

STUDENT GUIDANCE POLICY SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

In the case of student / staff issues please contact:

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A RATIONALE

Grantham College has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children and vulnerable adults receiving education and training at the College. This policy is freely available to all staff, students and parents/carers, both current and prospective.

Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance 'Working Together to Safeguard Children'. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.

The key documents from which this policy is predicated are: Children Acts 1989 & 2004, the Education Act 2002; 'Working Together to Safeguard Children' 2018; 'Keeping Children Safe in Education' 2020 and Children and the Families Act 2014; Safeguarding Vulnerable Groups Act 2006; Counter Terrorism and Security Act 2015.

B ENTITLEMENT

Throughout these policies and procedures, reference is made to "children and young people". This term is used to mean "those under the age of 18". The governing body recognise that some adults are also vulnerable to abuse, accordingly, the procedure is applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. Vulnerable adults includes those over 18 with learning disabilities, mental health problems, physical disabilities who either temporarily or permanently may be in need of community care services and/or are unable to take of themselves or protect themselves against significant harm or exploitation.

C POLICY STATEMENT

The governing body is committed to ensuring that the College:

- Provides a safe environment for students;
- Identifies children and vulnerable adults who are suffering, or likely to suffer, significant harm and,
- Takes appropriate action to see that such children and vulnerable adults are kept safe, both at home and at the College.

D IMPLEMENTATION

In pursuit of these aims, the governing body will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for the children and vulnerable adults learning within the College;

- Aiding the identification of children and vulnerable adults at risk of significant harm, and providing procedures for reporting concerns;
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff;
- The safe recruitment of staff;
- Providing adequate training for all staff in safeguarding issues, both via staff inductions and regular refresher training;
- In developing the policies and procedures, the Corporation will consult with, and take account of, guidance issued by the Departments for Education and other relevant bodies and groups. The procedures have been developed in co-operation with Lincolnshire Safeguarding Partnership (LSP) and with reference to Department of Health / CQC guidance with regards to vulnerable adults.

All staff are required to access Part 1 of “Keeping Children Safe in Education” 2020 and to read and understand it.

The College will refer concerns that a child or vulnerable adult might be at risk of significant harm to the relevant Children’s/Adult Services, Local Police and/or LSP.

The Principal & Chief Executive and all staff working with children will receive training to familiarise them with child protection issues and responsibilities and the College procedures and policies, which includes computer use policies, with refresher training every 2 years. There will be a member of the Senior Leadership team with special responsibility for child protection issues (the Designated Safeguarding Lead) who will be assisted by other deputies, as part of the College Safeguarding team.

The governing body will receive from the Designated Safeguarding Lead an annual report which reviews the prevalence and nature of safeguarding issues within the College and how the duties have been discharged.

E RECOGNISING AND DEFINING ABUSE

All College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

The governing body recognises the following as definitions of abuse, neglect or harm.

1. Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult, or adults, or another child or children.

2. Physical Abuse

Physical abuse causes harm to a child’s person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child whom they are looking after.

3. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4. Sexual Violence and Sexual Harassment

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Sexual violence and sexual harassment can occur between 2 young people of any age and sex. It can also occur through of young people sexually assaulting or sexually harassing a single young person or group of young people. Sexual violence and sexual harassment will not be tolerated.

Sexual Violence: Under the Sexual Offences Act 2003 sexual violence is describes as;

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape.

Sexual Harassment: Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include;

- Sexual comments, such as: 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- 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. (UKCCIS sexting advice provides detailed advice for schools and colleges);
 - Sexualised online bullying;
 - Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats.

5. Up skirting

Up skirting 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. Since April 2019 Up skirting has been a criminal offence - Under the Voyeurism Act, up skirting offenders can now be arrested, face up to 2 years in prison and have their name placed on the sex offenders register if caught up skirting. This includes instances where culprits say the images were taken just for a laugh.

6. Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child 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 include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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 maltreatment of a child, although it may occur alone.

7. Child Sexual Exploitation (CSE)

Child Sexual Exploitation is the term used for contact or non-contact child sexual abuse when there is any actual or attempted abuse of a child’s vulnerability or trust and an opportunity for the abused to enhance their social standing or receive payment from third parties. Non-contact abuse includes online grooming and sexual exploitation.

8. Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not

always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

9. So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

9a. Female Genital Mutilation (FGM)

Female genital mutilation is any procedure that’s designed to alter or injure a girl’s (or woman’s) genital organs for non-medical reasons. It is sometimes known as ‘female circumcision’ or ‘female genital cutting.’ It is mostly carried out on young girls. It is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. There is a specific legal duty on teachers whereby if a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **MUST** personally report this to the Police.

