

Child Protection and Safeguarding Policy and Procedures

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Policy

1 Purpose

This policy states the responsibilities of the college in relation to safeguarding children and vulnerable adults, in line with current legislation and guidance.

2 Definitions

- 2.1 The 1989 Children Act defines a child as ‘a person under the age of 18’. This therefore includes students under the age of 18 as well as other young people under 18 participating in college activities on college premises.

- 2.2 The Protection of Freedoms Act 2012 led to a change in the definition of vulnerable adult as it relates to safeguarding. An adult may now be described as vulnerable when they are in receipt of services classed as regulated activity, including health and personal care or support required because of age, illness or disability.

3 Policy statement

- 3.1 Bedford College aims to maintain a safe and welcoming environment on all its campuses for staff, students (including residential students) and visitors. It is committed to meeting its duty to safeguard and promote the welfare of children and vulnerable adults, and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.
- 3.2 It takes seriously its obligation to deliver the outcomes specified in the Ofsted common inspection framework. In the context of this policy inspectors will make a judgement on the effectiveness of leadership and management by evaluating the extent to which leaders, managers and governors safeguard all learners.
- 3.3 The college recognises the need to work with other agencies in performing its duties under the Education Act 2002 and Children Act 2004. These are, in summary:
- to have in place and follow procedures in keeping with local inter-agency (Local Safeguarding Children's Board) guidelines
 - to operate safer recruitment procedures
 - to have in place procedures to deal with allegations against staff
 - to designate a senior member of staff as having lead responsibility for safeguarding children, and ensure that they receive appropriate training
 - to liaise with schools regarding pre-16 students
 - to ensure all staff working with young people under 18 receive appropriate safeguarding children training and are aware of their responsibilities
 - to review policies and procedures annually
 - to represent the college on the Local Safeguarding Children Board.
- 3.4 The safety and well-being of children are paramount and all concerns about abuse are taken seriously.
- 3.5 The college is committed to applying these principles in respect of those over 18 felt to be 'vulnerable'. Procedures to be followed in respect of vulnerable adults are given at annex A.
- 3.6 The Director of Student Services and the Director of Organisation Development are nominated by the Principal to co-ordinate and manage procedures relating to the protection and safeguarding of children and vulnerable adults including safer recruitment and staff training.
- 3.7 The college reserves the right to refuse admission to any student who may pose a risk to children or vulnerable adults, and has appropriate student admissions procedures in place.

4 Legal framework

- 4.1 DfES circular 10/95 set out the role of FE colleges in helping to protect children from abuse, under the terms of the Children Act 1989.
- 4.2 The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools and colleges had a legal obligation to work with investigating agencies acting on behalf of children in need.
- 4.3 Section 175 of the Education Act 2002, which came into force in June 2004, places a duty on local authorities, the governing bodies of maintained schools and the governing bodies of Further Education institutions to have arrangements in place to ensure that they safeguard and promote the welfare of children. This duty is very general but acquires substance in guidance issued periodically by the Department for Education. S175 imposes a statutory duty to have regard to the guidance issued by the Secretary of State.
- 4.4 Responsibility for making sure appropriate arrangements are in place lies with the governing body. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by the governing body.
- 4.5 The Children Act 2004 resulted from Lord Laming's report into the death of Victoria Climbié. Section 11 of the Act, which came into force in October 2005, brought other key agencies into line with the duties already placed on schools and colleges by s175 of the Education Act 2002. Section 13 (as amended) specifies membership of local safeguarding boards, including further education colleges.
- 4.6 Guidance was published in 'Safeguarding Children in Education' (2004), extended in 2007 to 'Safeguarding Children and Safer Recruitment in Education'. It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying, and included specific guidance relating to the recruitment and vetting of staff, in the light of the Bichard enquiry into the Soham murders.
- 4.7 In April 2014 the Department for Education replaced this with new statutory guidance 'Keeping Children Safe in Education'. The guidance was revised in 2015 and 2016 and reflects recent changes to the vetting of staff, including the introduction of the Disclosure and Barring Service (DBS) to replace CRB, and the notion of 'regulated activity' which prescribes which staff may and may not be subject to pre-appointment checks. The document sets out what schools and colleges **should** do to safeguard and promote the welfare of children, as well as the legal duties with which they **must** comply. Although it is designed to be read in conjunction with 'Working Together to Safeguard Children', the intention of the guidance was to scale back to a minimal set of requirements which make clear where individuals should use their own professional judgement.
- 4.8 The Protection of Freedoms Act 2012 changed the definitions of regulated activity and amended the provisions of the Safeguarding Vulnerable Groups Act 2006, which altered the definition of a vulnerable adult.
- 4.9 Bedford College is not an investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers (the police and NSPCC). There is a mandatory duty to report known cases of female genital mutilation to the police.

