



Suffolk
New
College

Safeguarding & Child Protection Policy

Policy Title:	Safeguarding & Children Protection Policy
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Author(s):	Safeguarding Team
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Related Policies & Procedures:	<ul style="list-style-type: none">– Preventing Extremism and Radicalisation (PREVENT) Policy– Recruitment & Selection Policy– Disciplinary Policy– Managing Challenging Behaviour Policy– Student Anti-Bullying / Harassment Policy– Student Attendance & Punctuality Strategy– Student Performance & Behaviour Policy– 14 – 16 Policy– Student Placement Policy



Equality Impact Assessment Tool

Name of Policy: Safeguarding and Child Protection Policy

		Yes/No	Comments
1	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race or ethnicity	No	
	Disability	Yes	This policy is designed to safeguard children and vulnerable adults and so there are differences regarding the approach to them and other adults in situations.
	Gender	No	
	Religion or belief	No	
	Sexual orientation	No	
	Age	Yes	This policy is designed to safeguard children and vulnerable adults and so there are differences regarding the approach to them and other adults in situations.
	Marriage and Civil Partnership	No	
	Maternity and Pregnancy	No	
	Gender Reassignment	No	
2	Is there any evidence that some groups are affected differently?	No	Within children and vulnerable adults all treated the same.
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	Yes	This policy is covered by legislation.
4	Is the impact of the policy/guidance likely to be negative?	No	
5	If so, can the impact be avoided?		
6	What alternatives are there to achieving the policy/guidance without the impact?	None	
7	Can we reduce the impact by taking different action?	No	

SUFFOLK NEW COLLEGE SAFEGUARDING AND CHILD PROTECTION POLICY

1. CONTEXT

Suffolk New College has a statutory and moral duty to ensure that the College safeguards and promotes the welfare of students receiving education and training at the College. This policy has been developed in accordance with the principles established by the Children Acts 2004; the Education Act 2011, Information Sharing 2018, PREVENT Duty 2015 and in line with government publications: Working Together to Safeguard Children 2018, What to do if You are Worried a Child is Being Abused 2018. The guidance reflects Keeping Children Safe in Education September 2019, and Suffolk Safeguarding Partnership Procedures.

The College takes very seriously its responsibility to safeguard and promote the welfare of young people; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those students who are suffering harm.

Throughout this policy and procedure, reference is made to 'students and young people'. This term is used to mean 'those under the age of 18'. It is recognised that some adults are vulnerable to abuse; accordingly the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults.

It is important that child protection issues are handled with sensitivity and respect. Young people have the right to make important decisions about their lives. The College recognises this but also recognises its duty and responsibility to protect where there is a cause for concern.

Colleges are required to provide appropriate staff development programmes to familiarise all members of staff with child protection issues and the College procedures and policies, with refresher training at least every two years and an update briefing annually.

Colleges are required to designate a senior member of staff with lead responsibility for safeguarding.

The Designated Safeguarding Lead is Greer Hill.

Safeguarding Team

Greer Hill, Director of Student Services, Safeguarding & Support ext 2230

Nina Livermore, Student Safeguarding & Support Manager, ext 2239

Julie Gridley, Student Services Manager, ext 2884

Alison Allum, Student Support Team Leader, ext 2748

Caroline Francis, Learning Support Team Leader ext. 2342

Nell Burnett, Student Support Advisor ext 2715

Christie Thompson, Student Support Advisor ext 2867

Julie Patel, Deputy Director of Suffolk New College on the Coast, 01728 642900.

The College Corporation member with responsibility for safeguarding is Roger Fern. The Deputy Corporation member responsible for safeguarding is Jacqui Martin

It is the responsibility of the DSL to ensure that all safeguarding issued in the College are effectively responded to, recorded and referred to the appropriate agency. They are also responsible for ensuring introductory safeguarding training takes place for all staff who work with children and young people and that this training takes place at least every two years, alongside annual updates and bulletins.

2. PREVENT

Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015 places a duty on Colleges as well as other public bodies to have “due regard to the need to prevent people from being drawn into terrorism”. To meet this duty the College has implemented a Preventing Extremism and Radicalisation Safeguarding Policy, which should be read as a supplement to this Safeguarding policy

3. DEFINITIONS

Abuse can involve any one or more of the following aspects:

Physical: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person. There is a mandatory duty to report known cases of female genital mutilation.

Emotional: Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person’s emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond the young person’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone.