9b. Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

10. Extremism and Radicalisation

Extremism is defined by the Crown Prosecution Service (CPS) as: “The demonstration of unacceptable behaviour by using any means or medium to express views, which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
- Foster hatred which might lead to inter-community violence in the UK.”

11. Financial or Material Abuse

This may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misappropriation of property, possessions or benefits.

12. E-Safety

Includes cyber bullying, exposure to unsuitable images or websites and grooming via social networks

13. Domestic Abuse

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

14. Discriminatory Abuse

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.

15. Risk to Self and/or Others

This may include, but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others which may, or may not, include children. It may also include fabricated or induced illness.

16. Peer on Peer Abuse

Most likely to include, but is not exclusive to, bullying (including cyber bullying), gender based violence, sexual assaults and sexting.

Additionally, the governing body notes and draws to the attention of the College staff the criminal offences that may be committed in connection with the welfare of children, in particular those involving abuse of trust and those which prohibit staff from engaging in or encouraging sexual activity with students who are under the age of 18 or vulnerable.

F LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

The College will work in close collaboration with the virtual school and Children's Social Services to ensure all Looked After Children (and previously Looked After Children) are identified and offered appropriate support mechanisms. The Designated Teacher for these students is Sarah High, Student Services Manager and Deputy Designated Safeguarding Lead.

G 14-16 YEAR OLDS IN COLLEGE

The College will ensure that all 14-16 year olds in College are cared for and have their wellbeing needs met appropriately.

Where young people are on the roll of another education establishment there should be protocols in places between the College Designated Safeguarding Lead and the Designated Officers at these establishments for communication regarding unexplained absence or other concerns. There will also be liaison with the parent and the other education establishment.

Young people will be appropriately supervised and registered by qualified staff in all areas of the provision.

H Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the

existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

I DESIGNATED STAFF WITH RESPONSIBILITY FOR SAFEGUARDING

Designated Safeguarding Lead

The designated senior member of staff with lead responsibility for safeguarding issues is Claire Temprell: Vice Principal: HR & Student Services (01476) 400262.

This person is a member of the Senior Leadership Team. They have a key duty to take lead responsibility for raising awareness within the staff team and wider organisation of issues relating to the welfare of children and vulnerable adults, the promotion of a safe environment for children and vulnerable adults and the awareness raising of both counter-extremism and radicalisation legislation.

They have received training in safeguarding, child protection issues and inter-agency working as required by the Lincolnshire Safeguarding Partnership (LSP). They will receive 2 day refresher training at least every 6 years, as recommended by the LSP, and commit to keeping up to date with developments in safeguarding. This includes e-learning and webinars. The Designated Safeguarding Lead is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with the Children's and Adults Safeguarding Boards;
- Providing advice and support to other staff on issues relating to safeguarding;
- Maintaining a proper record of any child protection referral, complaint or concern or vulnerable adult safeguarding concern (even where that concern does not lead to a referral);
- Ensuring that parents of children and young people within the College are aware of the College's Safeguarding policy;
- Liaising with the Local Education Authority, and Children's and Adults Safeguarding Boards and other appropriate agencies;
- Liaising with the relevant Heads of Curriculum and staff in the College to ensure that appropriate arrangements are made for the pupils under 16 years of age whilst on college premises and appropriate safeguards are put in place with employers and training organisations that receive children or young people from college on long-term placements;
- Ensuring that staff receive basic safeguarding training and are aware of the College Safeguarding procedures.

The Designated Safeguarding Lead will provide an annual report to the College Corporation setting out how the College has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the Children's and Adults Safeguarding Boards (or others) to the Corporation at the earliest opportunity.

Deputy Designated Safeguarding Leads

Other designated members of staff with responsibility for safeguarding issues are Sarah High, Student Services Manager, Jo Bowman, Student Finance & Accommodation Co-ordinator, Steve Parsons, Student Mentor, Charlotte Fisher, Mental Health & Wellbeing Adviser, Sarah Ellis, Lecturer and Sarah Done, Daybreak Manager.

These Deputy Designated Safeguarding Leads:

- Report to the Designated Safeguarding Lead;
- Will know how to make an appropriate referral;
- Will be available to provide advice and support to other staff on issues relating to safeguarding;
- Have particular responsibility to be available to listen to children and vulnerable adults studying at the College;
- Will deal with individual cases, including attending case conferences and review meetings as appropriate;
- Have received training in safeguarding, child protection issues and inter-agency working, as required by the LSP, and will receive refresher training at least every 2 years whilst committing to the 6 year training pathway.

J DEALING WITH DISCLOSURE OF ABUSE AND PROCEDURE FOR REPORTING CONCERNS

The procedure has been determined primarily by the Lincolnshire Safeguarding Partnership (LSP), which establishes the locally agreed inter-agency procedures.