- 4.10 The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and also that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability. It is also acknowledged that additional barriers may exist when recognising the signs of abuse and neglect in children who have special educational needs and/or disabilities.
- 4.11 In February 2015 the Counter-Terrorism and Security Act placed on colleges the duty to have due regard to the need to prevent people from being drawn into terrorist activity.

5 Local and national safeguarding priorities

- 5.1 Through its participation on the Local Safeguarding Children Board the College is mindful of the current local and national agenda, including child sexual exploitation, domestic violence/domestic abuse, female genital mutilation, adverse childhood experiences, radicalisation and violent extremism, and the importance of 'early help'.
- 5.2 The College also recognises its role in promoting the wellbeing of its students, and, through its tutorial framework, cross-College events and national campaigns, seeks to raise student awareness of safeguarding issues and develop resilience and protective behaviours.

6 Equality and diversity statement

- 6.1 Bedford College is committed to the promotion and development of equality and diversity. We aim to provide a working and learning environment which values individuals equally and does not discriminate on any grounds including age, disability, race, sex (gender), sexual orientation, gender reassignment, religion or belief, marriage or civil partnership and pregnancy and maternity.
- 6.2 This policy and procedure will be implemented in accordance with our policy on equality and diversity, and decisions/actions taken in relation to a potential safeguarding or child protection incident will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.
- 6.3 This policy is subject to equality impact analysis.

7 Monitoring and review

- 7.1 Implementation of this policy will be monitored through an annual report to the Board of Governors.
- 7.2 The policy will be reviewed annually by the Safeguarding Group and agreed by the College Executive and Board of Governors.

8 Supporting documentation

- 8.1 The following College documents give further guidance on the application of this policy and matters relating to the wider child protection and safeguarding agenda:

- Admissions Policy
- Anti-Bullying Policy
- Confidentiality Procedure
- ICT Acceptable Use Policy
- Staff and Student Disciplinary Procedures
- Bedford Borough Safeguarding Children Board Procedures (<http://bedfordscb.proceduresonline.com/index.htm>)
- Children Act 1989 and 2004
- Education Act 2002 (s175)
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (2015)
- Keeping Children Safe in Education (2016)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2009)
- Safer Practice, Safer Learning (NIACE 2007)
- Accommodation of Students under Eighteen by Further Education Colleges - National Minimum Standards (DoH 2002)
- Protection of Freedoms Act 2012
- Prevent Duty Guidance (2015)

Procedures

The following procedures relate to child protection incidents. See annex A for guidance on the protection of vulnerable adults. Guidance for staff at Trinity Arts and Leisure is included at annex D.

7 Definitions

7.1 Throughout this document the following definitions apply:

Child	- a young person under the age of 18
Child abuse	- may be physical, sexual or emotional abuse, or neglect
Significant harm	- ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)
Physical abuse	- actual or likely physical injury to a child, or failure to prevent injury
Sexual abuse	- actual or likely sexual exploitation of a child, including prostitution
Emotional abuse	- actual or likely significant adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill-treatment or rejection
Neglect	- persistent or severe neglect of child, or failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out important aspects of care
Safeguarding	- includes promotion of health and well-being as well as protection of specific individuals
Designated person(s)	- the staff member(s) designated by the Principal as having responsibility for liaising with the investigating agency

8 Designated staff

8.1 A list of designated persons with responsibility for safeguarding and child protection is given at annex C.

8.2 There is a designated governor with specific responsibilities for safeguarding. The designated governor is a member of the cross-college Safeguarding Group and is responsible for ensuring the college has policies and procedures in place which are considered annually by the Board of Governors.

