Bury College Policy and Procedures

Safeguarding and Prevent Policy

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SECTION A

1. Introduction & Purpose

Bury College recognises that young people and vulnerable adults have a fundamental right to be protected from harm and exploitation and that students cannot learn effectively unless they feel safe and are safe. This policy should be read in conjunction with all other policies. A separate policy is available for Peer on Peer Abuse, Sexual Violence and Sexual Harassment. This policy applies to all students in all types of provision including 16-19, apprentices, adults and high needs. This policy will be implemented to support all students, including, children, vulnerable adults and adults. All concerns raised regardless of age will be followed up in line with this policy.

The College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults and that they are supported and protected. The College accepts its legal and moral responsibility to implement procedures, to provide a duty of care to young people and to safeguard their wellbeing and protect them from harm. This Policy details safeguarding arrangements for all students enrolled at the College. The college and all staff have an attitude of '**it could happen here'**. The college will respond appropriately to all concerns, including those outside of college or online.

The College is also committed to the safeguarding and welfare of all our staff and visitors to ensure that everyone who attends the College premises is safe.

The college has a zero-tolerance approach to sexual violence and harassment and it will not be tolerated.

This Policy represents the College's responsibility to protect all students, especially children, young people and vulnerable adults and those with identified needs at all College centres including those on work placement.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) considers whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Everyone working in or working for the College including sub-contractors, agency staff, shares a common duty to help keep children, young people and vulnerable adults safe by contributing to:

- providing a safe environment for children, young people and vulnerable adults to learn and develop in our College setting
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our College setting including off site provision and activity,
- Following the procedures set out by Greater Manchester and Bury's Safeguarding Children's Board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021 by:
- Knowing that safeguarding and promoting the welfare of children, young people and vulnerable adults is everyone's responsibility and the voice of the young person is evident
- Protecting young people and vulnerable adults at our College from maltreatment

- Establishing a safe environment in which our students can learn and develop within an ethos of openness
- Preventing impairment of young people and vulnerable adult's health or development;
- Ensuring young people and vulnerable adults at our College develop knowledge, skills and behaviours in circumstances consistent with the provisions of safe and effective care
- Understanding that no single professional can have the full picture of a young person or vulnerable adult's needs and circumstances. Everyone who comes into contact with young people and their family has a role to play in identifying concerns, sharing information and taking prompt action
- Undertaking the role so as to enable students at our College to have positive outcomes
- Ensuring, as a College we embed safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our College.

The College has a statutory responsibility to:

- At all times, and by all means, seek to create a safe environment for the entire College community. This includes using appropriate filters and monitoring systems (E Safe) to ensure maximum levels of online safety.
- Operate the policy to specifically encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable
- Acknowledge that abuse may take many forms, for example; physical, sexual, financial and material, emotional, neglect, 'Missing', sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others
- Comply with statutory safeguarding legislation including the Prevent Duty
- Work with external agencies, in particular, the Local Children's Safeguarding Board and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken
- Comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Independent Safeguarding Authority and 'Keeping Children Safe in Education' 2021
- Ensure that any safeguarding concern is swiftly referred as appropriate. Non-emergency referrals to be communicated to partner agencies within one working day of disclosure
- Comply with 'safer recruitment' procedures and undertake Disclosure and Barring Checks, to ensure that all employees and workers under terms of engagement are suitable to work at the College
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service
- Ensure apprentice employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to students in the workplace
- Educate and support all students in staying safe and being healthy
- Ensure that any child, young person or individual with additional needs who goes missing either from education, home or care home, particularly if this behaviour is repeated, is reported to the appropriate authority. All relevant staff are asked to complete registers timely and accurately and follow up unauthorised absences following the relevant College Attendance Strategy, policy and procedure
- Consult with students in developing safeguarding policies and procedures
- Encourage an atmosphere in which students find trained staff approachable to enable communication of any problems which may be putting them at risk

- Provide opportunities for children in need of additional support to identify themselves through the process of applications and enrolment. Students with identified support needs will be monitored through Student Support
- Provide appropriate mandatory training and development in accordance with the requirements of the Staff Development programme and induction. Raise awareness of all staff and governors of the need to safeguard children, young people and vulnerable adults and ensure they are aware of their responsibilities in identifying and reporting possible cases of abuse
- Provide environments where everyone feels valued, safe and respected. Where individuals are encouraged to talk and are listened to. This will be achieved by the regular promotion of the College values and embedding these together with British Values across every area of College activity
- Respond appropriately to all concerns, including those outside of college or online.

British values are defined as "democracy, the rule of the law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs".

Sub- Contracting

Sub-contractors will use their own safeguarding polices and procedures that are developed in line with up to date legislation and guidance. New and updated policies should be shared with Director of Personal Development (DSL) for feedback and approval.

Safe Practice

Bury College is fully compliant with the current Safe Practice guidance to be found in Bury Safeguarding Procedures at www.Burysafeguardingchildren.co.uk

Safe working practice ensures that students are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent way
- work with other colleagues where possible in situations open to question
- discuss and/or take advice from College management over any incident which may give rise to concern
- report any incidents following College safeguarding guidance processes
- apply the same professional standards regardless of gender, sexuality or disability
- comply and are aware of the confidentiality policy
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

College staff having concerns about another member of staff:

- should report these concerns the Director of HR or Hr Representative,
- where staff members have concerns about the Principal, these will be reported to the Chair of Governors.
- where staff members have concerns about the Chair of Governors, these will be reported to the Principal and the Local Authority Designated Officer (LADO)

College staff having concerns about safeguarding practices:

- all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding processes and that such concerns will be taken seriously by the senior leadership team.

- appropriate whistleblowing procedures must be in place within the College and can be read in further detail by accessing the College whistleblowing policy.
- where a staff member feels unable to raise an issue with their senior leadership or feel that their genuine concerns are not being addressed, other whistleblowing channels may be open to them by accessing www.gov.uk/whistleblowing or alternatively www.gov.uk/government/news/home-office-launches-child-abuse-whistleblowing-helpline

The ESFA has included safeguarding clauses in the funding agreements and contracts since 2017. Whilst the local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting his/her general duty, that the correct organisations are taking action to keep all pupils and students safe. For this reason, they must be made aware when an institution is itself the subject of an investigation by the local authority or the police. They do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, they require the Chair or Chief Executive of the institution (or senior designated safeguarding lead) to email Enquiries.EFA@education.gov.uk. ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police.

The college will ensure that apprentice employers are aware of their safeguarding responsibilities and are clear on the contact details of the college safeguarding team. All apprentice employers are provided with an employer handbook which contains advice and guidance on safeguarding and prevent.

Definitions

All staff at Bury College will have an understanding of Safeguarding and Prevent and their responsibilities through regular training and briefings. They will particularly develop knowledge in relation to safeguarding risks (appendix 4) and will have a clear understanding of procedures to follow (appendix 1). All staff and employers working with apprentices or students on work experience will be aware of the name and contact details for the Designated Safeguarding Lead, who is the expert within our College and is there to support staff, volunteers and the Governing Body further.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Children and young people includeing everyone under the age of 18.

Adults are those over the age of 18 including those that are vulnerable.

Frequently used acronyms which are commonly used within safeguarding and are referred to throughout this document:

- CAF – Common Assessment Framework (part of Early Help)