If a child or vulnerable adult tells a member of staff about possible abuse:

- Listen carefully and stay calm;
- Do not interview the individual, but question normally and without pressure, in order to be sure that you understand what the individual is telling you;
- Do not put words into the individual's mouth;
- Reassure the individual that by telling you, they have done the right thing;
- Do not promise confidentiality but ensure that any information is shared only with those that need to know;
- Inform the individual that you must pass the information on and to whom you will report the matter;
- Note the main points carefully;
- Make a detailed note of the date, time, place, what the individual said, did and your questions etc.

If a staff member suspects a child/young person is at risk/being harmed, this should be initially raised with a Designated Safeguarding Lead or Deputy who should then record and monitor concerns. Facts and opinions should be clearly identified.

In the first instance, staff should not investigate concerns or allegations themselves, but should report them immediately to a Designated Safeguarding Lead or Deputy. The Designated Safeguarding Lead or Deputy will make a referral in accordance with Children's and Adult's Safeguarding Board guidelines. The Designated Safeguarding Lead or Deputy will then complete the appropriate proforma. Should a Designated Safeguarding Lead or Deputy be immediately unavailable, and action is required, then any staff member may report a concern to the Police or Children's Services.

1. Recording and Monitoring

The College will record:

- Information about the child: name (aka), address, date of birth, those with parental responsibility, primary carers, emergency contacts, names of persons authorised to collect from school, any court orders, if a child is or has been subject to a Child Protection (CP) Plan (been on the CP Register);
- Key contacts in other agencies;
- Any disclosures/accounts from the student or others, including parents;

- All concerns, discussions, decisions, actions taken and arrangements for monitoring/review.

All records should be objective and include:

- Statements, facts and observable things (what was seen/heard);
- Diagram indicating position, size and colour of any injuries (not photograph);
- Words child uses (not translated into 'proper' words);
- Non-verbal behaviours.

All Child Protection documents will be retained in a 'Child Protection' file, separate from the student's main file. This will be an electronic folder which is only accessible to the Principal & Chief Executive, the Designated Safeguarding Lead and College Safeguarding Team. The CCSS Manager will have access rights to the electronic folder for the purposes of computer security management and access.

This file will be managed in accordance with the Freedom of Information Act and the General Data Protection Act.

2. Supporting the Child, Young Person or Vulnerable Adult and Partnership with Parents/Carers

In the vast majority of cases, it is good practice to be open and honest at the outset with the parents/carers about concerns, the need for a referral, information sharing between agencies and the accompanying need for making an enquiry to the Central Children's Database or Safeguarding Board.

All reasonable efforts should be made to inform parents/carers of the referral beforehand and to seek their consent where appropriate. However, an inability to inform parents/carers nor a lack of consent should not prevent a referral being made where concerns exist. Consideration should be given to not informing them when a child, young person or vulnerable adult expresses a wish that their parents/carers are not informed at this stage.

There are cases where it would not usually be good practice to discuss concerns with parents/carers before a referral. In these cases, who discusses the concerns with the parents/carers, when, and with whom, should be agreed in advance with Social Services and/or the police. Concerns must not usually be discussed with parents/carers before referral in the following circumstances:

- Where discussion would put a child, young person or vulnerable adult at risk of significant harm;
- Where discussion would impede a Police investigation or social work enquiry;
- Where sexual abuse is suspected;
- Where organised or multiple abuse is suspected;
- Where the fabrication of an illness is suspected;
- Where to contact parents/carers would place you or others at risk;
- Where it is not possible to contact parents/carers without causing undue delay in making the referral.

A reasoned judgement must be made in each case.

3. Dealing with Disclosure of Abuse made by Vulnerable Adults and Procedure for Reporting Concerns

The general principles detailed in the section above apply in situations where a safeguarding concern exists in relation to a vulnerable adult.

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

This procedure has been created from information made available by the Lincolnshire Safeguarding Partnership (LSP) in relation to the role of the Lincolnshire Local Area Designated Officer (LADO).

This procedure applies to all staff, whether teaching, administrative, management or support, as well as to volunteers. The generic term “staff” is used for ease of description and refers to all of the staff groups.

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

It is imperative that those dealing with an allegation maintain an open mind and that investigation is thorough and not subject to delay. The College recognises that the Children Act 1989 states that the welfare of the child is the 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, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

There may be three strands in consideration of the allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by Children’s Social Care about whether a child is in need of protection or in need of services.
- Consideration by the college to investigate and if necessary take disciplinary action.

1. Enquiries and Investigations

All allegations in the first instance must be reported to the Vice Principal: HR & Student Services. They will obtain written details of the allegation from the person who received it, ensuring the details are signed and dated.

The Vice Principal: HR & Student Services will make an initial assessment of the allegation and also call the Local Area Designated Officer (LADO) in all cases for advice on how to proceed.