9 Responding to a disclosure or suspicion of abuse

- 9.1 Any member of staff who has knowledge of, or a suspicion that, a child is or has been suffering significant harm must refer their concern to a designated safeguarding member of staff as soon as possible but within 24 hours at the latest. In exceptional circumstances such as out of hours, if no designated staff member is available, refer to the Duty Manager who has been trained to give a first response.
- 9.2 All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in college in the first instance.
- 9.3 Staff training recognises the many possible perpetrators of abuse, including adults inside or outside College as well as peer on peer abuse.
- 9.4 Staff who receive an allegation or disclosure of abuse should make an immediate written record of the conversation through the CP1 form, including the following information:
- date and time of report
 - date, time and place of alleged abuse
 - your name and name of complainant
 - name of child alleged to have been abused, if different from above
 - nature of alleged abuse including perpetrator if known
 - description of any injuries observed, if any
 - any other information given, including siblings if relevant
- 9.5 Questions should be kept to the minimum required for clarity, and leading questions must be avoided.
- 9.6 It may also be appropriate to remind the student about the availability of the college Counselling Service or external help lines.

10 Safeguarding students aged 16 and 17

- 10.1 These students are covered in law by the Children Act. This means that allegations or suspicions of abuse must be taken seriously by the college and acted upon according to the procedure.
- 10.2 Concerns or suspicions must be referred to a designated staff member even if the student's stated wishes are to the contrary. They will seek advice from the appropriate investigating agency and agree any further action which may be necessary. This may include a formal referral using the agency's proforma.
- 10.3 Students aged 16 and 17 are encouraged to report the abuse, or give consent for a report to be made, to an investigating agency. This will usually be the Children's Services department in the area where the student lives, via the relevant Multi-Agency Support Hub (MASH). The student should be made aware that it may be necessary to report the abuse even without their consent.
- 10.4 The following issues are relevant:
- what are the wishes of the student?
 - are younger siblings involved?
 - is a criminal act being committed?
 - is there immediate risk of significant harm?

11 Safeguarding students aged under 16

- 11.1 A number of pre-16 students attend college on a regular basis.
- 11.2 All allegations or suspicions of abuse must be reported to the 14+ Manager or, in her absence, another member of the designated safeguarding team, even if the student's stated wishes are to the contrary. The student must be informed that the information will be passed to someone else within college, and possibly also to the school and/or Children's Services.
- 11.3 The 14+ Manager will liaise with the school as appropriate, ensuring that the matter is reported to the appropriate investigating agency, either by the school or by the college. A written record of any discussions/referrals will be made.

12 Safeguarding residential students

- 12.1 Provision for residential students based at Shuttleworth College complies with the guidelines outlined in the Department of Health document, *Accommodation of Students under Eighteen by Further Education Colleges, National Minimum Standards 2002*. The document contains a statement of national minimum standards published by the Secretary of State under section 87C(1) of the Children act 1989 as amended by the Care Standards Act 2000.
- 12.2 The national minimum standards are applicable to further education colleges accommodating students under 18 and are intended to safeguard and promote the welfare of young people under the age of 18 for whom accommodation is provided.
- 12.3 The national minimum standards are not applicable to those students 18 or over, although the policies and procedures in place, including the provision of a team of trained wardens, are relevant to all residential students regardless of age.
- 12.4 Compliance with the national minimum standards is monitored through external inspection by Ofsted.
- 12.5 Safeguarding measures are put in place under each of the standards, which are separated into the following categories:
 - Welfare policies and procedures
 - Organisation and management
 - Welfare support
 - Staffing
 - Premises.

13 Work placements

- 13.1 Staff responsible for co-ordinating work placements/work experience must have received the relevant training. They must take the safeguarding of students, whether children or vulnerable adults, into account at the planning stage when assessing the suitability of the placement and as part of the college's health and safety procedures. Although students may be deemed more vulnerable to harm or abuse when in long-term placement in the workplace, all placements must be assessed for safeguarding risks. It is however recognised that in these circumstances the employer has primary responsibility for the health and safety of the student, and the college should therefore be satisfied that the employer understands and is managing

the risks, including safeguarding, associated with young people in the workplace.

- 13.2 The statutory guidance specifies that colleges may not request enhanced DBS checks for staff supervising children aged 16 or 17 on work experience. However, if the person working with the student in the workplace is unsupervised and in frequent contact with them, the employer may be asked to ensure that that person is not on the barred list.
- 13.3 All students on work placement should have a regular point of contact within college, and be made aware that they can discuss with that person or with a Student Services adviser any concerns about their placement. Any concerns raised about their work placement or any suspicions of abuse must be reported to a designated member of staff immediately and procedures followed as outlined in paragraph 9 above.
- 13.4 Students should be appropriately prepared for their work placement to ensure they understand how to keep themselves safe (protective behaviours) as well as their own responsibilities to others in the work place.
- 13.5 Where a student's placement is classed as 'regulated activity', the student will normally be required to have an enhanced DBS check.

