia (CWA) has a statutory and moral duty to safeguard and promote the welfare of all children, young people and vulnerable adults receiving education and training at the college. This policy, together with related documents *Keeping Children Safe in Education DfE (2021)* and the *Safeguarding Reference Guide*, sets out how CWA discharges its statutory responsibilities relating to safeguarding, child and vulnerable adult protection. The policy applies to all staff, paid and unpaid, working at the college. There is a separate safeguarding policy covering Applewood Nursery, available on the Applewood Nursery website.

This policy is available on the college website, staff intranet and is provided to all staff at induction alongside the staff *Code of Conduct* and the *Safeguarding Reference Guide*. In addition, all staff are provided with and required to read Part One of the statutory guidance *Keeping Children Safe in Education DfE (2021)*.

Custodian: Paul O'Shea **Last date reviewed:** October 2021

Last date this policy was Impact Assessed: August 2021

Further guidance and information can be obtained from Paul O'Shea (paul.oshea@cwa.ac.uk)

Introduction

CWA is committed to ensuring it:

- provides a safe environment for all children, young people and vulnerable adults to learn in
- identifies children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- takes appropriate action to see that such children, young people and vulnerable adults are kept safe, both at home at college or in their workplace.

Through their day-to-day contact with students and their families, staff at the college have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to the relevant Safeguarding Officer for assessment and possible referral to social Services.

OUR ETHOS

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children / vulnerable adults from abuse and harm.

The college will therefore:

- establish and maintain an ethos where students and apprentices feel secure and are encouraged to talk, and are listened to;
- ensure students and apprentices know that there are adults in the college whom they can approach if they are worried, in difficulty or wish to report a concern;
- ensure there are well-promoted and easily understood systems in place for students and apprentices to confidently report abuse, knowing their concerns will be treated seriously.
- include in the curriculum activities and /or tutorial opportunities which equip students and apprentices with the skills they need to stay safe from abuse, radicalisation and other safeguarding risks, and with information about who to turn to for help;
- include in the curriculum and/or tutorial materials which will help students and apprentices develop realistic attitudes to the responsibilities of adult life.

We recognise that our teaching and support staff play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose. The safeguarding team will always take into account the wishes and feelings of the student when determining what action to take in relation to a concern.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, employers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and local authority safeguarding children board procedures.

As part of our responsibilities for safeguarding and promoting the welfare of children and vulnerable adults, we will provide a co-ordinated offer of early help when additional needs are identified. These may include if the child / vulnerable adult:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of honour-based abuse such as female genital mutilation or forced marriage;
- has a family member in prison, or is affected by parental offending;
- is persistently absent from education.

The college will endeavour to provide early help support in a variety of ways, including:

- support from internal pastoral services (safeguarding, mental health and counselling staff) and relevant curriculum staff
- liaison with external agencies such as Social Services, Child and Adolescent Mental Health Services, Early Help services and other specialist third sector services
- fostering productive and supportive relationships with parents

ROLES & RESPONSIBILITIES

Governing Body

The governing body fully recognises its responsibilities with regard to child protection and vulnerable adults and to safeguarding and promoting the welfare of children and vulnerable adults.

It will:

- designate a governor for safeguarding who will monitor the college's compliance with Safeguarding Child/Vulnerable Adult Protection Policy and practice, and who will champion safeguarding issues, including statutory responsibilities under the "Prevent" agenda
- ensure an annual report is made to the governing body on safeguarding matters to include changes affecting safeguarding & child protection policy and procedures, safeguarding & child protection training, and an analysis of safeguarding incidents/cases recorded during the academic year.
- ensure a member of staff from the college leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy who is appropriately trained to deal with any issues in the absence of the Designated Safeguarding Lead (DSL).
- ensure procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
- safer recruitment practices are followed in accordance with the requirements of *Keeping Children Safe in Education DfE (2021)*;
- ensure that this policy is annually reviewed and updated.

CWA Management

The college will:

- ensure it has a designated senior member of staff, who has undertaken, as a minimum, the appropriate training for Designated Safeguarding Leads (DSL) run by local authorities.
- ensure this training is updated every two years in accordance with government guidance;

- recognise the importance of the role of the designated person and ensure s/he has the time and training to undertake her/his duties;
- ensure designated members of staff are trained to DSL level to enable them to deputise for the DSL, act as Designated Safeguarding Officers who can manage safeguarding concerns, make referrals, support staff and students, and liaise with the DSL in decision-making and record-keeping.
- provide all staff with safeguarding training relevant to their duties and in line with requirements set out in *Keeping Children Safe in Education DfE (2021)*
- ensure that Designated Safeguarding Officers will take relevant professional advice (e.g. local authority services) when managing complex cases.

