

# Child Protection (Safeguarding) Policy and Procedure

Publication Date	
Version Number	1.1
Policy Owner	Vice Principal (Student Experience)
Approval Level (committee)	LGB and Trust Board
Applies To (job roles relevant to)	All staff members with connections to students
Next Review Due	
Equality Impact Assessment	

## **Policy Purpose:**

The central purpose of the Lighthouse Learning trust is to transform communities ensuring that all students leave a place of learning having experienced high quality teaching, a safe and inclusive environment, enriching activities and guidance that support them in their next phase of education, training or working.

The trust recognises that it cannot make a commitment of this kind without being committed to the safeguarding and safekeeping of its students. In accordance to the relevant law and guidance, the policy sets out our procedures for safeguarding and child protection. It applies to all Lighthouse Learning staff (trust wide and college-based), governance and board members, external colleagues who interact on college sites and volunteers. It should be used in conjunction with Safeguarding and Child Protection Supplementary document which outlines high risk and emerging needs and provides links to detailed literature to support staff's knowledge of these key issues.

This safeguarding policy takes into consideration that our colleges may host young students aged between 14-16 as well as vulnerable adults and so this policy also applies to them too.

This safeguarding and child protection policy is intended for use across the Lighthouse Learning Trust. The policy should be followed and adhered to in all situations and circumstances when the safeguarding of our students is at stake.

## **Procedures:**

**1.1** In our college we recognise that because of the day to day contact with our students, college staff and volunteers are well placed to observe signs of harm, abuse, neglect, child-on-child abuse, victimisation and/or exploitation. Therefore we will all ensure arrangements are in place to safeguard and promote the welfare of children by:

- Maintaining an environment where all students feel secure, are encouraged to talk and are listened to
- Maintaining a “zero tolerance” to child-on-child abuse (formerly known as peer on peer)
- Ensure all students know the adults in the college who they can approach if they have concerns
- Teaching students to keep themselves safe from all forms of abuse including; child sexual exploitation, female genital mutilation, forced marriage, extremism, radicalisation and child on child abuse.
- Monitoring and supporting children who are subject to child protect plans and contributing to the implementation of the plan
- Ensuring the suitability of all staff through safe recruitment practice
- Ensuring that through all recruitment safeguarding responsibilities are clearly evident and advertised
- Ensuring that through recruitment of safeguarding leads the description is clearly advertised
- Ensuring all Lighthouse Learning staff and volunteers understand their responsibilities with regard to safeguarding and child protection
- Ensuring that parents and carers have an understanding of the responsibility placed on the college and its staff for safeguarding and child protection
- Maintaining awareness of those students who are persistently absent or missing from college
- Maintaining clear procedures for reporting allegations against staff members

**1.2** And we support our staff by:

- Providing effective, ongoing training and development (see section 16)
- Providing supervision or counselling if staff are affected by the disclosure
- Addressing concerns and making robust referrals to other agencies, at the earliest opportunity
- Developing effective links with relevant external agencies in all matters regarding safeguarding, child protection
- Proactively sharing information as early as possible to support students and their families
- Keeping meticulous, written records (CPOMS) of concerns about students, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely.

Records will include:

- A summary of concerns
- Details of the concern
- What action was taken and follow-up
- Actions and outcomes

**1.3** The Lighthouse Learning Trust recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The college may be the only stable, secure and predictable element for in the lives of children at risk. The college will support all students through:

- Appropriate staff conduct, in line with the policy
- Relevant curriculum design and implementation to teach students about staying safe at all times, including when they are online
- Consistent implementation of the college's Health and Safety, Anti-bullying, Safer Recruitment, Behaviour and Online safety policies and related practices
- Close and proactive liaison with other agencies such as social services, Child and Adult Mental Health Service and Psychology Services

**1.4** In line with government guidelines in KCSiE 2022, our college will (where reasonably possible), hold two emergency contact numbers and an E-mail address per student. This provides the college with additional options for making contact with a responsible adult when a student is absent from college and is also identified as a welfare and/or safeguarding concern.

## **2.0 Safeguarding Children and Vulnerable Adults**

**2.1** KCSiE 2022 writes about the importance of the context in which school and college safeguarding must be considered, including behaviours that are associated with factors outside the college which can occur between children outside of these environments i.e. whether children are at risk of abuse or exploitation in situations outside of their families.