- CAMAT – Child Abuse Multi-Agency Training
- CAMHS - Child & Adolescent Mental Health Services
- CEOP - Child Exploitation and Online Protection centre (tackling child sex abuse and providing advice)
- CRB checks – Criminal Records Bureau checks (now called DBS checks)
- CSA - Child Sexual Abuse CSE – Child Sexual Exploitation (one aspect of CSA)
- DASH - Domestic Abuse, Stalking and Harassment and Honour-Based Violence
- (HBV). A risk identification, assessment and management model.
- DASV - Domestic Abuse and Sexual Violence
- DBS – Disclosure and Barring Service (DBS checks were previously known as CRB checks)
- DSL – Designated Safeguarding Lead. The member of staff that co-ordinates child safeguarding concerns and makes referrals (see also Named safeguarding staff, Level 3 training)
- DV – Domestic Violence
- Early Help – "providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years". Essentially intervening to prevent abuse/neglect before it occurs.
- HBV - Honour-Based Violence
- HCPC – Health and Care Professions Council. An independent regulatory body responsible for setting and maintaining standards of training, performance and conduct of healthcare professions.
- ISA – Independent Safeguarding Authority
- LA - Local Authority
- LADO - Local Authority Designated Officer
- LSCB – Local Safeguarding Children Board
- MAAT - Multi-Agency Advice Team (within the MARU/Integrated Hub). Provides advice and consultation in cases where the LSCB threshold for statutory social work intervention is not met.
- MACP – Multi-Agency Child Protection
- MARAC - Multi-Agency Risk Assessment Conference
- MARU – Multi-Agency Referral Unit
- SCR - Serious Case Review
- Section 17 – Section of the Children Act 1989 which gives Local Authorities a general duty to safeguard and promote the welfare of children within their area who are In Need
- Section 47 – Section of the Children Act 1989 which places a duty on Local Authorities to make enquiries into the circumstances of children considered to be at risk of significant harm and, where these inquiries indicate the need, to decide what action, if any, it may need to take to safeguard and promote the child's welfare
- Section 47 Enquiry – if a child is taken into police protection, is the subject of an Emergency Protection order or there are reasonable grounds to suspect that a child is suffering or is likely to suffer significant harm, a Section 47 Enquiry is initiated
- TAC – Team Around a Child (part of Early Help)
- TAF – Team Around the Family (part of Early Help)

Safeguarding concerns

Appendix 4 provides an overview of the types of safeguarding risks that young people face. This is not an exhaustive list. All staff should refer students to the safeguarding team if they have any concerns or require further advice without delay. This covers:

- Abuse
- Bullying, including cyberbullying

- Children & Young People Missing in Education
- Child sexual exploitation (CSE)
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Homelessness
- Mental health
- Missing from home
- Online safety
- Peer on peer abuse
- Private fostering
- Preventing radicalisation
- Sexual violence and sexual harassment
- Sexting
- Trafficking
- Young people and the courts
- Young people with family members in prison
- Young people missing education
- Upskirting

Support Locations

Safeguarding, Counselling, Mental Health and Pastoral support is available in the Millennium building and is accessible to all students at Bury College. Support can be accessed via the student services team, pastoral teams and reception teams on any campus.

SECTION B

3 Responsibilities

Governing bodies and proprietors should facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process, policy and development. Ultimately all systems process and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, governing bodies, proprietors and college leaders should ensure the child's wishes and feelings are considered when determining what action to take and services to provide. Systems should be in place, they should be well promoted, easily understood, easily accessible or children to confidently report abuse and their concerns will be taken seriously.

3.1 Governing Body responsibilities

The Governing Body will ensure that the College:

- Has a whole college approach to safeguarding
- Has in place an effective Safeguarding Policy and Procedure in-keeping with locally agreed interagency procedures and makes the Policy available to parents/students or other users on request
- Has processes in place to ensure that all staff undertake regular effective safeguarding training that includes online safety
- Has appropriate provision to ensure that children and young people are taught about safeguarding, including online safety. This provision should include a personalised or contextualised approach for vulnerable children, victims of abuse or SEND children
- Operates safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with children and vulnerable adults, including DBS checks.
- Has procedures for dealing with allegations of abuse against members of staff and volunteers
- Has a member of the College Leadership Team who is designated to take lead responsibility for dealing with safeguarding issues, providing advice and support to other staff and liaising with local agencies.
- Ensures the designated person undertakes training that is up to the standards agreed by the LSCB and refresher training at 2 yearly intervals.
- Remedies any deficiencies or weaknesses in regard to safeguarding arrangements that are brought to its attention without delay.

There is a designated governor link for safeguarding. It is their responsibility to liaise with the local authority and/or partner agencies on issues of child protection and where allegations of abuse are made against The Principal. The designated Governor is responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over matters regarding safeguarding, including:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children Board's procedures.

- Ensuring all relevant policies and procedures include reference to safeguarding / Prevent.
- Ensuring that the Governing body considers College safeguarding and Prevent a priority.
- Ensuring that each year the Governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.
- The governors have an established Safeguarding Working Group which meets on a termly basis to receive reports and updates on legal responsibilities and ensure that the Local Authority procedures are being followed appropriately.
- The governors must wear ID Badges when visiting the college.

3.2 The responsibilities of the Principal

- The Principal and Chief Executive will ensure that
- The Policies and Procedures adopted by the Governing Body are fully implemented and followed by staff.
- Sufficient resources and time are allocated to enable the designated member of staff and others to discharge their responsibilities including taking part in strategy decisions and other inter-agency meetings.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, young people and vulnerable adults and such concerns are addressed sensitively and effectively in a timely manner.
- A member of the Leadership Team will take the operational lead on referrals, liaison with external agencies, related training and will be informed immediately of all incidents.

3.3 Management responsibilities

Director of Personal Development and Designated Safeguarding Lead

- Will ensure dissemination and implementation of the policy
- Will be the Designated Safeguarding Lead for the College with a day to day responsibility for supporting and supervising the Safeguarding and Prevent Manager
- Will act as the Designated Safeguarding Lead for Students with SEND, High Needs and EHCP
- Will be the Senior Mental Health Lead for the College
- Will ensure the development of cross College training to ensure that governors, staff and visitors are fully ware of the safeguarding issues faced by children, young people and vulnerable adults and how to keep them safe
- Will provide advice and support to staff on child welfare and child protection matters. He/she will take part in strategy discussions and inter agency meetings and ensure strategies and policies are agreed, implemented and effectively delivered.
- Will refer to LADO as appropriate.

- Will report at least termly to the Board of Governors regarding the appropriate policies and procedures and will provide a statistical analysis of safeguarding incidents and all training and related CPD undertaken.
- Will report weekly to the Leadership Team on matters arising around safeguarding
- Will report immediately to the Principal any safeguarding issues that impact on the wider College
- Will keep up to date with nationwide threat and issues arising in the community
- Will be available and contactable through periods of partial College closure
- Will monitor the overall attendance of vulnerable students through a period of partial College closure
- Will ensure that the tutorial framework includes opportunities to develop skills, knowledge and behaviours to enable students to keep themselves safe
- Will ensure that adults and apprentices have appropriate resources to ensure they know how to keep themselves safe from radicalisation, including equality and diversity, online safety, mental health and well-being. These resources will be adapted and include relevant considerations to the student's location.
- Will ensure that the tutorial framework includes opportunities to develop skills, knowledge and behaviours in regards to upholding British Values and awareness around Prevent for all types of students including adults and apprentices
- Will lead on the Mental Health and Wellbeing Strategy across the College

Director of HR, Student & Customer Services

- Will ensure staff complete mandatory training and provide proof as required
- Be the first point of contact in regards to allegations against staff
- Be responsible for safer recruitment
- The lead for staff mental health
- Arranges counselling and support for staff as appropriate

Safeguarding & Prevent Manager

- Will be the initial point of contact for referrals and concerns related to radicalisation and extremism and will be available at all times during term time/college hours. Where this is not possible, effective cover arrangements must be in place
- Will be the Deputy DSL with day to day responsibility for the safeguarding of students
- Will provide support for staff in relation to Prevent
- Will contribute to, and regularly review, the Prevent Risk Assessment
- Will organise training for staff and students
- Will meet with Pastoral Managers to discuss referrals and agree actions
- Will be available and contactable through periods of partial College closure
- Will monitor the attendance of vulnerable students through a period partial College closure

- Will ensure that resources are available to signpost students in their communities
- Will ensure the deployment of appropriate support for students in regards to mental health and wellbeing
- Will ensure that all referrals and concerns raised in regards to safeguarding are dealt within 24 hours
- Will ensure that all students with SEND that are referred to safeguarding have additional support in regards to their communication needs.
- Will arrange through the local authorities' translators for students with ESOL support needs

Curriculum Directors

- Will ensure staff are aware of, and follow, policies and procedures
- Will provide approval for guest speaker forms
- Will ensure staff attend training
- Will ensure the safety measures and process are followed and in place for external trips and visits
- Will ensure safety measures and process are followed for external work experience

Pastoral Managers

- Will Risk assessing students with criminal convictions prior to starting programmes
- Will support the Safeguarding & Prevent Manager in dealing with Safeguarding issues.
- Will take responsibility for dealing with safeguarding issues relating to students as they arise
- Will refer safeguarding concerns to the appropriate agencies
- Will provide advice and support to staff dealing with a safeguarding concern relating to students
- Will attend external meetings as appropriate
- Will liaise with schools, children's services, the police and other agencies as required
- Will maintain accurate records of safeguarding issues and subsequent actions
- Will be available and contactable through periods of partial College closure
- Will monitor the attendance of vulnerable and all students through any period of partial College closure
- Will ensure that all students with SEND that are referred to safeguarding have additional support in regards to their communication needs
- Will ensure that all referrals and concerns raised in regards to safeguarding are dealt within 24 hours