Where the allegation is considered to be either a potential criminal act or indicates that a student has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to Local Authority Designated Officer (LADO) without delay.

If the Vice Principal: HR & Student Services is advised by the LADO that the case needs investigating by the Police and/or Social Care, the college will support the investigation, but will not conduct an internal investigation. To do otherwise may prejudice the investigation.

If the LADO is agreeable for the college to conduct the investigation, the Vice Principal: HR & Student Services will appoint an Investigating Officer. The Investigating Officer will usually be another member of the Senior Leadership team. It is important that the Vice Principal: HR & Student Services does not investigate the allegation, as they may be required to provide procedural advice.

The Investigating Officer will keep a detailed account of the investigation to include, interviews, telephone calls and any contact in relation to the case.

Subject to no objections from the Police or other investigating agency, the Investigating Officer shall:

- Inform the young person or child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve;
- Ensure that the parents/carers of the child, young person or vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve;
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve;
- Inform the Chair of the Corporation of the allegation and the investigation;
- Keep a written record of the action taken in connection with the allegation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child, young person or vulnerable adult. The matter should be addressed in accordance with the College disciplinary procedures;
- The allegation can be shown to be false because the facts alleged could not possibly be true.

2. Suspension of Staff

Suspension should not be automatic. In respect of staff other than the Principal & Chief Executive, suspension can only be carried out by the Vice Principal: HR & Student Services. If the allegation is against the Principal & Chief Executive, suspension can only be carried out by the Chair of the Corporation, or in their absence the Vice Chair.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where a child or vulnerable adult is at risk;
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct;
- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

If the Vice Principal: HR & Student Services considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation

of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day. The Vice Principal: HR & Student Services will be responsible for ensuring the suspension letter has been issued.

Where a member of staff is suspended, the Vice Principal: HR & Student Services should address the following issues:

- The Chair of the Corporation should be informed of the suspension;
- The Governing Body should receive a report that a member of staff has been suspended pending investigation; the detail given to the governing body should be minimal;
- Where the Principal & Chief Executive has been suspended, the Chair or Vice Chair of the Corporation will need to take action to address the management of the College.

The Vice Principal: HR & Student Services shall consider carefully and review the decisions as to who is informed of the suspension and investigation.

Depending on the nature of the allegation, the Vice Principal: HR & Student Services should consider, with the Chair of Governors, whether a statement to the students of the college and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments of the case at regular intervals. The suspension should remain under review in accordance with the college disciplinary procedure.

3. The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedure. The member of staff should be informed of:

- The disciplinary charge against them;
- Their entitlement to be accompanied or represented by a trade union representative or workplace colleague.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The young person, child or children making the allegation and/or their parents should be informed of the outcome of the investigation and the proceedings. This should occur prior to the return to college of the member of staff (if suspended).

Child protection and vulnerable adult protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child and vulnerable adult protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College should assist the agencies with their enquiries.

The College shall hold its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Designated Safeguarding Lead should normally be involved in, and contribute to, the inter-agency strategy discussions. The Vice Principal: HR & Student Services is responsible for ensuring that the College gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

4. Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LADO in order that other agencies may act upon the information. The Vice Principal: HR & Student Services shall:

- Inform the member of staff against whom the allegation is made verbally and in writing that no further disciplinary or safeguarding/child protection action will be taken. Consideration should be given to offering counselling/support;
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome;
- Where the allegation was made by a child other than the alleged victim, consider informing the parents/carers of that child;
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

5. Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the college's statutory duty to inform the Disclosure and Barring Service.

6. Monitoring Effectiveness

When an allegation has been made against a member of staff, the Vice Principal: HR & Student Services should, at the conclusion of the investigation, consider whether there are any matters arising from it such as:

- Training needs
- Mentoring
- Risk Analysis
- Good Practice
- Procedural anomalies

7. Whistleblowing

Where staff members feel unable to report a concern inside of the organisation, or feel that concerns raised are not being addressed, they are encouraged to contact the NSPCC Whistleblowing Helpline on 0800 028 0285. The line is open between 08:00am and 08:00pm between Monday and Friday. Staff can email help@nspcc.org.uk

L RECRUITMENT AND SELECTION PROCEDURES

In conjunction with current recruitment policies, Grantham College should ensure robust procedures are used, avoiding any risk to students. Actions will include:

- They should apply to staff, governors and volunteers who may work with children/vulnerable adults;
- The post or role should be clearly defined;
- The key selection criteria for the post or role should be identified;
- Vacancies should be advertised widely in order to ensure a diversity of applicants;
- Require documentary evidence of academic/vocational qualifications;
- Obtain professional and character references;
- Verify previous employment history;
- Enhanced DBS check (we will maintain sensitive and confidential use of the applicant's disclosure);
- Use a variety of selection techniques (eg qualifications, previous experience, interview, reference checks);
- Conform with legislation under the 'Safeguarding Vulnerable Groups Act 2006' which includes checks using the Disclosure and Barring Service and the 'Protection of Freedoms Act 2012' which specifies when individuals are subject to a check;
- Safer recruitment training for interviewing staff;
- Risk assessing of new starters if DBS check/references not all available on start date;
- Maintenance of a Single Central Record.