14 Confidentiality

- 14.1 A good working relationship between staff and students depends to a large extent on the establishment of trust. This may be described as a 'confidential relationship'. However, guarantees of absolute confidentiality should not be given as it may prove necessary to make a referral to an appropriate agency.
- 14.2 If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.
- 14.3 The college counsellors work to the British Association for Counselling and Psychotherapy ethical framework. This allows the counsellor to break confidentiality in exceptional circumstances, with or without the student's consent if necessary where, in her/his professional judgement:
 - there is a serious risk of the student harming themselves or being harmed
 - there is a serious risk of another person being harmed
 - there is a risk of a serious crime being committed.

15 Record keeping

- 15.1 All written records must be passed to the designated staff member.
- 15.2 Records will be kept securely within Student Services, and held until the student's 25th birthday (or, for vulnerable adults, for 2 years after the end of the academic year in which the referral was made).
- 15.3 A summary of the record will be held securely on Intuition, the Student Services database.
- 15.4 Records are confidential. They may be accessed by the subject of the record but not by any third party other than a designated staff member and/or the originator.

15.5 Personal tutors or other staff must not retain any records relating to a safeguarding issue.

16 Safer recruitment of staff

16.1 The college undertakes best endeavours to ensure that its employees are fit to work with children and vulnerable adults.

16.2 The college has safer recruitment procedures in place to prevent unsuitable people from working with children and vulnerable adults and promote safe practice.

16.3 Changes to the Protection of Freedoms Act which came into force in September 2012 have resulted in a new definition of regulated activity which determines when disclosure and barred list checks may be undertaken.

16.4 'Keeping Children Safe in Education' (2016) describes the checks that are, or may be, required for any individual working in college.

16.5 The measures to be taken in respect of staff, volunteers, contractors and others who may come into contact with our students are listed at annex B.

16.6 In accordance with the regulations, a single central record is kept of all checks and disclosures carried out.

17 Training of staff

17.1 Designated staff receive multi-agency safeguarding training every 2 years, and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up-to-date with developing local and national priorities.

17.2 All other staff and governors receive mandatory training as part of their induction, to ensure they are aware of their safeguarding responsibilities and of the college's policies and procedures. The training includes recognising signs of abuse, and recording and reporting suspected abuse. They receive updates on safeguarding and child protection at least annually.

17.3 All staff are made aware of our duties under the Prevent agenda through the WRAP (Workshop for Raising Awareness of Prevent) programme, delivered in-house.

18 Allegations of abuse against staff

18.1 The college has in place a Professional Boundaries Policy which sets out clearly its expectations in terms of staff behaviours and provides guidance to staff on keeping themselves safe. Nevertheless, allegations against staff may occur.

18.2 All allegations and concerns will be taken seriously and dealt with according to the relevant statutory guidance.

18.3 Where an allegation of abuse is made against a member of staff, the relevant disciplinary procedures may be invoked as well as reporting the case to the appropriate authorities, normally the Local Authority Designated Officer (LADO). Following this, any investigation taken under Local Safeguarding Children's Board procedures must take precedence over internal college procedures.

18.4 Any such allegation must be reported to a designated member of staff as soon as possible but within 24 hours at the latest. The designated member of staff will refer the matter to the Director of Organisation Development who will, if appropriate, report it to the LADO.

- 18.5 If an allegation of abuse is made against a designated member of staff, the allegation must be referred directly to the Director of Organisation Development who will report the matter to the appropriate authorities. An allegation against the Principal must be dealt with by a member of the Board of Governors.
- 18.6 Where an allegation is made by a student aged 18+, it will be investigated through internal college procedures, unless the student is deemed to be a vulnerable adult.
- 18.7 If it is subsequently found that a student has made a false allegation, or that the allegation was prompted by the student's inappropriate behaviour, the matter will be investigated through the student disciplinary procedures.

