

**DN COLLEGES GROUP**

# **Safeguarding Policy**

Effective from: March 2019

Version Number: 2

## 1. Purpose

- 1.1 To demonstrate the DN Colleges Group's commitment in regard to safeguarding and child protection.
- 1.2 To state the responsibilities of DN Colleges Group in relation to safeguarding children, and adults with care and support needs, in response to current legislation and guidance. These being specifically Keeping Children Safe in Education 2019, Working Together 2018 and the Care Act 2004 (for vulnerable adults).
- 1.3

- To fulfil the requirements of Section 175(4) of the Education Act 2002 which states that governing bodies of maintained schools (including maintained nursery schools), further education institutions and management committees of pupil referral units must have regard to any guidance given by the Secretary of State.
- 1.4

To ensure:

- i. All students and apprentices (hereafter all references will be to 'student' but also includes apprentices) have a right to be protected, respected, valued and to be heard by:
  - the identification of students at risk of suffering significant harm, exploitation or extremism
  - reducing the potential risks students face of being exposed to violence, extremism, exploitation or victimisation
- ii. The safety, effective protection and prevention of maltreatment or impairment of health and development of children and young people, in line with DN Colleges Group policy, local policies and procedures and government legislation
- iii. The DN Colleges Group responds effectively to the ideological challenge of terrorism and extremism and the risk of radicalisation
- iv. Good practice and responsibility for admission, within the context of inclusion, for individuals who present with a criminal conviction
- v. All staff demonstrate an awareness and understanding through effective communication and training
- vi. The referral of all disclosures to the appropriate agencies, addressing concerns at the earliest possible stage using Early Help procedures
- vii. Effective work in partnership with the Local Safeguarding Children Board (LSCB), in Doncaster, (to be replaced by the three safeguarding partners in a local authority area working together as a multi-agency safeguarding arrangement), and the Children's Multi Agency Resilience and Safeguarding (MARS) arrangement in North Lincolnshire.

## 2 Scope

2.1 The Children Act 1989 defines a **child** as “a person under the age of 18”. This could therefore include:

- Any student up to the age of 18
- Siblings or other family members of any student
- Any other persons under the age of 18 participating in College activities on College premises.

2.2

Under the Care Act 2004 safeguarding duties apply to adults (over the age of 18) who:

- Have needs for care and support (whether or not the local authority is meeting any of those needs) and
- Is experiencing, or at risk of, abuse or neglect and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

2.3

Within this context safeguarding can also include a range of potential issues (but are not limited to) which may include:

- Bullying, including cyber bullying (by text, on social media etc) and prejudice based bullying
- Upskirting (voyeurism)
- Gender based violence
- Homelessness
- Racist, disability and homophobic or transphobic abuse
- Radicalisation and extremist behaviour
- Child sexual exploitation in the context of young people
- Youth produced sexual imagery (sexting)
- Alcohol/substance misuse
- Risk management and safety of others in relation to admissions and on-course students
- Issues that may be specific within Doncaster or North Lincolnshire
- Particular issues in relation to domestic abuse, sexual exploitation, female genital mutilation (FGM), honor based violence and forced marriage
- Sexual violence and sexual harassment, within the context of peer on peer abuse
- Child criminal exploitation within the context of County Lines, gang activity and youth violence
- Children and young people who are missing from home and/or education.

2.4 This policy extends to all DN Colleges Group employees, students, contractors, visitors and volunteers to whom the DN Colleges Group has a duty of care and responsibility.

### **3 Responsibilities**

3.1 The Corporation is committed to complying with the procedures of the Local Safeguarding Children Board/ Multi-agency local safeguarding arrangements. It recognises that it has a responsibility towards young people or vulnerable adults and people attending or visiting DN Colleges Group to safeguard and promote their welfare and to take appropriate decisions about how this can be achieved. It is not the Corporation’s responsibility to investigate child abuse.

Nevertheless, the Corporation has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action. It has

a duty to act if there is a cause for concern in relation to a potential threat or risk posed by any potential or existing members of staff or students to young people or vulnerable adults at DN Colleges Group. Overall the Corporation should ensure that:

- i. Policies and structures are in place to safeguard students safer recruitment, designated staff, training and development, whistleblowing, managing allegations against staff and health and safety management and framework
- ii. Policies are aligned to Local Authority Guidance and agreed inter-agency procedures
- iii. Policies are effective, reviewed annually and updated accordingly
- iv. Up to date knowledge and understanding of the Corporation's role in safeguarding is maintained
- v. Appropriate resources are available to enable statutory compliance
- vi. Young people are taught how to keep themselves safe
- vii. Young people have access to services to keep themselves safe regardless of protected characteristics

The Chair of the DN Colleges Group Corporation has responsibility for managing safeguarding allegations against a Principal or Chief Executive Officer and ensuring locally agreed policies and procedures are followed.