All staff are aware of the Staff Code of Conduct.

M REFERRAL PROCESSES

ALL staff should be aware of their local Early Help process and understand their role in it. Chapter 1 of "Working Together to Safeguard Children 2018" provides detailed guidance on the Early Help process.

- All staff play a fundamental role in ensuring children, young people and adults are kept safe at the College through vigilance, attending training, reporting concerns and acting swiftly where there is a risk of immediate danger or harm;
- Concerns are any worries about a particular student or colleague that need to be referred onto the Safeguarding team, wherever there is a lack of surety or clarity about someone's safety;
- Risk of immediate danger or harm means a situation where action must be taken without delay in order to ensure adequate protection is put in place for the person at the centre of the issue. Staff are able to refer direct to Social Services or the Police in these circumstances should the need arise. The Safeguarding team should be advised of any such action as soon as possible.

1. Early Help Assessment (EHA)

Lincolnshire County Council and the Lincolnshire Safeguarding Partnership provide agencies and organisations working with children and vulnerable adults with a wide range of information relating to Early Help Assessments. Early Help should be instigated where a Designated Safeguarding Lead or Deputy feels that, whilst there is no immediate danger to the young person or vulnerable adult, there is need to engage other services to prevent harm coming to them in the future.

Early Help is the term used to describe arrangements and services that identify the need for help for children and families as soon as the problems start to emerge at any point in a child's life from the foundation years to teenage years, or when there is a strong likelihood that problems will emerge in the future.

Working Together to Safeguard Children (2018) identifies the critical features of effective Early Help as:

- A multi-disciplinary approach that brings a range of professional skills and expertise to bear through a Team Around the Child (TAC) approach;
- A relationship with a trusted lead professional who can engage with the child and their family, and coordinate the support needed from other agencies;
- Practice that empowers families and helps them to develop the capacity to resolve their own problems;
- A holistic approach that addresses the children's needs in the wider family context
- Simple, streamlined referral and assessment process;
- Early Help in Lincolnshire includes both the Team Around the Child (TAC) and Early Support Care Coordination (ESCO) process.

An Early Help Assessment form can be downloaded at [http://microsites.lincolnshire.gov.uk/children/practitioners/team-around-the-child-\(tac\)/forms-and-documents/53681.article](http://microsites.lincolnshire.gov.uk/children/practitioners/team-around-the-child-(tac)/forms-and-documents/53681.article) though a blank copy will be stored in the confidential Child Protection folder on the College's server.

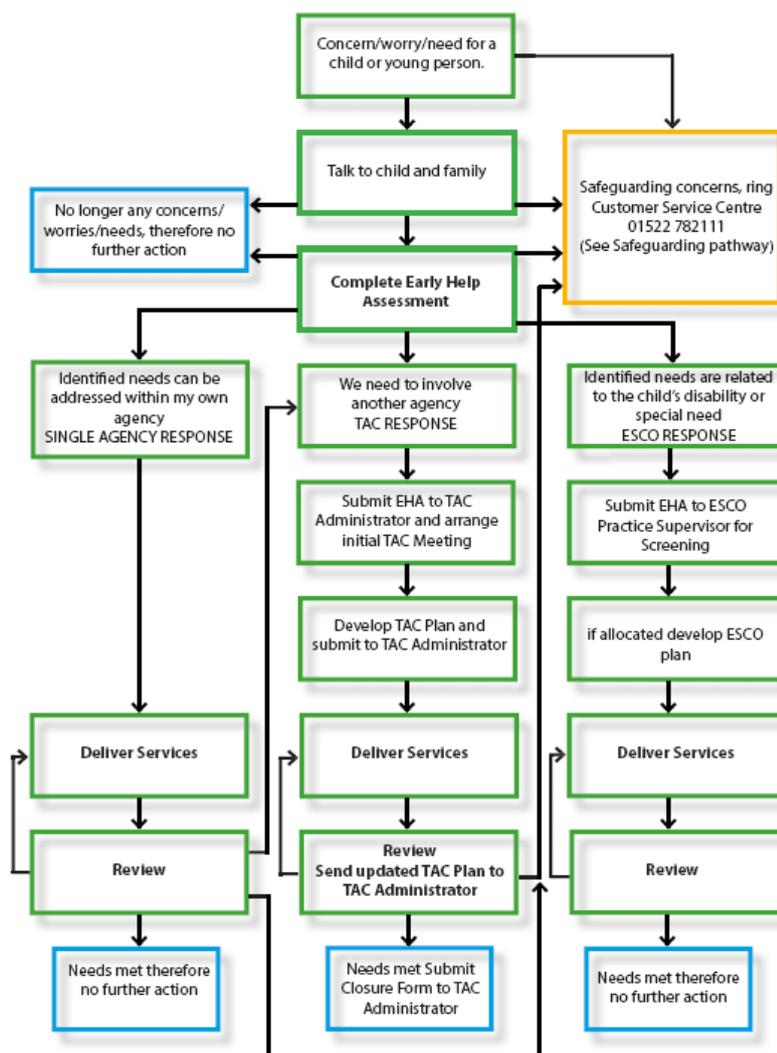
If the Designated Safeguarding Lead or Deputy feels that they would benefit from talking through the Early Help concern then they can contact an Early Help Advisor, who is a trained social worker. In this instance, the Designated Safeguarding Lead or Deputy should contact the Lincolnshire County Council Customer Services Centre on 01522 782111 and make the request to speak to an Early Help Advisor.