19 Support for staff

- 19.1 This policy document is available to all staff via the staff intranet, the website or from Student Services. An up to date list of the Designated Safeguarding team is available on the staffnet and smartlog
- 19.2 Where a member of staff finds a disclosure particularly distressing, they may wish to seek support through the Employee Assistance Programme (EAP). Details of the EAP are available on the college intranet or from Human Resources. Alternatively, they may talk through their concerns with a designated member of staff or with Human Resources.
- 19.3 A Professional Boundaries Policy is in place and was developed in consultation with staff. It outlines expected standards of conduct for staff when working with children and vulnerable adults, and provides support and guidance on professional boundaries and keeping themselves safe.

20 Safeguarding group

- 20.1 A cross-college safeguarding group meets three times per year. It includes representation from across the college including all designated safeguarding staff, the designated governor and representatives from teaching and support areas. The group may convene sub-groups as required to action specific issues such as staff training and internet safety.
- 20.2 The group reports to the college Executive and its terms of reference include monitoring the effectiveness of the college's safeguarding arrangements, advising on the development and review of related policies, and developing a safeguarding plan.
- 20.3 The safeguarding group concerns itself with the wider safeguarding agenda which includes matters such as bullying, internet safety, safe learning environments, drug and alcohol misuse, and student awareness of personal safety.
- 20.4 The designated safeguarding team meets half termly to share best practice, develop, review and ensure consistency of procedures, and to consider feedback from the local safeguarding children board.

21 Preventing violent extremism – the 'Prevent' agenda

- 21.1 The Counter-Terrorism and Security Act (2015) places duties on the college to take best endeavours to prevent students from being drawn into terrorist and extremist activity, and statutory guidance is in place from the 2015/16 academic year. In College, Prevent is embedded within our safeguarding

procedures, and this document should therefore be read in conjunction with the Bedford College Prevent Strategy.

- 21.2 Staff and governors will be trained through the Workshop for Raising Awareness of Prevent (WRAP) programme.
- 21.3 Staff should be aware of the signs of extremism and report any such concerns through the safeguarding process. The College will take such concerns seriously and take action as is necessary, including referring to our local police contacts, the Channel panel, the multi-agency support hub and/or providing support through our own internal structures.
- 21.4 The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. Through its classroom practice, theme weeks and induction activities, it will encourage equality of opportunity and celebrate diversity.
- 21.5 The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature. Promotion of any organisations linked to violent extremism is contrary to the values of the College and would constitute misconduct.

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Em Lowe
Vice Principal

Safeguarding vulnerable adult procedures

1. Definitions of 'vulnerable adult'

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. The Protection of Freedoms Act 2012 has brought about a change to the definition of vulnerable adult. An adult is now defined as vulnerable when they are in receipt of 'regulated activity', such as health care, personal care, relevant social work or transportation support because of age, illness or disability, or where a person is authorised to make financial/welfare decisions on their behalf.

However, it is important to recognise that, in the context of college students, any adult can be subject to abuse (such as domestic abuse, financial abuse, physical and emotional abuse etc) and they do not have to be 'vulnerable' as newly defined in order for these procedures to be implemented.

Vulnerable adults enrolling on courses at college may have a named advocate who should be identified at interview stage.

2. Definitions of abuse against vulnerable adults

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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 feature age or developmentally inappropriate expectations being imposed on children. These 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 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-

penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: 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 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.

Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and also NSPCC.

Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- preventing radicalisation
- sexting
- teenage relationship abuse
- trafficking
- peer on peer abuse

Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Staff should always report any prolonged holidays or absences to the Designated Safeguarding Lead prior to removing the student from their study programme or course. Victims of FGM are likely to come from a community that is known to practise FGM.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on the Safeguarding section of the Intranet. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

PREVENT (Radicalisation)

The Prevent strategy, launched in 2007, seeks to stop people becoming terrorists or supporting terrorism. It is the preventative strand of the government's counter-terrorism strategy, CONTEST.

Objectives of the Prevent strategy are to:

- respond to the ideological challenge of terrorism and the threat from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address

If there are concerns that a student is becoming radicalised and involved in an organisation which could ultimately harm the student and the community this needs to be reported to the Designated Safeguarding Lead.

For more information, please see the Prevent Policy, Action Plan and Risk Assessment.