Sexual: Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching. They may include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely

perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people and children.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a young person 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;
- to be responsiveness to a young person's basic emotional needs;
- financial abuse;

Peer on Peer Abuse

Young people and children can abuse other young people and children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual Violence and Sexual Harassment between Young People (see Keeping Children Safe in Education Part 5)

Sexual violence and sexual harassment can occur between young people and children of ANY age and sex. It can also occur through a group of young people and children sexually assaulting or sexually harassing a single person or group of people. Young people and children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, this could affect their educational attainment. Some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

The college is aware of and expects its staff to know 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 behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence and Sexual Harassment

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

Rape

Assault by Penetration

Sexual Assault

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including, on social media
 - Sexual exploitation; coercion and threats
- 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.

The initial response to a report from a young person is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Child Exploitation: Gangs & County Lines

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to

a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Young people with special educational needs and disabilities

Young people with special education needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the young person's disability without further exploration
- Being more prone to peer group isolation than other young people
- The potential for young people with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

The college offers a range of additional and specialist support to young people with SEN, information can be sought from the Student Services Teams.

'CHILDREN' The Children Act defines a child as person under the age of 18. For the purposes of this policy, this includes children in the care of students on placements. Students with special education needs and/or disabilities under or over 18 are also covered by this policy and need to be protected by staff.

'STUDENT' means a person who is currently enrolled on a course at the College.

'STAFF' means any person employed by the College, apprentices, contractors, volunteers and sabbatical officers and staff of the Student Union.

4 SCOPE OF THE POLICY

The policy aims to provide a framework for protecting students under 18 years of age, vulnerable adults and children in the care of students.

The policy should be followed if there is a concern that a young person or vulnerable adult is in need of protection. It should also be followed if a member of staff or a student suspects that a staff member, a student or another person may be abusing a student under 18 or a child in the care of a student.

Child protection issues concerning 14-16 year old Programme, or Special School taster students attending the College should be referred to the designated senior person or deputy who will make any necessary referrals. The school senior designated person will be notified of any referrals or safeguarding concern.

The policy does not include persons who are outside the College community for whom there are other means of raising concerns, however it does apply in situations where actions take place externally to the College but involve children or young people who are part of the College and the College becomes aware of them.

5 PROCEDURE FOR DEALING WITH DISCLOSURE, SUSPICIONS OR ALLEGATIONS OF ABUSE

All safeguarding concerns need to be acted upon immediately. If a staff member is concerned that a child or young person is at risk or is actually suffering abuse, they should tell a member of the Safeguarding Team immediately.

It is important that students and other children are protected from abuse. All complaints, allegations or suspicion of abuse must be taken seriously.

Individual members of staff should never deal with child abuse disclosures in isolation and should always refer to the designated senior person for child protection, unless a member of staff discovers that an act of Female Genital Mutilation have been carried out on a girl under the age of 18, the member of staff must report this directly to the Police by calling 101.

Staff should, where possible, make it clear to a person that they cannot make guarantee of confidentiality. If possible, they should warn the individual about this before they are given an opportunity to disclose.

The student should be made aware that information may have to be shared with a nominated person for child protection and that social care services will have to be contacted in order to discuss appropriate action.

If the student wishes to continue, staff should:

- Listen carefully to what is said;
- Keep questions to a minimum, just to clarify what has been said;
- Avoid leading questions or comments as these can cause problems for any subsequent investigation or proceedings;
- Tell the student what is going to happen following the interview and assure them that they will be kept informed of all developments;
- Reassure the young person that by telling a member of staff they have done the right thing.

Staff should make a full, factual record of the disclosure and any other relevant information including:

- The date, time and place where the disclosure of information took place;
- The reporting staff member's/student's name and the names of other staff or students involved;
- The date, the time and the place where the alleged abuse occurred;
- The name of the complainant and where different, the name of the young person/child who has allegedly been abused;
- The nature of the alleged abuse;
- A description of any injuries observed;
- The account which has been given.

The mechanism for reporting concerns at the College is through on an online system called 'My Concern'. Every member of staff has a log in to the system and the link can be accessed via the College intranet. Safeguarding training for new staff includes a demonstration of the system and how to report a concern.

6 SAFEGUARDING TEAM STAFF MEMBERS

Roger Fern (Chair of Corporation), is the Corporation Safeguarding Lead. The Deputy Corporation member responsible for safeguarding is Jacqui Martin.