Once the Early Help Assessment form is completed, if the Designated Safeguarding Lead or Deputy feels that the child or vulnerable adult would benefit from a Team Around the Child (TAC) meeting, then they should instigate this and inform the parents/carers where this is necessary.

If the Designated Safeguarding Lead or Deputy feels that they would benefit from receiving advice on the process then they should submit their completed, and signed, copy of the Early Help Assessment to TACAdmin@lincolnshire.gcsx.gov.uk where the email should be acknowledged and responded to within a 24 hour period.

The Early Help Assessment Process can be followed in the flow-chart below, taken from Lincolnshire County Council:

2. Safeguarding Referral Process



Lincolnshire County Council and the Lincolnshire Safeguarding Partnership (LSP) provide agencies and organisations working with children and vulnerable adults with a wide range of information relating to the Safeguarding Referral Process. A Safeguarding Referral can be made by anyone, though where the person making the referral is not a Designated Safeguarding Lead or Deputy, then a Designated Safeguarding Lead or Deputy should be informed as soon as possible. Anyone can make a referral should they feel that there is a risk of imminent danger to the young person or vulnerable adult and require the involvement of either Lincolnshire County Council, the LSPB or the police.

A Safeguarding Referral form can be downloaded at <http://microsites.lincolnshire.gov.uk/children/practitioners/childrens-social-care/120797.article> though a blank copy will be stored in the confidential Child Protection folder on the College's server.

Following completion of the Safeguarding Referral form with the young person or vulnerable adult, the Designated Safeguarding Lead or Deputy should contact the Lincolnshire County Council Customer Services Centre on 01522 782111.

The Designated Safeguarding Lead or Deputy will then be asked to give as much detail as possible to a social worker and be given a secure email address to send the completed Safeguarding Referral Form to.

N USEFUL INFORMATION

Websites

Lincolnshire Safeguarding Partnership

<http://www.lincolnshire.gov.uk/lscb>

Lincolnshire County Council, Children's Services

<http://microsites.lincolnshire.gov.uk/children/child-protection/>

Lincolnshire Safeguarding Adults Board

<http://www.lincolnshire.gov.uk/lsab>

EduCare Online Training

<http://www.educare.co.uk/educare-for-education/>

Telephone Numbers

Lincolnshire County Council Customer Services Centre: 01522 782111

Further Reading

'Working Together to Safeguard Children July 2018'

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

'Keeping Children Safe in Education September 2020'

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

O EVALUATION

The governing body will approve and annually review this policy as defined in section D above. Reviews will also be undertaken when statutory requirements change.

Quality Assurance – Version Control			
Review Period	Annually	Review carried out by	Vice Principal – HR & Student Services
Approved by	Corporation	Date Approved	20 January 21
Equality Impact Assessment Date	November 2020	Last Review Date	November 2020



COVID-19 College Closure Guidance for Safeguarding and Child Protection at Grantham College

**Annex to Grantham College Safeguarding Vulnerable Children and
Adults Policy**

**March 2020
Updated June 2021**

Response to COVID-19

- 1. Key Contacts**
- 2. Context**
- 3. Vulnerable students**
- 4. Reporting a concern**
- 5. New staff or volunteers**
- 6. Peer on peer abuse**
- 7. Online safety**
- 8. Mental Health**
- 9. Parents and carers**
- 10. Support Organisations**
- 11. 1:1 Video Calls – May 2020**

1. Key Contacts

Grantham College arrangements continue in line with our Safeguarding Vulnerable Children and Adults Policy.