Designated Safeguarding Lead (DSL)

The DSL is a member of the college senior leadership team and takes lead responsibility for safeguarding and child & vulnerable adult protection at CWA, including fulfilling our duties under the Prevent agenda.

The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of *Keeping Children Safe in Education DfE (2021)* and will:

- provide support and advice to other staff on safeguarding and child protection matters
- ensure effective safeguarding reporting and case management procedures are in place
- ensure the college maintains written records and child protection files which are kept confidential and stored securely.
- Represent CWA (or appoint a deputy from the group of Designated Safeguarding Officers) at child protection conferences, core group meetings and other multi-agency meetings in relation to safeguarding cases
- Liaise with local authorities, police and counter-terrorism in relation to radicalisation and Prevent concerns

Designated Safeguarding Officers (DSO)

DSOs include the student welfare manager, the student welfare team as well as selected members of the college management team. The DSO supports and deputises for the DSL in the management of safeguarding cases across the college and undertakes the statutory training for DSLs. CWA has a team of DSOs to ensure sufficient resource to cover all campuses and provision, including apprenticeships and sub-contracted delivery.

Partnership Providers

CWA requires each of its sub-contracted partnership providers to have appropriate safeguarding policies and procedures in place, ensuring they comply with instructions and guidance as specified in the most recent version of KCSIE and relevant local authority processes. Partners must also have due regard for and comply with CWA safeguarding requirements. The CWA head of employer liaison, partnerships and commercial training is responsible for checking partnership compliance.

PROCEDURES FOR MANAGING CONCERNS

Working to the guidelines and requirements of *Keeping Children Safe in Education DfE (2021)* and *Working Together to Safeguard Children (2018)*, CWA will follow child and vulnerable adult

protection procedures of the relevant local authority (this will usually be Norfolk, Cambridgeshire or Lincolnshire)

All staff are encouraged to report any concerns they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as disclosure of abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns immediately in accordance with this policy to allow the safeguarding team to build up a picture and access support for the child or vulnerable adult at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

We recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the college environment and/or can occur between young people outside college. This is known as contextual safeguarding. All staff should be aware of this so that when reporting concerns, they include as much information and background detail as possible to provide a holistic view of the child, which will allow any assessment to consider all available evidence and the full context of any abuse.

All concerns must be reported to a Designated Safeguarding Officer (DSO) via the agreed channels.

Concerns will be triaged and managed by a DSO (in liaison with the DSL, where necessary). Where a referral to social services is appropriate, this will be done by a DSO using the relevant local authority procedures.

Staff should always follow the agreed CWA reporting procedures in the first instance. However, they may also share information directly with Children's Services or the police if:

- the situation is an emergency and the DSL, a DSO or a member of senior management are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the principal or chair of governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

Liaison with Other Agencies

The college will:

- work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child / vulnerable adult protection matters including attendance and written reports at child protection conferences and core group meetings.
- notify the relevant Social Services team if:
 - it should have to exclude or suspend a student who is subject to a child protection plan
 - there is an unexplained absence of a student who is subject to a child protection plan of more than two days duration from college (or one day following a weekend); or as agreed as part of any child protection plan or core group plan

CWA works in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to students who have experienced domestic violence in their

household; this scheme is called Operation Encompass. In order to achieve this, Norfolk Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our students has been present with the CWA safeguarding team, who will decide on any appropriate action and support. All information sharing and resulting actions will be undertaken in accordance with the 'Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools'. We will record and store this information in accordance with our safeguarding record-keeping procedures.

Record Keeping & Information Sharing

The college will:

- keep clear detailed written records of concerns about students (noting the date, event and action taken), even where there is no referral to Social Services
- ensure all records are kept secure, with any paper records kept in locked locations with restricted access
- ensure safeguarding information will only be shared with staff on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.
- Share information with statutory and other external agencies appropriately and proportionately in order to safeguard a child or vulnerable adult's welfare
- ensure all relevant child protection records are sent to the receiving school or college or establishment when a student moves/transfers/progresses.