**2.2** Safeguarding covers a broad range and aims to achieve the following:

- Protecting students from maltreatment
- Preventing impairment of students' health and/or development
- Ensuring students are living in circumstances consistent with the provision of safe and effective care
- Undertaking that role so as to enable students to have optimum life changes, so they can enter adulthood successfully

**2.3** Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as:

- Staff conduct
- Health and safety
- Bullying
- Child-on-child abuse (formerly known as peer-on-peer)
- Online Safety
- Arrangements for meeting the medical needs, providing first aid and/or intimate care
- Security of the building
- Alcohol, drugs and substance misuse
- Positive behaviour management
- Physical intervention and restraint

**2.4** Within our college our DSLs will consider the local context of safeguarding in their early working in any safeguarding process. This involves looking at how issues affect students at home, in the community and at college.

We will ask “what are we protecting our students from” and consult with the Local Authority, staff and students for their views.

This means that in our college we:

- Recognise the importance of proactive information sharing between professionals and other agencies as vital in identifying and tackling all forms of abuse
- Will not allow concerns about sharing information to stand in the way of protecting the safety and welfare or any of our students
- The college will (where reasonably possible) hold two emergency contact numbers and an E-mail address per student.
- In our college, all of these policies are accessible for staff, parents and community to read
- We will record when staff have been given this policy using the Lighthouse Learning Trust Annual Declaration Process and we will expect our staff and volunteers to adhere to it
- Staff will be able to discuss policies with their line manager if they don't understand the policy

**2.5** 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.

**2.5(i)** 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.

**2.5(ii)** 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.

**2.5(iii)** 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.

**2.5(iv)** 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 College VLE and guidance produced for staff relating our Duty to Prevent.

**2.5(v)** 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.

### **3.0 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, Child Protection and Duty to Prevent Incident/Disclosure Record form (Appendix C) should be used wherever possible – available on Moodle 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.

#### **4.0 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.

### **3.0 Students' with Special Educational Needs and Disabilities (SEND)**

**3.1** If a student with SEND is subject to safeguarding concerns the college acknowledge and will respond to the potential additional challenges in supporting that student.

**3.2** Safeguarding concerns relating to students' with SEND will be led by the DSL with the support of a lead in SEND e.g. Personal Tutor, Head of SPL and High Needs Funding Manager, SENCO, Trust Manager for SEND who can provide additional understanding around SEND related conditions.

**3.3** The college acknowledges and will respond to the additional safeguarding challenges associated with students' with SEND including:

- Their behaviour, mood and possible self-inflicted injuries masking or obscuring possible abuse by others and ensuring that any concerns are fully investigated
- Being at a higher risk of isolation from other students and others within the college which may affect disclosures and ensuring that there is a designated keyworker who they can speak to
- Potential communication challenges which may affect disclosures and ensuring that there is specialist support for liaising with students

**3.4** Where a student with SEND is aged 19+ consideration will need to be given to obtaining consent prior to referral. The college does not require consent from students' aged 19+ for any concerns to be raised with relevant external parties, however, information should be passed on that is proportionate with the safeguarding concern and the student should be advised of the referral.

#### **4.0 Multi-Agency Safeguarding Arrangements**

**4.1** There may be safeguarding issues that are specific to the local area or population that need to be identified in partnership with the Multi-Agency Safeguarding Arrangements (MASA) and or other agencies such as gang membership, FGM, Child Criminal Exploitation (CCE including CSE), extremism and the safeguarding of vulnerable adults.

**4.2** Staff at our college are made aware of specific issues relating to the locality that could impact the safety of students at the college through comprehensive staff training and bulletin updates.

**4.3** We will also ensure that our students are kept informed of issues within their RSE and PHSE curriculum, acknowledging and recognising that the risk will present differently between male, female, trans and non-binary students.

#### **5.0 Data Protection and Sharing Safeguarding Information – UK GDPR**

**5.1** In our college the UK GDPR and Data Protection Act 2018 will **not** prohibit information about students being shared with specific authorities if it is for the purposes of safeguarding students and individuals at risk.

**5.2** Information that could be relevant to keeping a student safe will be shared so that informed decisions can be made about a student's welfare. We recognise that we have a duty of care for our students and safeguarding is of the utmost importance to us.

**5.3** UK GDPR does not override safeguarding. The sharing of safeguarding data is necessary for the protection of students. Therefore, consent is not needed for the effective sharing of safeguarding information between a college and relevant authorities. However, the college will ensure compliance with our legal obligation to which the Lighthouse Learning Trust is subject.