All staff have a responsibility for safeguarding children and reporting concerns in line with procedures and policies.

### 3.2 Nominated Members of Staff

The overall responsibility for Safeguarding Children and Vulnerable Adults is vested in the Governing body, with the senior nominated person and Designated Safeguarding Lead (DSL) being the Deputy Principal (North Lindsey). In the absence of the Deputy Principal (North Lindsey) it is the Associate Director Safeguarding, Staff/Student Welfare and Prevent (Doncaster).

The Deputy Principal and Associate Director are responsible for ensuring that students and staff are appropriately supported and guided and for liaising with the Local Safeguarding Children Boards to ensure compliance with policies and procedures.

The Associate Director will be the Designated Safeguarding Lead (DSL) for Doncaster College and in their absence the Deputy Safeguarding Designated Officers will assume Lead Safeguarding responsibility in the two colleges.

The Deputy Principal and the Associate Director are responsible for ensuring that DN Colleges Group is effectively represented at appropriate Strategic Boards and works in partnership in the context of safeguarding.

The Associate Director is responsible for ensuring the 14-16 cohort is safeguarded and that staff have the appropriate knowledge and expertise via a staff development programme, including 2 years mandatory essential skills training. All staff should be vetted with the Disclosure and Barring Service, prior to appointment and every 3 years thereafter.

The Deputy Principal and the Associate Director are responsible for ensuring that all incidents are appropriately recorded and reported.

The Governing body, in conjunction with the Deputy Principal (North Lindsey), must ensure

all safeguarding policies, procedures and training is effective and compliant with current law.

The Designated Governor (Safeguarding) is responsible for consulting with the Chair of Governors, in the event of allegations being made against a College Principal or the Chief Executive Officer.

## 4 Definitions and/or Relevant Legislation

4.1 The Children Act 1989 defines a child as person under the age of 18.

This policy accordingly applies to children/young people under the age of 18. 'Working Together to Safeguard Children 2019, statutory guidance published by HM Government, sets out the guidance on child protection for all staff, including those in further education. Colleges should be aware of the need to alert Social Care/Children's Services, the NSPCC or the Police, where they believe a child has been abused or is at risk of abuse. This would also include children and young people who are at risk of actual FGM (female genital mutilation), sexual exploitation, peer on peer abuse, child criminal exploitation (including county lines), missing in education, running away and bullying.

4.2 A Vulnerable Adult

A vulnerable adult refers to any person over the age of 18 years who amongst other indicators:

- Is or may be in need of community care services by reason of mental or other disability, age or illness
- Is or may be unable to take care of himself or herself
- Is or may be unable to protect himself or herself against significant harm or serious exploitation

4.3 Categories of Abuse

**Physical:** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing ill health to a child.

**Psychological:** including emotional abuse, threats of harm or abandonment, forced marriage (this is a marriage conducted without the full consent of both parties and where duress is a factor), deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive network.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

**Neglect:** is the persistent failure to meet a child's basic physical and/or psychological needs,

likely to result in a serious impairment of the child's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, a child's basic emotional needs.

**Financial:** including theft, fraud, exploitation, pressure in connection with Wills, property or inheritance for financial transactions, or the misuse or misappropriation of property.

**Discrimination:** including racist, homophobic, sexist based on a person's disability and other forms of harassment, slurs or similar threat.

**Institutional:** when the needs of the institution take precedent over the needs of the individual.

**Domestic abuse including "honour" based violence:** Domestic abuse is a pattern of behaviour which may involve violence or other abuse by one person against another in a domestic setting.

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of a family or community.

**Modern Slavery:** human trafficking which may include transporting, recruiting, or harbouring people for the purposes of exploitation using violence, threats or coercion.

**Bullying:** Young people and vulnerable adults can be vulnerable to bullying, which is deliberately hurtful and harmful behaviour, often repeated over a period of time and from which it may be difficult to defend themselves. Bullying may take many forms, including: physical attacks, verbal (which would include name-calling, threats, racist or homophobic remarks) and emotional (for example, isolating an individual from the activities and social acceptance of other young people). Cyberbullying involves making use of the Internet or mobile phones to taunt intimidate or threaten.

The damage inflicted by bullying must not be under-estimated; it can cause considerable distress, affect the young person's health and development and cause significant harm. Where any staff member suspects bullying, they must report the suspicion to their line manager who must investigate and, where appropriate, invoke the DN Colleges Group bullying and harassment procedure.

