



# **Student Protection and Duty to Prevent Policy and Procedures**

**2021-22 Edition**

**Addendum re: COVID-19 Safeguarding measures  
relating to site closure and distance learning added  
March 2020**

**to be read in conjunction with the  
Safeguarding Policy and Guidance and the  
Managing Allegations against other students' Policy**

*This policy should be read in conjunction with the College's Safeguarding Policy and Procedures.*

## **1.0 POLICY**

1.1 The College recognises that it has a statutory obligation towards the safety and welfare of all of its students', staff and visitors. The purpose of this policy and its associated procedures is to ensure that any safeguarding issues are dealt with promptly, sensitively and in line with national and regional guidelines. This policy applies to all staff, governors, volunteers and agencies working in the College and enacts relevant legislation and statutory guidance *Keeping Children Safe in Education (2021)*.

1.2 In addition this policy and inherent procedures apply to our legal duty under the *Counter-Terrorism and Security Act* to 'have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism' (Appendix A). For the purposes of this policy all references to Safeguarding include our *Duty to Prevent* people being drawn into terrorism.

- The College aims to ensure that the needs and welfare of its students' are paramount and to act if there is any cause for concern in respect of safeguarding issues.
- The College will ensure that safe recruitment practices are always followed.
- All staff should be alert to signs of abuse and be aware of the procedures to be followed.
- The College does not have the responsibility for investigating suspicions or allegations of abuse but it will notify the appropriate agencies, including the Local Authority Designated Officer (LADO), so that they can investigate and take any necessary actions (Appendix B – Local Authority contact information).
- The College will work with the Hampshire Safeguarding Children Partnership (HSCP) and comply with its procedures. It recognises that it has a responsibility towards students' attending or visiting the College to safeguard and promote their welfare and to take appropriate decisions about how this may be achieved.
- The College will work with the Police and Local Authority and recognises that it has a legal duty to have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism'.
- The associated procedures outline the process which must be followed when dealing with suspicions or allegations of abuse/concerns relating to the Prevent agenda. These must be followed by any member of staff who has knowledge or suspicions of a student suffering, or being at risk of significant harm, or concerns regarding the safety and welfare of non-students' (e.g. siblings).
- In the procedures the term 'student' refers to all persons whether they are children under 18 years of age or vulnerable adults (aged 19+) and who are either students' enrolled at the College or others attending specific activities arranged and managed by the College, irrespective of site.

## **2.0 RESPONSIBILITIES**

2.1 The College's designated senior member of staff with lead responsibility for safeguarding and Duty to Prevent is the Principal; however the Governing Body and Principal have delegate the role of Designated Senior Lead for Safeguarding to the Director of Learning for Enhanced Provision and Adult Community College.

2.2 In the absence of the Director of Learning for Enhanced Provision and Adult Community College details of suspicions or allegations of abuse should be reported to another member of the Safeguarding Team who undertake the role of Deputy designates. This team comprises of the Mental Health and well-being Coordinator and 5 Deputy DSLs, one of whom is the named contact with Social Services and holds responsibility for working with such services to ensure that students' in Local Authority Care (LAC) are effectively monitored in supported.

- 2.3 For students' with *moderate to high level learning difficulties and disabilities* who access specialist provision in the School of Personalised Learning (SPL) this role is undertaken by the relevant Director of Learning for Enhanced Provision and Adult Community College or Head of SEND and High Needs Provision.
- 2.4 Whilst the Safeguarding Team hold responsibility for responding to Safeguarding or Duty to Prevent concerns *any member of staff can make a referral to Children's (or Adult) Social Care or other relevant bodies if a concern arises.*
- 2.5 The members of the Safeguarding Team have received appropriate training in Safeguarding issues and will receive regular refresher Safeguarding training and updates at least annually. All staff (including temporary and volunteers) will receive appropriate training to familiarise themselves with safeguarding issues and the College policy and procedures every two years. New staff will be given training as part of their induction programme which includes a review of the expectations of staff regarding their conduct and guidelines for supporting students', including those in Local Authority Care.
- 2.6 The Governing Body is responsible for annually reviewing the College policy and procedures to ensure it is fit for purpose and compliant with the latest regulations. The Governing Body will also receive an annual report from the Designated Safeguarding Lead which reviews how the duties of the College have been discharged. A Governor is also nominated as a Safeguarding Lead and will work with the team to ensure that College processes are robust and appropriately audited.
- 2.7 The responsibilities of the Governing Body. The Governing body is responsible for ensuring:
- The College has effective Safeguarding policies and procedures in place.
  - That the College has a broad and balanced curriculum that incorporates Safeguarding, including online, through teaching and learning opportunities.
  - That national and local guidance is followed, specifically 'Keeping Children Safe in Education'.
  - There is a member of the College's Senior Management Team identified as DSL.
  - That training is undertaken at the required frequency.
  - An annual audit of Safeguarding is carried out and any concerns are remedied without Delay
  - The school has effective Safeguarding policies and procedures including a Child Protection Policy and a Staff Conduct Policy.
  - HSCP is informed annually about the Discharge of Duties (audit).
  - Recruitment, selection and induction follows safer recruitment practice.
  - Allegations against staff are dealt with by the Designated Safeguarding Lead (DSL).
  - A member of senior staff team is designated as Designated Safeguarding Lead and have this recorded in their job description.
  - Staff have been trained appropriately and this is updated in line with guidance.
  - Any Safeguarding deficiencies or weaknesses are remedied without delay.
  - Ensure that the Child Protection Policy is updated at least annually and available publicly (for example via the College website).
  - Ensure appropriate filters and appropriate monitoring systems are in place to safeguard pupils from potentially harmful and inappropriate online material.
  - Provide opportunities for staff to contribute to and shape safeguarding arrangements and child protection policy so recognising the experience and expertise of their staff.
  - Ensure that all staff read at least Part one of Keeping Children Safe in Education.
  - Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education.
- 2.8 The responsibilities of the Designated Safeguarding Lead. In addition to the role of staff and Senior Leadership Team the DSL will:

- Assist the Governing Body in fulfilling their responsibilities under Section 175 or 157 of the Education Act 2002.
- Attend initial training for the role and refresh their knowledge every two years or as required. This is by attending refresher training after the first two years and then demonstrating evidence of Continuing Professional Development thereafter.
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL.
- Ensure that whole College training occurs regularly so that staff, Governors and volunteers can fulfil their responsibilities.
- Ensure any members of staff joining the College outside of this training schedule receive an online induction prior to or at the commencement of their duties.
- Keep written records of Child Protection concerns securely and separately from the main student file and use these records to assess the likelihood of risk.
- Ensure that copies of Safeguarding records are transferred accordingly (separate from student files) when a student transitions from school to College.
- Ensure that where a student transfers school and is on a Child Protection Plan or is a Child Looked After, the information is passed to the new school immediately and that the child's Social Worker is informed.
- Liaise with HCC LADO in the event of allegations made against staff and where advice and support is needed to fulfil the duties of the post
- Ensure that changes to regulations and legislation are enacted in to policy and practice
- Liaise with the nominated link Governor regarding changes to processes and key areas of risk.
- The DSL will also research and understand the processes, procedures and responsibilities of other agencies, particularly Children's Social Care
- In addition to fulfilling the responsibilities of staff and senior management team, the DSL will also follow the role description set out in Annex B of Keeping Children Safe in Education 2016.

2.9 The responsibilities of Senior Management Team (including DSL): The Senior Management Team will:

- Contribute to inter-agency working in line with guidance (Working Together 2015).
- Provide a co-ordinated offer of early help when additional needs of children are identified.
- Work with Children's Social Care to support their assessment and planning processes including supporting staff to attend student focused support meetings and conferences.
- Carry out tasks delegated by the Governing Body such as training of staff; safer recruitment; maintaining a Single Central Register.
- Provide support and advice on all matters pertaining to Safeguarding and Child Protection to all staff regardless of their position within the school.
- Treat any information shared by staff or students' with respect and follow procedures.
- Provide copies of policies (including the Child Protection Policy; Safeguarding Policy (where adopted) and Staff Behaviour Policy (Code of Conduct)) and a copy of part one of Keeping Children Safe in Education to all staff at induction.
- Ensure all staff understand the role of the DSL and are aware of systems within their school which support safeguarding.

2.10 The responsibilities of staff:

- Establish and maintain an environment where students' feel secure, are encouraged to talk

and are listened to.

- Ensure students' know that there are staff in the College whom they can approach if they are worried about any problems.
- Plan opportunities within the curriculum for students' to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to Safeguarding.
- Record their concerns if they are worried that a student is being abused and report these to the relevant person as soon as practical that day.
- If the disclosure is an allegation against a member of staff, they will follow the allegations procedures
- Treat information with confidentiality but never promising to "keep a secret".
- Fulfil their duty of care to take registers promptly and correctly, to ensure the safety of our students' all times.
- Notify a member of the Safeguarding Team if any student on a Child Protection Plan has unexplained absence.
- In the context of early help, staff will notify colleagues and/or parents of any concerns about the student(s), and provide them with or signpost them to opportunities to change the situation.
- Ensure they know who the Designated Safeguarding Lead (DSL) and deputy DSLs are and know how to contact them.

### **3.0 PROCEDURES**

- 3.1 This document offers guidance and outlines procedures for dealing with suspicions or allegations of abuse reported by any student at the College. The College will take in to account any contextual circumstances (both internally within the College and externally relating to the students' personal circumstances and living arrangements) when addressing and acting upon safeguarding concerns.
- 3.2 Although it is not the College's responsibility to investigate abuse, the College has a duty to act if there is a cause for concern and to notify the appropriate agencies. The following guidelines must be followed whenever an allegation is made that a student has been abused or where there is a suspicion that a student has been abused.
- 3.3 The College believes that its students' have a right to make important decisions about their own lives. Therefore, there are occasions where an instant response may not be in the best interests of the young person or people concerned, so it is important to apply the guidelines with sensitivity to the individual circumstances of the student and his or her family. At all times the welfare of the student is paramount.
- 3.4 Consideration will be given to obtaining consent from students' aged 19+ before information is shared external bodies under the rights afforded to them under the Mental Capacity Act 2005. It is for the DSL or Deputy DSL to determine if obtaining consent is proportionate to the potential risk posed to the student or others. Where appropriate any referral relating to a disclosure of a student aged 19+ should be shared with them.
- 3.5 Students' are informed of College Safeguarding processes through study communities and teaching and are provided with an individual tutor who holds responsibility for support and monitoring their success and achievements. Themed events also promote Safeguarding to students' as well as raise their awareness of social and cultural issues. Information regarding safeguarding process are provided too students' via the Hub and guidance produced for staff relating our Duty to Prevent.

3.6 Students' in need of additional support or who are identified as potentially vulnerable are identified via the enrolment process, transition information, tutor engagement and self-disclosure. The College provides a comprehensive support service relating to academic and pastoral need which work in partnership with specialist external services where required.

#### 4.0 REPORTING ALLEGATIONS OR SUSPICIONS

- Any allegations of abuse, or suspicions of abuse, need to be taken seriously and handled in a sensitive manner.
- **Promises of total confidentiality should not be given**, as the matter may develop in such a way that these cannot be honoured. However, the student should be assured that as few people as possible will be involved and that nobody will be told more than they need to know. Wherever possible names will not be used. Information will be disclosed only on a need to know basis and the student will always be informed of any action to be taken and their agreement sought. If, on hearing this, the student does not wish to continue, they should be referred/taken to the Designated Safeguarding Lead.
- If a member of staff does not feel comfortable listening to a student, the student should be referred/taken to a member of the Safeguarding Team.
- If the disclosure comes directly from the student, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided, as these can cause problems in any subsequent investigation. The student should be informed of the actions that will follow the conversation and be assured that they will be kept informed of all developments.
- Staff who receive reports of alleged abuse or concerns regarding our Duty to Prevent should make a written record (the **Safeguarding and Duty to Prevent Incident/Disclosure Record** form (Appendix C) should be used wherever possible – available on the Hub and in the staff room) as soon as possible of the nature of the allegation and any other relevant information including:
  - the date and time that the allegation was made
  - the name of the member of staff writing the report and the names of any others present
  - the date, time and place where the alleged abuse happened
  - the name of the student and, where different, the name of the student who has allegedly been abused
  - the nature of the alleged abuse
  - a description of any injuries observed
  - the account given of the allegation
  - the student's preferred action
- Some students' with learning difficulties or disabilities may need a different approach from other students': for example, the student's LSA or teacher could be present to act as a facilitator or in an advocacy role.
- Individual members of staff should never deal with disclosures of abuse in isolation and should always report the details to one of the Safeguarding Team as soon as possible, with a view to these concerns being passed on to Social Services or the Police.
- If abuse is suspected but not disclosed by the student, then advice should be sought from a member of the Safeguarding Team.
- Where a student who is not a child under the terms of the Children Act is identified as being at risk, or reveals past abuse, the same procedures will be followed. The member of the Safeguarding Team will make a decision on whether there is a need to involve outside agencies: for example, there may be siblings under 18 who could also be at risk.

## **5.0 RESPONDING TO AN ALLEGATION**

- Following consultation, in the event of a decision to report, the member of the Safeguarding Team will endeavour to make sure the student is aware of the proposed action and the reasons for this decision. Ideally this should happen before the appropriate agency is informed and be with the agreement of the student, unless doing so would place them at greater risk.
- The member of the Safeguarding Team should contact Social Services and possibly the Police Child Protection Team and where appropriate the Police Counter-Terrorism Team regarding issues relating to our Duty to Prevent. The Local Authority Designated Officer (LADO) will also be contacted should the College require advice, guidance or support regarding the allegation/disclosure.
- The discussion will include advice regarding Social Services' contact with the student's family. To support this process, any contact with parents/carers by other members of staff should be referred to the member of the Safeguarding Team.
- A written record of the date, time and name and position of the person to whom the matter is reported, will be made. The telephone report will be confirmed in writing to Social Services as soon as possible.
- The Designated Safeguarding Lead will retain a copy of written records and any other relevant material. These will be kept securely locked at all times. No other records should be kept by any other member of staff.

## **6.0 STUDENTS' WITH SPECIAL EDUCATIONAL NEEDS (SEN) AND DISABILITIES**

- 6.1 If a student with SEN and/or disabilities is subject to Safeguarding concerns the College acknowledge and will respond to the potential additional challenges in supporting these students'.
- 6.2 Wherever possible, Safeguarding concerns relating to students' with SEN and/or disabilities will be led by the Head of School (Enhanced Curriculum and Welfare) due to their experience and understanding of SEN related conditions. If the Head of School is not available any other member of the safeguarding team can lead safeguarding processes and request support from relevant staff who support the individual student.
- 6.3 The College acknowledges and will respond to the additional safeguarding challenges associated with students' with SEN and/or disabilities. This includes:
- Being aware that the students' behaviour, mood and possible injuries may relate to possible abuse and just their SEN or disability.
  - These students' are at higher risk of peer group isolation
  - That issues such as bullying may have a disproportionate impact on the student compared to those without SEN or disabilities
  - That there will be potential communication challenges which may require specialist support when liaising with students'
- 6.4 The College will provide an appropriate level of pastoral support for all students' subject to safeguarding concerns.
- 6.5 As a significant proportion of students' with SEN and disabilities are aged 19+ consideration will need to be given to obtaining consent prior to referral subject to the terms of section 3.4 on page 5. The College does not require consent from students' aged 19+ for any concerns to be raised with relevant external parties; however, the information passed on should be proportionate with the student advised of the referral is appropriate.

## 7.0 ALLEGATIONS MADE BY ONE STUDENT AGAINST ANOTHER

7.1 Details relating to how allegations made by one student against another are addressed provided in the '*Managing Allegations against students' Policy*'. This policy should be used in the event of potential safeguarding issues associated with peer on peer abuse concerns.

## 8.0 ALLEGATIONS AGAINST A MEMBER OF STAFF

8.1 All staff are made aware of the need to maintain a professional relationship with students' at all times and the need to take all reasonable precautions in order to protect themselves from false allegations. (Appendix D: Guidelines for safer working practice)

- If an allegation or suspicion of abuse is made against a College employee, then this must be reported to the Designated Senior Lead as soon as possible.
- If the Designated Senior Lead is the subject of the allegation or complaint, then the matter should be reported to another member of the Senior Management Team. All information must then be passed to the Principal who will implement the appropriate procedures.
- If the Principal is the subject of the allegation or complaint, then the matter should be reported to the Clerk of the Governing Body. They will then liaise with the Chair of Governors to implement the appropriate procedures.
- In all instances of an allegation being made against a member of staff, Human Resources and the HCC Local Authority Designated Officer must be notified as soon as possible.

8.2 The Designated Safeguarding Lead or Principal will take any steps necessary to ensure the safety of the student/staff/visitors in question and will liaise with members of the Human Resources Department as required.

- An initial assessment will be carried out on the basis of the information received and a decision made as to whether the allegation warrants further investigation.
- The Designated Safeguarding Lead will report the allegation to the Hampshire County Council LADO and obtain advice on how to proceed.
- Where appropriate the College will inform the Independent Safeguarding Authority of any individual who poses a threat to young people or vulnerable adults.
- In relation to allegations linked to the Duty to Prevent agenda the Police and/or Local Authority will be notified.

This policy should be used in consideration of the following associated documents:

- Off-site Visits Policy
- E-Safety Policy
- Single Equality Plan
- Equality and Diversity Policy
- Anti-Bullying Policy
- Recruitment Policy
- Drugs & Alcohol Misuse Policy
- Work-related placements procedures

<b>Responsibility:</b>	<b>Approved by:</b>	<b>Date:</b>	<b>Review Date:</b>
Designated Safeguarding Lead	Governors	September 2021	September 2022

## GLOSSARY

For the purposes of this policy and its associated procedures the following definitions will be considered to apply:



**Child**

The Children Act of 2004 defines a child as a person under the age of 18.

**Adult**

Any person aged 18+

**Child Abuse**

Child abuse can involve any one or more of the following:

- **Physical abuse**  
This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Fabricated or induced illness may also constitute physical abuse, whereby a parent or carer feigns the symptoms of, or deliberately causes ill health in a child.
- **Sexual abuse**  
This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- **Emotional abuse**  
This is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
- **Neglect**  
This is the persistent failure to meet a child's basic physical and psychological needs, likely to result in serious impairment of the child's health and development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

**ADDENDUM RE: COVID-19 PANDEMIC AND COLLEGE CLOSURE**

**REVISED ARRANGEMENTS RELATING TO SAFEGUARDING OF STUDENTS' DURING SITE CLOSURE**

## **Context**

From 8<sup>th</sup> September 2021 the College resumed full onsite curriculum delivery following the enforced closure of schools and colleges on 20<sup>th</sup> March 2020.

In the potential event that there is the need for a further lockdown which will require the partial or complete closure of college for onsite delivery (wherever possible the College will remain open only for those young people of workers critical to the COVID-19 response - who absolutely need to attend) these additional safeguarding measures are in place to ensure we continue to provide appropriate levels of engagement and support in order to meet our safeguarding duties to each student.

This addendum to the College Student Protection and Duty to Prevent Policy contains details of our individual safeguarding arrangements in response to the unprecedented circumstance we find ourselves following Government measures to curb the spread of COVID-19. The adaptations cover the following areas:

- Vulnerable students'
- Students'' eligible for Free School Meals
- Attendance monitoring
- Designated Safeguarding Lead and cover arrangements
- Reporting a concern
- Safeguarding Training and induction
- Safer recruitment/volunteers and movement of staff
- Online safety in schools and Colleges
- Student and online safety away from College
- Supporting students' not in College
- Supporting students' in College
- Managing Allegations against other students' - Peer on Peer abuse
- Communication

## **Vulnerable Students**

'Vulnerable Students' include those who have a social worker and those children and young people up to the age of 25 with Education, Health and Care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, where appropriate, to decide whether they need to continue to be offered a College place in order to meet their needs, or whether they can safely have their needs met at home. Many children and young people with EHC plans can safely remain at home and should do so where possible to minimise health risks for themselves and others.

The Designated Safeguarding Lead (DSL), Safeguarding Team (including Welfare Officers) know who our most vulnerable children are and will be responsible for identifying these students' and ensuring they are targeted for appropriate levels of support. All requests for the College to offer provision onsite are to be forwarded to the Vice-Principal who will liaise with Senior Managers, including the DSL to consider each request in line with the guidance set by Government. The College will work with and support student's social workers to help protect our most vulnerable learners. This includes students' who are care leavers.

## **Students Eligible for Free School Meals**

In accordance with guidance from the Government the College will provide all students' in receipt of Free School Meals (FSM), with a voucher that entitles them to purchase food at the College refectory.

## **Attendance Monitoring**

Where we have students' in the identified categories attending College during the period of enforced site closure the College will provide daily updates to the DfE via their online submission form. This will be led by the Management Information Systems (MIS) team with attendance information provided by College senior staff. Attendance will also be logged on the College register system.

All students' not attending College will be marked with a neutral register mark specifically created for this period of site closure.

Teaching and support staff will complete weekly contact logs which will be used to review engagement in learning activities and contact from staff (teaching and support). Students' who have not engaged in any given week will be prioritised for targeted engagement.

## **Designated Safeguarding Lead (DSL) and Cover Arrangements**

Andy Grant (Principal) had previously delegated DSL duties to Sarah Hounsell (Head of Enhanced Curriculum and Welfare) under agreement with the Local Governing Body and Trust CEO.

Sarah is supported by Deputy DSLs with Mandi Cross (Head of Dept for Foundation Learning), Karen Murray-Gow (Coordinator for Mental Health and Well-Being) and Paula Lamport (Student Welfare Officer) undertaking these duties as Safeguarding Officers. The team are supported by Dan Mann (Director of Learning for the School of Sixth Form) as a trained member of the safeguarding team.

Where we have students' engaged in activities onsite the Principal will be the onsite DSL. In all other circumstances Sarah Hounsell will assume this responsibility. Principal will assume this responsibility if the DSL is unable to assume these duties and vice versa. If neither the DSL nor Principal can assume these duties then Trust CEO will nominate a member of the Deputy DSLs to assume DSL responsibilities. The DSL will continue to engage with social workers, and coordinate engagement in all multi-agency meetings where these can be undertaken remotely.

## **Reporting a Concern**

Where staff have a concern about a student, they should continue to follow the process outlined in this policy. Staff can contact the DSL by email at [shounsell@stvincent.ac.uk](mailto:shounsell@stvincent.ac.uk) or alternatively [agrant@stvincent.ac.uk](mailto:agrant@stvincent.ac.uk) if DSL unable to undertake duties.

Staff are reminded of the need to report any concern immediately and without delay.

All reporting mechanisms for raising concerns about the safety and welfare of any student remain in line with the processes within this policy.

## **Safer Recruitment/Volunteers and Movement of Staff**

When recruiting new staff, St Vincent College will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

The College name will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE. The College will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral. During the COVID-19 period any referrals will be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk)

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that the College is aware, on any given day, which staff will be in the College, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, St Vincent will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

During the current pandemic staff are not to move between the St Vincent and Richard Taunton site unless essential to maintain continuation of remote teaching and business continuity.

### **Safeguarding Training and Induction**

Safeguarding training will be provided remotely where required whilst the site is closed and there remains a threat of the COVID 19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing College staff have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (2021). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a student.

In the event that new staff are recruited, they will continue to be provided with a safeguarding induction and training remotely. All existing safer recruitment processes will be adhered to during this period of site closure (see below). The College will not enable any new volunteers to commence support for the College whilst under site closure.

### **Online Safety in College**

The College will continue to provide a safe environment, including online. This includes directing students' to only use known, trusted and safe online learning resources. Where students' are using computers in College this will be subject to supervision and our firewall/security systems.

### **Children and Online Safety Away from College**

It is important that all staff who interact with students', including online, continue to look out for signs that a student may be at risk and report any such concerns as per this policy.

Online teaching should follow the same principles as set out in the College code of conduct and St Vincent will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms
- The live class should be recorded where possible so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time
- Language must be professional and appropriate, including any family members in the background,
- One to one video conference is not permitted due to potential safeguarding risks to students'' and staff. The only exception is for welfare based communications whereby face-to-face engagement supports relevant staff to determine that students'' are safe and well. Such engagements must be approved by the DSL or a senior manager.
- Staff must only use platforms approved for use by their managers

- Staff should record, the length, time, date and attendance of any sessions held.

The College will also email students' online safety information and promote such practice via our social media.

### **Supporting Students' when not in College Due to Site Closure**

The College is committed to ensuring the safety and wellbeing of all of its students'. All students' are subject to regular attempts to contact them by phone and email in addition to structured online teaching activities during the COVID-19 site closure. Engagement is recorded and logged by staff on a weekly basis with those students' identified as vulnerable subject to targeted engagement and support from our welfare and support services. These are reviewed by Heads of Department and Senior Managers and actions directed where appropriate to safeguard our most vulnerable students'.

The College will share safeguarding messages by email with students', parents and staff and will also provide updates on the College on its website and social media pages.

Guidance and advice from the Government regarding keeping students' and their family safe will be distributed as and when made available to the College.

### **Supporting Students' who are Required to Attend College**

The College is committed to ensuring the safety and wellbeing of all its students'. In the event that students' have to access College the site will continue to be a safe space for all students' to attend and flourish. The Principal will ensure that appropriate staff are on site and staff to students' ratio numbers are appropriate, to maximise safety.

The College will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19. The College will ensure that where we care for the students' of critical workers and vulnerable students' on site, we ensure appropriate support is in place for them. This will be bespoke to each student dependent on the level of need they have.

The Principal will fundamentally take any decision regarding whether or not the site should remain open to students' in the identified categories following assessment of risk with the CEO of the Lighthouse Learning Trust. Consideration will be given to the impact of staff absences due to ill health/self-isolation, risk of exposure to COVID-19 for students' and staff and the latest Government guidance.

### **Managing Allegations Against Other Students' - Peer on Peer abuse**

The College recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims. Should we receive a report of peer on peer abuse, the College will follow the principles as set out in our Managing Allegations against other Students' Policy which encompasses Part 5 of KCSIE and of those outlined within this policy.

The College will listen and work with the young person, parents/carers and any multi-agency partners required to ensure the safety and security of that young person.

### **Recording Concerns**

Any safeguarding concerns need to be shared with the DSL at the earliest opportunity. All concerns must be recorded as 'confidential' on Pro Solution/Monitor and the DSL copied in to any recorded entries. The DSL will advise all staff on any reporting processes required in the event that a concern for a student's welfare is raised.

### **Communication**

During the period of site closure the College senior management will maintain communications with students', parents, staff, governors and our wider community by the use of emails, text messages, website updates, conference calls (for staff/governor communications) and social media posts.

## **END OF ADDENDUM**

Produced on 22<sup>nd</sup> September 2021 and approved by SMT on Monday 28<sup>th</sup> September 2021

The policy and addendum has been revised in September 2020 following publication of the new Keeping Children Safe in Education 2021' and is to be reviewed and approved by the Local Governing Body on Monday 4<sup>th</sup> October 2021

## **APPENDIX A - DUTY TO PREVENT**

The Counter-Terrorism and Security Act places a legal duty on Colleges (and many other organisations) to 'have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism'. Preventing people becoming terrorists or supporting terrorism also requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The Act requires Colleges to have regard to the 'Prevent Duty Guidance' which is currently in draft form.

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. St Vincent College is aware of these risks and are familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism. It is the aim of the College to stop people from becoming terrorists or supporting terrorism by working with students', staff and our communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity.

### **RESPONSIBILITY FOR CONTACTING APPROPRIATE SERVICES REGARDING CONCERNS**

The College has developed internal support mechanisms and the referral procedures detailed in this policy as well as supporting guidance for staff and students'. This procedure outlines who staff and students' should contact with any concerns about fellow staff or students'. If, once internal processes are completed, it is considered that additional external support or referral is required this can be arranged via the Designated Senior Manager for Safeguarding (if the concern is about this post holder the Principal will assume responsibility). External support will normally involve an individual being asked to voluntarily receive tailored support from relevant external individuals or organisations.

If a concern is raised the Police and/or Local Authority will be notified. They will then determine if a 'Channel' multi-agency, early intervention process with relevant partners is required. The College is committed to support appropriate interventions to support the Prevent agenda and we will work with these services to identify and provide appropriate support and access to services.

Any of the following people are responsible for making decisions to contact the Counter-Terrorism Team at Hampshire Police if serious concerns are raised about a student, staff member or visitor:

- Head of School (SPL and Welfare)
- Head of Specialist Curriculum
- Student Welfare Officers

*NB: As outlined in Keeping Children Safe in Education anyone has the right to refer to Social Care regarding any concerns for an individual. The College gives this right with regards to extremism and anyone can report a concern to Hampshire Police via 101. Where this does occur please inform the Designated Senior Manager for Safeguarding.*

## APPENDIX B – CONTACT INFORMATION FOR THE LOCAL AUTHORITY

### Hampshire County Council contact details

#### Point of contact if you have concerns for the safety of a child:

Contact the **Children's Services Department**

During office hours - 8.30am – 5:00pm

Tel: - **0300 555 1384**

At all other times you should contact the out-of-hours Service: **0300 555 1373**

#### Point of contact if you have concerns for the safety of an adult:

Contact **Hampshire Adult Services**

During office hours - 8.30am - 5pm Monday - Thursday

- 8.30am - 4.30pm on Friday

Tel: - **0300 555 1386**

Out of office hours - after 5pm until 8.30am Monday - Thursday,

after 4.30pm Friday to 08.30am Monday and Bank Holidays

Tel: - **0300 555 1373**

In an emergency and if it is suspected someone is in immediate danger, 999 should always be called.

Other useful contact numbers include:

Organisation	Phone Number
Hampshire Adult Services	0300 555 1386
Portsmouth Adult Services	023 9268 0810 023 9282 2251 (out of hours)
Portsmouth Children's Social Care	023 9283 9111 0845 600 4555(out of hours)
Portsmouth Joint Action Team (MASH)	0845 671 0271
Child Abuse Investigation Team (Police)	023 9289 1639
DV Help for Men (Refuge)	0808 2000 247
PCC Refuge	023 9229 1034
Aurora New Dawn	023 9247 2165
SDAS Services	East Hampshire - 01420 590109 Fareham & Gosport - 01329 285375 Havant - 023 9248 0246 Email: <a href="mailto:info@southerndas.org">info@southerndas.org</a>
Solent MIND	023 8202 7810
Fareham & Gosport MIND	01329 281 445 and 07757 508723
Specialist CAMHS	01962 831044
Solent CAMHS	023 8060 8900

*NB: As outlined in Keeping Children Safe in Education (April 2014), anyone has the right to refer to Social Care regarding any concerns for an individual. The College gives this right with regards to extremism and anyone can report a concern to Hampshire Police via 101. Where this does occur please inform the Designated Senior Manager for Safeguarding.*



## Safeguarding/Child Protection/Duty to Prevent

<b>Student Name</b>	
<b>Student DoB</b>	
<b>Is the student a LAC</b>	
<b>Is the student known to Social Services</b>	
<b>Date Form Completed</b>	
<b>Date &amp; Time of Incident</b>	
<b>Staff Member(s) Involved</b>	

<p><b>In the box below, please give a detailed account of the incident/disclosure/general concern. Continue on a separate sheet of paper if necessary.</b></p>

<p><b>Action taken by designated Safeguarding team member.</b></p>
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**Please give detailed response and never leave blank.**

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<b>Agency/agencies referred to (if any)</b>	
<b>Name of Safeguarding team member completing report</b>	
<b>Signature of Safeguarding team member</b>	

## APPENDIX D – GUIDELINES FOR SAFER WORKING PRACTICE

### Introduction

All adults who come into contact with young people and vulnerable adults in their work have a duty of care to safeguard and promote their welfare. The Children Act 2004, through the Stay Safe outcome of Every Child Matters, and the Safeguarding Vulnerable Groups Act 2006, place a duty on organisations to safeguard and promote the well-being of young people and vulnerable adults. This appendix also implements statutory guidance from *Keeping Children Safe in Education*. This includes the need to ensure that all adults who work with or on behalf of young people and vulnerable adults are competent, confident and safe to do so.

The vast majority of adults who work with young people and vulnerable adults act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for the people in their care. However, we recognise that in this area of work tensions and misunderstandings can occur. The behaviour of adults can give rise to allegations of abuse being made against them, which may be malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine and there are adults who will deliberately seek out, create or exploit opportunities to abuse young people or vulnerable adults. It is therefore essential that all possible steps are taken to safeguard young people and vulnerable adults and ensure that the adults working with them are safe to do so.

The aim of these guidelines is to provide clear and practical advice and guidance for all staff in their work with our students' by raising their awareness of illegal, unsafe and inappropriate behaviours.

**Each guideline should be interpreted in accordance with the latest government guidance regarding social distancing and COVID-19 safety measures.**

Issue	Potential Risk	Guidelines
Physical Contact: Comforting	Risk of allegation or misunderstanding	<ul style="list-style-type: none"> <li>Not all students' feel comfortable about physical contact and staff should not make the assumption that it is acceptable practice to use touch as a means of communication or that students' seek physical comfort if they are distressed. You must ensure you never touch a student in a way that may be considered indecent.</li> </ul>
Physical Contact: Restraint	Risk of allegation or misunderstanding	<ul style="list-style-type: none"> <li>The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a student's behaviour if it is necessary to prevent personal injury to the student, other students' or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. You must record and report as soon as possible after the event any incident where physical intervention has been used. Ideally you should call premises/security for help whenever possible.</li> </ul>
Physical Contact: Sport and Performing Arts	Risk of allegation or misunderstanding	<ul style="list-style-type: none"> <li>Always tell the student what you need to do (eg reposition their foot) and ask if they are happy for you to do this. Ensure you have a witness and if they are not happy don't do it.</li> </ul>
Physical Contact: First aid and personal care	Risk of allegation or misunderstanding	<ul style="list-style-type: none"> <li>There are specific guidelines for staff who provide first aid or personal care</li> </ul>

<b>Issue</b>	<b>Potential Risk</b>	<b>Guidelines</b>
One-to-one situations eg tutorials	Risk of allegation or vulnerability if a sensitive or violent situation were to arise	Consider how you are seated: don't allow the student to sit between you and the door. Leave the door slightly open, especially if there is no window in the door. Ensure someone knows that you are seeing the student.
Transport	Risk of allegation or vulnerability	Do not offer lifts to a young person or vulnerable adult unless this has been checked with your line manager and has been agreed with the parents/carers. There may be occasions where a student requires transport in an emergency situation or where not to give a lift may place a student at risk. Wherever possible you should be accompanied by another member of staff. Such circumstances must always be recorded and reported to a senior manager and parents/carers.
Trips	Risk of allegation	You must ensure that your behaviour remains professional at all times. Where there are overnight stays, careful consideration needs to be given to sleeping arrangements and the gender mix of staff. Students' and parents should be informed of these prior to the start of the trip.
<b>Personal information</b> <ul style="list-style-type: none"> <li>• Mobile phones</li> <li>• Email</li> <li>• Address</li> <li>• Social networking</li> </ul>	Risk of bullying, stalking, allegation	<ul style="list-style-type: none"> <li>• Don't give out your personal mobile phone number to any student except when necessary on College trips (it should then be made clear to students' that they are only to use this during the trip). See also text messaging policy and procedures.</li> <li>• Any emails sent to students' should use your College email address not your personal email and should use a professional tone.</li> <li>• You should not give a student your home address.</li> <li>• Don't invite or accept current students' as 'friends' on Facebook. If ex-students' are 'friends' then you should still retain the same professional tone regarding any communication with them. Avoid putting photos of yourself on Facebook which may show you in a vulnerable position</li> </ul>
Social contact	Risk of allegation or vulnerability if a sensitive or violent situation were to arise	You should not invite a student into your home, unless the reason for this has been firmly established and agreed with parents/carers, where appropriate, and your line manager.
<b>Sexual contact</b> <ul style="list-style-type: none"> <li>• Students' under 18</li> <li>• Students' over 18</li> </ul>	Illegal behaviour	<ul style="list-style-type: none"> <li>• No member of staff should have a sexual relationship with a student under 18. The Sexual Offences Act 2003 states: "Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity".</li> <li>• Any member of staff in a sexual relationship with a student over 18 should inform their line manager and SMT.</li> </ul>

These guidelines aim to cover most situations but if you are in any doubt see Sarah Hounsell – Director of Learning for Enhanced Provision and Adult Community College. If you have a particular concern that an action may have been misinterpreted, you should report it to your line manager as soon as possible after it has occurred.