**5.4** Photographs and films represent key ways of making memories or events within college and the Lighthouse Learning Trust recognises its legal obligations to Data Protection in the processing of personal data. As such we will seek consent from the student, teachers and other adults before taking and publishing photographs. Consent is completed at enrolment but students should be made aware that they can withdraw consent at any time. Consent is considered given for the duration of the time the student is registered or earlier if consent is withdrawn.

**5.5** The Lighthouse Learning Trust requires that in general, for the protection of students, consent should be obtained to name students alongside their photograph when used in college publications such as newsletters, prospectuses and websites.

**5.6** This means that in our college we will apply the Lighthouse Learning Trust guidance issued around photography, social media, websites and printed publications in colleges.

## **6.0 Training and Development of staff and governors**

**6.1** All staff and governors must complete safeguarding and child protecting training as part of their induction and continue to undertake annual safeguarding and child protecting training as organised by the DSL. Similarly, all staff must access update briefings on safeguarding child protection each year.

**6.2** The DSL team will be appropriately trained and demonstrate attendance at Local Authority and Multi-Agency Safeguarding Arrangement meetings as required but as a minimum every three years.

## **7.0 Allegations against members of staff**

**7.1** All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of the Principal immediately. Within one working day all concerns and allegations should be raised with:

- Allegations about a member of staff including supply: must be reported to the Local Authority Designated Officer (LADO) and the DSL
- Allegations against the Principal: Reported to the CEO and Trust Chair
- Allegations against the CEO: Reported to the Trust Chair and Governance Manager
- Allegations against a member of the governing board: The CEO
- Allegations against the Trust Chair and/or Governance Manager: Reported to the CEO and Chair of Audit & Risk Committee

**7.2** If the allegation meets Harms criteria, the Principal (or member of the senior executive team as appointed by the Principal) must report it to the Local Authority Designated Officer (LADO) the same day. If it is alleged that a teacher or member of staff (including a volunteer or governor) has:

- Behaved in a way that has harmed a student or may have harmed a student
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

**7.3** Where an allegations is made against a supply teacher, a member of the senior executive team (SET) will immediately contact both the agency concerned and the LADO. Our college will support any investigation that is required.

**7.4** The SET staff member will act as the 'case manager' and following the direction of the LADO will commission an investigation and liaise with the LADO as to the actions required.

**7.5** During an investigation, the college may suspend or redeploy the member of staff.



**7.6** At the conclusion of any investigation if enough evidence is gathered to have foundation then a referral will be made to the DBS Authority as soon as possible.

**7.7** Concerns that do not meet the Harms threshold will be fully investigated within our college and the appropriate actions recorded in the personnel files.

**7.8** Where allegations are found to be unsubstantiated or false these will not be recorded in personnel files and action will be considered against those who raised the allegation.

**7.9** For other allegations, the Principal or Vice Principal for Student Welfare and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer.

**7.10** The Local Authority's Designated Officer (LADO) must be informed of all allegations that come to the colleges' attention that meet the criteria so that they can consult the police and social care colleagues as appropriate. All alleged physical injuries must be investigated by the appropriate external agencies.

## **8.0 Suitability of staff and safer recruitment practices**

**8.1** Safe recruitment practices are an essential part of creating a safe environment for children and young people. As such, in accordance with the Keeping Children Safe in Education 2022, we will require a risk assessment for each volunteer. Where the volunteer is undertaking regulated activity an enhanced DBS and barred list check will be taken. Where the volunteer is not in regulated activity we will undertake an enhanced DBS but are not legally allowed to do a barred list check.

**8.2** 'Due Diligence' checks will be conducted for external visitors working with students independently of the students. If they do not have DBS checks, the member of staff who invited them will ensure they are escorted throughout the buildings for the time they are onsite.

**8.3** The Single Central Record (SCR) is on Cintra. It is a commitment to safeguarding and is maintained by the HR team and audited on a regular basis. The SCR is overseen and directly managed by the Director of HR and is reviewed:

- Every half term by the Director of HR
- By the Local Governing Board (LGB) as part of their checks and quality assurance of the Director of HR

**8.4** The DSL or their deputy will provide all new staff with training to enable them to fulfil their role and understand the child protection policy, the supplementary document, behaviour/code of conduct policy.