Role	Name	Contact number	Email
Designated Safeguarding Lead	Claire Temprell	07805 424319	ctemprell@grantham.ac.uk
Deputy Designated Safeguarding Lead	Sarah High	01476 404334	shigh@grantham.ac.uk
Deputy Designated Safeguarding Lead	Charlotte Fisher	07936 957375 (Term Time only)	cfisher@grantham.ac.uk (Term Time only)
Deputy Designated Safeguarding Lead	Jo Bowman	01476 400281	jchetwynd@grantham.ac.uk
Deputy Designated Safeguarding Lead	Steve Parsons	07719 542705	sparsons@grantham.ac.uk
Deputy Designated Safeguarding Lead	Sarah Ellis	01476 404391	sellis@grantham.ac.uk
Deputy Designated Safeguarding Lead	Sarah Done	01476 404331	sdone@grantham.ac.uk

2. Context

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19.

This Annex sets out some of the adjustments Grantham College is making in line with the changed arrangements in the college and following advice from government and local agencies.

<https://www.lincolnshire.gov.uk/childcare-family-support/lscp>

The current position is that, following the Government announcement, all college sites are closed and timetables have been postponed, whilst online remote delivery is taking place.

Despite the changes, the College's Safeguarding Vulnerable Children and Adults Policy is fundamentally the same: the welfare of children and young people always comes first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access on line resources). Staff may be aware of the mental health of both students and their parents or carers, and should refer to safeguarding about any emerging concerns.

3. Vulnerable students

Vulnerable students include those who have an allocated social worker and those children and young people with education, health and care plans (EHCPs).

Those who have a social worker include students who have a Child Protection Plan and those who are looked after by the Local Authority. A student 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.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Grantham College will continue to work with and support student's social workers to help protect vulnerable students.

We have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker and those with an EHCP.

For students subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker: contact will be made by a member of the Safeguarding team on a weekly basis with these students in agreement with the family and social worker.

For students who are Looked after Children and recent Care Leavers: contact will be made by the Student Services Manager in their role as Designated Teacher for LACs and Care Leavers who will call weekly, or as agreed with the student, carer and social worker.

For students with an EHCP: Lecturers and Learning Support Assistants will maintain regular contact as agreed with student and parents / carers. Support can be delivered through individual arrangements based on curriculum activity.

For students on the edge of social care involvement or pending allocation of a social worker, or identified as high risk: contact will be made by a member of the Safeguarding Team once per week for a welfare check. The relevant Student Mentor will also contact students as appropriate to ensure the necessary level of support is offered in order for them to engage with their learning.

For students who fail to respond to contact from the college: a member of the Safeguarding Team will attempt to make contact with parents/carers. Should there be no response from either student or their parent/carer, a letter will be sent to the parent/carer expressing the college's concern about the lack of contact and informing them that from a safeguarding point of view further action will be taken if no contact is made.

NB Contact will be made remotely through telephone calls or other appropriate methods.

4. Reporting a concern

Staff should continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not.

COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

If you have access to ProMonitor please continue to log confidential comments as you normally would. If you do not have access to ProMonitor to log confidential comments please email concerns to safe@granthamcollege.ac.uk where a member of the safeguarding team will respond to the concern and log on ProMonitor. This email address is monitored by all safeguarding staff. Student information relating to safeguarding or family members and/or personal or sensitive information not to be uploaded on ProMonitor. Any safeguarding concerns should be reported to a designated safeguarding lead.

Student information of a personal, private or sensitive nature should be forwarded to the relevant Student Mentor who will log it accordingly.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team (listed above) who will follow appropriate measures in seeking the appropriate and necessary support. Out of hours guidance can be found in the Safeguarding Guidance 2019-20 and also here:

<https://www.Granthamsafeguardingchildren.co.uk/procedures-local-protocols-and-guidance/>

Should a child or young person be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure, available here: https://lincolnshirescb.proceduresonline.com/pdfs/lscp_procedures.pdf

5. New staff or volunteers

All new starters must have an on line induction. They must read the college Safeguarding and Child Protection Policy, the Whistleblowing Policy and the staff Code of Conduct. The DSL or deputy will ensure new recruits know who to contact if worried about a child or young person and ensure the new starters are familiar with the child protection procedure.

All new starters or volunteers need to confirm that they have read Part I and Annex A of Keeping Children Safe in Education.

6. Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim measure and similar. When making contact with these families our staff may ask about relationships between learners.

7. Online safety

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for on line working have been issued and emailed to all staff by the CCSS Team. With such different arrangements in place, young people could be at greater risk of on line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place. The College has taken on board the guidance from the UK Safer Internet

Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium.

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

8. Mental Health

Restrictions to movement and contact with other people means students could be more likely to be at risk of mental health problems. The Department for Education have produced guidance to support parents:

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

9. Parents and Carers

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. We have set out the College's approach, including the sites students will be asked to access and named who from the college (if anyone) their student is going to be interacting with online.