E-Safety

The College is fully aware that the use of social networking sites, the internet and other communication vehicles present opportunities for child and vulnerable adult abuse. Often through a process known as grooming (whereby predatory adults use a variety of techniques to encourage young people to engage in inappropriate behaviour). Students can also use these channels to bully others and to carry out a process known as Sexting (the sending of inappropriate images via text messages).

Missing Children

A child going missing from an education setting is a potential indicator of abuse and neglect. Governing bodies and proprietors should put in place appropriate safeguarding responses to children who go missing from education settings, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risk of their going missing in future.

For more information, please see the Missing Children's Procedure.

Forced and Arranged Marriages

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the young people. In forced marriages, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

Possible indicators of Forced Marriages:

- Truancy
- Decline in performance or punctuality
- Low motivation at school
- Poor exam results
- Being withdrawn from school by those with parental responsibility
- Not allowed to attend extracurricular activities
- Over control by parents/family.

What to do if you are concerned that a student is being forced to marry:

- Immediately contact one of the named members of staff for Vulnerable Adult and Child Protection (these are named on the chart in this booklet) and complete the CP1 referral form.
- If the student insists on talking to you:
 - Make sure you can meet them in a private place where there is a telephone
 - Have a 'story' ready about how you are providing support with learning in case you are challenged by the family
 - Listen to what the student has to say and write it down
 - Do not question apart from to clarify
 - Inform the student you have to talk to a senior member of staff but that it will remain confidential
 - Provide the opportunity for them to talk to the forced marriage unit on
 - 020 7008 0151

3. What to do if you suspect a vulnerable adult is being abused

Any member of staff who has knowledge of, or a suspicion that, a vulnerable adult student is or has been suffering abuse must refer their concern to the designated member of staff as soon as possible. All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in college in the first instance.

The designated member of staff when dealing with vulnerable adults is:

Katrina O'Brien (Head of Foundation Education) ext. 5652

In her absence you should contact one of the designated safeguarding staff. Advice may be sought from the appropriate local authority adult social care department.

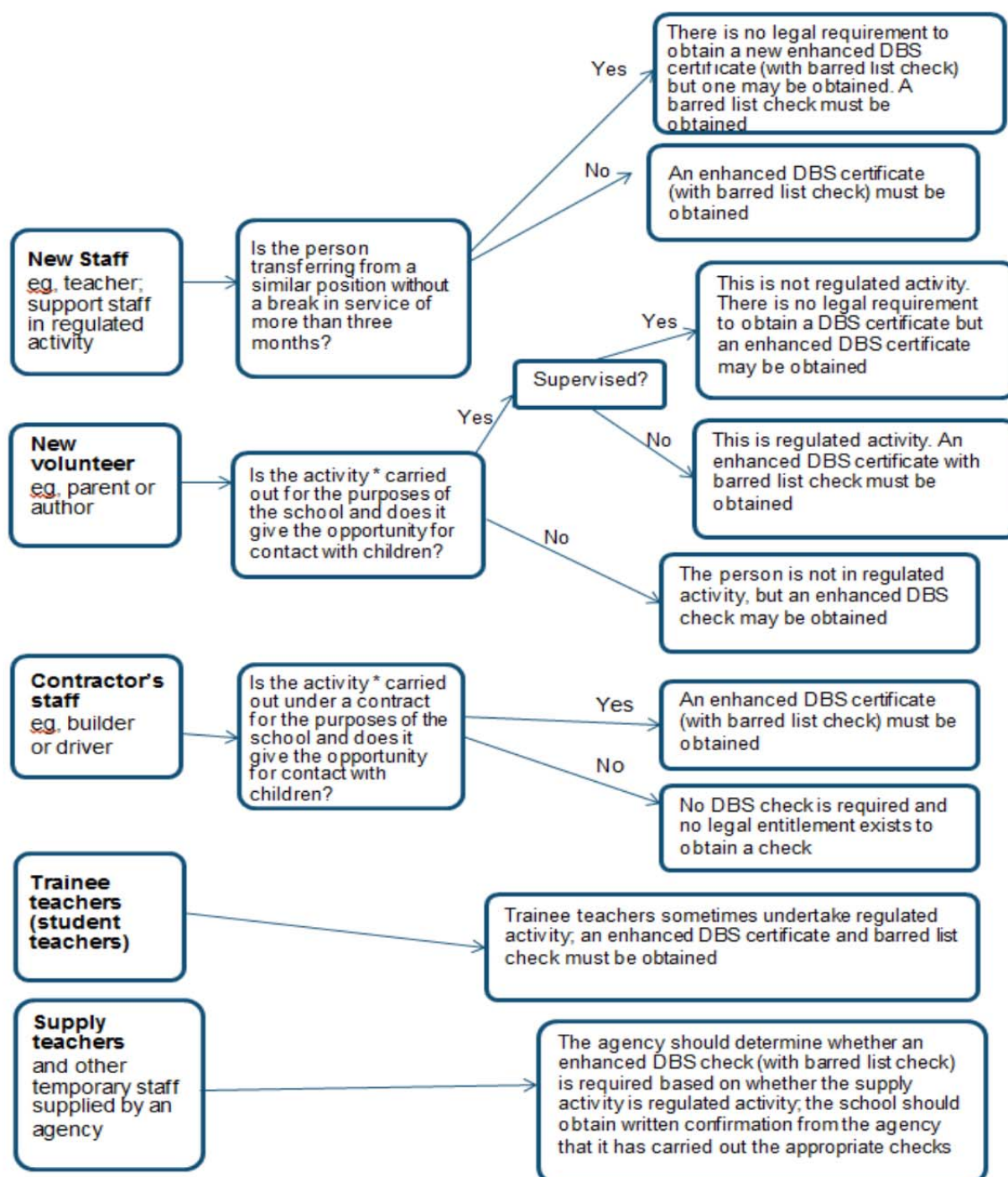
In all other respects, including confidentiality, the procedure relating to vulnerable adults is identical to that which should be followed in respect of children and young people, and which is detailed in the main body of this document. Records will be kept for 2 years after the end of the academic year in which the referral was made.

