



# Safeguarding Policy

Young people and  
Vulnerable Adults

## Process

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**Adopted by: (signatures)**

**Review date:**

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Date:

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## 1. INTRODUCTION

St Mary's College Board of Governors and Senior Management Team recognise that it has moral and statutory obligations under the Children's Act 2014 and the Education Act 2011 to safeguard and promote the welfare of individuals. In relation to vulnerable adults the Government set out key principles (No Secrets 2000) which state that "the protection of vulnerable adults should always receive a high priority and that all agencies should be able to clearly demonstrate the ability to respond to abuse with prompt, timely and appropriate action".

All students and vulnerable adults have the right to be protected from abuse of any kind. St Mary's College believes that the protection of students is an integral part of the ethos of the College, that this is a "listening" College which seeks to create an atmosphere in which students feel secure, know that their welfare is valued and that they will be listened to. In law a child is anyone under the age of 18, however all students regardless of age, including HE are entitled to the same care and the College will take whatever steps are required to safeguard any member of our community.

### **Compliance: Legal, Statutory and Internal Regulations**

The Safeguarding (Young People and Vulnerable Adults) Policy is underpinned by the following legal/statutory regulations:

- Keeping Children Safe in Education 2019
- Children's Act 2014
- Common Assessment Framework 2016
- Counter Terrorism and Security Act 2015
- Guidance: Sexual Harassment and the Law 2017
- Teacher Standards 2016
- Every Child Matters 2017
- No Secrets (Adult Protection) 2015
- Modern Slavery Act 2015
- GDPR 2018

### **Procedures and Protocols Supporting this Policy**

- Equality Policy & Procedures
- Whistleblowing Policy & Procedures
- Employee Code of Conduct
- Health and Safety Policy and Procedures
- Online Safety Policy & Protocol and Acceptable Use Agreements

## 2. SCOPE

The Safeguarding Young People and Vulnerable Adults Policy has been updated in line with 'Keeping Children Safe in Education' revised guidance which commences September 2019. It applies to all staff, students (including vulnerable adults), Governors and visitors to the College (including customers and contractors). It repeals all previous policies in relation to Child and Vulnerable Adult Protection. The College follows the Blackburn with Darwen LSCB (Local Safeguarding Children Board) policies and procedures.

**Prevention and early support:** Our college is committed to early help and identification of unmet needs and vulnerabilities. The college works in partnership with other agencies to promote the welfare of students and keep students safe. We recognise that effective safeguarding systems are those which:

- Put the student’s needs first;
- Provide students with a voice;
- Promote identification of early help;
- Encourage multi-agency working and sharing of information.

Early support and intervention to address unmet needs can be either single agency (such as within school) or multi-agency as part of the Child and Family (CAF) assessment and plan. All staff who are in positions to assess a child’s needs should be aware of the CAF process and how to support a child/family using this process. They should also be aware of and undertake the role of Lead Professional appropriately.

The Pan Lancashire Children’s Continuum of Need and Response (CoNR) framework is a tool to assist all those whose work brings them into contact with children, young people and their families (including the unborn child) to identify the level of help and protection required to ensure children grow up in circumstances that achieve their best outcomes. The framework supports a risk sensible approach (see Appendix A).

## **Child Protection**

Where it is believed that a child is at risk of or is suffering significant harm, the college will follow the procedures set out by the Pan Lancashire safeguarding children partnership arrangements and on page 10 of this policy

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the college’s commitment with regard to child protection to students, parents and other partners
- To contribute to the college’s safeguarding portfolio

**Protection:** All staff and volunteers are trained to recognise and respond to abuse and neglect. All staff and volunteers are expected to be vigilant and must act quickly when they suspect a student is suffering, or is likely to suffer harm.

**Staff** refers to all those working for or on behalf of the college, full time or part time, in either a paid or voluntary capacity.

**Child** refers to all young people who have not yet reached their 18th birthday.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents or legal guardian

**Vulnerable Adults:** adults who are parents or carers and who have care and support needs may also be at risk of abuse and neglect and school will ensure they follow procedures outlined by the Local Safeguarding Adult Board [www.lsab.org.uk](http://www.lsab.org.uk) and seek advice from the Adult Safeguarding Team on 01254 585949

### **3. Children who may be particularly vulnerable**

It is vital that children receive the right help and support at the right time to address unmet needs and identify risks to prevent issues from escalating.

To ensure that all of our students receive equal protection, we will give special consideration to students who are:

- Disabled and has special educational needs;
- Has special educational needs (with or without a Health Care Plan)
- Young carers
- Affected by adverse childhood experiences such as parental substance misuse, adult mental ill health or domestic abuse;
- Asylum seekers;
- Regularly absent from school;
- Living away from home (frequent movers);
- Vulnerable to being bullied, or engaging in bullying;
- Living in temporary accommodation;
- Living a transient lifestyle;
- Living in chaotic and unsupportive home situations;
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- Involved directly or indirectly in prostitution or child trafficking;
- Speakers of another first language;
- Subject to a Child Protection Plan;
- Exhibiting any changing behaviours or risk taking behaviours that cause concerns;
- Children In Our Care/Looked After Children;
- Privately fostered

See also section on ‘Specific Safeguarding Circumstances page 14’

### **4. Roles and Responsibilities**

The Principal holds ultimate accountability to ensure a safe environment.

#### **All staff (including governors):**

- Will have student’s safeguarding training appropriate to their role and responsibility which is regularly updated. In addition, all staff members should receive at least annual updates which can be in the form of emails, bulletins, staff meetings/discussion and supervision;
- Should be aware of the signs of abuse and neglect;
- Should be aware of how to respond to specific safeguarding concerns as outlined in this policy;
- Have a responsibility to identify those students who may require early intervention support and what action to take to ensure they are supported appropriately;
- Have a responsibility to identify and respond to a student who is or likely to suffer significant harm and what action they must take, appropriate to their role;
- Must be aware of the importance of multi-agency partnership working and information sharing processes;

- Who work directly with students and can contribute to early support and safeguarding assessments must be aware of the risk sensible approach to safeguarding adopted in Blackburn with Darwen (BwD);
- Have a responsibility to provide a safe environment in which students can learn.

**The governing body will ensure that:**

- The college complies with their duties under legislation;
- All staff undergo safeguarding training (including online safety) on induction and at a minimum every 2 to 3 years' dependent upon their role;
- All college leaders and staff working directly with children read Part One of 'Keeping children safe in education' 2019
- This safeguarding policy is consistent with local requirements, reviewed and updated annually and made available publicly (available on the college website);
- Safeguarding training commissioned and/or delivered internally is in line with advice from the Department for Education;
- There are procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal and a nominated person identified to liaise with the BwD Local Area Designated Officer (LADO);
- Policies adopted are disseminated, followed and understood by all staff;
- They appoint a member of staff from the senior leadership team to the role of Designated Safeguarding Lead (DSL);
- Students are taught about safeguarding (including online) through teaching and learning opportunities, as part of providing a broad and balanced curriculum;
- There are written recruitment and selection procedures that include the requirement for appropriate pre-employment checks and at least one person on any appointment panel has undertaken safer recruitment training;
- The procedure is in place to handle allegations of abuse of children against other children (see page 15);
- There are appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in the future; see page 14;
- The student's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students through ensuring there are systems in place for students to express their views and give feedback;
- They recognise the importance of information sharing between professionals and the local authority;
- They appoint a designated teacher to promote the educational achievement of children who are looked after and this person has appropriate training; and
- Ensure the college **ICT** policy addresses the safety of children in accessing inappropriate material when accessing the internet and that appropriate filtering and monitoring systems are in place.

## **The Designated Safeguarding Lead (DSL):**

The DSL or Deputy will always be available during college hours to discuss safeguarding concerns

### **As set out in Annex B: Keeping children safe in education 2019**

A deputy lead will be identified who can undertake those functions in the absence of the DSL.

#### ***Managing referrals:***

The DSL is expected to:

- Refer cases of suspected abuse to the Multi Agency Safeguarding Hub (MASH) as required,
- Support staff who make referrals to MASH
- Refer cases to the Channel Panel where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel panel;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS)
- Refer cases whereby a crime may have been committed to the police as required

#### ***Working with others***

The DSL will:

- Liaise with the principal to inform of ongoing enquires under section 47 of the Children Act and police investigations;
- As required liaise with the LADO for all cases involving a staff member;
- Liaise with staff on matters of safety and safeguarding when deciding whether to refer by liaising with relevant agencies.
- Act as a source of support, advice and expertise for all staff

#### ***Training:***

The DSL (and deputies) should undergo safeguarding training that is updated every 2 years. They will also undertake Prevent awareness raising at the level agreed by the BwD Prevent Coordinator.

DSLs skills and knowledge should be refreshed at regular intervals but at least annually and this can involve e-bulletins, meeting other DSLs or simply taking the time to read and digest safeguarding materials.

The DSL will:

- Understand the assessment process for providing early help and intervention, for example through the Child and Family (CAF) process;
- Have a working knowledge of how BwD Children's Social Care conduct child protection case conferences and child protection review conferences and be able to attend and contribute to these effectively when required to do so;

- Ensure members of staff has access to and understands the college’s child protection policy and procedures, behaviour policy, management of children missing education and staff code of conduct policy, especially new and part time staff;
- Be alert to the specific needs of children in need, students with special educational needs and young carers;
- Be able to keep detailed, accurate, secure records of concerns and referrals;
- Understand and support the college with regards to the requirement of the Prevent duty and able to provide advice to college staff;
- Understand the current risks associated with online safety including recognition of the additional risks that students with SEN and disabilities face online e.g. from bullying, grooming and radicalisation and support SEND children to stay safe online;
- Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

### ***Raising Awareness:***

The DSL will:

- Ensure the college’s policies are known and used appropriately;
- Ensure this policy is reviewed annually, procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this;
- Link with the local safeguarding partnership arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding; and
- Where students leave college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

## **5. Recognising and Responding to Safeguarding Concerns**

All staff should be aware of the signs of abuse and neglect and if they are unsure they should speak to the DSL. In exceptional circumstances or for advice and support, staff and the DSL can contact the Multi Agency Safeguarding Hub (MASH) 01254 666400.

The Department for Education ‘What to do if you are worried a child is being abused - Advice for practitioners’ is a booklet that helps staff to identify child abuse and neglect and take appropriate action in response. All staff can access this on the following web address:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What to do if you re worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

The following flowchart will be visible for staff to be able to identify actions required when they have a safeguarding concern: Action when a child has suffered or is likely to suffer harm

## **Child in Need (CIN)**

Under section 17 (s.17 (10)) of the Children Act 1989, a child is 'in need' if:

- She/he is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- His/her health or development is likely to be impaired, or further impaired, without the provision of such services;
- She/he is disabled.

Referral to Children's Services is via the Multi Agency Safeguarding Hub using the MASH form (see the next section)

## **Child in Need of Protection**

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

- Is the subject of an Emergency Protection Order;
- Is in Police Protection; or where they have
- Reasonable cause to suspect that a child is suffering or is likely to suffer significant harm

A professional making a child protection referral under s.47 must provide information that highlights what the child's unmet needs (underlying risk factors) are as well as high risk indicators that potentially identify the child may be suffering or likely to suffer significant harm.

The underlying risk factors and high risk indicators are identified on the Multi Agency Safeguarding Hub (MASH) form which is to be used for all referrals to Children's Services:

[http://panlancashirescb.proceduresonline.com/chapters/p\\_referral\\_social\\_care.html](http://panlancashirescb.proceduresonline.com/chapters/p_referral_social_care.html)

## **Referral to children's social care**

- **Telephone Blackburn with Darwen Borough Council's MASH (Multi-Agency Safeguarding Hub) 01254 666400**
- **Complete a MASH referral form and send securely to [cypreferrals@blackburn.gov.uk](mailto:cypreferrals@blackburn.gov.uk)**

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. There are four categories of abuse: physical, emotional, sexual and neglect:

### **Physical abuse**

Physical abuse 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**

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age – or developmentally – inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 serious bullying (including online), causing children to frequently feel frightened or in danger, or the exploitation of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. It is not solely perpetrated by adult males as women can also commit acts of sexual abuse as can other children.

### **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 as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

*(Definitions are taken from Keeping Children safe in education 2019).*

### **Also see Specific Safeguarding Circumstances on page 13**

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to MASH immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.

### **Key points for staff to remember for taking action are:**

- In an emergency take the action necessary to help and protect the child, for example, call 999;

- Report your concern to the DSL as soon as possible;
- Do not start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Complete a record of concern;
- Seek support for yourself if you are distressed.

### **If a student discloses to you**

It takes a lot of courage for a student to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the student know that they must pass the information on. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

### **During their conversations with the students, staff will:**

- Allow them to speak freely;
- Endeavour to utilise a neutral translator if necessary;
- Remain calm and collected – the student may stop talking if they feel they are upsetting their listener;
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- Not be afraid of silences – staff must remember how hard this must be for the student;
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s mother think about all this;
- Tell the student that in order to help them, the member of staff must pass the information on;
- Not automatically offer any physical touch as comfort. It may be anything but comfort to a student who has been abused;
- Avoid admonishing the student for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be interpreted by the student to mean that they have done something wrong;
- Tell the student what will happen next. The student may agree to go to see the designated safeguarding lead. Otherwise it is the duty of the member of staff to inform the DSL of what has been discussed. If the student does agree to go and see the designated safeguarding lead, the staff member should inform the DSL that the student will be coming to see them at some point;
- Report verbally to the DSL even if the student has promised to do it by themselves;
- Write up their conversation as soon as possible on the record of concern form and hand it to the DSL;
- Seek support if they feel distressed.

## **Notifying parents**

The college will normally seek to discuss any concerns about a student with their parents (if safe to do so). This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the college/DSL believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from children's social care (particularly if the disclosure is sexual abuse, forced marriage, under Prevent Duty, Female Genital Mutilation or Fabricated and Induced Illness (FI)).

## **6. Specific Safeguarding Circumstances**

Annex A in 'Keeping children safe in education 2019' sets out information about specific forms of abuse and safeguarding issues. All college staff who work directly with our students will read this annex and if they have concerns about a student's welfare speak to the DSL (or deputy) immediately.

In addition to the guidance above, college will ensure that the following safeguarding partnership arrangements are followed on the specific areas of concern using the following links (and additional information where provided):

### **Children and the Court system**

[http://panlancashirescb.proceduresonline.com/chapters/p\\_sg\\_youth\\_justice\\_sys.html?zoom\\_highlight=chidren+in+the+court+system](http://panlancashirescb.proceduresonline.com/chapters/p_sg_youth_justice_sys.html?zoom_highlight=chidren+in+the+court+system)

### **Children missing from education**

The following link provides both the procedure and forms for college to follow:

[https://panlancashirescb.proceduresonline.com/chapters/p\\_children\\_missing.html](https://panlancashirescb.proceduresonline.com/chapters/p_children_missing.html)

<http://www.lscb.org.uk/deletion-from-roll-notification-form/>

### **Children with family members in prison**

#### **Child Sexual Exploitation (CSE)**

- All staff will undertake CSE training appropriate to their role

Link to Pan Lancashire CSE Standard Operating Protocol which includes further guidance that college will follow if CSE is recognised:

[http://panlancashirescb.proceduresonline.com/chapters/p\\_child\\_sex\\_exp.html](http://panlancashirescb.proceduresonline.com/chapters/p_child_sex_exp.html)

### **Domestic Abuse**

[http://panlancashirescb.proceduresonline.com/chapters/p\\_domestic\\_violence\\_abuse.html?zoom\\_highlight=domestici+abuse](http://panlancashirescb.proceduresonline.com/chapters/p_domestic_violence_abuse.html?zoom_highlight=domestici+abuse)

## Homelessness

## Honour Based Abuse

[http://panlancashirescb.proceduresonline.com/chapters/p\\_honour\\_abuse.html?zoom\\_highlight=honour+based+abuse](http://panlancashirescb.proceduresonline.com/chapters/p_honour_abuse.html?zoom_highlight=honour+based+abuse)

## Preventing Radicalisation

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act of 2015, to have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'.

[http://panlancashirescb.proceduresonline.com/chapters/p\\_radicalisation.html](http://panlancashirescb.proceduresonline.com/chapters/p_radicalisation.html)

## Peer on peer abuse and sexual violence and harassment between children

[http://panlancashirescb.proceduresonline.com/chapters/p\\_peer\\_abuse.html](http://panlancashirescb.proceduresonline.com/chapters/p_peer_abuse.html)

## Upskirting

### Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is encompassed within a range of crimes of so called 'honour based abuse' or 'honour based violence' including forced marriage, the practice of breast ironing and FGM. There is a statutory duty upon teachers that they must report to the police cases where they discover that an act of FGM appears to have been carried out.

**The duty above does not apply** in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff must inform the DSL if they have any concerns that a student may be having FGM surgery in the future in the UK but also abroad. Staff should not examine students.

[http://panlancashirescb.proceduresonline.com/chapters/p\\_female\\_mutilation.html](http://panlancashirescb.proceduresonline.com/chapters/p_female_mutilation.html)

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow the above pan Lancashire safeguarding procedures

Warning signs for FGM can be found in the HM Government Multi-Agency Practice Guidance (link below), and pages 59-62 focuses on the role of schools and colleges. Pages 38-41 gives guidance on the warning signs that FGM may be about to take place or has already taken place.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/800306/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800306/6-1914-HO-Multi_Agency_Statutory_Guidance.pdf)

### Forced Marriage and Honour Based Violence

A forced marriage is one whereby one or both parties do not consent to marriage but are forced to do so through violence, threats or any form of coercion. Schools and colleges play

an important role in safeguarding children from being forced to marry and will follow local procedure.

[http://panlancashirescb.proceduresonline.com/chapters/p\\_forced\\_marriage.html](http://panlancashirescb.proceduresonline.com/chapters/p_forced_marriage.html)

## **Online Safety**

The governing body will carry out an annual appraisal of college's online safety using the Pan Lancashire guidance tool; Online Safety Governance Checklist available on:

<http://www.lancshiresafeguarding.org.uk/online-safeguarding/schools-the-childrens-workforce.aspx>

Mobile phones, computers and other digital devices can be a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm may include sending hurtful or abusive texts and emails; enticing children to engage in sexually harmful conversations online; inappropriate/indecent webcam filming and photography or face-to-face meetings.

The college's ICT Acceptable User Student Agreement is updated **annually**.

Children and young people may unknowingly also engage in activities that could put themselves and others at risk, such as revealing personal information and uploading images of others.

Online bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

- We will ensure that our students are taught how to keep safe online through our curriculum
- College policies/measures will encourage good behaviour and respect (this includes around bullying);
- We have an anti-bullying / behaviour policy that links to online safety;
- We ensure policies take into account equality and diversity;
- We ensure policies relating to searching a student or their property with and without their consent are written correctly;

## **Modern Slavery & Child Criminal Exploitation: County Lines**

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools and colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery, e.g. human trafficking, slavery, sexual and criminal exploitation, forced labour and domestic servitude. The public authority (including schools and colleges) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking'.

Children do not need to give their consent to be referred to the NCA.

- Staff must be aware of the above and contact the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery
- The DSL should then contact the NCA and the following persons:

- BwD MASH for concerns about children possibly subject to Modern Slavery.

[http://panlancashirescb.proceduresonline.com/chapters/p\\_modern\\_slavery.html?zoom\\_highlight=modern+slavery](http://panlancashirescb.proceduresonline.com/chapters/p_modern_slavery.html?zoom_highlight=modern+slavery)

### **County Lines**

<http://www.lancshiresafeguarding.org.uk/online-safeguarding/schools-the-childrens-workforce.aspx>

**Gender-based violence/violence against women and girls/Racist, disability and homophobic or transphobic abuse**

[https://panlancashirescb.proceduresonline.com/chapters/p\\_diversity.html](https://panlancashirescb.proceduresonline.com/chapters/p_diversity.html)

## **7. Support for those involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- Taking all suspicions and disclosures seriously;
- Nominating a link person (DSL) who will keep all parties informed and be the central point of contact;
- Nominating a separate link people for the student and member of staff, where a member of staff is the subject of an allegation made by a student, to avoid any conflict of interest;
- Responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- Storing records securely;
- Offering details of helplines, counselling or other avenues of external support;
- Following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;
- Cooperating fully with relevant statutory agencies;
- Making sure a neutral interpreter is available when English is not the student's first language;
- Providing time for the member of staff to reflect on child protection issues

## **8. Safer Recruitment**

Our college endeavours to do our utmost to employ 'safe' staff by ensuring our recruitment, selection and pre-employment processes are in line with statutory guidance including Disclosure and Barring Service (DBS) and 'Keeping children safe in education 2019'.

St Mary's College will ensure that any contractor or their employees has been subject to the appropriate level of DBS check prior to undertaking work in college.

## **In Brief:**

Regulated activity requires an enhanced DBS certificate and this includes barred list information. Regulated activity is if a member of staff:

- Will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or
- Will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engages in intimate or personal care or overnight activity, even if this happens only once

### ***Secretary of State Teacher Prohibition Orders and Section 128 Direction***

A teacher who is appointed will require an additional check to ensure they are not prohibited from teaching.

School will register and complete these checks as appropriate:

<https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>

In addition, the Secretary of State 128 direction prohibits or restricts a person from taking part in the management or as a governor of a maintained school.

For staff who have regular contact not classed as regulated activity: an enhanced DBS certificate, which does not include a barred list check, will be appropriate. This would include contractors that would have the opportunity for contact with students and who work under a temporary or occasional contract.

Supervised volunteers: In a school, a supervised volunteer who regularly teaches or looks after children is not in regulated activity. Our college will have regard to when considering which checks should be undertaken on volunteers as set out in Part 3 and Annex F of Keeping Children Safe in Education 2019

External contractors in regulated activity: An enhanced DBS certificate, which includes a barred list check, will be required

Single Central Record:

Keeping children safe in education (2019, sets out the college's responsibility to keep all staff details on the Single Central Record (example Appendix B). This will cover the following:

- All staff (including supply staff, and teacher trainees on salaried routes) who work at the school: and

Safer recruitment means that all applicants will (appropriate to the role & responsibility) have the following:

- Their identity checked;
- A barred list check;
- An enhanced DBS check/certificate;

- A prohibition from teaching check;
- Further checks on people living or working outside the UK;
- A check of professional qualifications: and
- A check to establish the person’s right to work in the UK

College has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm to a child (or vulnerable adult). School will follow DBS guidance on referrals as per the GOV.UK website.

## 9. Allegations of abuse

### Against teachers and other staff

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a student to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A student may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected.

- Allegations against staff should be reported to the Principal;
- Allegations against the Principal should be reported to the Chair of Governors;
- The Principal and/or Chair of Governors must discuss the allegation with the Local Authority Designated Officer (LADO);
- The full procedures for dealing with allegations against staff can be found in the following local safeguarding policy on allegations against staff:

[http://panlancashirescb.proceduresonline.com/chapters/p\\_allegations.html](http://panlancashirescb.proceduresonline.com/chapters/p_allegations.html)

**Staff conduct:** Staff that are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague’s career. All staff must remember that the welfare of the student is paramount and that they have a duty to respond and inform the Designated Safeguarding Lead.

The college’s whistleblowing code enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Principal. Complaints about the Principal should be reported to the Chair of Governors.

## 12. Confidentiality, Information Sharing & Record Keeping

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Safeguarding Lead, Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act and General Data Protection Regulations. Information is:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary – local authority guidance is 25 years after leaving school/education
- Processed in accordance with the data subject's rights
- Secure

Written record of concern forms will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers.

Child protection information will be stored separately from the student's college file and the college file will be 'tagged' to indicate that separate information is held.

Safeguarding information must follow the student throughout their education as an additional separate record but a copy must be retained by each school attended for the set time as above/99 years.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Principal or DSL.

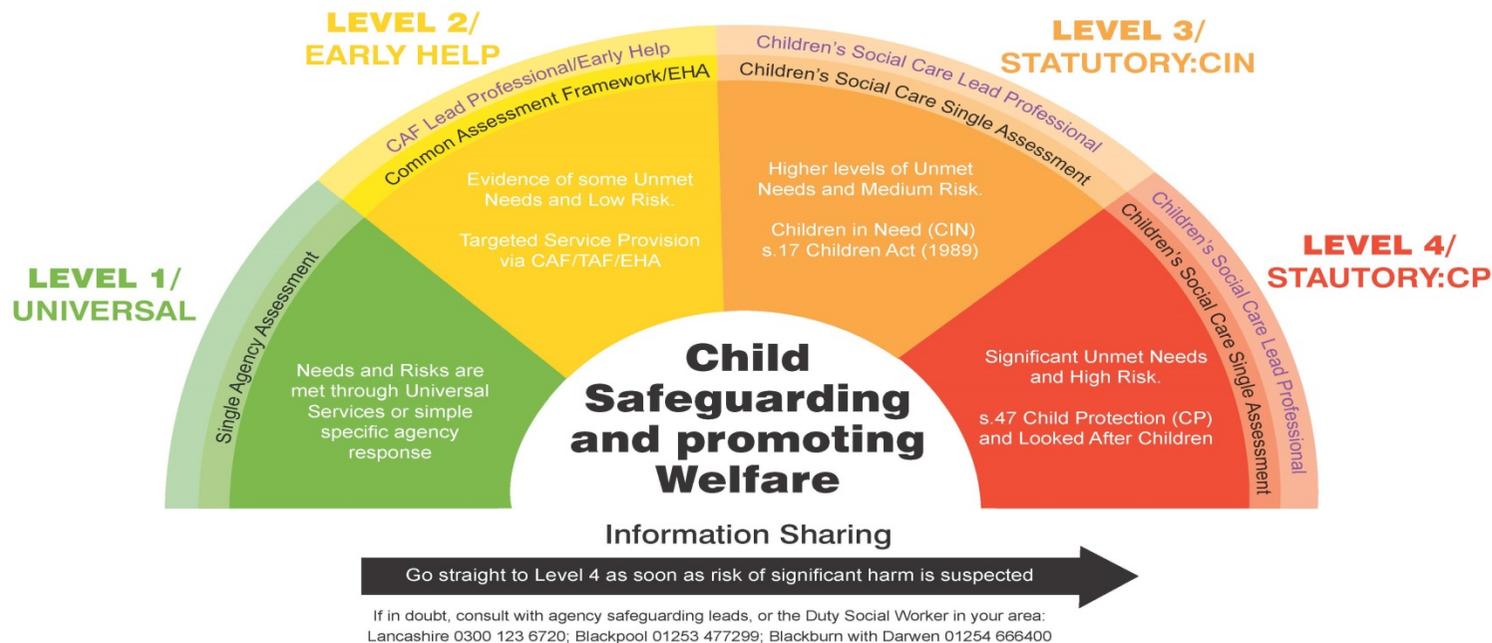
The Data Protection Act does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a student.

The college's policy on confidentiality and information-sharing is available to parents and students on request.

The college policy will reflect the local safeguarding partnership Multi Agency Information Sharing Policy:

[http://panlancashirescb.proceduresonline.com/chapters/p\\_info\\_share\\_confident.html](http://panlancashirescb.proceduresonline.com/chapters/p_info_share_confident.html)

# Pan - Lancashire Continuum of Need



July 2017

The Pan-Lancashire Children's Continuum of Need and Response (CoNR) Framework is a guidance tool to assist all those whose work brings them into contact with children, young people and their families (including the unborn child) to identify the level of help and protection required to ensure children grow up in circumstances that achieve their best outcomes.

The table below defines the four levels of the framework and there are more detailed need and risk indicators contained within the booklet accompanying this which can be found on the LSCB website: [www.lscb.org.uk](http://www.lscb.org.uk)

Level	Risk & Need	Definition of the Level
1	Needs & Negligible Risk	<p><b>Universal Service Provision</b></p> <ul style="list-style-type: none"> <li>• Primary prevention services being accessed by parents/carers through universal service routes; effects of socio-economic disadvantage addressed</li> <li>• Good enough parenting</li> <li>• Social and emotional readiness for school and equipped for life</li> <li>• Step Down from level 2: Provision of prevention services to avoid long term suffering, monitoring of progress and access to tools required to transform lives</li> </ul>
2	Evidence of Some Unmet Need(s) & Low Risk	<p><b>Single Agency Targeted Service Provision and Child and Family Plan (CAF)</b></p> <ul style="list-style-type: none"> <li>• Selective primary prevention services offered to vulnerable groups/areas</li> <li>• Variety of unmet needs and ‘underlying risk factors’ that are not being met, making the child potentially vulnerable and requiring multi-agency early help to ensure the child maintains the capacity and protective factors to sustain satisfactory development</li> <li>• Parenting and parental relationships requiring additional support and guidance</li> <li>• Secondary prevention to respond quickly to low level problems to prevent them getting worse; interventions designed to stop falling into difficult circumstances</li> <li>• Step Down from level 3: Provision of prevention services to avoid long term suffering, monitoring of progress and access to tools required to transform lives</li> </ul>
3	Higher Levels of Unmet Needs & Medium Risk	<p><b>Child in Need (CIN) – s.17 Children Act (1989)</b></p> <ul style="list-style-type: none"> <li>• Unlikely to meet developmental milestones without concerted multi-agency support led by a social worker</li> <li>• Variety of unmet needs and ‘underlying risk factors’ that are not being addressed (including resistance at CAF level to address), making the child vulnerable and unlikely to achieve good outcomes</li> </ul>

Level	Risk & Need	Definition of the Level
		<ul style="list-style-type: none"> <li>• Tertiary prevention services including responding to serious problems and avoiding them becoming entrenched</li> <li>• Step Down from level 4: Provision of prevention services to avoid long term suffering, monitoring of progress and access to tools/services required to transform lives</li> </ul>
4	Significant Unmet Needs & High Risk	<p><b>Child Protection (CP) and Looked After Children (LAC)</b></p> <ul style="list-style-type: none"> <li>• Reasonable cause to suspect the child is suffering, or likely to suffer, significant harm requiring immediate multi-agency management and service provision – <b>s.47 Children Act (1989)</b></li> <li>• Possible unaddressed ‘underlying risk factors’ and the presence of ‘high risk indicator(s)’</li> <li>• Child accommodated by the local authority due to: the child having no person who has parental responsibility for him/her; or, the child being lost or abandoned; or, the person caring for the child is prevented from providing suitable accommodation or care – <b>s.20 Children Act (1989)</b></li> <li>• Child is suffering, or likely to suffer (if a court order were not made), significant harm and that the harm, or likelihood of harm is attributable to the care given to the child (the care not being what it would be reasonable to expect a parent/carer to provide) – <b>s.31 Children Act (1989)</b></li> <li>• Tertiary prevention services including responding to serious problems and avoid them becoming entrenched</li> </ul>