Communication with Parents

The college will undertake appropriate discussion with parents / carers prior to involvement of another agency unless the circumstances preclude this action.

SPECIFIC SAFEGUARDING ISSUES

Children and vulnerable adults with special educational needs and disabilities

We recognise that children and vulnerable adults with special educational needs and /or disabilities (SEND) can face additional safeguarding challenges, which will be reflected in the higher levels of support available for these students. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Peer on Peer Abuse

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. We also recognise that with such abuse, girls are far more likely to be the victims and boys the perpetrators.

Peer on peer abuse can take different forms, including but not limited to:

- bullying (including cyberbullying);

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- non-consensual sharing of nude images (formerly referred to as sexting);
- initiation/hazing type violence and rituals.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult and such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

Staff must never tolerate or dismiss concerns relating to peer on peer abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff will reassure victims that they are being taken seriously, will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about peer on peer abuse. The DSL & DSOs will respond to any concerns related to peer on peer abuse in line with guidance outlined in Part five of *Keeping Children Safe in Education DfE (2021)* and *Sexual violence and sexual harassment between children in schools and colleges (Sept 2021)*. We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

Children who go missing from education

Children missing from education, particularly on a persistent basis, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. At CWA, we will ensure that:

- all staff are aware of the need to report absences promptly using the central absence management system
- all unknown / unexplained absences are followed up promptly, involving parents and carers for students aged under 18
- Specific arrangements are in place to monitor the attendance of individual students identified as being at high risk (e.g. child criminal or sexual exploitation) and for those under the care of of the local authority or with a child protection plan.

Preventing Radicalisation and Extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At CWA, we will ensure that:

- through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- there are systems in place for keeping students, apprentices and staff safe from online extremist material via our IT network by using effective filtering and usage policies.

- the DSL or DSOs will make referrals in accordance with local authority procedures and will represent CWA at Channel meetings, if required.
- has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- our curriculum & tutorial system provide opportunities to raise awareness and educate students about the dangers and signs of radicalisation and what to do if they have concerns.

PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH STUDENTS

The college will operate safe recruitment practices including ensuring appropriate DBS (Disclosure and Barring Service) and reference checks are undertaken in accordance with the document *Keeping Children Safe in Education DfE (2021)*. *Managers will complete appropriate safer recruitment training and at least one person involved in conducting interviews when recruiting staff will have completed safer recruitment training.*

The college will consult with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff (including volunteers and agency staff) and adhere to the relevant the relevant local authority procedures in accordance with the document *Keeping Children Safe in Education DfE (2021)*..

The college will ensure that any disciplinary proceedings against staff relating to safeguarding matters are concluded in full even when the member of staff 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

Full details of the procedures for dealing with allegations (including low level concerns that do not meet the threshold of harm) of abuse against a member of staff are contained in the Safeguarding Reference Guide.

The college will ensure that all staff, paid and unpaid, are aware of the need to maintain appropriate and professional boundaries in their relationships with students and parents, and will adhere to the relevant requirements in the Staff Code of Conduct.

The college will ensure that staff and volunteers are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of trust). Staff who work within a college have a duty of care to model appropriate social behaviours and to ensure that the professional role of trust is not abused.

USE OF PREMISES FOR NON-COLLEGE ACTIVITIES

Where we hire or rent out our facilities/premises to organisations or individuals external to CWA we ensure that appropriate arrangements are in place to keep children safe.

Where relevant, we will seek assurances that the body concerned has appropriate safeguarding policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; failure to comply with this would lead to termination of the agreement.

OTHER RELATED POLICIES

Anti-Bullying

Our policy on anti-bullying is set out in a separate document and is reviewed annually. We expect staff to acknowledge that to allow or condone bullying constitutes a lack of duty of care and may lead to consideration under safeguarding & child protection procedures.

Health and Safety

Our health and safety policy is set out in a separate document and is reviewed annually. It reflects the consideration we give to the protection of our children and vulnerable adults both within the college environment and when away from the college when undertaking college trips and visits.

E-Safety and Acceptable Use

Our policies on e-safety are set out in a separate document and are reviewed annually. They reflect the balance needed between the exciting opportunities offered by the internet and other technologies and the need for students and staff to keep themselves safe and deal sensibly with risk.