The nominated members of staff with responsibility for Safeguarding & Child Protection are:

- Greer Hill, (Director of Student Services, Safeguarding & Support), Designated Safeguarding Lead, Learning Curve, Ext. 2230
- Nina Livermore (Student Safeguarding & Support Manager), Deputy Safeguarding Lead, Learning Curve, Ext. 2239
- Julie Gridley, (Student Services Manager), Deputy Safeguarding Lead, Learning Curve, Ext 382239
- Alison Allum (Student Support Team Leader), Safeguarding Officer, Student Support Office, Ext. 2748
- Caroline Francis (Learning Support Team Leader), Safeguarding Officer, Learning Curve, Ext 2342
- Nell Burnett (Student Support Advisor), Safeguarding Officer, Student Support Office, Ext 2715
- Christie Thompson, (Student Support Advisor), Safeguarding Officer, Student Support Office, Ext 2867
- Julie Patel (SNC On the Coast), Safeguarding Officer, 01728 642900

7 RESPONDING TO A CONCERN

Any safeguarding concern must be reported as soon as possible and in any event, within two hours. If this is not possible, a member of Executive must be notified.

A record of the report shall be made via the online system My Concern, including the date and the time of the report, and the name and position of the person receiving the report.

When a concern is raised the safeguarding team will take appropriate action which may include making a referral in line with Suffolk Safeguarding Partners guidelines.

The safeguarding team will record all actions taken, discussions, referrals made and outcomes on My Concern.

In keeping with the commitment made in the Children Act 1989, children and young people should be involved and have a say in actions taken on their behalf. Where a student is emotionally and intellectually able, the College will only make a referral with their knowledge and, if possible, their full consent.

Students with learning disabilities may be less likely to appreciate the seriousness of the situation and be unable to decide on the safest outcomes. Therefore, there is a greater possibility of external referral without the students' full knowledge and consent.

The safeguarding team shall discuss with the relevant external agency what action should be taken to inform the parents of a student or a child, unless to do so would put the young person or child at risk.

Where, in exceptional circumstances, a staff member deems there to be an immediate risk to a young person and it is not possible to contact a member of the safeguarding team or a member of Executive within the same day, they should report the matter – normally by telephone – directly to the local social care services department or the police as appropriate. Customer First is the initial point of contact for social services in Suffolk. The staff member shall notify a member of the safeguarding team or a member of Executive as soon as possible and normally within one working day of the action taken and submit a written report of the action taken and the circumstances leading to it.

8 REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

In rare instances, staff of educational institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of abuse made against them. The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that such an allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

All staff should take care not to place themselves in a vulnerable position with a young person.

The College recognises that the welfare of the child is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, career and confidence. Therefore those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

The College will follow the Suffolk Safeguarding Partnership procedures for managing allegations of abuse against staff which are set out in 'Working Together to Safeguard Children 2018'

A member of staff who receives an allegation about another member of staff should report the incident immediately to the Human Resources Manager (DSL for staff/volunteer related matters) or a member of the Executive team. The incident should **not** be logged on My Concern.

The allegations should not be investigated by the College at this stage. The Human Resources Manager (DSL for staff/volunteer related matters) or a member of the Executive Team must contact the Local Authority Designated Officer (LADO) as soon as an allegation or concern is raised. ladocentral@suffolk.gcsx.gov.uk or 03001232044.

The LADO will discuss whether the allegations meets the threshold of the LSCB procedures and will consult with police and social care as appropriate.

If the parents/carers of the young person are not already aware of the allegation the LADO will discuss how and by whom they should be informed.

The Human Resources Manager (DSL for staff/volunteer related matters) or a member of the Executive Team should inform the member of staff about the allegation as soon as possible after consulting the LADO. However, where a strategy discussion is needed, or it is clear that police or social care may be involved that should not be done until those agencies have been consulted.

Should the Human Resources Manager (DSL for staff/volunteer related matters) or a member of Executive be the subject of an allegation or complaint under this procedure, the matter should be notified to the Principal or Chair of Corporation.

The actions set out above, shall also be followed in the event of a complaint being made under this procedure against the Principal. The College nominee shall inform the Chair of the Corporation or the Vice-Chair in their absence.

Allegations against members of staff may result in a social care services or police investigation. The Human Resources Manager (DSL for staff/volunteer related matters) and or Executive Team will be advised of the allegation and the progress of any investigations conducted by external agencies and will be advised whether College disciplinary processes can proceed in parallel with the criminal process or whether any disciplinary action needs to wait for the completion of police enquiries and/or prosecution.

If it is considered that the allegation does not involve a possible criminal offence the College will deal with the matter under the College disciplinary procedures.