10. Support Organisations

❖ **Child Line** – Tel: 0800 1111

❖ **Samaritans** – Tel: 116 123

Find self-harm support groups and many other support lines with advice about mental and physical health at <https://www.themix.org>



❖ **CalmHarm App** - Support to manage self-harm

❖ **Steps 2 Change** - Tel: 0303 123 4000 or <https://www.lpft.nhs.uk/steps2change/home>

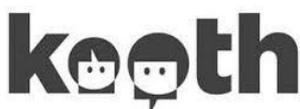
To access NHS support for mental health difficulties



NHS Talking Therapies for Lincolnshire

❖ **Visit www.KOOTH.com**

Online counselling for young people up to age 25. You can access this from home on your computer or phone.



❖ **Coronavirus and your wellbeing**

Advice on how to stay well: [https://www.mind.org.uk/information-support/coronavirus and-](https://www.mind.org.uk/information-support/coronavirus-and-)



- ❖ **Feeling Suicidal?** - Telephone your Doctors' surgery or 111 if you need urgent support. Please do not ring the numbers above unless it is urgent. If you are not feeling suicidal follow the other links as detailed in the above list.
 - ❖ **Net-aware** - for support for parents and carers from the NSPCC
 - ❖ **Parent info** - for support for parents and carers to keep their children safe online
 - ❖ **Thinkuknow** - for advice from the National Crime Agency to stay safe online
 - ❖ **UK Safer Internet Centre** - advice for parents and carers
- Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

11. Video Calls

11:1 Safeguarding Protocols regarding video calls and Professional Conduct

Currently all of our students are being educated at home and this is likely to continue going forwards where students as part of their course will continue to receive a mixture of learning at home and also in College.

Keeping staff safe when providing remote education is essential.

Although education is now being delivered remotely, it is important for staff and students to remain professional at all times. When communicating online with either parents or students the following needs to be adhered to:

- Communication within College hours as much as possible;
- Communicate through College channels e.g. e mail, Microsoft Teams;
- When communicating via Microsoft Teams ensure the photo uploaded of yourself is professional as others will see it including external people and students;
- **Do not** share personal social media accounts, personal telephone numbers or e mail addresses to students or parents;
- If calls have to be made with a personal mobile or landline to block the telephone number before the call is made.

11.2 Virtual lessons and live streaming or video calls

If delivering virtual lessons, live streaming or video calls the following approaches need to be made:

- Find a quiet or private room;
- When broadcasting a lesson, consider what will be in the background. Ideally needs to be a plain wall with no inappropriate images on display or photos in the background of family members or friends;
- To be clear about what you want to achieve during the lesson or call.

Steps to take when carrying out 1:1 video calls with a student

Before a 1:1 Video call takes place there are various steps you need to take:

- 1) It is very important before you consider a 1:1 video call to first identify an additional person to be part of the call such as an LSA, Assessor, Student Mentor or Employer (applicable if an Apprentice is under the age of 18 years old. If step 1 and you cannot source a colleague to attend the call, move to step 2:
- 2) Seek approval from your Line Manager for the 1:1 video call to take place. Complete 1:1 protocol for video call with student's spreadsheet attached. Once the spreadsheet is completed forward on to Eileen Brazil Sheffield detailing the reasons why the 1:1 video call is required;
- 3) If the student is under the age of 18 years old you will need written parental authorisation before the call is made, this can be received via an e mail. If an Apprentice is under the age 18 years old the employer or parent will need to provide consent. The confirmation of approval email needs to be sent to Eileen Brazil Sheffield as it is very important, we keep a record in case of any allegations made after the call;
- 4) If at any point during the video call there is any inappropriate behavior from the student end the call immediately and report the situation to a member of the safeguarding team.

11.3 Safeguarding

Any safeguarding concerns identified on the call or through virtual delivery must be reported immediately to a member of the safeguarding team.

It is important to continue to be vigilant even with remote working as extremist groups are continuing to make use of the current crisis to spread conspiracy theories and prey on vulnerable individuals.

11.4 Delivering Virtual Lessons or video calls applying the Staff Code of Conduct

The same principals need to apply when delivering remotely to students as they do when in the classroom. When conducting yourself on calls either video or audio or delivering virtual lessons, it is important you behave in the following manner:

- You protect and promote the good reputation of the College;
- You demonstrate courtesy and respect;
- You dress in an appropriate manner;
- You do not act in a way which is discriminatory towards individuals or groups for reasons of age, disability, sexual orientation, ethnicity, race, sex/gender, religion/belief, gender reassignment or pregnancy/maternity;
- To be punctual if you agreed a specific time;
- Do not use offensive language;
- Do not attend the call whilst under the influence of alcohol or illegal drugs.

May 2020