3.4 All College Staff

All college staff play an important role in safeguarding as they are in a position to identify concerns early, providing help for children and young people to prevent concerns from escalating

- **All Staff should ensure that they have read part 1 of KCSIE**

- Any member of staff of staff who has a concern should follow the referral process as set out by the College.
- All staff must wear their ID badges at all times
- Promote a zero-tolerance culture in regards to sexual violence and sexual harassment
- Ensure that all concerns in relation to sexual harassment are treated seriously
- All staff must challenge any form of derogatory and sexualised language or behaviours, Taking a zero-tolerance approach to inappropriate behaviour
- All College staff have the responsibility to provide a safe environment in which they can learn
- All College staff have the responsibility of being vigilant in observing, identifying and reporting concerns
- All staff should ensure that they refer in concerns about a student's mental health and wellbeing
- All new staff will undertake an induction to ensure they are fully appraised of current safeguarding policy and procedures.
- All College staff will undertake an appropriate level of training to raise awareness and highlight key issues. This training will take place as a minimum every year via briefings and e-learning packages.
- All College staff have the responsibility to adhere to the staff code of conduct and to behave in a professional manner that safeguards children and themselves.
- All staff will not access the personal details of any student within the College without prior permission from the DSL
- All staff have the responsibility to follow the procedure for sending students home in Appendix 2
- All staff have a duty to report through the safeguarding processes, any concerns that may arise through observing students in the work place or conversation with students that present a safeguarding concern in external organisations. For example, if a concern arises around the practices at a workplace that give rise to concerns about a patient or clients.
- All staff have a duty to report through the College disciplinary process and safeguarding process any concerns that a learner behaviour puts into question the professional standards and responsibility of the qualification they are studying. All staff should be familiar with the expectations around professional conduct for students in line with awarding body requirements. The student handbook should ensure that students are aware of the professional conduct required within their qualification and their chosen profession. An incident would be addressed through the disciplinary process.
- During a period of distance learning, College staff should make requests to the Principal to undertake any live sessions that contain video imagery.
- Any online conferencing or audio conferencing must be requested through the DSL and a risk assessment completed and approved.
- Staff must only use technology that has been approved by the College Leadership Team

- Teachers should use Appendix 7 guidance when asking students to research sensitive topics, such as safeguarding, terrorism and counter terrorism

3.5 Student responsibilities

Student responsibilities are clearly sent out in the student code of conduct that is explained, agreed and signed at the start of their learning programme.

- Visible ID Badge at all times on College premises
- Abide by the student contracts
- Abide by the zero tolerance to sexual violence and sexual harassment
- Report any concerns they have around sexual violence or sexual harassment
- Contact the safeguarding team if they feel unsafe at home or at College
- Report any concerns they have about other student's safety
- Report any concerns they have around upholding British Values and Prevent
- Be aware of their own safety and the safety of others
- Complete all tutorial activities that promote awareness of safety
- Inform the College if they have a diagnosed learning difficulty or disability
- Seek support for help with mental health issues.

3.6 **Multi-agency working**

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies.

Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need.

The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements. Bury's partnership details can be found here:
https://burysafeguardingpartnership.bury.gov.uk/CHttpHandler.ashx?id=20167&p=0

The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners

Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

SECTION C

4 Dealing with disclosure or abuse: Safeguarding Referral Process (Appendix 1)

In the event of any partial College closure, the DSL will be contactable via telephone and staff should not hesitate to refer in safeguarding concerns. The process below should still be followed.

All staff that have concerns should follow the College's safeguarding referral process

In the event that a student or someone discloses that a child or young person is at risk, all staff members:

- Must listen and take detailed notes,
- Should not interrogate or ask leading questions
- Must explain your duty of care to report all cases where abuse is suspected to be taking place.
- Must not promise confidentially

Staff should immediately inform the College's safeguarding team.

It is essential that this information is recorded and detailed carefully on promonitor using the level 3 confidential comments area. This information should not be shared within anyone other than the safeguarding team. You must include

- A clear comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decision reached and the outcome

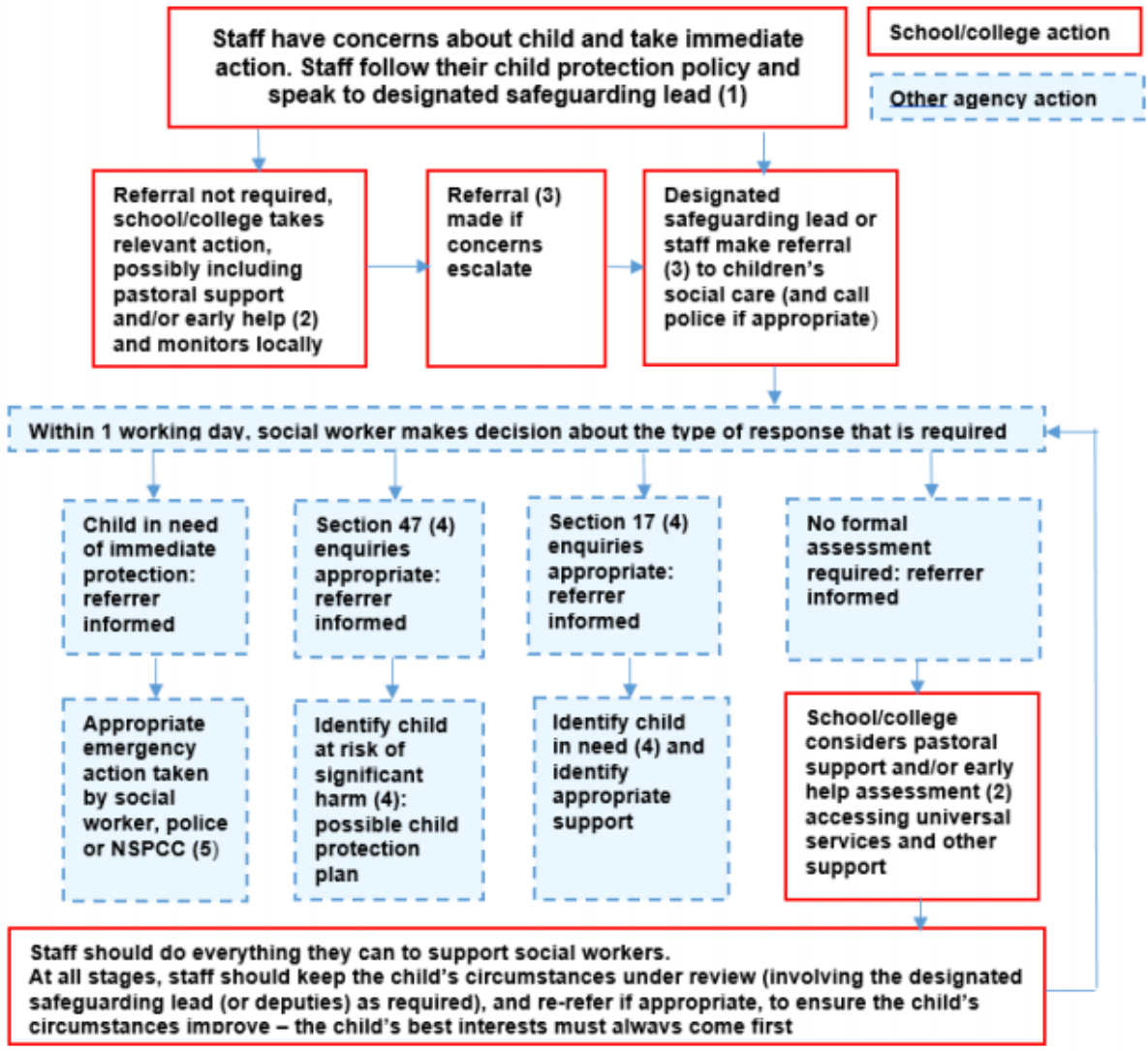
If the issue is urgent, the student is at immediate risk of harm or injury or staff are unsure, the safeguarding team should be contacted in person, by telephone 07713312773 or Safeguarding@buryCollege.ac.uk

For non-urgent safeguarding issues, detailed information should be detailed carefully and recording in confidential comments under level 3 safeguarding.

The Appendix when to contact the police should be used alongside the behaviour and disciplinary policy to ensure appropriate referrals are made.

The safeguarding team will follow the flow chart below when dealing with safeguarding concerns:

Actions where there are concerns about a child



SECTION D

5.1 Dealing with allegations against members of staff

The framework for managing cases is set out in the College Managing Allegations of Abuse against staff policy includes the KCSIE 2021 updates on low level concerns. This applies to a wider range of allegations for those in which there is reasonable cause to believe a child is suffering, or is likely to suffer, significant harm.

It also caters for cases of allegations that might indicate that s/he is unsuitable to continue to work with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

There may be up to 3 strands in the consideration of an allegation: -

- Police investigation of a possible criminal offence;
- Enquiries and assessment by Children's Services about whether a child needs protection or is in need of services; and/or
- Consideration by the employer of disciplinary action in respect of the individual if there is a breach of professional standards/code of conduct.

This part of the guidance relates to members of staff, agency workers and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

The College as an employer has a duty of care towards its employees. The College should ensure it provides effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes agency workers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

The College has identified that the Director of HR, Student & Customer Services and the Director of Personal Development (DSL) as the key staff to whom allegations or concerns that a member of staff or volunteer may have abused a child or failed in their safeguarding duty should be reported. Or in cases where that person is the subject of the allegation or concern, the concern should be reported to the named L.A.D.O(Local Authority Designated Officer) within the Children's Services Department. All concerns should follow the flowchart below. For further guidance please refer to the Allegations of Abuse made against staff policy

Low level concerns

This term does not mean insignificant, it means that behaviour towards a child does not meet threshold as set out above. A low level concern no matter how small and even if no more than causing a sense of unease or a 'nagging' doubt. This concern is that an adult working for the college or on behalf of a college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to be referred to the LADO.

Examples of such behaviour include but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with children on a 1-1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

The staff code of conduct and the Managing Allegations against staff policy clearly states the acceptable behaviours of staff. These behaviours may also be identified by students and should be referred to HR.

5.2 Staff Training and Induction

The College's Designated Safeguarding Lead (DSL) with responsibility for child protection, undertakes appropriate child safeguarding training and inter–agency working training (provided the local Safeguarding Children Board).

The DSL(s) and Pastoral Managers will undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

In addition to their formal training, their knowledge and skills will be updated (for example, via e- bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

All other College staff, including non-teaching staff, will receive appropriate safeguarding and child protection training which is regularly updated.

In addition, all staff members will receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All new staff (including agency staff and volunteers) are provided with the College's Safeguarding Policy and informed of College's Child Protection arrangements at Induction.

5.3 Safer Recruitment and Selection (please download guidance on DBS, Vetting and Barring)

Bury College pays full regard to DfE guidance 'Keeping Children Safe in Education' (2021).

The College will ensure that all appropriate measures are applied in relation to everyone who works in the College who is likely to be perceived by the student as a safe and trustworthy adult, including volunteers and staff employed by contractors.

Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the candidate's DBS status, the Children's List, DBS checks and right to work in England checks.

In line with statutory changes, underpinned by regulations, the College will maintain a Single Central Record (SCR). This document will cover the following people:

- all staff, including agency staff, and those providing education to children.

The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained**, and** the date on which each check was completed/certificate obtained apply:

- an identity check;
- a barred list check;
- an enhanced Disclosure and Barring Service (DBS) check
- a prohibition from teaching check;
- a section 128 check (for management positions as set out in paragraph 99 for independent schools, including free schools and academies);
- further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

For supply/agency staff, the College will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.

Where checks are carried out on volunteers, the College will record this on the single central record.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a person under 18.

5.4 Health and Wellbeing Support for Staff

Support is available for staff via HR where incidents have occurred with students where they feel victimised or unsafe. Where a staff member is the victim of a student assault this should be reported to HR to ensure the staff member is supported. Further guidance on this is available in the student disciplinary policy.

SECTION E – ADDITIONAL ARRANGEMENTS

6.1 Missing in education

The College has a responsibility to ensure that all staff are aware that children and young people going missing, particularly repeatedly, can act as a vital warning sign for a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and follow the College 'unauthorised absence' and 'children missing from education' procedures.

Where a student has not attended College for a week and tutors have not been able to make contact, this should be referred as a safeguarding concern using the level 3 comments. Where a student is a Care Leaver, a Looked after Child or is supported by the safeguarding team, a referral should be made to safeguarding on the same day. If the safeguarding team are unable to make contact via, phone, text, email or letter, a home visit will take place the following week or sooner if appropriate. Home visits will always be conducted by the 10th day, or earlier if the student is under safeguarding support or deemed an immediate risk. Pastoral Managers will monitor students attendance through weekly At Risk meetings and will be alert to attendance patterns, these students will be referred to safeguarding for further investigation**.**

This should include a consideration of holiday requests within term time. Any requests for holidays should be approved by the Head of Curriculum.

6.2 Residentials, Trips and Visits

Any staff who support students on residentials or during day trips should ensure appropriate forms are completed, approved and logged with the College before commencement of the event and in accordance with College established procedures. In each case it is required that all staff or volunteers included must be DBS checked. It is essential that all staff must be made aware of safeguarding procedures and be in contact with the College named person during the event.

6.3 Student DBS Checks and Disclosure by Association

DBS checks are carried out on students who complete work experience with children or vulnerable adults. Students completing work experience with children under the age of 8 are also required to complete a disclosure by association. The DBS is logged by the counter signatory but remains the property of the student. Any convictions appearing on a DBS or any issues identified through disclosure by association are dealt with by the relevant Curriculum Director The nature of any conviction will be considered and appropriate controls put in place.

6.4 Recruitment of Students with a Criminal Record

Students who disclose that they have a criminal record, or if this subsequently comes to light, will be interviewed by the Pastoral Manager with responsibility for that programme. The nature of the conviction will be considered and a risk assessment produced. This will identify appropriate control measures and be held and monitored by the Pastoral Manager. Should the student change courses or be required to attend classes on a different site the Pastoral

Manager completing the risk assessment will share the control measures with other Pastoral Managers who will now have responsibility for this student. If it is not possible to provide learning for an individual due to the nature of their conviction, the reason will be explained.

Declaring a criminal conviction does not automatically prevent anyone from becoming or continuing as a student at Bury College and we offer appropriate support when necessary. However, if a risk assessment is identified as 'high risk' then admission to College will be refused. Applicants assessed as 'medium risk' will be robustly monitored in partnership with appropriate external agencies.

The College is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe.

All students will know that we have a Designated Safeguarding Lead (DSL) and Pastoral Managers with responsibility for child protection.

The College's tutorial programme, strongly promotes key messages relating to all aspects of safeguarding during induction and throughout the academic year.

The College reserves the right to refuse a place to an applicant if s/he is assessed as a high risk to themselves or others, or if the College is unable to ensure a safe environment for the College community if the applicant is admitted. We will also undertake risk assessments if information is received at any time which suggests that the student may present a risk to themselves or others. This will include referrals from external agencies relating to criminal activity, organised gang crime (weapons, drugs) or serious gang affiliation. Any student who is clearly evidenced to be involved with serious criminal and / or violent activity will be withdrawn from their course.

6.5 Student Support

All students are made aware throughout induction, tutorial and College promotions of how to keep themselves safe. This includes training and support around, Health and wellbeing, British Values, Prevent, online safety and awareness raising of common themes and risks to students. Students training and awareness is a key priority at Bury College and is reinforced throughout their whole learner journey. The tutorial framework is sequenced in a way that allows students to develop skills knowledge and behaviours over time to keep themselves safe. Students are made aware of what to do should they not feel safe. For apprentices, key topics are selected and personalised to deliver to individual students. Adult students receive adapted news letter to provide information on key topics.

Welfare, Pastoral and Chaplaincy

To support students of all faiths including those with none, the College has a number of measures in place. A contemplation room is provided for students that is monitored by the College. There are rules of respect around the use of the contemplation room to ensure that students that require a quite place of reflection have the opportunity to do so. As well as this resource students have access to:

- The Safeguarding Team
- Pastoral Team
- Behaviour Team
- Chaplaincy Team

- Counselling Service

Mental Health and Wellbeing

Students mental health and wellbeing does not mean an absence of physical or mental illness. Rather it is a state of physical, mental and emotional health where a student is able to engage meaningfully in learning and contribute to their community. Wellbeing is personal and multifactorial, but typically includes feelings of being socially connected, a sense of direction and belonging, satisfaction with personal achievements, and low levels of anxiety. To ensure that. The College support mental health and wellbeing through:

- Mental Health and Wellbeing Steering group
- A dedicated Mental Health and Wellbeing Strategy that highlights the Colleges responsibility and individuals in supporting mental health
- The Thrive model to provide early intervention and support for students
- Centralised resources available on the VLE
- Inclusion and embedded within the tutorial model
- Training for staff on the thrive model
- A dedicated team including, safeguarding, behaviour, pastoral and counselling

All staff must be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the designated safeguarding lead or a deputy.

6.6 On-Line Safety

The use of technology has become a significant component of many safeguarding issues. The internet can be a fantastic place for children and young people where they can talk to friends, be creative and have fun. However, the college is committed to managing the risks associated with the use of technology.

Working with our students we have a tutorial entitlement that develops skills, knowledge and behaviours in identifying and avoiding risk, learning how best to protect themselves and their friends, and knowing how to get support and report abuse if they do encounter difficulties.

IT filters and monitoring systems are in place and these are regulated and risk assessed as part of the Prevent duty. An **Online Safety Policy** identifies the usage and expected behaviour of staff and students. As a College of further education, we appreciate the value of technology

and that appropriate filters are in place yet this does not lead to unreasonable restrictions which would limit online teaching.

The College will provide support, guidance and advice to children, young people, vulnerable and adults, parents and guardians on how to keep safe online. Those taking part in online or distance learning will have the same access to the safeguarding team to report any concerns. Concerns should be reported through safeguarding@buryCollege.ac.uk

Through a period of online or distance learning it essential that staff have regular contact with students to ensure that they are still looking out for signs that they may be at risk.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

6.7 Campus security

Campus security at the College ensures that all staff, students and visitors are kept safe. The College has the following controls in place:

- Visible ID policy
- Security at the entrances of the millennium building, Woodbury Centre and Enterprise building.
- The College has a visitor procedure, security barriers and security guards.
- Those not displaying ID badges are challenged
- CCTV policies in place.
- Emergency and evacuation procedures are in place

6.8 Visitors to College premises

To ensure that all visitors are accounted for and are on-site for a legitimate purpose. The Visitor Procedure must be followed and can be found within the Proof of ID Policy. Contractors & visitors must sign in and display the ID badge issued while on site.

6.9 Use of reasonable force

The term ‘reasonable force’ covers the broad range of actions.

- Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury.
- ‘Reasonable in the circumstances’ means using no more force than is needed.

Reasonable force must only be used to control students or to restrain them where there is no other alternative.

- Control means either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom.
- Restraint means to hold back physically or to bring a pupil under control. It is typically used in more extreme circumstances, for example when two pupils are fighting and refuse to separate without physical intervention.

When can reasonable force be used?

- Reasonable force can be used to prevent students from hurting themselves or others, from damaging property, or from causing disorder.
- The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

6.10 Power to ask to search students for prohibited items

Authorised staff can request to search a learner or their bags as is reasonable given the circumstances to conduct a search for the following “prohibited items”:

- knives and weapons
- alcohol
- illegal drugs
- fireworks
- pornographic images
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.

Where students refuse to consent to a search the College will call upon a member of the Leadership team to discuss with the student the consequences of not consenting. Where there is a concern that the student possess any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property then the police should be contacted.

Where there is not an immediate risk of harm or injury the student should be suspended and the sending student home procedure should be followed.

This should then be followed by disciplinary action.

6.11 Prevent

The College Prevent strategy is embedded throughout the safeguarding policies, IT Policies, online safety, behaviour policy and procedures. The framework has Prevent threaded throughout to develop students understanding of risks and how to keep themselves and others safe. The College has a Prevent Action Plan in place and a Prevent working group that meets once per term to monitor and measure the risks and control measures to ensure that students and staff are safe. The prevent action plan covers:

- Leadership
- Staff and Student Awareness Training
- Online Safety
- Campus Security
- Speakers and Events
- Partnerships and Local intelligence

- Work Based Learning, Sub Contractors, Community Based Learning, Distance Learning through a period of partial closure

The Safeguarding and Prevent Manager has effective links with the DfE Regional Prevent Co-ordinator and regular liaison with the local Police prevent team, local authority, regional co-ordinator and other agencies working with Prevent for guidance and critical reflection as required.

6.12 Speakers and Events

A speakers and events process ensures that all events and invited guest speaks are providing a well-rounded, well balanced delivery that aligns with College's vision and values and will prepare students for their next steps.

No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in this policy. This includes advertisement through any social media platform. Bury College reserves the right to cancel, prohibit or delay any event with an external speaker if the policy is not followed or if health, safety and security criteria cannot be met.

Any room booking or event organisation with an external speaker involved must be made no later than 14 days before the date of the event. This is to allow for the organiser to have made adequate safeguarding checks as well as allowing time for alterations to the event if necessary. Any request made outside of this time frame will be considered on an individual basis in order to ensure adequate checks can be made.

The individual organising an external speaker should conduct brief research into the proposed speaker. The External Speaker Check and Review Form must be used. The Curriculum Director must approve before any arrangements are confirmed. If in doubt as to the suitability of a speaker, the decision should be referred to the DSL.

6.13 Fundraising

Bury College encourages and fully supports the concept of charitable giving and welcomes such collections by staff and students across the College community. In order to ensure that monies raised through fundraising are being donated to bona fide charities which work for the good of others and do not support illegal activity such as abuse or terrorism, the following procedure must be followed:

- 2 weeks prior to the collection the lead person responsible for the activity will complete an on-line pro forma stating which charity is being supported by the fundraising, when the collection will take place and where.
- The Student Services Supervisor will approve or decline the event and will inform the lead person of the decision
- All monies collected for charity must be collected in a secure charity collection bucket (available from the Finance Office). This is a sealed bucket and must be kept sealed until the end of collection, when the monies should be immediately counted and signed for by two members of staff in a secure office.
- This must then be taken to the cash office for banking.

6.14 Student Contact Details

Bury College will endeavour to keep up to date and accurate information in order to keep students safe. To do this it is essential that contact information is kept up to date. The College needs update information on:

- names and contact details of persons with whom the student normally lives
- names and contact details of all persons with parental responsibility (if different from above)
- **two adult's emergency contact details (if different from above)**
- any relevant court orders in place including those which affect any person's access to
- the young person (e.g. Children and Families Court Order, Injunctions etc.)
- if the young person is or has been subject to a Child Protection or Child in Need Plan
- any other factors which may impact on the safety and welfare of the child

The College will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting GDPR, data protection and safeguarding requirements.

6.15 Communication, Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect and promoting children's welfare, including their educational outcomes. Colleges have clear powers to share, hold and use information for this purpose. At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018). Bury College works closely with Local Authorities and, where appropriate from a placing local authority.

As a College we recognise the importance of information sharing between professionals and local agencies. We follow best practice guidance.

The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a College we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of the young people in our care. The DSL will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal data.

6.16 Managing Complaints

As a College we encourage young people and families to raise with us compliments, concerns or comments and have a robust internal investigation process.

The compliment, comment or complaint policy states clearly the stages of complaints and where to escalate concerns. Our complaints policy is on our College website.

Safeguarding concerns should be raised with the College immediately. All visitors are given safeguarding information which outlines how to share concerns and also code of conduct expected by visitors/contractors.

6.17 Fitness to Practice/ Fitness to study

The College has a responsibility to ensure that students who are admitted to, registered on and graduate from professional programmes are fit to practise and accordingly will provide students with appropriate teaching, support and guidance. However, situations or circumstances may arise where a student's fitness to practise is called into question. Where these arise the Fitness to Practice policy should be used in conjunction with this guidance.

The College is committed to supporting students and recognises the importance of their health and wellbeing in relation to their academic progress and College experience. Students are expected to take a proactive part in the process, by managing their own health and wellbeing as well as engaging with any support, in order to fulfil their academic potential.

There may be occasions where the health or wellbeing of a student deteriorates to the point where it raises questions about their fitness and suitability to continue their studies. The Fitness to Study Policy and Procedure will be used to deal with instances where concerns have been expressed over a student's health or behaviour.

6.18 Pre-16 students

All pre-16 students will be risk assessed and protocols established as required. This will indicate whether the student is able to leave the premises at lunchtime and, if not, what the supervision arrangements will be.

Pre-16 students will be issued with a grey lanyard and Pre-16 students must not be sent out of a class or refused entry. Should a class be cancelled the Head of Curriculum will inform the pre-16 co-ordinator. Pre-16 students will be instructed not to smoke or vape on the College campus. Any safeguarding issues or concerns for Pre-16 students will be dealt with in-line with Bury College procedures and referred back to the Designated Person at the young person's institution. A College Designated Person will liaise directly with that institution

6.19 Children who need a social worker (Child in Need and Child Protection Plans)
Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known

safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Bury College ensures that all young people with a social worker have an identified key person who will be the key contact and support.

SECTION F

7. Associated Documents

- Visitor Procedure
- Proof of ID
- Policy Data
- Protection
- Administering
- Medication Procedures
- Supporting Students with Medical Conditions Policy & Procedure
- Student Contract
- Education and Inspection Act 2006
- Staff Code of Conduct
- DfE Guidance “Use Of Reasonable Force 2013”
- Behavioural Policy
- Prevent Risk Assessment
- Guidance in Safeguarding Children & Keeping Children Safe 2020
- Recruitment & Selection Policy
- Agency Staff Handbook
- Control of Contractors
- Disciplinary Policy & Procedures
- Off Site Working Vehicle Policy
- Home Visit Procedure
- Rehabilitation of Offenders Act 1974 (Exceptions) order1975 Pastoral
- Preventing youth violence and gang involvement
- Safeguarding Handbook
- Online Safety Policy

SECTION G

8. Monitoring, Review and Evaluation

This policy will be reviewed annually by the DSL and Safeguarding Steering Group.

- Appendix 1 Safeguarding Referrals
- Appendix 2 Flow chart for dealing with peer on peer abuse, sexual harassment and/or sexual violence
- Appendix 3 Abuse by a Professional
- Appendix 4 Sending young people home
- Appendix 5 Types of Abuse and Safeguarding Concerns
- Appendix 6 Home Visits
- Appendix 7 Assignment Research- Safeguarding guidance for tutors

Appendix 1 Procedure for reporting a safeguarding concern

Appendix 2 Flow Chart for concerns around Peer on Peer Abuse, Sexual Violence and/or Sexual Harassment

Suspicion, Disclosure or Concern

Staff Suspect abuse or overhear other students

Student discloses a situation has taken place

Another person or friend reports a concern

There is a concern about a member of staff. Report Immediately to HR

Listen take detailed notes, do not integrate or ask leading questions
Explain your duty to report all case where there is a concern do not promise confidentiality.
Give the student time to ensure they do not feel a burden. Keep accurate records.

Inform the safeguarding team via the normal referral process. Unless the student is in immediate danger where you should contact reception and request a member of the safeguarding team or leadership team attend immediately

The Safeguarding and Prevent Manager will speak to the victim to gather more information, including their wishes

The safeguarding manager will discuss with the DSL on the course of action

The following process run parallel. The DSL and Safeguarding and Prevent Manager will not wait for an outcome from external agencies before putting safeguarding measures in place

Take action:

- Managing Internally
- Provide Early Help
- Refer to Children's Social Care
- Refer to the Police

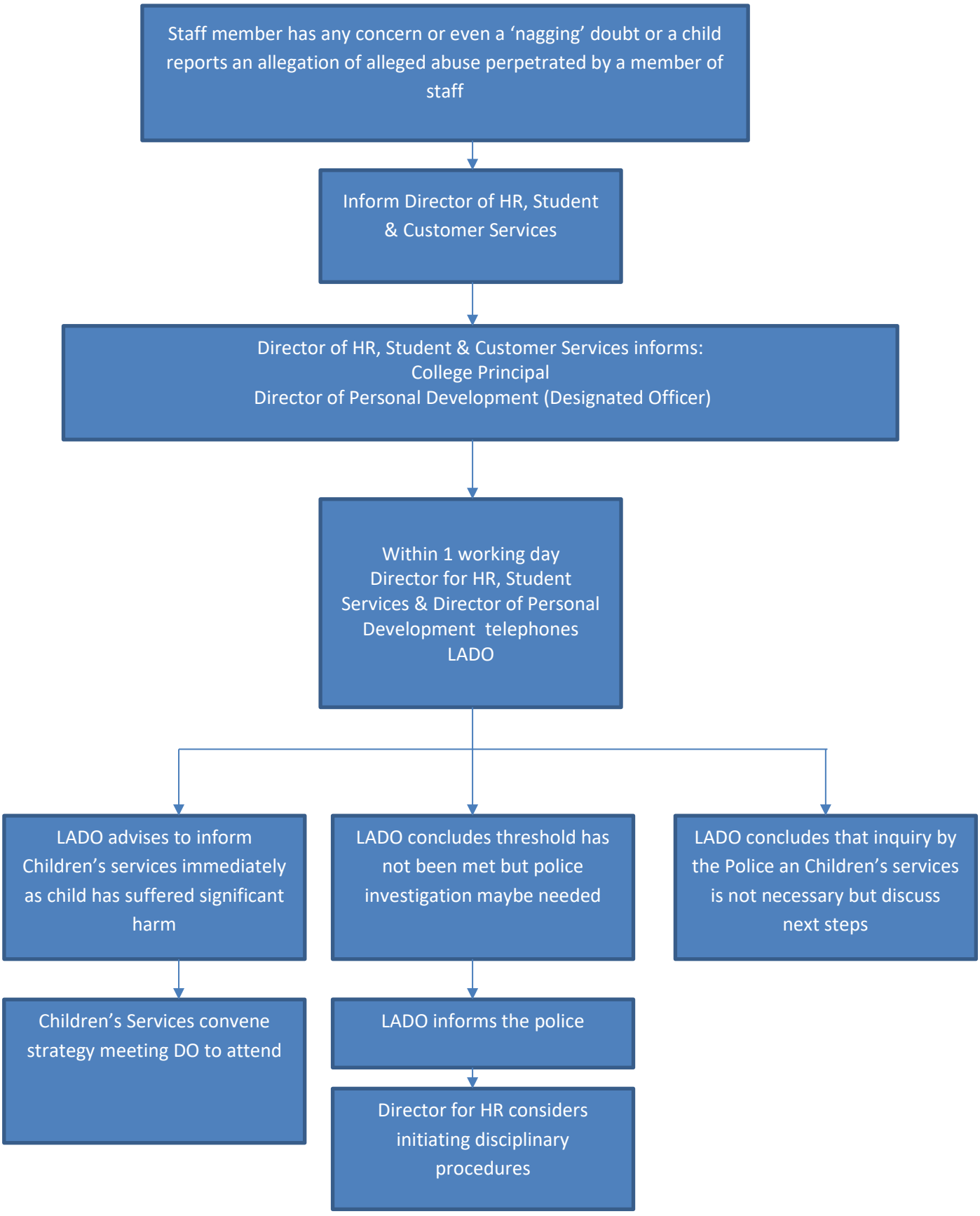
Complete a risk assessment to ensure that the victim and perpetrator are kept apart. Consider the risk to other children. Where there is not alternative safe situation, the perpetrator may be suspended pending disciplinary action and further external information. Communicate with parents.

The disciplinary procedure will be implemented. In line with a zero-tolerance approach all hearings will be heard as Gross Misconduct. All incidents will be recorded using the terminology, substantiated. unsubstantiated. unfounded.

Ongoing support will be provided to the victim and monitoring inline with any external advice.

Ongoing support and monitoring will be provided to the perpetrator where they remain a student of the college.

Appendix 3 Flow chart for abuse by a professional



Appendix 4 Sending students home

This should be followed for any student that needs to be sent home for any reason including where a student is unwell. There may be a need to send a student home from College after a reported act of gross misconduct whilst an investigation takes place. It may also be necessary to send a student home due to persistent behaviour issues pending a parent/carer meeting. This procedure should be applied to all students studying on the College campus including those on 16-19 provision, apprenticeships and part-time and HE courses.

Where it is necessary to send a student home from College the following procedure should be adhered to:

- A student can only be sent home by a member of the Pastoral Team or Leadership Team. In certain circumstances they may instruct another member of staff to do this on their behalf, but they are responsible for ensuring the appropriate steps are taken.
- The student should be made aware of the reason why they are being sent home. This may be following an incident on campus where an investigation has to take place.
- The student's parent/carer must be contacted by telephone, the reasons for sending home explained, and confirmation provided that the student is able to travel home independently.
- A student should not be sent home unless it has been possible to speak to a parent/carer and establish that it is safe to do so. Arrangements can be made for the student to be supervised within Student Services until this has taken place. In certain situations, the Pastoral Team may be able to make a judgement to send a student home without contacting a parent/carer where they are familiar with the student and their domestic/travel arrangements.
- Where a student is clearly distressed a member of the Pastoral Team will need to assess the impact of sending home on a student's personal safety and well-being. It may be necessary to arrange a parent/carer to collect the student from College.
- If a student is on an EHCP (E on ProMonitor photograph) the personal protocol held by the ALS team must be consulted before any action is taken.
- In some situations, students may need a travel pass, this will be issued by Student Services.
- Where a violent incident has taken place between two or more students, precautions must be taken to ensure further escalation does not take place off campus.
- The student should be escorted off the College campus, another member of staff may be instructed to do this. Where a violent incident has taken place, this may need to be a security guard.
- The College ID badge should be taken from the student to prevent access to the campus during the period of suspension. If the ID badge is not surrendered reception should be instructed to deactivate.
- The incident and actions taken must be recorded as a comment on ProMonitor, in certain circumstances this may need to be a confidential comment.
- A Pastoral Manager will support tutors following up the incident using the Pastoral Support System and Disciplinary Procedure.

In the case of pre-16 students, the Pastoral Manager or member of the safeguarding team must make contact with the school to make arrangements for the student to be sent home.

Appendix 5

The following provides an overview of the types of safeguarding risks that young people face. This is not an exhaustive list. All staff should refer students to the safeguarding team if they have any concerns or require further advice without delay.

Types of Abuse

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying Including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to protect themselves. It can take many forms but the main types are:

- Physical (e.g. hitting, kicking, theft);
- Verbal (e.g. racist or homophobic remarks, threats, name-calling);
- Emotional (e.g. isolating an individual from the activities and social acceptance of their peer group); and
- Cyberbullying (including sexting).

Children/Young People Missing Education

All professionals working with children and young people, as well as the wider community can help by remaining vigilant to children's safety. The law states every child/young person should be receiving an education, and we stand a better chance of ensuring their safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child/young person going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Bury College will hold emergency contact numbers for each student and we will inform the Local Authority when a student has been permanently excluded.

During any partial College closure, it is essential that all students but in particular those most vulnerable are regularly contacted and their welfare checked on weekly basis. The College will remain open to those students who are not safe at home in line government guidance.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact including penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images or watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child Sexual Exploitation:-Definition and Guidance, Feb 2017. Gov.uk).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex:

- Can still be abuse even if the sexual activity appears consensual
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- Can be perpetrated by individuals or groups, males or females, children or adults.

- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources

Some of the following signs may be indicators of child sexual exploitation:

- Unexplained gifts or new possessions;
- Association with other young people involved in exploitation;
- Older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or become pregnant;
- Changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or do not take part in education

Child/Young Person Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;

- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of criminal exploitation:

- Unexplained gifts or new possessions;
- Association with other young people involved in exploitation;
- Changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time or regularly come home late
- Regularly missing school or education or do not take part in education

Both **CSE** and **CCE** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants and/or the financial advantage and increased status of the perpetrator or facilitator through violence or threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families with violence or entrap or coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry weapons as a sense of protection. As children become involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. They are not always treated as victims despite the harm they have experienced, this occurs particularly in older children. They may have been criminally exploited even if the activity appears to be something that they have agreed or consented to.

It is important to note that the experience of girls that are criminally exploited can be different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk too. It is important to note that both boys and girls that are criminally exploited may be at higher risk of sexual exploitation.

Domestic Violence – Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place

Drugs - There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school and College, poor health, committing crime to support 'habits' and also increased risk of being a victim of violent crime and sexual exploitation.

Fabricated or induced illness - Fabricated or Induced Illness is a condition whereby a child/young person suffers harm through the deliberate action of their carer and which is attributed by the adult to another cause.

There may be a number of explanations for these circumstances and each requires careful consideration and review. Concerns about a child/young person's health should be discussed with a health professional who is involved with them.

Female Genital Mutilation (FGM)- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM is known by a number of names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is similar to male circumcision, but it bears no resemblance to male circumcision, has serious health consequences and no medical benefits.

Tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still

consider and discuss any such case with the school or College's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, tutors should follow local safeguarding procedures.

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

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family or members of their community, could put the young person in a situation of significant risk. Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Gangs and Youth Violence

Dealing with gang or youth violence issues in an area is a shared responsibility for the community and partner agencies. Schools or Colleges affected by these issues will be able to draw advice and support from their local partners, such as the police, youth offending teams, other local authority teams or the voluntary and community sector. The Local Safeguarding Children Board (LSCB) may also have a strategy to address these issues.

Homelessness

Homelessness means not having a home. A home is a place that provides security, privacy, and links to a community and support network. It needs to be decent and affordable. Under

the law, even if someone has a roof over their head they can still be homeless. This is because they may not have any right to stay where they live or their home may be unsuitable to live in.

Mental Health

Short term stress and worry is a normal part of life and many issues can be experienced as mild or transitory challenges for some children and their families. Others will experience more serious and longer lasting effects. The same experience can have different effects on different children depending on other factors in their life. For example, it is normal for children to feel nervous or under stress around exam times, but other factors can make such stress part of an enduring and persistent mental health problem for some children. When a problem is particularly severe or persistent over time, or when a number of these difficulties are experienced at the same time, children are often described as experiencing mental health problems.

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders. Mental health professionals have classified these as:

- emotional disorders, for example phobias, anxiety states and depression
- conduct disorders, for example stealing, defiance, fire-setting, aggression and anti-social behaviour
- hyperkinetic disorders, for example disturbance of activity and attention
- developmental disorders, for example delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders, for example children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- Other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder.

It is essential to be vigilant in identifying early signs of mental health or well being support so that early intervention can be put in place.

Missing from Education

The College has a responsibility to ensure that all staff are aware that children and young people who go missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and follow the College unauthorised absence and children missing from education procedures.

On occasions where 14 to 16-year old students are on a programme of study at the College, the College has a responsibility to inform named schools when the attendance or absence of a 14 to 16-year-old student becomes a cause for concern so that the school can implement their own attendance or missing in education procedures.

This should include a consideration of holiday requests within term time. Any requests for holidays should be approved by the Head of Curriculum.

Missing from Home or Care

There are strong links between children and young people involved in sexual exploitation and other behaviours such as running away from home or care, bullying, self-harm, teenage pregnancy, truancy and substance misuse. In addition, some are particularly vulnerable, for example, children/young people with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. The majority of children/young people who go missing are not in care and go missing from their family home. However, those who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Peer on Peer Abuse

All Bury College staff are aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to:

- Bullying (including cyber bullying, prejudice based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens or encourages physical abuse)
- Sexual Violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual Harassment, such as sexual comments, remarks, jokes and online sexual harassment, which made be stand alone or part of a wider pattern of abuse
- Causing some to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexual or engage in sexual activity with a third party
- Consensual and Non-Consensual sharing of nude or semi nude imagery or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which involves taking an image under a persons clothing without their permission, with the intention of viewing their genitals or buttocks for sexual gratification or to cause the victim humiliation, distress or alarm.
- Initiating/hazing type violence and rituals, this can include activities involving harassment, abuse or humiliation used as a way of initiating somebody into the a group.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should never be passed off as ‘banter’ or ‘part of growing up’. The DFE states ‘peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. sexual violence and sexual harassment;

Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be made to feel they are creating a problem by reporting abuse, sexual

violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Concerns should be referred to the Designated Safeguarding Lead. Victims of peer on peer harm will be supported by the safeguarding team and referred to specialist agencies if appropriate

Bury College has an anti-bullying and positive behaviour policy, along with a Student Code of conduct.

On-Line Safety

The use of technology has become a significant component of many safeguarding issues. The internet can be a fantastic place for children and young people where they can talk to friends, be creative and have fun. However, just like in the real world sometimes things can go wrong.

Working with our students we have a curriculum that develops skills in identifying and avoiding risk, learning how best to protect themselves and their friends, and knowing how to get support and report abuse if they do encounter difficulties.

At Bury College we have filters and monitoring systems in place and these are regulated and risk assessed as part of the prevent duty. We have an online safety policy which identifies the usage and expected behaviour of staff and students. As a College of further education, we appreciate the value of technology and that appropriate filters are in place yet does not lead to unreasonable restrictions which would limit online teaching.

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate responses are in place for children who are absent from College or who go missing from education.

We also recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. Our staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

Prevent and Radicalisation –

Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Bury College values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech

is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Bury College is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the College's safeguarding duty.

Bury College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Risk Reduction

The DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment includes consideration of the use of College premises by external agencies, external speakers and use of IT. The College holds a Prevent Steering Group once a every half term to review the risks.

This risk assessment is reviewed throughout the academic year and this information is shared with the DfE HE/FE North West Prevent Lead – Nigel Lund

Response

With effect from 1 July 2015, all schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people. More information on these factors is in Appendix 1.

Our College, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: The SPOC is Marc McMahon.

Staff will be alert to changes in student's behaviour or attitude which could indicate that they are in need of help or protection.

Our College will monitor online activity within the College to ensure that inappropriate sites are not accessed by students or staff. This is done by the use of specialist online monitoring software, which in this College is called Barracuda.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC .

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Manchester Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity;
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability;
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages; and
- Colleges have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children/young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and

- Upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitalia or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

It is important that College staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of young person on young person sexual harassment. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- Non-consensual sharing of sexual images and videos;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;

- Sexual exploitation; coercion and threats; and
- Upskirting.

Response to a report of Sexual Violence or Sexual Harassment

The initial response to a report from a young person is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should never be passed off as 'banter' or 'part of growing up'.

Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Concerns should be referred to the Designated Safeguarding Lead. Victims of peer on peer harm will be supported by the safeguarding team and referred to specialist agencies if appropriate

If staff have a concern about a young person or a young person makes a report to them, they should follow the safeguarding referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). College behaviour and disciplinary policy will support any sanctions. The Sexual Violence and Harassment Policy provides further details on how incidents are dealt with.

Sexting

Sexting is when a young person takes indecent images of them self and sends this to their friends or boy / girlfriends via mobile phones. The problem is that once taken and sent, the sender has lost control of these images and these images could end up anywhere.

By having in their possession, or distributing, indecent images of a person under 18 on to someone else – young people are not even aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. This includes consensual and non-consensual sharing of nudes or semi-nude images or videos.

Trafficking

Human trafficking is defined by the UNHCR guidelines (2006) as a process that is a combination of three basic components:

- Movement (including within the UK);
- Control, through harm / threat of harm or fraud; and
- For the purpose of exploitation.

The Palermo Protocol establishes children/young people as a special case for whom there are only two components – movement and exploitation. Any child/young person transported for exploitative reasons is considered to be a trafficking victim – whether or not s/he has been deceived, because it is not considered possible for children to give informed consent.

A child/young person may be trafficked between several countries in the EU or globally, prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents), but the intention of exploitation underpins the entire process. Victims may be indigenous UK nationals, European Union [EU] nationals from any country outside the EU.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

As a College we are aware of the potential for children and young people with **SEND** to have additional barriers when it comes to safeguarding, Bury College recognises that this group can be more vulnerable to abuse and neglect. Disabled children/young people may be especially vulnerable to abuse, because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Heightened vulnerability linked to:

- Communications skills;
- Maturity (Lower cognitive ability);
- Perceptions of intent from others;
- Lower self-esteem/confidence;
- Potential to trust unreservedly;
- A need to have "friends" or find a partner;
- Differing boundaries; and
- Online safety – digital technology understanding

A combination of these factors can make them more susceptible to risks.

Young people develop and mature at different rates. Parental behaviours may also indicate abuse or neglect, so you should also be alert to parent/young person interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol, if there is a sudden change in their mental health or if domestic abuse is present. By understanding the warning signs, you can respond to problems as early as possible and provide the right support and services for the young person and their family.

Children and young people say they need:

- Vigilance: to have adults notice when things are troubling them;
- Understanding and action: to be heard and understood; and to have that understanding acted upon;

- Stability: to be able to develop an on-going stable relationship of trust with those helping them;
- Respect: to be treated with the expectation that they are competent, rather than not;
- Information and engagement: to be informed about and involved in procedures, decisions, concerns and plans;
- Explanation: to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative;
- Support: to be provided with support in their own right as well as a member of their family; and
- Advocacy: to be provided with advocacy, to assist them in putting forward their views.

Looked After Children:

All Local Authorities are advised to support the raising of the educational attainment and achievement of their Looked After Children through the overarching support of a Virtual School. The responsibility for each child's education, target setting, learning and teaching remains with the school/College where they are enrolled.

Bury and Greater Manchester Virtual School for Looked After Children provides a support and challenge role for schools and Local Authority teams in the form of staffing support; access to additional resources to support educational outcomes; information, advice and guidance (especially around Personal Education Plans); monitoring and tracking of educational outcomes and targets, and training and support at key transitional moments

Appendix 6 Home Visits

1. Home visits can be arranged for students and apprentices who:
   - The College have been unable to contact
   - The College have concerns about their welfare due to lack of engagement

2. Requests for a home visit should be made to the relevant Pastoral Manager (PM) for students or the Departmental Lead (DL) for apprentices. The request should be made via the ProMonitor comment category – Home Visit.

3. The ProMonitor Home Visit comment should outline:
   - Current attendance summary
   - Academic progress
   - An explanation of the cause for concern
   - The reason for suggesting a home visit
   - Any additional background information relating to personal circumstances
   - Coursework and learning materials that need to be taken

4. The home visit will be carried out by a member of the Pastoral Team, who will in conjunction with the Safeguarding Manager determine if the visit requires more than one person to attend; this may be done on the basis of location, circumstances or other information provided by the PM.

5. Details of the visit will be recorded in the Home Visits book held in Student Services and will be updated on return to College by Student Services.

6. Home visits should be carried out following the guidance and procedures outlined in the *Off Site Working* document, which can be found on the Bury College Intranet
   - Comply with College requirements for travel to and from the place of visit
   - Take a mobile phone with them, keep it switched on and advise Student Services Supervisor of the mobile number (there is a facility on smartphones to activate a GPS tracker that enables the phone's whereabouts to be tracked if appropriate)
   - Inform Student Services Supervisor on return to College

7. The College risk assessment must be followed for the visit.

8. Upon return to College the member of staff who carried out the visit will record a ProMonitor follow-up comment to summarise the main discussion points and actions.

9. Where there are safeguarding concerns these should be recorded as a ProMonitor Confidential Comment.

Appendix 7
Assignment research topics
Safeguarding considerations for tutors

When designing an assignment on sensitive topics, please ensure that you refer to the awarding body suggestions. Consider when and how students will research these topics.

Sensitive topics of concern are:

- Health and care topics such as types of abuse
- Terrorist/ Counter terrorism or terror related topics
- Drugs and alcohol
- Weapons
- Violence

This is not an exhaustive list

These topics need careful preparation to ensure that students are searching using the most appropriate websites. Care should be taken to consider providing links to well informed websites that provide a balanced view.

Consider providing suggested websites that have been checked by college staff to ensure that they are relevant.

Check in points with students should be provided to check students welfare as some of the topics maybe of personally sensitive nature and some sources might create trauma.

If students are researching terrorist or terror related topics. It is extremely important to ensure that the sites searched by students are safe and provide relevant information. It is important to discuss with students throughout the research their finding to provide opportunities for students to ask question and be curious around any information that they find. Students need to be supported to become critical independent thinkers.

Students should have a question in mind and know what they are looking for.
What specific information do you want them to find?

Students should be encouraged to evaluate their resources. In particular they also should be courage to spot Fake News. Students should:

Consider the source: Click away from the story to investigate the site, its mission and its contact information

Read beyond: Headlines can be outrageous in an effort to get clicks. What's the whole story?
Check the author: Do a quick search on the author. Are they credible? Are they real?

Supporting sources: Determine if the information given actually supports the story

Check the date: Reposting old stories doesn't mean they are current events.

Check biases: Consider if your own beliefs could affect your judgment.
Ask the experts: Ask a librarian, your teacher or consult a fact checking website.

Having researched online, students may want to share what they have found with others. They should consider the **SHARE** checklist.

- **Source:** Rely on official sources
- **Headline:** Headlines don't always tell the full story
- **Analyse:** Analyse the facts. If something sounds unbelievable it might well be
- **Retouched:** Watch out for misleading pictures or videos, they might be edited or show an unrelated place or event.
- **Error:** Look out for mistakes. Typos and other errors may mean the information is false