Safer Recruitment Guidance

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks

These guidelines set out minimum requirements in line with current statutory guidelines on 'Keeping Children Safe in Education'. They apply to employees, workers, self-employed contractors, companies providing services, third party providers of services on our premises, volunteers and visitors/delegates.

Queries on any situation not covered below to be referred to Human Resources.



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

The requirements for staff working out of normal teaching hours with residential students in halls of residence are as specified in *The National Minimum Standards for FE Colleges which accommodate under 18s*.

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

Regulated activity includes:

- teaching, training, instructing, caring for without supervision, or supervising children if the person is unsupervised,
- providing healthcare/personal care/wellbeing advice
- providing advice or guidance on well-being
- driving a vehicle with children or vulnerable adults as passenger
- and/or with the opportunity for unsupervised contact with children or vulnerable adults as part of their job

Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Source: DFE Keeping Children Safe in Education (effective from 5 September 2016).

Safeguarding Children and Vulnerable Adults - Summary for Staff

Everyone's Responsibility

The College and every member of staff have a legal duty to report cases of suspected abuse. If you have concerns that a child or vulnerable adult is at risk, or is being abused, you must report it.

Definitions

A **child** refers to anyone up to their 18th birthday.

A **vulnerable adult** is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. They would normally be in receipt of services classed as 'regulated activity', including health and personal care or support required because of age, illness or disability.

What is abuse?

Children and vulnerable adults can be subject to:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Financial or material abuse
- Domestic violence
- Forced marriage
- Bullying or cyber-bullying
- Being drawn into terrorism or violent extremism.
- Peer on Peer abuse

Recognising abuse

Identifying abuse is difficult. Possible indicators of abuse include:

- Unexplained cuts and bruises
- Unusually passive, lethargic, withdrawn or attention seeking behaviour
- Low self esteem
- Bullying behaviour
- Unexplained changes in academic performance
- Self-harm
- Sexually explicit behaviour
- Reporting concerns about 'someone they know'
- Asking you to keep a secret

What to do

If you have any concerns about a child or vulnerable adult you must:

- talk to them about these concerns
- listen carefully to what you are being told. Questions should be kept to the minimum required for clarity, and leading questions must be avoided. not ask leading questions
- advise the student that this information cannot be kept confidential and will be passed on to a designated member of staff in college who has been trained to deal with such matters
- make a written record of the conversation on the CP1 form, including
 - date and time of report
 - date, time and place of alleged abuse
 - your name and name of complainant
 - name of child alleged to have been abused, if different from above
 - nature of alleged abuse
 - description of any injuries observed, if any
 - any other information given, including siblings if relevant
 - confirmation that the student has been advised of the next steps
- tell the student what you are doing and why
- inform one of the designated safeguarding staff immediately and email the CP1 form to the safeguarding email address - do not keep any personal records.