## **9.0 Confidentiality and Record Keeping**

**9.1** Staff have the professional responsibility to share relevant information about the protection of children with the DSL, Vice Principals and Principal and potentially external investigating agencies.

**9.2** If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that they have a responsibility to refer the matter to the Designated Safeguarding Lead (DSL) to ensure their welfare. We will seek to reassure the student that the matter will only be disclosed to the DSL who will then decide on appropriate action.

**9.3** Accurate written notes will be written onto CPOMS in a timely manner of all incidents or child protection concerns relating to individual pupils.

**9.4** As part of their contractual arrangements any external individual or organisation with the college, be required to work in accordance with the colleges' child protection and safeguarding policy.

**9.5** Working in partnership with parents is important, the college should endeavour to do this at all times. It is recognised that there are occasions when it is in the child's best interest for work to be undertaken and referrals made without the parents initial consent to ensure the welfare and safety of our students.

**9.6** We will aim to help parents understand that the college has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the best interests of the student. As such we will aim to be transparent in our communications:

- We will consider the safety of the student and should a concern arise the DSL has the responsibility to seek advice prior to contacting parents.
- Make our policies available on the website and on request
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers
- Provide advice and signpost parents and carers to other services where their child requires extra support

**9.7** Colleges will ensure child protection records are kept secure and arrangements made to comply with the data protection policy. The DSL will ensure that these records are kept separately from other records such as progress or attainment records. Information from the child protection files will only be shared with relevant staff when it is necessary to do so and in a manner that is consistent with data protection legislation.

**9.8** We will make students and parents aware that their safeguarding documentation from previous settings is shared with the college. If a student transfers to another college or sixth-form provision we will ensure that safeguarding information is shared to ensure the safe and consistent support for that child.

## **10.0 Safeguarding pupils who are vulnerable to extremism; The Prevent Duty**

**10.1** The Prevent strategy aims to stop people becoming terrorists or supporting terrorism. While it remains rare for children to become involved in terrorist activity, the college recognises some, from an early age can be exposed to terrorist and extremist influences or prejudiced views. As with other forms of safeguarding strategies, early intervention is always preferable.

**10.2** The trust is aware there have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

**10.3** Within classrooms and learning spaces, pupils and teachers have the right to speak freely and voice their opinions where it does not discriminate or curtail the rights of others. Inappropriate language and offensive and discriminatory expressed thoughts should be explored with the student or staff member to ascertain whether there is an educational need or a concern around extremism.

**10.4** The college will make appropriate provision within the PSHE curriculum to ensure British Values, fundamental Human Rights, democracy; its place and importance, E-safety and the dangers of extremism are taught as part of their curriculum provision.

**10.5** The college will ensure that there is visible signage to students surrounding issues related to extremism and appropriate support is signposted for them within the college and website for students to access.

**10.6** Our trust is committed to working with the local authority and other local partners, families and communities to play a key role in ensuring young people and our communities are safe from the threat of:

- **Extremism** – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** – Defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**10.7** All college staff need to be alert to changes in student behaviour which could indicate that they may be in need of help or protection.

**10.8** The college will identify a Prevent Single Point of Contact (SPoC) who will be the lead within the college for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding lead. If there is a concern that a young person is being radicalised or at a risk of being drawn into terrorism refer to Children's Services as with any other safeguarding concern.

**10.9** The trust will ensure that the DSL and SPoC (if different) will complete training on Prevent to be cascaded to all staff.

**10.10** Due diligence checks should be undertaken by the college on any organisation that uses its facilities. This should include:

- An internet search on the organisation
- Checks with local groups
- MASA and local police checks
- Local Authority checks

**Links to other policies:**

This policy has been developed in line with the following key documents:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, updated June 2022, DfE
- Working Together to Safeguard Children, July 2018, HM Government
- Inspecting safeguarding in maintained schools and academies, September 2019, Ofsted
- Sexual violence and sexual harassment between children in schools and colleges, 2021, DfE
- Mental Health and Behaviour in Schools, 2018, DfE
- The current Lighthouse Learning E-safety Policy
- Education for a Connected World, UKCCIS 2018
- Multi-agency Statutory Guidance on Female Genital Mutilation, July 2020, HM Government
- Revised Prevent Duty Guidance for England & Wales, April 2021, Home Office
- The Children Act, 1989 and 2004
- The Education Act, 2002
- 14-16 Risk Assessment

**Document History**

<b>Version</b>	<b>Approved by</b>	<b>Date Approved</b>
1.1		