In circumstances of allegations against staff, suspension on full pay, pending the outcomes of investigation, may be appropriate. Suspension will not be an automatic response (see the College Disciplinary Policy for the arrangements for suspension.)

In cases of allegations against staff there must be a clear and comprehensive summary of the allegations made, details of how and who followed the allegation up and any resolution and conclusion. The record should include details of any action taken and all decisions reached.

These notes will be kept on the member of staff's file and will be retained until the person attains normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

A record will also be placed on the file of a young person making an allegation against a member of staff.

The College will refer to the Disclosure and Barring Service when appropriate and will take professional advice from other agencies when the necessary.

The college is under an obligation to notify any future employers if an ex-member of staff is a danger to or concern for working with vulnerable children and young adults.

9 SAFEGUARDING RECORD KEEPING

My Concern is the secure online system for reporting all safeguarding concerns and is used for all records, for example: notes, photo images, reports, referrals and any other information relating to the safeguarding concern.

All members of staff are issued with a log in to My Concern at the start of their employment with the College.

All safeguarding records are to be treated confidentially and stored securely with due regard for Data Protection 2018 incorporating GDPR 2018.

Information will be shared in line with Information Sharing, July 2018.

10 RECRUITMENT AND SELECTION PROCEDURES

The College adheres to the Keeping Children Safe in Education Statutory guidance for Schools and Colleges, September 2019 recruiting all staff to protect children and vulnerable adults and safer recruitment. These are detailed in the Recruitment & Selection Policy.

Appropriate checks are carried out on all new staff and volunteers and include identity checks, references, Disclosure and Barring Service and Childrens Barred List checks.

11 SAFEGUARDING & CHILD PROTECTION TRAINING

All staff will be made aware of the Safeguarding & Child Protection Policy and receive written guidance in relation to Safeguarding.

All staff will receive safeguarding training every two years, alongside annual updates and bulletins.

The safeguarding team will receive designated safeguarding lead training every two years and receive an annual update.

12 WHISTLEBLOWING

Young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the College they should follow the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally within the College. Staff can call 0800 028 0285 (8.00am to 8.00pm Monday to Friday) email: help@nspcc.org.uk

13 USE OF 'REASONABLE FORCE'

The College's Managing Challenging Behaviour Policy sets out the circumstances when physical intervention or reasonable force is permissible. It acknowledges that staff must only ever use physical intervention or reasonable force as a last resort, when a young person is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Where reasonable force is used in response to risks presented by young people with SEN or disabilities or with medical conditions, the additional vulnerability of these groups should be recognised. Individual behaviour plans and risk assessments can help reduce and manage challenging behaviours.

Such events must be reported to the individual's line manager and written records kept.

Physical intervention or reasonable force of a nature which causes injury or distress to a young person may be considered under safeguarding and child protection or disciplinary procedures.

14 BULLYING

The policy on bullying is set out in the Student Anti-Bullying / Harassment Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection and vulnerable adult procedures.

15 SECURITY

On college premises and college visits and trips the College's Visible ID policy must be adhered to and ID cards with lanyards must be worn at all times. All visitors report to reception and are required to sign in and wear a visitors lanyard and will be accompanied by a member of staff at all times. Staff are required to address individuals who do not comply with the Visible ID Policy.

16 WORK EXPERIENCE & PLACEMENTS

Staff organising any work experience or work placements should take safeguarding and child protection into account when assessing the suitability of the placement, to ensure students are placed in appropriate and safe environments, for more information please refer to the Student Placement Policy.

17 USEFUL CONTACT NUMBERS

Designated Safeguarding Lead

Greer Hill, Director of Student Services, Safeguarding & Support 01473 382409

Deputy Safeguarding Lead

Nina Livermore, Student Safeguarding & Support Manager 01473 382239

Julie Gridley, Student Services Manager 01473 382884

Safeguarding Officers

Alison Allum, Student Support Team Leader 01473 382748

Caroline Francis, Learning Support Team Leader 01473 382342

Nell Burnett, Student Support Advisor 01473 382715

Christie Thompson, Student Support Advisor 01473 382867

Julie Patel (SNC On the Coast), Deputy Director 01728 642900

External Agencies

Social Services Customer First: 0808 800 4005

Police: 101 or 999

Childline: 0800 1111

NSPCC: 0808 800 5000

Suffolk Local Safeguarding Children Board: www.suffolkscb.org.uk

Child Exploitation and Online Protection (CEOP) Agency www.ceop.org.uk

<http://www.thinkuknow.co.uk>

This policy will be reviewed annually.