**Child Sexual Exploitation (CSE) and Trafficking:** 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 organized 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 cyberbully 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 abuse.

**Female Genital Mutilation:** Female Genital Mutilation is defined by the World Health Organisation as 'all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons'. If staff have a suspicion that a child is at risk in the context of Female Genital Mutilation DN Colleges Group have a mandatory legal duty in line with the DfE and Home Office statutory guidance to report, including known cases of Female Genital Mutilation in under 18 year olds to the Police.

**Forced Marriage:** Forced Marriage (FM) is an entirely separate issue from an arranged marriage. It is a human rights abuse and falls under the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Signals of forced marriage (FM) may be lengthy, unexplained absences or changes in behaviours.

- 4.4 **Extremism / Radicalisation – the Prevent Duty:** The Counter Terrorism and Security Act (2015) places a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). This is part of the government’s wider counter terrorism strategy aimed at raising awareness of the challenges raised by terrorism and extremism and providing appropriate support and advice.

The DN Colleges Group mission, vision, values and professional standards, for staff and students provide the platform to ensure children and young people are given the support and guidance to respect themselves and others and understand their role as local and global citizens. DN Colleges Group values inclusion, tolerance, the freedom of speech and expressions of belief/ideology as fundamental rights underpinning healthy communities in which the college is based. Freedom of speech is embedded within British values, however, freedom comes with responsibility. Free speech is subject to treating others with respect, understanding differences, equality, human rights, community safety and community cohesion.

- 4.5 **Children or young people who go missing from home/education:** DN Colleges Group will work in line with local statutory guidance for children and young people who are missing from home and /or from education and the Statutory Guidance on ‘Children who run away or go missing from home or care’ 2014. Where a young person has gone missing from College the local authority and parents where appropriate will be contacted to ensure the health, safety and wellbeing of that young person. Reference, ‘Children missing education’ DfE statutory guidance, 2016.

## 5 The Policy

- 5.1 DN Colleges Group believes that safeguarding students is our paramount concern and therefore safeguarding issues take priority in relation to any other policies and/or procedures. The Corporation is committed to ensuring that this duty of care is the Group’s paramount concern.

This policy is intended to safeguard and promote the welfare of young people and vulnerable adults who are students of DN Colleges Group. Its aim is to provide an environment in which all students and staff feel secure and supported.

Therefore within statutory requirements DN Colleges Group recognises that safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfill this responsibility effectively, all practitioners should make sure their approach is child-centred, This means that they should consider, at all times, what is in the **best interests** of the child.

This policy should be read in conjunction with the DN Colleges Group Student Anti- Bullying and Anti- Harassment Policy, Staff Anti-Bullying and Anti-Harassment Policy, Whistle Blowing Policy, Health and Safety Policy and Online Safety Policy.

Members of staff have a legal and moral responsibility to ensure that all children, young people and vulnerable adults are protected from harm. All complaints, allegations or suspicions must

be taken seriously. There is also a responsibility for the welfare of children, young people and vulnerable adults where to ignore such issues may result in harm.

## 5.2 Guiding Principles

The Corporation recognises that it has an important role to play in safeguarding the welfare of children and young people in line with Keeping Children Safe in Education (2019) and preventing their abuse (actual or suspected). DN Colleges Group has a duty to support all students and additional duties regarding the protection and support of students in the 14 to 18 age range, vulnerable young people and adults and children in the DN Colleges Group child care provision, primary school children attending Children's University, students attending external partners' premises and training facilities, young volunteers within the DN Colleges Group volunteering projects and those individuals who may be concerned about potential or actual coercion into forced marriage.

The Police and Social Care/Children's Services have the primary responsibility in the field of Safeguarding and Child Protection. The Children Act 1989 places a duty on local authorities to take steps to protect children in appropriate circumstances and gives certain powers to the police so that they can take action to protect children. All DN Colleges Group staff and volunteers have a duty to safeguard and promote the welfare of children and young people.

In the context of Multi-Agency Strategy Meetings, DN Colleges Group will share information and will be bound by the agreed actions from that meeting. The DSL in accordance with Keeping Children Safe in Education (2019) has the status and authority to action child protection and safeguarding matters relating to both College students and external individuals.

### Allegations Concerning Members of Staff

5.3 Any suspicion, allegation or actual abuse of a young person or vulnerable adult, by a member of staff must be reported to the DSL. The Head of People will be notified and an investigation under the Disciplinary Procedure will also be conducted where appropriate. DN Colleges Group procedures comply with guidance contained in Keeping Children Safe in Education (2019) and the LSCB procedure, Managing Allegations Against Staff.