Who to contact

The designated safeguarding staff are:

Em Lowe	Vice Principal & Safeguarding Lead	01234 291908
Marie Hennem	A2FE Manager	01234 291057
Rosalind Birtwistle	Student Participation Adviser	01234 291930
Elizabeth Nash	Director of Organisation Development (Staff-related issues)	01234 291006
Saima Nasir	Student Wellbeing Manager	01234 291915
Jo Norman	Student Development Manager	01234 291278
Katrina O'Brien	Head of Department, Foundation and Additional Support (Vulnerable adults)	01234 291652
Amanda Riches	BCS Deputy General Manager	01234 291778
Jonathan South	Personal Tutor	01234 291242
Will Sparrow	Student Enhancement Team Leader	01234 291277
Charlotte Woodhams	Halls of Residence Tutor	01234 291279
Jenna Barron	Personal Tutor (BSF)	01234 291658
Amy McKendry	Lecturer (BSF)	01234 291787
Suzanne Revell	Personal Tutor (BSF)	01234 291659

Further information and guidance on safeguarding are available on the staff intranet.

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Safeguarding at Trinity Arts and Leisure - Guidance for Staff

The principles of the Bedford College Safeguarding Policy and Procedures apply to users of the Trinity Arts and Leisure complex. What follows is guidance for staff on the management of safeguarding incidents specifically relating to that context.

1. General Guidance

- Signs of neglect or abuse may be more obvious in a sporting/swimming pool environment and staff have a duty to act if they have any safeguarding concerns.
- Staff must report any concerns they have, no matter how small they think they are. If the observation, allegation or disclosure of abuse occurs on poolside, the duty manager or designated safeguarding staff member should be informed. If immediate assistance is not available and the incident is urgent, team support should be requested by radio or, exceptionally, using the pool alarm.
- When using the radio, information about the situation, allegation or disclosure should not be disclosed by radio. Immediate assistance only must be requested.
- If a child or vulnerable adult wishes to speak to an individual member of staff every effort should be made to allow this to happen. However it is important to remain visible at all times, in sight of other staff members.
- Staff should listen and record the facts but not ask leading questions. Incident report forms are held in the safeguarding folder in the Trinity Arts and Leisure reception. These must be used to record concerns and any further action taken.
- If staff have concerns about a suspected abuser, they should be careful of questioning and wording used. A description of the person, their name (if it can be ascertained) and the reasons for the concerns should be recorded and passed on to the duty manager/designated safeguarding staff member immediately.
- Bedford College and Trinity Arts and Leisure provide mandatory safeguarding training to managers, swim teachers and lifeguards.

2. Schools and Club Sessions

- During school bookings the school is responsible for the children in their care. The children whilst in the changing room are not to be left unattended at any point. This may require two or more persons per changing room so that, if required, one can leave to enter the communal area.
- Any concerns identified by TAL managers or lifeguards during the booking should be raised with the school staff. Do not assume they know.
- If you are not satisfied that the concern is being dealt with appropriately by the school staff, refer the matter to the TAL duty manager/designated safeguarding staff member. They should discuss the concerns with the designated safeguarding teacher at the school. Complete an incident report form found in safeguarding folder in TAL reception.
- If you suspect abuse, or abuse is disclosed and allegedly happened at TAL, it must be reported to the duty manager/designated safeguarding staff member at TAL who will take appropriate action.

3. Swimming Sessions

- If the child or vulnerable adult is known, record their name and as many details as possible regarding the incident or disclosure. Information on children in School of Fish swimming lessons can be obtained through the TAL database. Registers can also be used to monitor attendance.
- If the child or vulnerable adult is not known, try to ascertain through careful questioning. If this is not possible, record a description and as much detail as possible.
- Never ask leading questions.
- Stay in a visible location so you are never completely alone with vulnerable adult or child.
- If child or vulnerable adult is in immediate danger, call the emergency service(s) if necessary.
- Report all information to the TAL designated safeguarding staff member.
- If a parent/carer is present, record a description of the parent and, where possible, their name.

4. Process

This flow chart is a guide and may vary depending on the incident you are faced with. Please be aware you can contact a Trinity Arts and Leisure designated safeguarding person outside working hours if urgent advice or assistance is required.