In addition, on being notified of any such matter the DSL/Safeguarding Officer shall:

- Ensure that the Deputy Principal is aware
- Take such steps as he/she considers necessary to ensure the safety of the young person in question and any other young person who may be at risk
- Report the matter to the local Children's Services Department in accordance with the procedure and LSCB requirements via the LADO (Local Authority Designated Officer). Contact with the LADO will only be via the Head of People, Deputy Principal or Associate Director
- Ensure that a report of the matter is completed by the person who reported the original concern.

If the DSL/Safeguarding Officer is the subject of the allegation or the complaint the matter must be reported to the Principal or Deputy Principal.

In the event of a complaint being made against a Senior Post holder, the Safeguarding Officer would notify the Chair of the Corporation.

DN Colleges Group acknowledges its duty of care towards employees and will ensure that effective support is provided for anyone facing an allegation. A named contact will be provided if the employee is suspended. An allegation against a member of staff, volunteer or contractor will be dealt with quickly and in a fair and consistent manner which provides effective protection for the child/young person and support to the individual subject to the allegation.

## Safer Recruitment

5.4 It is vital that DN Colleges Group creates a culture of safe recruitment and as part of that adopt recruitment procedures which help deter, reject or identify people who might abuse children and young people. Decisions will be made about the suitability of prospective employees based on checks and evidence including, criminal record checks (DBS), barred list checks, reference and interview information following the principles of Working Together (2018).

As a measure of good practice DN Colleges Group request disclosure of criminal conviction at the point of admission (or conviction if on programme).

DN Colleges Group has a duty of care to all students, staff and visitors to promote and protect wellbeing. Within the context of risk DN Colleges Group will assess disclosed convictions in relation to:

- Applicants who pose an unacceptable risk to DN Colleges Group's community
- Applicants unable to meet particular professional or statutory requirements that exist for some courses.

Under the Rehabilitation of Offenders Act 1974 'spent' convictions will be assessed according to factors in line with the offence, age and sentence received. (SPA – Criminal Convictions in Admissions 2014).

## The Counter Terrorism & Security Act (2015) & The Prevent Duty

5.5 Prevent is 1 of the 4 elements of CONTEST; the Government's Counter Terrorism Strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent Strategy:

- Responds to the ideological challenge faced from terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provides practical help to prevent people from being drawn into terrorism and ensure individuals are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online health) where there are risks of radicalisation.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent terrorism.

DN Colleges Group will ensure that it is aware of the risks and monitors and deals with them effectively by:

- Understanding the threat from violent extremism and potential risks from external influences
- Ensuring plans are in place to respond appropriately to a threat or incident
- Having effective ICT security and IT Use and Misuse Policies
- Responding appropriately to a threat or incident locally, nationally or internationally as it will impact the College community
- Using College Risk Assessment Procedures and monitor visiting speakers.

The DN Colleges Group response to its role in the context of preventing radicalisation and extremism is to:

- Work in partnership with organisations involved in Prevent strategies
- Ensure staff, students and employers understand their responsibility in preventing violent extremism
- Provide support and make appropriate referrals for students at risk of radicalisations

- Support interfaith and intercultural engagement through external partnership working
- Ensure that the DN Colleges Group has a zero tolerance to bullying and harassment
- Listen and respond effectively to issues with DN Colleges Group and local community.

### Role and Responsibilities

The DN Colleges Group response to its role in safeguarding the welfare of its young people concerning child protection is:

- 5.6
- To work in accordance with the policies of the Local Safeguarding Children Board/ Multi-agency arrangements
  - To provide appropriate development to members of staff to ensure that they are aware of the issue of child protection and the procedures that follow
  - To ensure all staff and employers understand their responsibilities in relation to safeguarding children, young people and vulnerable adults
  - To provide guidance to all students on work or volunteering placements in specified settings, such as child care
  - To make appropriate referrals of children and young people under 18 to Social Care (Referral and Response Team, Doncaster or Children’s Services, North Lincolnshire) or other appropriate agency (Police or NSPCC) where there are concerns that the child is or may be being abused
  - To ensure all students wear lanyards which differentiate their age and programme of study for example under 16s, FE or HE students
  - To allocate a member of staff to the pre 16 student cohort to ensure these students have a link person with school, home and College
  - To allocate Pastoral Support within the curriculum to the 14-16 cohort to ensure absences or at risk behaviours can be supported and referred at the point of need
  - To take appropriate action where reports/referrals relate to potential or actual risk of forced marriage
  - To prohibit sexual relationships between staff and students under 18 and vulnerable students
  - To ensure that children and young people have the right of access to DN Colleges Group staff who will respect their confidences; and who will not judge, intervene and act, except in extreme circumstances, without the young person’s agreement
  - To recognise the DN Colleges Group duty of care and that the child’s welfare must be paramount. Hence, in extreme circumstances, it may be necessary to breach a person’s confidentiality to protect them from harm. Students must be informed of this position through DN Colleges Group literature reinforced by verbal explanations from learning assistants/tutors/counsellors. All employees of the College have a general duty to ensure the confidentiality of information relating to both students and employees
  - To ensure that in situations where child abuse is alleged or suspected DN Colleges Group will take account of the advice from other agencies, on circumstances warranting breach of confidentiality

These include:

- A child/young person in a dangerous situation
  - A situation when inaction might place them/someone else in a dangerous situation
  - A child/young person in fear of the abuser
  - When inaction infringes the rights of other children
  - When inaction could lead to someone being harmed
- To ensure that confidentiality is maintained and incidents will never be discussed within or outside the Colleges except on a strictly “need-to-know” basis.
  - To recognise the particular challenges and difficulties children/young people with special educational needs by ensuring they are appropriately supported
  - To ensure the Colleges take appropriate action to exclude or refuse admission to any

- individual who may pose a risk to young people or vulnerable adults
- To ensure the DN Colleges Group Nurseries comply with relevant legislation requirements

#### Allegations against students on placement with children

Any allegation of abuse against a student within placement needs the fullest investigation both from the child's point of view but also from the student's point of view.

It would be normal to suspend placement whilst investigations are undertaken.

5.7

Any concerns that result from that investigation may need disciplinary action or a review of the appropriateness of continuing placement and the course of study.

#### Allegations of peer on peer abuse

Allegations of abuse by one student against another student need to be taken seriously and in accordance with child protection procedures, but may also involve disciplinary procedures. The student who it is alleged has been abused will be advised regarding reporting to police.

- 5.8 Parents may be contacted and immediate suspension considered while an investigation is completed. Support for both parties will be offered.

#### Protection concerns about siblings and family members of students

Any concerns about the safety and protection of a student may also reflect concerns about others within the household.

- 5.9 Younger siblings for example may be at risk of harm and the matter will need reporting and investigating as if the younger sibling was our responsibility as well.

#### Staff contact with students

All staff when communicating with enrolled students must in the first instance attempt to use their DN Colleges Group provided facilities for example; email, mobile phones and social media, not those for personal use.

- 5.10 Staff contacting students for Risk Assessment purposes should do by means of formal letter, questionnaire or email unless already a student where College email may be used.

#### Training

Mandatory training will be provided, as appropriate, to all members of staff to ensure that they are aware of these procedures and specialist training will be provided for the nominated members of staff with safeguarding responsibilities.

5.11

## **6 Relevant Policies and Procedures**

- 6.1 The following documents support the Safeguarding Policy
- Whistleblowing Policy
  - Human Resources, including Safer Recruitment and Managing Allegations against staff.
  - Health and Safety Policy
  - Doncaster and North Lincolnshire Safeguarding Children's Board Policies and Procedures
  - Personal Relationships at Work Policy/Code of Conduct
  - On-line Safety
  - Use of Reasonable Force
  - Equality & Diversity
  - Screening, Searching and Confiscation of Prohibited Items
  - Safeguarding Procedures

## 7 Who to contact with Queries

- 7.1 Kit Sargent, Deputy Principal, 01724 294198, [kit.sargent@northlindsey.ac.uk](mailto:kit.sargent@northlindsey.ac.uk)  
Diane Lawson, Associate Director Safeguarding & Staff/Student Welfare, including Prevent, 01302 553553 ext. 4216, [diane.lawson@don.ac.uk](mailto:diane.lawson@don.ac.uk)  
Bob Dickinson, Equality & Diversity and Prevent Leader, 01724 294645, [bob.dickinson@northlindsey.ac.uk](mailto:bob.dickinson@northlindsey.ac.uk)  
Emma Whittaker, Head of Facilities and Contracts Management, 01302 553562, [emma.whittaker@don.ac.uk](mailto:emma.whittaker@don.ac.uk)

## 8 Communication

- 8.1 This Policy will be available externally via the DN Colleges Group website and referred to in key documentation. It will be promoted to staff via the intranet, internal communications, induction and ongoing training opportunities.

## 9 Authorisation

Policy Holder: Kit Sargent/Diane Lawson  
Committee Group: Safeguarding Group (NLC & DC)  
Authorising Group: Senior Leadership Team  
Initial Authorisation:  
Review Date: