

2022/23 SAFEGUARDING AND CHILD PROTECTION POLICY FOR CITY COLLEGE PETERBOROUGH:

Children and Adults at Risk

Purpose: Safeguarding is **everyone's** responsibility. This policy lays out the colleges approach to safeguarding and promoting the welfare of children, young people and adults at risk of abuse. It applies to all staff (whether temporary, sessional or full time), governors, contractors and visitors and sets out our commitment, processes and activities in keeping people safe from harm, recognising signs of abuse and how to report concerns and disclosures.

Chair of Governors	Sign and Date	C Higgins 13/10/22
Governor for Safeguarding	Sign and Date	J Lewis 15/9/22
Executive Principal	Sign and Date	P Carrington 13/10/22
Designated Safeguarding Lead	Sign and Date	J Bennett 15/9/22

Date for review September 2023

Version 1.1

Foreword

This policy has been adapted from the Local Authority model Child Protection and Safeguarding Policy and the Cambridgeshire and Peterborough Safeguarding Adults Policy and Procedures. Its purpose is to enable City College Peterborough governors and staff to achieve consistent and robust arrangements for safeguarding children and adults at risk with care and support needs, and to inform key stakeholders such as learners, supported people, Ofsted and commissioners.

City College Peterborough has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of the children and adults at risk. The College has a zero tolerance of abuse of any kind or other harmful behaviour affecting learners/supported people or staff.

- All learners/supported people regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm and abuse
- The Governing Board, all staff, including volunteers and agency staff working for City College Peterborough are responsible for the safety and welfare of children and adults at risk by following the procedures set out in this policy.
- All staff have a duty to maintain the highest standards of professional behaviour and confidentiality when dealing with children and adults at risk and personal and sensitive issues relating to these groups. All staff and volunteers will apply the principles of the “Guidance for safer working practice for those working with children and young people in education setting” (Safer Recruitment Consortium, February 2022) irrespective of whether they are working with young people or adults in education provision or Day Opportunities.
- All staff have a duty to identify and support people who may be vulnerable to being drawn into violent extremist activity (Preventing Violent Extremism/ Prevent strategy)
- City College Peterborough takes very seriously its responsibility to practice Safer Recruitment Procedures to protect learners/supported people and staff
- All staff have a duty to be alert to any suspicions, nagging doubts or allegations raised about the safety and welfare of children or adults at risk and to refer to or seek advice from the Designated Persons for Safeguarding.
- At CCP we recognise that learners with special educational needs and disabilities (SEND) and adults at risk can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of people. These can include:
 - I. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learners/supported persons additional needs without further exploration
 - II. The potential for learners with SEND and adults at risk being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - III. Communication barriers and difficulties in overcoming those issues

Staff across CCP will remain vigilant and observant to these additional challenges.

- Designated Persons will share information about concerns or allegations with statutory agencies, involving learners/supported people and parents/ carers appropriately
- All staff have a duty to raise concerns about the actions of other employees, employees of the colleges and Councils Partners, private contractors and/or elected members, this is enshrined in our whistleblowing policy (appendix A). This safeguarding policy should be read in conjunction with that policy.
- The college takes historic safeguarding concerns, allegations, and disclosures seriously. If an individual discloses historic abuse, such as past sexual abuse whilst in a school or college, the individual will be supported to make an independent, informed decision about what steps they would like to take, such as making a report to the police.

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Part I INTRODUCTION

City College Peterborough is committed to ensuring that the College:

- Provides a safe environment for children and adults at risk to learn, train or receive health and wellbeing or employment support
- Identifies children and adults at risk who are suffering, or likely to suffer, significant harm and
- Takes appropriate action to see that such children and adults at risk are kept safe at College and in College venues and workplaces.

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

- Raising awareness of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for them
- Aiding the identification of children and adults at risk at risk of significant harm, and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- The safe recruitment of staff

In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Department for Education (DfE) and the Cambridgeshire and Peterborough Safeguarding Boards and other relevant bodies and groups. This will include compliance with the Care Act (2014), the statutory guidance “Working together to safeguard Children (updated September 2018) and the “Prevent duty guidance for England and Wales” to comply with the Counter Terrorism and Security Act 2015.

Staff leading on Child and Adult at risk Protection within the College and staff working with children and adults at risk will receive adequate training to familiarise them with child and adult at risk protection issues and responsibilities and the College’s procedures and policies. All staff will receive appropriate training, updated as needed but as a minimum every two years. This will be tracked by the Designated Safeguarding Lead to ensure the right training is happening at the right time.

The governing body will receive an annual report in March, from the designated Senior Member of Staff with lead responsibility for child and adult at risk protection. This report reviews how the duties have been discharged.

Throughout these policies and procedures, reference is made to “children and young people and adults at risk”. The terms “children” and “young people” are used to mean “those under the age of 18”. City College Peterborough recognizes that some adults are also vulnerable to abuse. A adult at risk is defined in section 42 of the Care Act (2014) as an adult who has needs for care and support (whether the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

This policy applies to staff and full and part-time learners/supported people enrolled at the college who are covered by the relevant legislation.

PART II - KEY CONTACTS, RESPONSIBILITIES AND GOVERNANCE

1 KEY CONTACTS

1.1 Key Contact list for Safeguarding in City College Peterborough

Role	Name	Telephone contact	email
Safeguarding Governor	Jonathan Lewis	01223 507165	Jonathan.Lewis@cambridgeshire.gov.uk
Designated Safeguarding Lead	Julie Bennett	01733 293894/ Ext 215/ 07762 208810	jbennett@citycollegepeterborough.ac.uk
Safeguarding Manager	Racheal Franklin	01733 452424	rfranklin@cityculturepeterborough.org.uk
Deputy Designated Safeguarding Lead	TBA		
Deputy Designated Safeguarding Lead	Michaela Granger	01733 555197/ 07494 314752	mgranger@citycollegepeterborough.ac.uk
Deputy Designated Safeguarding Lead	Barry Spicer	07376182793	bspicer@citycollegepeterborough.ac.uk

The Designated Persons are:

Site	Designated Person	Telephone Number/Ext
Brook Street 01733 761361	Sarah Perkins	241
	Harriet Bowen	261
	Sarah Collins	01733 588356
	Vacant (Deputy)	
John Mansfield 01733 55197	Tash Dalton	806
	Michaela Granger (Deputy)	821
	Georgia Brownsword	820
	Carleen Osborne	258
	Dominique Mallabar	820
Kingfisher Centre 01733 797720	Debbie Hembrow	01733 797726
	Racheal Bright	01733 797726
Employability Hub 01733 797706	Allison Valentine	01733 797719
Industrial Hub 01733 797701	Sarah Lewis	01733 797701
Across Day Opportunity Sites	Barry Spicer (Deputy)	07376 182793
Across all Sites	Racheal Franklin Julie Bennett	01733 452424 07762208810

Additional Lead Responsibilities:

Role	Name	Telephone contact	Email
Prevent incl. SPOC	Julie Bennett	01733 761361	jbennett@citycollegepeterborough.ac.uk
	Racheal Franklin	01733 452424	rfranklin@cityculturepeterborough.org.uk
Domestic Abuse	Georgia Brownsword	01733 555197	gbrownsword@citycollegepeterborough.ac.uk
	Carleen Osborne	01733 555197	cosborne@citycollegepeterborough.ac.uk
Child Sexual Exploitation/County Lines	Michaela Granger	01733 555197	mgranger@citycollegepeterborough.ac.uk
Children of Prisoners	Tash Dalton	01733 555197	tdalton@citycollegepeterborough.ac.uk
Early Help Assessors	Tash Dalton	01733 555197	tdalton@citycollegepeterborough.ac.uk
	Michaela Granger	01733 555197	mgranger@citycollegepeterborough.ac.uk

	Georgia Brownsword	01733 555197	gbrownsword@citycollegepeterborough.ac.uk
	Carleen Osborne	01733 555197	cosborne@citycollegepeterborough.ac.uk
Mental Capacity Act (MCA) and Deprivation of Liberty (DoLs)	Debbie Hembrow Barry Spicer	01733 797726 07376182793	dhembrow@citycollegepeterborough.ac.uk bspicer@citycollegepeterborough.ac.uk
Knife Crime / Youth	Georgia Brownsword	01733 555197	gbrownsword@citycollegepeterborough.ac.uk
Senior Mental Health Lead	Tash Dalton	01733 555197	tdalton@citycollegepeterborough.ac.uk
Organisational Abuse	Racheal Franklin	01733 452424	rfranklin@cityculturepeterborough.org.uk
Child on Child	Michaela Granger	01733 555197	mgranger@citycollegepeterborough.ac.uk
Online Safety	Racheal Franklin	01733 452424	rfranklin@cityculturepeterborough.org.uk
Scams	Sarah Collins	07983 915182	scollins@citycollegepeterborough.ac.uk
Multi-agency Risk Management (MARMS)	Barry Spicer	07376182793	bspicer@citycollegepeterborough.ac.uk

The following governors and members of staff have undergone Safer Recruitment training:

Governors and ELT	OLT	Study Programmes	Day Opportunities	Adults and Health and Care Sector Work Academy	Support Services
Pat Carrington Julie Bennett Tash Dalton Adele Fender		Michaela Granger	Debbie Hembrow Elaine Hovell Allison Valentine Sarah Collins Barry Spicer	Sarah Perkins Natalia Holdich	Mark Lowey Jenny Holmes Tracy Preston Anne Hornsby

1.2 Key local contacts

1.2.1. Children's

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures
<http://www.safeguardingcambspeterborough.org.uk/children-board/>

Education Safeguarding Team Education Safeguarding Manager – Sara Rogers Education Safeguarding Lead – Sue Proffitt		ecps.general@cambridgeshire.gov.uk Sara.rogers@cambridgeshire.gov.uk Susan.proffitt@peterborough.gov.uk
Police Child Abuse Investigation Unit	Tel: 101/999	
Early Help	01733 863649	helpwithcaf@peterborough.gov.uk
Customer Service Centre – social care referrals	01733 864180	
Emergency Duty Team (Out of hours)	01733 234724	
Local Authority Designated Officer (LADO)	01733 864038	LADO@peterborough.gov.uk
PREVENT Team	01480 422596	prevent@cambs.nn.police.uk

1.2.2. Adults

Cambridgeshire and Peterborough Safeguarding Adults Partnership Board – Safeguarding Inter-Agency Procedures
<http://www.safeguardingcambspeterborough.org.uk/adults-board/>

Customer Services	01733 747474 (9am to 5pm Monday to Friday)	adultsocialcare@peterborough.gcsx.gov.uk
Out of hours	01733 234 724	

2. RESPONSIBILITIES

2.1. The Designated Safeguarding Lead responsibilities:

2.1.1. Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's and adults social care, Multi Agency Safeguarding Hub (MASH) and police as required;
- support staff who make referrals to local authority children's and adults social care, MASH and police;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

2.1.2. Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

2.1.3. Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated people, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.¹
- have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the college's child protection and safeguarding policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;²
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations, and practitioners.

¹ Full details in Chapter one of Working Together to Safeguard Children

² Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children

- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
- can recognise the additional risks that children with SEN and disabilities (SEND) and adults at risk face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

2.1.4. Raise Awareness

The designated safeguarding lead should:

- ensure the college's child protection and safeguarding policies are known, understood and used appropriately;
- ensure the college's child protection and safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- ensure the child protection and safeguarding policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

2.1.5. Child protection file

Where children leave the college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

2.1.6. Availability

During term time the designated safeguarding lead (or a deputy or ELT/OLT member) should always be available (during college hours) for staff in the college to discuss any safeguarding concerns. Available may mean via phone and/or Teams or other such media.

The DSL or a deputy will be available in person or via phone out of hours and out of term.

2.1.7. Reporting

Liaising with the Governor for Safeguarding, provide quarterly and annual reports to the Board of Governors.

2.1.8. Communication

Ensure College staff receive timely information to maintain safeguarding awareness, vigilance and action

2.1.9. Policies and Procedures

Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's and adult at risk welfare

2.1.10. Audits

Quality assure safeguarding arrangements within the college through a range of self-assessment tools and internal audits including actual concerns raised, training database and the single central record.

- Overseeing Safeguarding processes and procedures, incidents, concerns and the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with safeguarding boards.
- Ensuring that staff receive basic training in child and adult at risk protection issues and are aware of the College child and adult at risk protection procedures
- Receiving regular training in child and adult at risk protection issues and inter-agency working, as required by the Cambridgeshire and Peterborough Safeguarding Children's Board (CPSCB) and Cambridgeshire and Peterborough Safeguarding Adults Board (CPSAB), and will receive refresher training at least every 2 years
- Providing an annual report in March to the governing body of the College setting out how the College has discharged its duties. They are responsible for reporting deficiencies in procedure or policy identified by the CPSCB / CPSAB to the governing body at the earliest opportunity.

The roles of the Deputy Safeguarding Leads, Designated Persons and additional safeguarding responsibilities can be found in appendix B.

2.2 Governing Board Safeguarding Responsibilities:

The Governing Board will ensure it facilitates a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child/adult at risk at their heart

The governing board fully recognises its responsibilities with regard to child protection and safeguarding and promoting the welfare of children, young people, adults at risk and all learners. It aims to ensure that the policies, procedures and training in college are effective and comply with the law and government at all times, through a Safeguarding Training Strategy.

2.2.1 Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

2.2.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description.

2.2.3. Ensure that the DSL has the appropriate status and authority within the college to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2022, Annex C'). Ensure that the DSL and deputies have undertaken the two-day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.

2.2.4. Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via bulletins, meetings or further reading **at least annually**.

2.2.5. Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the point of induction. Staff members are required to log a concern via the electronic reporting system 'MyConcern' and submit it immediately.

2.2.6 Ensure that the DSL, DDSL or DP are always available to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL, DDSL or DP are not available. If in exceptional circumstances, the designated safeguarding lead (or deputy) or Safeguarding Manager is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) or Safeguarding Manager as soon as is practically possible.

2.2.7. The college has a team of trained designated persons and duty manager guidance in the event that a designated person is not available, for example, during evening classes. If a designated person is not onsite a staff member should contact a duty manager, who will:

- Contact the out-of-hours social care team on 01733 234724 or, if the individual is in immediate danger or is hurt, call 999
- Establish if a Designated Person or member of the senior leadership team is on site and report the safeguarding concern
- If no Designated Person or ELT/OLT member is available contact the Designated Safeguarding Lead, Julie Bennett, on 07762 208810 for further guidance

2.2.8. Liaise with the three safeguarding partners (Local Authority, clinical commissioning group and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018, and the Cambridgeshire and Peterborough safeguarding board policies and procedures.

2.2.9. Nominate a governor for safeguarding and child protection who has undertaken appropriate training and will take leadership responsibility for the college's safeguarding arrangements and practice and champion safeguarding and child protection issues.

2.2.10. Ensure every member of staff and every governor knows:

- the name of the designated safeguarding leads/deputies and their role;
- how to identify the signs of abuse and neglect;
- that people may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful
- how to pass on and record concerns about a learner;
- that they have an individual responsibility to be alert to the signs and indicators of abuse; and for referring child protection concerns to the DSL/DDSL/DP;
- what is meant by, and the importance of, showing professional curiosity
- that they have a responsibility to provide a safe environment in which children can learn;
- where to find the Inter – Agency Procedures on the Safeguarding Children Partnership Board website;
- their role in the early help process;
- the process for making referrals to children's and/or adult's social care.
- the safeguarding response to children who go missing in education.

2.2.11. Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required **but at least annually**.

2.2.12. Ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the college are effective and support the delivery of a robust whole college approach to safeguarding. This training will be regularly updated.

2.2.13. Ensure governors are aware of their obligations under the Human Rights Act 21, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.

2.2.14. Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

2.2.15. Ensure that parents are informed of the responsibility placed on the college and staff in relation to child protection by setting out these duties in the college prospectus and brochure website

2.2.16 Ensure that this policy is published on the college website

2.2.17 Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that learners (including young people with a social worker) are experiencing/have experienced with tutor and college leadership staff

2.2.18. Ensure an annual report is made to the full governing board and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.

2.2.19 Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.

2.2.20 Ensure that young people's exposure to potential risks while using the internet is limited by having in place appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed. The system used in the College is Sophos XG 230, military grade filtering service

2.2.21 Ensure young people's wishes and feelings are taken into account where there are safeguarding concerns.

2.3 Use of college premises for non-college activities

2.3.1 If the governing body provides extended college facilities or before or after college activities directly under the supervision or management of college staff, the college's arrangements for safeguarding as written in this policy shall apply.

2.3.2 Where services or activities are provided separately by another organisation or individual, either on or off college site, the governing body will seek assurance that they have appropriate policies and procedures in place to keep young people and adults at risk safe and there are arrangements to liaise with the college on these matters where appropriate.

3. MONITORING AND EVALUATION

3.1. Our Safeguarding and Child Protection policy and procedures will be monitored and evaluated by:

- Governing Body visits to the college
- ELT/OLT 'drop ins' and discussions with young people, adults at risk and staff
- Learner and Supported People surveys
- Scrutiny of attendance data
- Scrutiny of a range of risk assessments and monitoring and audit information, for example as required by CPSAB/CPSCB
- Monitoring of logs of behaviour and prejudice related incidents
- Review of parental concerns
- Provision of an annual report to governors
- Quarterly collation of concerns raised on MyConcern, reviewing types of abuse/concerns occurring, support and action provided and outcomes. Report to be discussed with the governor responsible for safeguarding and submitted to the governing board
- Regular supervision with staff
- Team meetings – standard agenda items

3.2. The implementation of the policies and procedures will be monitored by:

- MyConcern audits completed by the DSL and Deputy DSL's
- Audit of the Single Central Record by the Governor for Safeguarding and DSL
- Monthly designated person meetings to highlight best practice
- Safeguarding reports to the Governing Board

4. SAFER RECRUITMENT POLICY

The College is committed to the safer recruitment of staff, volunteers and contractors/agency staff. Recruiting staff must follow PCC Recruitment and Selection Procedure and Management Guidance for City College Peterborough which is available on SharePoint. In summary:

- 4.1. The job vacancy advertisement must make it clear that the college is committed to safeguarding and promoting good practice in equality and diversity
- 4.2. A face-to-face interview must be held. The recruitment panel must:
 - Include at least two interviewing panel members or which at least one must have taken safer recruitment training within the last three years.
 - Explore gaps in work history and inconsistencies must be challenged ensuring all panel members are satisfied that the explanations provided are robust and can be verified
 - Include a minimum of three specific safeguarding questions of which one must cover Prevent
- 4.3. Appropriate checks are completed before the selected staff member commences employment:
 - an identity check. Identification checking guidelines can be found on the GOV.UK website;
 - A Basic/Standard/Enhanced DBS Check (full details are given in the council's policy on DBS/Vetting & Barring) – dependent on roles
 - 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, where required
 - a check to establish the person's right to work in the United Kingdom
 - record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
 - At least 2 references are taken up and checked. References should always be obtained from the candidate's current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving should be obtained from the school, college, local authority or organisation at which they were employed
- 4.4. The College will maintain a Single Central Record for all staff and agency workers in electronic format. This will be maintained by HR. The single central record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained. A record of the name of the person carrying out the check will also be recorded.

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

- 4.5. The college will obtain written notification from any agency or third-party organisation that the organisation has carried out the checks in respect of the enhanced DBS certificate and all other verification checks on an individual who will be working at the college
- 4.6. All volunteers must be interviewed by an OLT member or above, and must be asked a minimum of three safeguarding and Prevent questions. The interview must probe the motivation of the individual to volunteer at the College and explore any gaps in work history/inconsistencies of information provided to the same level as if the interviewee is applying for a paid position. If the manager is satisfied that an individual is suitable to volunteer in the college, then the application form should be submitted for an ELT decision.

Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. Volunteers who, on an unsupervised basis teach or support young people or adults at risk regularly, or provide personal care on a one-off basis in college, will be in regulated activity. A DBS must be obtained at enhanced level for all volunteers who are new to working in regulated activity and re-checked at least every three years.

³ If, on a rare occasion, it is critical that a person starts in a role before a DBS is obtained, a full risk assessment must be completed and authorised by the Executive Principal and Governor for Safeguarding, and the new recruit will be barred from working with any young person or adult at risk until the DBS is received.

- 4.7. The college will ensure that any contractor, or any employee of the contractor, who is to work at the college, has been subject to the appropriate level of DBS check. Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.
- 4.8. Where young people and adults at risk are supported into paid employment, apprenticeships, traineeships, work experience, voluntary jobs and Supported Internships the college will ensure that the external business has policies and procedures in place to protect the young person/adult at risk.

5. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN AND ADULTS AT RISK

- 5.1. In addition to Safer Recruitment, all staff will receive three yearly DBS checks.
- 5.2. The Colleges policy and procedures managing allegations of abuse made against a member of staff or volunteer is in appendix C.

6. SAFEGUARDING CONCERN MANAGEMENT

- 6.1. With effect from 1st September 2019 the College has used MyConcern to record, manage and report all of its Safeguarding and Prevent incidents, nagging doubts and body maps. MyConcern also provides one place for all local and national guidance, policies and procedures and is available to all governors and college staff. MyConcern is an internet-based platform and therefore is available across all sites and community bases.
- 6.2. All staff will receive MyConcern training on the first day of employment and whole college refresher training is provided via Z cards and team meetings

7. RELEVANT DOCUMENTS

- “Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)
- “Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)
- “Keeping children safe in education: Statutory guidance for schools and colleges” (Sept 2022)
- “The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)
- “Revised Prevent Duty Guidance: for England and Wales” (April 2021)
- “Sexting in schools and colleges: Responding to incidents and safeguarding young people” published by the UK Council for Child Internet Safety (UKCCIS) – (September 2016)
- “Sexual violence and sexual harassment between children in schools and colleges” (September 2021)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, December 2020)
- “What to do if you’re worried a child is being abused: Advice for practitioners” (March, 2015)
- “When to Call the Police: guidance for schools and colleges” (National Police Chief Council)
- “Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)
- Care Act 2014
- Mental Capacity Act 2005

8. OTHER RELATED POLICIES AND PROCEDURES

This policy also links to the following policies and procedures:

- Allegations against staff
- Anti-bullying and Harassment Policy
- Assisting and Moving (People Moving People) Policy
- Business Continuity
- Behaviours of Concern Policy
- Code of Conduct
- Common Working Practice
- Company Visitor Procedure
- Complaints Procedure
- Conflict Resolution and Physical Intervention Policy
- Equality and Diversity Policy

- External Speaker and Events Policy and Procedure
- Health and Safety Policy
- Learner Disciplinary Policy
- Learning Support Policy
- Lone Working Policy
- Medications Policy
- Online Safety Policy and Acceptable Use Policy
- Personal and Intimate Care Guidelines
- PPE Policy
- Responding to Prejudice Related Incidents Policy
- Safer Recruitment Policy
- Sexual Violence, Bullying and Harassment Policy
- Staff Grievance and Disciplinary Policies and Procedures
- Whistleblowing Policy

Part III – SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICY

INTRODUCTION

City College Peterborough fully recognises the responsibility it has under section 157/175 of the Education Act 2002 (as amended) to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2022). All staff must be made aware of their duties and responsibilities under part one of this document (set out below).

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education' (September 2022) and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015).

Through their day-to day contact with learners and direct work with families, all staff in College have a responsibility to:

- Identify concerns early to prevent them from escalating
- Provide a safe environment in which children can learn
- Identify children who may benefit from early help
- Know what to do if a child tells them he/she is being abused or neglected
- Follow the referral process if they have a concern

This policy sets out how the college's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are learners at the college. Our policy applies to all staff and volunteers working in the college, including governors. Teaching assistants, office staff as well as tutors can be the first point of disclosure for a child. Concerned parents/carers may also contact the college and its governors.

It is consistent with the Safeguarding Children Partnership Board procedures.

There are four main elements to our policy:

PREVENTION, through the teaching and pastoral support offered to learners and the creation and maintenance of a whole college protective ethos

PROCEDURES for identifying and reporting cases, or suspected cases of abuse. The definitions of the four categories of abuse are attached (see Appendix D)

SUPPORTING CHILDREN, particularly those who may have been abused or witnessed violence towards others

PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents/carers on request and is on the college website.

1. PREVENTION

1.1. We recognise that for our learners, high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps to protect children.

1.2. This college will therefore:

1.2.1 establish and maintain an environment where learners feel safe, including in a digital context, and are encouraged to talk and are listened to;

1.2.2 ensure learners know that there are adults in the college whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate;

- 1.2.3 Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- 1.2.4 Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.
- 1.2.5 Ensure that college staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy' .;
- 1.2.6 incorporate into the curriculum, activities and opportunities which equip learners with the skills they need to stay safer from abuse in all contexts, including:
- How to: determine whether other children, young people, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about other, if needed
 - The characteristics of positive and healthy friendships
 - That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable
 - About online risks, including that any material someone provides has the potential to be shared online and the difficult of removed potentially compromising material placed online
 - What to do and where to get support to report material or manage issues online
 - The impact of viewing harmful content
 - That especially explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
 - That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, honour-based violence and FGM and how they can affect current and future relationships
 - How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online)
- 1.2.7 We use the Personal Safety Units from the Cambridgeshire PSHE Service Personal Development Programme. These units support children to recognise if they are feeling safe or unsafe in their relationships with family, friends and online. This includes considering the importance of permission seeking and giving in relationships, and the sort of boundaries which are appropriate both on and offline.
- 1.2.8 We use Safer Corridors Toolkit developed by the Cambridgeshire PSHE Service which supports schools and colleges in preventing and reducing sexual violence and harassment and responding to incidents.
- 1.2.9 ensure that wherever possible every effort will be made to establish effective working relationships with parents and carers and with colleagues from partner agencies.
- 1.2.10 "PRAG" rate each learner aged 14 to 19 years to identify and differentiate support needs, prioritising those most at risk of serious harm

PURPLE	RED	AMBER	GREEN
An identified safeguarding concern, including suicide-risk, self-harm, current depression, a serious health issue, in the care system or in Y11	An identified safeguarding concern, including learning difficulties, behaviour, emotional or social difficulties, depression, living independently or a care-leaver	<ul style="list-style-type: none"> • youth offending order • young parent • young carer 	No safeguarding concerns identified

2. PROCEDURES

- 2.1. We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Partnership Board 'Inter-Agency Procedures'. A copy of these procedures can be found on their website: <http://www.safeguardingcambspeterborough.org.uk/children-board/>
See Part I, page 5 for a list of designated safeguarding staff and governors
- 2.2. See Part I, page 9 for Governing Board responsibilities
- 2.3. All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk will be taken seriously and staff will raise and concern on MyConcern and report to a Designated Person as soon as possible or within 24 hours. If the Designated Person is not available, staff should report to a member of the Executive Leadership Team. In emergency situations, immediate medical attention will be provided. If a crime may have been committed, the concern, suspicion or allegation will be reported to the Police.
- 2.4. The recording of concerns on MyConcern include nagging doubts and body maps. Nagging doubts are concerns regarding the welfare of a young person or adult at risk which at that point does not warrant a safeguarding investigation (appendix E). In the event that three nagging doubt concerns are raised in any one academic year, a safeguarding concern will be raised to MASH
- 2.5. The college fully recognises the importance of the role of the Designated Safeguarding Lead (DSL). The DSL is a member of the Executive Leadership Team and the role is explicitly defined in their job description, with time, resources and training to undertake her/his duties agreed. (See Keeping Children Safe in Education 2018 Annex B).
 - 2.5.1. The lead responsibility for safeguarding and child protection will not be delegated, though specific activities may be delegated to appropriately trained deputies.
 - 2.5.2. Contingency arrangements are in place should the DSL not be available. A Deputy DSL (DDSL) or Designated Persons (DP) will be available
 - 2.5.3. The DSL or a Designated Person (DP) will always be available during college core hours. The out of hours contact is 01733 864612.
 - 2.5.4. It is the responsibility of the Designated Safeguarding Lead to ensure that all of the child protection procedures are followed within the college.
 - 2.5.5. The DSL, DDSL and DPs should undergo the two-day training provided by the Education Child Protection Service, and update this training every two years. Knowledge and skills in addition to this formal training should be refreshed regularly.

2.6. Liaison with Other agencies

The college will:

- 2.6.1. work to develop effective links with relevant services to promote the safety and welfare of all learners.
- 2.6.2. cooperate as required, in line with 'Working Together to Safeguard Children (July 2018)', with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.6.3. notify the relevant Social Care Unit immediately if:
 - it should have to exclude a learner who is subject to a Child Protection Plan (fixed term or permanently)
 - there is an unexplained absence of a learner who is subject to a Child Protection Plan
 - there is any change in circumstances to a learner who is subject to a Child Protection Plan.
- 2.6.4. When a learner who is subject to a child protection plan leaves, information will be transferred to the new school/college immediately. The Child Protection Chair and Social Work Team will also be informed.

2.7. Record Keeping

The college will:

- 2.7.1. keep clear, detailed, accurate written records of concerns about children (noting the date, event and action taken) via MyConcern, even when there is no need to refer the matter to Social Care immediately.
- 2.7.2. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded on MyConcern.
- 2.7.3. Records will include:
 - A clear and comprehensive summary of the concern.
 - The persons wishes and feelings.
 - Details of how the concern was followed up and resolved.

- A note of any action taken, decisions reached and outcome
 - A record of any discussion/communication with parents, other agencies etc
- 2.7.4.ensure electronic records are stored in MyConcern, an identified, purpose-built, secure platform
- 2.7.5.ensure all relevant child protection records are sent to the receiving college or establishment when a child moves education provider within five days, in accordance with 'Keeping Children Safe in Education, 2022, (page 163) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.
- The DDSL for Study Skills will consider whether it would be appropriate to share information with the new school/college in advance of a learner leaving
- 2.7.6.make parents aware that such records exist, except where to do so would place the child at risk of harm.
- 2.7.7.Ensure all actions and decisions will be led by what is considered to be in the best interests of the child.

2.8. Confidentiality and information sharing

- 2.8.1.Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.
- The college will:
- 2.8.2.Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.
- 2.8.3.Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).
- 2.8.4.Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a learner or parent/carer they will refer the request to the DSL or Data Protection Officer, Adele Fender, Executive Operations Manager.
- 2.8.5.Ensure staff are clear with learners that they cannot promise to keep secrets.
- 2.8.6. The Designated Safeguarding Lead/Deputies/Designated Persons will:
- Disclose information about a learner to other members of staff on a 'need to know' basis. Parental consent may be required.
 - Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner
 - Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018)
- 2.8.7. In cases where the 'serious harm test' is met, the college must withhold providing the data in compliance with the college's obligations under the UK Data Protection Act 2018. Where in doubt the college will seek independent legal advice
- 2.8.8.Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

2.9. Communication with parents/carers

The college will:

- 2.9.1.ensure that parent/carers have an understanding of the responsibility placed on the college and staff to child protection by setting out its duties in the college prospectus/website.
- 2.9.2.undertake appropriate discussion with parents prior to involvement of another agency unless specific circumstances preclude this.
- 2.9.3.Discuss with Children's Social Care if the college believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. *[Further guidance on this can be found in the Effective Support for Children and Families in Cambridgeshire and Peterborough].*
- 2.9.4.record what discussions have taken place with parents on MyConcern (Appendix E) about a Child's welfare. If a decision has been made not to discuss with parents, for example if the college believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the

prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

2.10. Child-On-Child Abuse

- 2.10.1. We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 2.10.2. All forms of child-on-child abuse are unacceptable and will be taken seriously.
- 2.10.3. The college will therefore:
- 2.10.4. Create a whole college protective ethos in which child-on-child abuse, including sexual harassment will not be tolerated.
- 2.10.5. Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- 2.10.6. Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up.
- 2.10.7. Ensure that disclosures are taken seriously and that victims are kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment
- 2.10.8. Include within the curriculum, information and, materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.10.9. Provide high quality Relationship and Sex Education (RSE), including teaching about consent.
- 2.10.10. Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the DSL, DDSL or DP in line with safeguarding reporting procedures.
- 2.10.11. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. By having the Wellbeing Team we will ensure that these young people have a trusted adult in college to talk to.
- 2.10.12. Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- 2.10.13. The DSL will refer to the Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

2.11. Dealing with Sexual Violence and Sexual harassment between children

- 2.11.1. The college recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2.11.2. Children 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 and will be exacerbated if the alleged perpetrator(s) attends the same college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The college will:

- 2.11.3. Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 2.11.4. Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.11.5. Make decisions on a case-by-case basis.
- 2.11.6. Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.11.7. Implement measures to keep the victim, alleged perpetrator and, if necessary, other children and staff members safe. Record any risk assessments and keep them under review.
- 2.11.8. Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.11.9. The DSL, DDSL and DP's will refer to the Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

- 2.11.10. Liaise closely with external agencies, including police and social care when required.
- 2.11.11. Refer to 'Keeping Children Safe in Education - Part Five', 2022, 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September 2022) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

3. SUPPORTING CHILDREN

The college recognises that **any** young learner may be subject to abuse and 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 and as such will support all learners by:

3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.

3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.

3.3 Applying the college's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the young learner but does not damage the learner's sense of self-worth. The college will ensure that the learner knows that some behaviour is unacceptable, but s/he is valued and not to be blamed for any abuse which has occurred.

3.4 Liaise with the senior mental health lead where safeguarding concerns are linked to mental health in school/college for advice on case management

3.5 Liaising with other agencies which support the learner such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help Teams.

3.6 Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

3.7 The College recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see pages 9 of Keeping Children Safe in Education, 2022 for the complete list. The list includes:

3.7.1 Children with Disabilities, Additional Needs or Special Educational Needs

3.7.1.1. We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties, and disabilities are most vulnerable to abuse. College staff who deal with young learners with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

3.7.1.2. The college has learners with emotional and behavioural difficulties and/or challenging behaviours. The college will support staff to decide appropriate strategies that will reduce anxiety for the individual learner and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

3.7.1.3. As part of the PSHE curriculum staff will teach young learners personal safety skills commensurate with their age, ability and needs. Learners will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

3.7.1.4. The college has learners who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead such learners will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the learner.

3.7.1.5. Where necessary the College will provide additional training to staff in the use of Makaton, PECS, or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the learners.

3.7.1.6. We promote high standards of practice, including ensuring that disabled learners know who to raise concerns, and have access to a range of adults with whom they can communicate.

3.7.1.7. Most learners in our High Needs Provision have an Education, Health and Care Plan and multi-agency planning and involvement to support integrated care.

3.7.2. Young Carers

3.7.2.1. The college recognises that learners who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

3.7.2.2 City College Peterborough will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

3.7.3. Children at risk of Criminal Exploitation

3.7.3.1. Criminal exploitation of children is a form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

3.7.3.2. All staff working with young learners will consider whether children are at risk of abuse or exploitation in situations outside their families. This will be achieved through the PRAG system (see 1.2.7) and throughout the year through interactions with learners and escalation through the safeguarding policy where concerns are raised. The College will address indicators of child criminal exploitation with staff through training and information circulated to all staff. Staff will follow the safeguarding procedures outlined in this policy if concerns of criminal exploitation arise.

3.7.3.3. The DSL/DDSL/DP will complete Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

3.7.3.4. The College recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions (see 3.6.7)

3.7.4. Children Frequently Missing Education

3.7.4.1. City College Peterborough recognises that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation, modern slavery and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

3.7.4.2. The college monitors attendance of individual learners closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

3.7.4.3. The College endeavours to hold more than one emergency contact for each learner to provide additional options to make contact with a responsible adult when a young person missing education is identified as a welfare and/or safeguarding concern.

3.7.4.4. When a young person is missing for education, the college follows the procedure as set out in Cambridgeshire's Child Missing Education guidance. The college will inform the Education Welfare Officer and Social Care if a missing

child is subject to a Child Protection Plan or there have been ongoing concerns.

3.7.5 Children Misusing Drugs or Alcohol

3.7.5.1 The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the college will consider such action in the following situations:

3.7.5.2 When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse.
- To believe the learners substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults.
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

3.7.6. Children at risk of Child Sexual Exploitation (CSE)

3.7.6.1. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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.

3.7.6.2. CSE 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.

3.7.6.3. Sexual exploitation can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

3.7.6.4. The DSL/DDSL/DP/CSE Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE / Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

3.7.6.5 The college recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions

3.7.6.6. At City College Peterborough we are working in partnership with Cambridgeshire Police and Peterborough City Council to identify and provide appropriate support to learners who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the young person may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information

3.7.7 Children Living with Substance Misusing Parents/Carers

3.7.7.1 Misuse of drugs or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

3.7.7.2. When the college receives information about drug and alcohol abuse by a child's parent/carers they will follow appropriate procedures.

3.7.7.3. This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable care givers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child.

3.7.8 Children Living with Domestic Abuse

3.7.8.1. The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

3.7.8.2. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

3.7.8.3 Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

3.7.8.4. Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

3.7.8.5. The college recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

3.7.8.6. Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The college will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

3.7.8.7. At City College Peterborough we are working in partnership with Cambridgeshire Police and Peterborough City Council to identify and provide appropriate support to learners who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

3.7.8.8 In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called, where one of our learners has been present, with the DSL/Domestic Abuse (DA) Lead.

3.7.8.9 On receipt of any information, the DSL/DA Lead will decide on the appropriate support the learner may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notification to Schools, Colleges and Early Years settings'.

3.7.9. Children at risk of 'Honour-based' Abuse including Female Genital Mutilation (FGM)

3.7.9.1. So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The college takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

3.7.9.2. FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the learners' wishes.

3.7.9.3. In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

3.7.10. Children who have returned home to their family from care

3.7.10.1. The college recognises that a previously looked after child potentially remains vulnerable. We will vigilantly monitor the welfare of previously looked after children, keep records and notify Social care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'.

3.7.11. Children showing signs of Abuse and/or Neglect

3.7.11.1. The college recognises that experiencing abuse or neglect may have an adverse impact on those learners which may last into adulthood without appropriate intervention and support. College may be the only stable, secure and predictable element in the lives of young learners at risk. Young learners who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that learners may develop abusive behaviours and that these learners may need to be referred on for appropriate support and intervention.

3.7.11.2. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments for example within the home or in the community. All staff, but especially the designated safeguarding lead (and deputies) should consider whether learners and vulnerable adults are at risk of abuse or exploitation in situations outside their families for example through the college's PRAG system (see 1.2.7) and through observations/incidents throughout the year. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, and serious youth violence.

3.7.11.3. College will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix D).

3.7.12 Privately Fostered Children

3.7.12.1. Private fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

3.7.12.2. The college will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team

3.7.13. Children with Family Members in Prison

3.7.13.1. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

3.7.13.2. Children may be the target of bullying or may have attendance issues. There may be problems associated with prison visits and the family may be experiencing financial difficulties.

3.7.13.3. City College Peterborough is committed to supporting the children and young people who have a parent or close relative in prison, and to minimise the risk of them not achieving their full potential. The policy can be found on MyConcern under local policies.

3.7.13.4. Information shared by the family will be treated in confidence and will be shared on a 'need to know' basis.

3.7.13.5. The college will work with the family and the child to minimise the risk of the young person not achieving their full potential.

3.7.14. Children at risk of Radicalisation

3.7.14.1. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. Nationally, there have been occasions where 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.

Whilst City College Peterborough values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values, we also recognise that free speech is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The College fully recognises its statutory duty to identify and support learners at risk and is clear that this exploitation and radicalisation should be viewed as safeguarding concern.

The college governors, the Executive Principal and the Designated Safeguarding Lead will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment may include consideration of the college's curriculum, SEND policy, the use of college premises by external agencies, anti-bullying policy, online-safety and other issues specific to the college's profile, community and philosophy.

The College's SPOC (Single Point of Contact) will be the lead for safeguarding in relation to protecting individuals from radicalisation, sharing relevant information in a timely manner with the appropriate agency, including Channel.

City College Peterborough Prevent strategy is can be found in Appendix F.

4. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

4.1 The college will operate safer recruitment practices including ensuring pre-employment checks, and appropriate DBS and reference checks are undertaken according to Part three "Keeping Children Safe in Education". (DfE 2022). This section should be read in conjunction with the college's Safer Recruitment Policy on page 12.

4.2 The governing board will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. A list of members of staff who have undertaken Safer Recruitment training is on page 6.

4.3 The college policy and procedure for concerns and allegations made about its staff is specified in appendix C

5. EXTENDED COLLEGE AND BEFORE AND AFTER COLLEGE ACTIVITIES

The College provides Breakfast Club and after college activities at John Mansfield Centre. The arrangements for child and adults at risk as written in this policy shall apply.

Part IV – SAFEGUARDING ADULTS AT RISK

1. INTRODUCTION AND MAKING SAFEGUARDING PERSONAL

The six key principles of making safeguarding personal underpin all adult safeguarding work:

Empowerment

People being supported and encouraged to make their own decisions and informed consent.

“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”

Prevention

It is better to take action before harm occurs.

“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”

Proportionality

The least intrusive response appropriate to the risk presented.

“I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.”

Protection

Support and representation for those in greatest need.

“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

Accountability

Accountability and transparency in delivering safeguarding.

“I understand the role of everyone involved in my life and so do they.”

Source: Department of Health Care and support statutory guidance

1.1 Making Safeguarding Personal⁴

1.1.1 The underpinning philosophy for safeguarding under the Care Act is provided by “Making Safeguarding Personal”. Making safeguarding personal means it should be person-led and outcome-focused.

1.1.2 Making safeguarding personal requires engagement with people throughout the safeguarding episode and consulting with them about the outcomes to achieve. The extent to which the person felt those outcomes were realised should be ascertained at the end.

1.1.3 To ensure safeguarding is personal it is necessary to ensure that people have an opportunity to discuss the outcomes they want at the start of safeguarding, and to ascertain at the consultation to what extent the desired outcomes have been met.

1.1.4 The strengths of the person in dealing with the abuse or neglect should be recognised.

⁴ Making Safeguarding Personal: Guide 2014 Local Government Association & Association of Directors of Adult Social Services

1.1.5 Outcomes will be recorded to inform practice and provide aggregated outcomes information for CPFT and for the Safeguarding Adults Boards

1.2 Roles and responsibilities of all agencies

1.2.1 The Care Act 2014 states that local authorities must cooperate with each of their relevant partners, as described in section 6(7) of the Care Act, and those partners must also cooperate with the local authority, in the exercise of their functions relevant to care and support including those to protect adults.

1.2.2 City College Peterborough (a partner agency) will work to the following principles:

- Ensure people accessing services, visitors and relatives receive information about how to raise concerns if they suspect or experience abuse in all its forms including neglect
- Empower individuals with knowledge and understanding so that they will be aware of what is appropriate or inappropriate behaviour towards them
- Raise awareness amongst people with care and support needs, who may cause harm, of what constitutes abuse and why
- Provide the support that may be necessary to ensure adequate levels of understanding, and adequate skills to ensure that rights and responsibilities are recognised and asserted
- Enable staff and volunteers to recognise poor practice, or abuse and respond appropriately
- Raise awareness of how staff and volunteers can use their routine processes (e.g. single assessment, risk assessments, care planning, and triage) to enable people to acknowledge that they are at risk of abuse, and signpost them to effective support
- Raise the profile of adult safeguarding in all relevant internal and inter-agency meetings
- Promote relevant advocacy and advisory services
- Ensure that when commissioning, contracting, or monitoring services that service providers are aware of, and adhere to the multi-agency procedures
- Recognise that children may also be at risk when working with families and adults with care and support needs. Referrals must be made to relevant children and families departments where appropriate.

2. PREVENTION

2.1 City College Peterborough will

2.1.1 Provide information for people with care and support needs and their carers, in a range of media in different, user-friendly formats. This should be easily accessible.

2.1.2 Promote adult protection within their agencies and ensure these are considered for inclusion in all appropriate strategies and policies.

2.1.3 Ensure rigorous recruitment and selection practice and adhere to pre-appointment checking requirements e.g. references will always be taken up, DBS checks.

2.1.4 Ensure clear service standards are maintained and where relevant staff and volunteers should receive clear operational guidance and appropriate training in such areas as:

- Serious Incidents
- Accidents
- Health and Safety
- Managing challenging behaviour
- Providing Personal and intimate care
- Same gender personal care
- Physical interventions
- Moving and handling
- Tissue viability, falls prevention and hydration
- Risk assessment and management
- Control and administration of medicines
- Involvement with the property and finances of people accessing services
- Approaches to sexuality
- Personal and professional boundaries

- Standards of care for excellence
- Managing or supporting finances
- Managing visitors
- Chaperoning

3. PROCEDURES

3.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Local Safeguarding Board 'CPSAB Procedures' A copy of these procedures can be found on the LSAB website: <http://www.safeguardingcambspeterborough.org.uk/adults-board/>

3.2 All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk will be taken seriously and staff will report to a Designated Person as soon as possible or within 24 hours. If the Designated Person is not available, staff should report to a member of the Senior Leadership Team. In emergency situations, immediate medical attention will be provided. If a crime may have been committed, the concern, suspicion or allegation will be reported to the Police.

3.3 The College has a nagging doubt procedure enabling staff members to log concerns regarding the welfare of a young person or adult at risk on MyConcern which at that point does not warrant a safeguarding investigation (Appendix E). In the event that three nagging doubt concerns are raised in any one academic year, a safeguarding concern will be raised to MASH

3.4 The Care Act guidance for the categories of abuse is provided in Appendix G

3.5 The College will monitor the quality of its safeguarding revision through

3.5.1 Provision of an annual report to governors

3.5.2 Quarterly collation of safeguarding and nagging doubts, reviewing types of abuse/concerns occurring, support and action provided and outcomes. Report to be discussed with the governor responsible for safeguarding and submitted to the governing board

3.5.3 Annual learner surveys

3.5.4 Providing monitoring and audit information to the safeguarding adults board as required

4. PREVENT

4.1 Prevent is part of a Government initiative to develop a robust counter-terrorism programme – CONTEST. City College Peterborough Prevent strategy is can be found in Appendix F.

5. MENTAL CAPACITY ACT

5.1 The Mental Capacity Act (MCA) 2005 came into force during 2007. The MCA is designed to protect and restore power to those vulnerable people who lack capacity. The MCA also supports those, over the age of 18, who have capacity and choose to plan for their future.

5.2. The 'MCA code of practice' is available under the safeguarding tab on SharePoint. It provides guidance to anyone who is working with and / or caring for adults who may lack capacity.

At the heart of the MCA in terms of concepts and values are the five 'statutory principles. Consider the five principles as the benchmark. They should be used to underpin all acts done and decisions taken in relation to those who lack capacity.

- **Principle 1:** A presumption of capacity. Every adult has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. Do not assume that someone cannot make a decision for themselves just because they have a particular medical condition or disability.

- **Principle 2:** Individuals being supported to make their own decisions. Make every effort to encourage and support people to make the decision for themselves. If lack of capacity is established, it is still important to involve the person as far as possible in making decisions.
- **Principle 3:** Unwise decisions. People have the right to make what others might regard as an unwise or eccentric decision.
- **Principle 4:** Best interests. If a person has been assessed as lacking capacity then any action taken, or any decision made for, or on behalf of that person, must be made in his or her best interests.
- **Principle 5:** Less restrictive option. Someone making a decision or acting on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person's rights and freedoms of action, or whether there is a need to decide or act at all.

Further information is available at <http://safeguardingcambspeterborough.org.uk/>

6. ADULTS AT RISK AND CONSENT

6.1 In the context of adult safeguarding, consent to share safeguarding information, e.g., make a referral, with agencies such as MASH or the Police should be gained from the individual. There may be circumstances where consent cannot be obtained because the adult at risk lacks the capacity to give it or is subject to coercion or undue influence. There are occasions when a safeguarding concern may need to be raised without the person's consent, for example:

- it is in the public interest⁵,
- there is a risk to other 'adults at risk', or children, (note that a risk to other "adults at risk" may include financial scams or other forms of exploitation) or
- the concern is about organisational abuse, or
- the concern or allegation of abuse relates to the conduct of an employee or volunteer within an organisation providing services to adults at risk (college or another provider)
- the adult at risk lacks capacity to make the specific decision to consent to share information and a decision is made to raise a safeguarding concern in the person's "Best Interests" (Mental Capacity Act 2005)
- the adult at risk is subject to coercion or undue influence, to the extent that they are unable to give consent
- it is in the adult at risk's vital interests (to prevent serious harm or distress or life-threatening situations)

The DSL, Deputy DSL or Safeguarding Manager will seek advice from MASH if it is unclear whether a formal concern should be raised where consent has not been obtained.

Where consent to make a safeguarding referral has been gained it must be explained to the adult at risk what giving their consent means and what will happen next and that they understand what has been said.

If a safeguarding concern is raised without the adult at risk's consent it should still be explained to them that a safeguarding referral is being made and the reasons why. The only exception to this would be that if by telling them about the safeguarding referral this puts them at further risk.

6.2 If none of the above apply and the decision is not to share safeguarding information with other safeguarding partners, or not to intervene to safeguard the person:

- support the person to weigh up the risks and benefits of different options
- ensure they are aware of the level of risk and possible outcomes

⁵ Confidential information can be disclosed in the public interest where that information can be used to prevent, detect, or prosecute, a serious crime. "Serious crime" is not clearly defined in law but will include crimes that cause serious physical or psychological harm to individuals. Crimes such as: theft, fraud or damage to property where loss or damage is not substantial, are less likely to constitute a serious crime and as such may not warrant a breach of confidential information, though proportionality is important here. Further information on The Public Interest Test can be found on page 13 of Cambridgeshire and Peterborough Safeguarding Adult Boards Multi-Agency Safeguarding Adults Procedures available on their website

- offer to arrange for them to have an advocate or peer supporter
- offer support for them to build confidence and self-esteem if necessary
- agree on and record the level of risk the person is taking
- record the reasons for not intervening or sharing information
- regularly review the situation
- try to build trust and use gentle persuasion to enable the person to better protect themselves.

7. MULTI-AGENCY RISK MANAGEMENT (MARM)

7.1 Where an adult at risk refuses help and services and is believed to be self-neglecting which therefore puts them at a high level of risk the CPSAB MARM policy and procedures must be referred to. Staff should report a concern via Myconcern.

7.2 Serious self-neglect is a complex issue which usually encompass a complex interplay between mental, physical, social and environmental factors. It frequently covers inter-related issues such as drug and alcohol misuse, homelessness, street working, mental health issues, criminality, anti-social behaviour, inability to access benefits and / or other health related issues.

7.3 An adult may be at risk of serious harm where they are:

- Either unable, or unwilling to provide adequate care for themselves
- Not engaging with a network of support
- Unable to or unwilling to obtain necessary care to meet their needs
- Unable to make reasonable, informed or mentally capacitated decisions due to mental disorder (including hoarding behaviours), illness or acquired brain injury
- Unable to protect themselves adequately against potential exploitation or abuse
- Refusing essential support without which their health and safety needs cannot be met and the individual lacks insight to recognise this.

7.4 The aim of this Policy and Procedures are to provide an agreed and structured process against which to consider a 'concern' of self-neglect. They are aimed at preventing serious harm or even the death of individuals who appear to be self-neglecting by ensuring that:

- Individuals are empowered as far as possible, to understand the implications of their actions
- There is a shared, multi-agency understanding and recognition of the issues involved in working with individuals who self-neglect
- There is effective multi-agency working and practice
- Concerns receive appropriate prioritisation
- Agencies and organisations uphold their duty of care
- There is a proportionate response to the levels of risk to self and others

7.5 The CPSAB policy and procedures are here: <http://www.safeguardingcambspeterborough.org.uk/adults-board/information-for-professionals/selfneglect/>

PART V: RESOLVING PROFESSIONAL DIFFERENCES

Effective working together depends on an open approach and honest relationships between agencies. This could include (and is not limited to) care agencies, other education providers, health or statutory provision. Problem solving, and resolution is an integral part of professional co-operation and joint working to safeguarding children, young people and adults at risk.

Transparency, openness and a willingness to understand and respect individual and agency views are a core aspect of multi-agency working. However, there may be occasions where individuals and/or agencies working with children, adults at risk and families/carers disagree on how best to keep young people and adults at risk safe and promote their welfare.

Disagreements can arise in a number of areas, but are most likely to arise around:

- Perceived levels of risk
- Levels of need and whether a young learner/adult has met the threshold for a service or intervention
- Roles and responsibilities
- Level of quality of communication/information sharing
- Provision of services
- Action or lack of action progressing plans
- Cases being/not being stepped up or down and/or closed

The College will respectfully challenge whenever it has a concern about the action or inaction of another professional or agency. Our aim is to resolve a professional disagreement at the earliest possible stage, always keeping in mind that the young learners or adult at risk safety and welfare is paramount.

If a young learner or adult at risk is thought to be at immediate risk of harm, the Police or a designated safeguarding lead should be informed immediately.

Any employee who feels that a decision is not safe, or is inappropriate, should initially speak to their line manager. A record should be made confirming the nature and source of the concerns. If the concern is in relation to a decision, action or inaction of a College employee, volunteer or governor, it should be raised immediately with the line manager and/or the whistleblowing policy should be followed.

Stages of Resolution

Stage One: Discussion between workers

A staff member who disagrees should have a discussion to try to resolve the problem. This discussion must take place as soon as possible and could be a telephone conversation or a face to face meeting. If the staff member is not confident then support should be sought from the line manager.

Stage Two: Discussion between Line Managers

If the problem is not resolved and concerns remain, the staff member should contact their line manager or Designated Person to consider the issue raised, what outcome they would like to achieve and how differences can be addressed. The line manager should contact their respective counterpart to try to negotiate an agreed way forward. This could involve a professionals meeting if deemed appropriate.

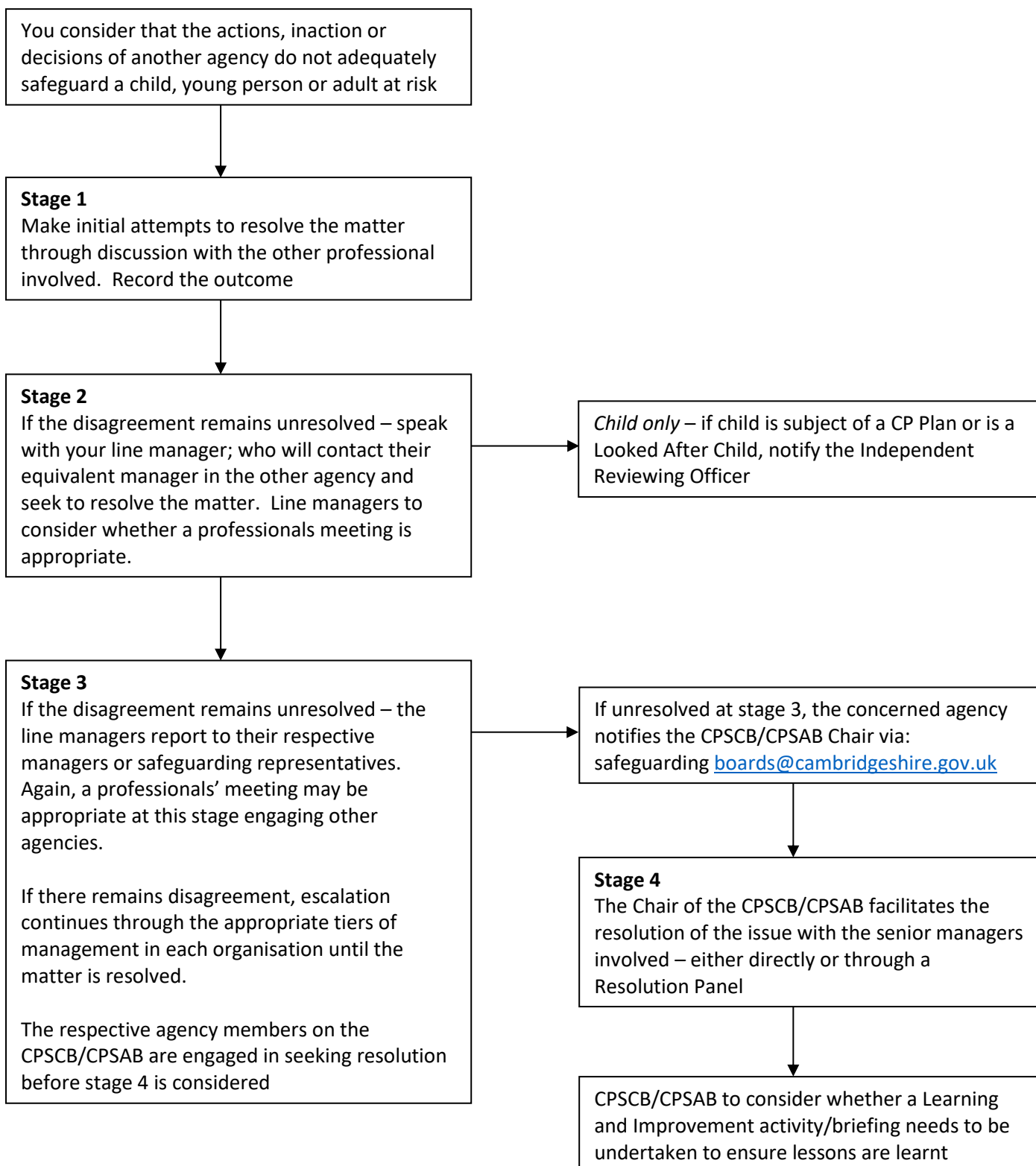
Stage Three: Discussion between Senior Managers

If the issue is not resolved at stage two, the line manager should report the concern and actions taken to date to an OLT member or Lead/Deputy Designated Person who will liaise with the ELT member of Lead Designated Person of the other organisation to attempt to resolve professional differences.

Stage Four: Resolution by Cambridgeshire and Peterborough Safeguarding Board's Chair

If there is no resolution, and having exhausted all other routes, the matter should be escalated by the Lead Designated Person/Executive Principal to the Chair of the Cambridgeshire and Peterborough Safeguarding Board. The Chair may either seek to resolve the issue directly with the relevant senior managers or convene a Resolution Panel.

Escalation Flowchart



PART VII GLOSSARY

CPSAB	Cambridgeshire and Peterborough Safeguarding Adults Board
CPSCB	Cambridgeshire and Peterborough Safeguarding Children’s Board
CSE	Child Sexual Exploitation
DfE	Department for Education
DoL	Deprivation of Liberty
DP	Designated Person
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
EHA	Early Help Assessment
FGM	Female Genital Mutilation
LAC	Looked After Child
LADO	Local Authority Designated Officer
LSCB	Local Safeguarding Children Board
MARAC	Multi-Agency Risk Assessment Conference
MASH	Multi-Agency Safeguarding Hub
MCA	Mental Capacity Act
CPSAB	Cambridgeshire and Peterborough Safeguarding Adult’s Board
CPSCB	Cambridgeshire and Peterborough Safeguarding Children's Board
RSE	Relationship and Sex Education
SEND	Special Educational Needs and Disabilities
SPOC	Single Point of Contact
UKCCIS	UK Council for Child Internet Safety

Appendix A: WHISTLEBLOWING POLICY – guidance for employees

This guideline must be read with Peterborough City Councils' Whistleblowing Policy available on MyConcern.

The aims of Whistleblowing are to:

- encourage Council (and college) employees, our Partners' employees and others to feel confident in raising serious concerns and to question and act upon any concerns about council (and colleges) practices;
- provide avenues for those individuals to raise these concerns internally and receive feedback on any action taken;
- ensure that all concerns are taken seriously;
- deal consistently with disclosures in a fair, objective, and discrete manner.
- ensure that the Council (and therefore the College) continues to improve its services and operate best practices.
- reassure individuals that they will be protected from victimisation, subsequent discrimination or disadvantage by colleagues for whistleblowing; and
- allow individuals to take the matter further if they are dissatisfied with the Council/College's response.

Staff must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children, young people and vulnerable adults may be at risk. Employees should use supervision sessions, team meetings and other opportunities to raise questions and seek clarification on issues which are of concern. It can be difficult to raise concerns about the practice or behaviour of a colleague, but employees must act to prevent an escalation of the problems and to prevent themselves being potentially implicated.

You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation; these feelings, however natural, must never result in a child, young person or adult at risk continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or adults who are targeted. These people need someone like you to safeguard their welfare.

Don't think what if I'm wrong - think what if I'm right

Concerns may include

- Physical, sexual, or emotional abuse of a child or any other person by another employee or any other person.
- Inappropriate use of grants;
- tampering with tender documents to advantage a particular party;
- Manipulation of accounting records and finances, including fraudulent claims;
- Decision making for personal gain;
- Infringement of service users' personal, human and basic rights e.g. abuse (physical, emotional, sexual), harassment, bullying and prejudice.
- Inappropriate use of council assets by an individual;
- Deceit, within council practices;
- Abuse of position within the Council or its Partners.
- Health and safety of employees or service users.

Concerns which fall within the scope of the whistleblowing procedure may also be about something that:

- is potentially unlawful; or
- is against the council's Standing Order or policies; or
- falls below established standards or practice; or
- amounts to improper conduct.

Full information regarding the safeguards for the individual raising the concern, confidentiality, anonymous allegation, untrue, malicious and unfounded allegations and support to employees can be found in the full policy (available on MyConcern)

How to raise a concern

1. Raise a concern with your immediate manager. Serious and sensitive issues can also be reported to:

- a. ELT Member
 - b. Chief Executive
 - c. Director of Governance
 - d. Executive Director Strategic Resources
 - e. Executive Director Children's Services
 - f. Chief Internal Auditor
2. Concerns should be raised in writing with the following information:
 - a. Background and history of the concern
 - b. Relevant names, dates and places
 - c. Reasons for the concern
 3. If an individual is unable to put their concern in writing, they can telephone or meet with the appropriate manager to who they decide to report the concern. **It is important that the employee makes it clear that they are raising the issues via the whistleblowing procedure.**

An employee is not expected to prove the truth of an allegation but they will need to demonstrate that there are sufficient grounds for the concern and that it is in the public interest. In some instances it may be appropriate for an individual to ask their trade union to raise a matter on their behalf or to ask a colleague or trade union representative to accompany them when they commence the procedure.

How a concern will be responded to

The action taken will depend on the nature of the concern. The matters raised may:

- Be investigated internally
- Be referred to the police
- Be referred to the External Auditor
- Form the subject of an independent inquiry

In order to protect individuals and the Council (and College), initial enquiries, (usually involving a meeting with the individual raising the concern), will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the council/college will have in mind, is the public interest.

Some concerns may be resolved simply, by agreed action or an explanation regarding the concern, without the need for further investigation.

Within ten working days of a concern being received, the person receiving the concern will write to the employees acknowledging that the concern has been received and;

- indicate how they propose to deal with the matter;
- advise whether any initial enquiries have been made;
- advise whether further investigations will take place, and if not why not;
- where possible give an estimation of how long it will take to provide a final response;

It may be necessary for the person receiving the concern to meet with the individual who is reporting the concern on more than one occasion depending on the nature of the concerns raised. Where any meeting is arranged, the person reporting the concern, if they wish, may be accompanied by a colleague or recognised Trade Union Representative. When appropriate, meetings will be arranged away from the workplace.

"Absolutely without fail- challenge poor practice or performance. If you ignore or collude with poor practice, it makes it harder to sound the alarm when things go wrong"
With acknowledgement to Sounding the Alarm - Barnardo's

Appendix B: ROLE OF LEADS

Deputy Designated Safeguarding Lead Responsibilities

Manage referrals

The Deputy Designated Safeguarding Lead is expected to:

- refer cases of suspected abuse to the Local Authority children's and adults' social care, MASH and police as required;
- support staff who make referrals to Local Authority children's and adults' social care, MASH and police;
- refer cases to the DSL (Designated Safeguarding Lead) for referral to Channel programme where there is a radicalisation concern as required;
- support staff who make referrals for the Channel programme;
- where DSL is not available, refer cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required; and,
- inform the DSL of all referrals and ensure the referral is recorded on the organisations safeguarding management information system.

Work with others

The Deputy Designated Safeguarding Lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the DSL to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, IT Technicians, and the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

Training

Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Deputy Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Deputy Designated Safeguarding Leads and designated persons, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;⁶
- have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the College's Safeguarding Policy and Procedures, especially new and part time staff;

⁶ Full details in Chapter one of Working Together to Safeguard Children

- are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;⁷
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and associated legislation;
- understand the importance of information sharing, both within the College, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
- can recognise the additional risks that children and adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Raise Awareness

The Deputy Designated Safeguarding Lead should:

- ensure the College's Safeguarding Policies are known, understood and used appropriately;
- ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the College, the Deputy Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the Deputy Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time a Deputy Designated Safeguarding Lead (or the DSL or an ELT/OLT member) should always be available (during college hours) for staff in the College to discuss any safeguarding concerns. Available may mean via phone and/or Skype or other such media.

A Deputy Designated Safeguarding Lead or the DSL will be available in person or via phone out of hours and out of term.

Reporting

Provide monthly, quarterly and annual data and information to the DSL to inform governor and ELT reports and action plans

⁷ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children

Audits

Quality assure safeguarding arrangements within the college through a range of self-assessment tools and internal audits including actual concerns raised, training database and the single central record.

Designated Person Responsibilities

Manage referrals

The Designated Person is expected to:

- refer cases of suspected abuse to the Local Authority children's and adults' social care, MASH and police as required;
- support staff who make referrals to Local Authority children's and adults' social care, MASH and police;
- refer cases to the DSL (Designated Safeguarding Lead) for referral to Channel programme where there is a radicalisation concern as required;
- support staff who make referrals for the Channel programme;
- refer cases where a crime may have been committed to the Police as required; and,
- inform the DSL of all referrals and ensure the referral is recorded on the organisations safeguarding management information system.

Work with others

The Designated Person is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the DSL, or Deputy DSL to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, IT Technicians, and the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

Training

Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Person should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated persons, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's and adult social care referral arrangements;⁸
- have a working knowledge of how local authorities conduct a child/adult protection case conference and a child/adult protection review conference and be able to attend and contribute to these effectively when required to do so;
- are alert to the specific needs of children in need and adults at risk, those with special educational needs and young carers;⁹

⁸ Full details in Chapter one of Working Together to Safeguard Children

⁹ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and associated legislation;
- understand the importance of information sharing, both within the College, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and adults at risk from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children and adults at risk safe whilst they are online at college;
- can recognise the additional risks that children and adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children and adults at risk to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Child protection file

Where children leave the College, the Designated Person should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the Designated Person should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Additional Lead responsibilities – to be added as required

Mental Capacity Act Responsibilities (Barry/Debbie)

As named lead for the Mental Capacity Act (MCA) ensure:

- the Mental Capacity Act is embedded within the practices of the college and seek expert advice when issues are complex, or concerns need to be escalated.
- Ensure all staff have access to policies and procedures on the Mental Capacity Act and Deprivation of Liberty Safeguards (DoLS) implementation and know who to go to access expert advice on Mental Capacity Act issues.
- Staff know how and when to access an Independent Mental Capacity Advocate (IMCA's) where supported people and learners have no family members or significant others to advocate for them. Family are involved (when a person lacks capacity) in Best Interest decision making, MCA and DoLS processes.

Children in Care Lead Responsibilities (Tash)

As named lead for Domestic Abuse ensure:

- the progress of children in care are monitored
- participate fully in the care planning process and submit reports as requested
- support children who are previously looked after

Domestic Abuse Lead Responsibilities (Georgia and Carleen)

As named lead for Domestic Abuse ensure:

- act as lead for all concerns raised regarding Domestic Abuse
- ensure all staff have access to policies, procedures and information on Domestic Abuse and know who to contact to get access to expert advice on Domestic Abuse
- support young people and adults at risk who have been the victims or witnessed, domestic abuse

Child Sexual Exploitation Lead Responsibilities (Michaela)

As named lead for Child Sexual Exploitation ensure:

- act as lead for all concerns raised regarding Child Sexual Exploitation
- ensure all staff have access to policies, procedures and information on Child Sexual Exploitation and know who to contact to get access to expert advice on Child Sexual Exploitation
- support young people and adults at risk who have been the victims or witnessed, child sexual exploitation

Designated Person for Young Learners of Prisoners (Tash)

As named lead for Young Learners of Prisoners:

- Keep the Deputy Principal and DSL fully informed of learners with a parent in prison
- Liaise with other relevant college staff on a 'need to know' basis
- Provide a point of contact in the college for external agencies in order to share information
- Liaise with the family and seek their consent to provide additional support for the learner as necessary
- Liaise with other statutory and voluntary agencies as appropriate
- Promote the use of the Early Help Assessment (EHA) to identify the needs of the learner unless a Core Assessment has been completed
- Consider calling a multi-agency meeting to address the needs of the learner and to identify a key worker for that learner following the completion of an EHA
- Consider the use of an individual education plan for the learner concerned
- Monitor the achievement, attendance and behavior of the learner with a parent in prison
- Act as an advocate for young learners with a parent in prison, particularly if the learner is a Looked After Child (LAC) as LAC have poor levels of visiting a parent in prison.
- Consider purchase of books and resources on the subject of prisons and prisoners for the college library
- Keep appropriate and current records with reference to information sharing guidance

Early Help Assessor Lead Responsibilities (Tash/Michaela/Georgia / Carleen)

As named lead for Early Help Assessments ensure:

- act as lead for all concerns raised regarding Early Help Assessments
- ensure all relevant staff have access to procedures and information on Early Help Assessments and know who to contact to get access to expert advice on Early Help Assessments

Appendix C: STAFF GUIDANCE ON PROCEDURE FOR REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE OR CONCERNS AGAINST MEMBERS OF STAFF, AGENCY WORKERS AND VOLUNTEERS

These procedures apply to all staff (including agency staff, volunteers and contractors). The word LADO refers to a nominated (nominated by Children's Services) Local Authority Designated Officer, whose role is to attend all complex strategy meetings, be involved in the management and oversight of individual cases and monitor their progress, provide advice and guidance to the College and liaise with police and other agencies for Children and Young Learners under the age of 18 (or 25 where the learner has an Education Health and Care Plan (EHCP)). This guidance refers to the procedures aligned to Cambridgeshire and Peterborough Safeguarding Boards and KCSiE (2022).

The college will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with learners and parent/carers as advised within the Local Authority's Code of Conduct: Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (February 2022)'. As part of the induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

All staff have been given a copy of Guidance for safer working practice for those working with children and young people in education settings (February 2022) as part of their induction and have signed as an undertaking that they will comply with this guidance. All staff are aware of their whistle blowing responsibilities and will promptly report any concerns in the interests of protecting children and staff from poor practice and/or unsuitable behaviour. This includes the requirement to self-disclose any personal issues which may impact on their suitability to work in an education setting.

The college will ensure that staff and volunteers are aware that sexual relationships with learners aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).

The college will ensure that communication between learners and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

Introduction

The aim of this procedure is to afford greater safeguarding to children and adults at risk with regard to those working with them and to allow for allegations and concerns to be dealt with expeditiously, fairly and thoroughly and avoiding delays. Compliance will help to ensure that allegations of abuse are dealt with consistently using a thorough and fair process.

Initial Response to an Allegation or Concern

Allegations against a member of staff, carer or volunteer may arise from a number of sources e.g. a report from a child or adult at risk, a concern raised by another adult in the College or a complaint by a parent/carers.

Any allegation of abuse made against a member of staff or volunteer will be reported straight away to the Executive Principal. In cases where the Executive Principal is the subject of an allegation, it will be reported to the Chair of Governors. Where the allegation involves a young person under 18 (or under 25 for learners with an Education Health and Care Plan) the college will follow the procedures set out in Part four of 'Keeping Children Safe in Education (2022)'.

The member of staff who receives the allegation or concern should treat the matter seriously and keep an open mind. They must:

- Provide written details of the information and allegation, where possible using the child / adult's own words, including times, dates, locations and names of potential witnesses and sign and date the record. The written details should be countersigned and dated by the Executive Principal (or Designated Person).

They must not:

- investigate or ask leading questions if seeking clarification.
- promise confidentiality but give an assurance that information will be shared only on a “need to know” basis. Make assumptions or offer alternative explanations.

Concerns and allegations in relation to children and learners under the age of 18

The Executive Principal and Designated Safeguarding Lead (DSL) will consider whether the concern or allegation meets the harm threshold as set out in KCSiE (September 2022) Section Four. Threshold will have been made where it is alleged that an individual has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and or
- behaved towards a child or children in a way that indicate they may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside of college, that might make an individual unsuitable to work with children – known as transferable risk).

Examples of concerns and allegation that do not meet threshold (also known as ‘low-level’ concerns could include:

- being over friendly with young people
- having favourites
- taking photographs of young learners on their mobile phone
- engaging with a young learner on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating learners

Procedures for allegations that may meet the harms threshold (Part Four, Section One)

Any allegation of abuse made against a member of staff (including agency staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children safe in Education, 2022, part 4, section one, will be reported straight away to the Executive Principal.

In cases where the Executive Principal is the subject of an allegation, it will be reported to the Chair of Governors (See Allegations flowchart appendix C. The college will follow the procedures set out in Part four of ‘Keeping Children Safe in Education (2022)’.

The college will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, agency staff or volunteer and adhere to the relevant procedures set out in ‘Keeping Children Safe in Education’ (2022) and the College’s HR Policies, and seek advice from HR.

The Executive Principal or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, the college will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The college will use the guidance chart found at Appendix B to support their decision-making.

Where the college identifies a young person has been harmed, that there may be an immediate risk of harm to a child/young person or if the situation is an emergency, we will contact children’s social care and as appropriate the police immediately.

The college will consider:

- **Looking after the welfare of the young person** - the DSL, DDSL or DP is responsible for ensuring that the young person is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action

The college will ensure that any disciplinary proceedings against staff, agency staff or volunteers relating to child protection matters are concluded in full even when the member of staff, agency staff or volunteer is no longer employed at the college and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff (including agency staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that learners are protected.

Procedures for concerns that do not meet the harms threshold (Part Four, Section Two)

Low level concerns that do not meet the harms threshold should be reported to the Executive Principal. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

In cases where the Executive Principal is the subject of an allegation, it will be reported to the Chair of Governors. The college will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2022.

The college will deal with any such concern, no matter how small, where an adult working in or on behalf of the 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 consider a referral to the LADO.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be kept by HR, and held confidentially, securely and in adherence to the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Procedures for concerns and allegations in relation to Adults At Risk

The college will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Immediate consideration must be given on how to best safeguard the young person/adult at risk e.g. suspension or not working unsupervised. The investigation will be led by the DSL with support from the college Specialist HR Advice and Support provider. The enquiries could result in:

- A referral to the MASH team and/or
- A referral to the Police and/or
- An investigation under the colleges disciplinary policies and procedures and/or
- A referral under Persons in a Position of Trust (PIPOT)

Persons to be notified

As soon as possible after an allegation is made or a concern of suitability is raised, the Executive Principal or DSL should inform the parent(s) or carer(s) of the child/ren or adult at risk(s) involved. For young people under 18 (25 if they have an EHCP) the LADO should be contacted first to ensure that this does not impede the disciplinary or investigative

processes. There may be some circumstances where the parent(s) or carer(s) need to be told straight away e.g. if a child is injured and requires medical treatment.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 206-207). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

The parent(s)/carer(s) and the child/adult at risk, if they have capacity, should be helped to understand the processes involved and need to be kept up to date about the progress of the case and of the outcome where there is no criminal prosecution. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence

City College Peterborough has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Unless an objection is raised by social care or the police, the Executive Principal or DSL will as soon as possible, inform the accused person about the nature of the investigation, how enquiries will be conducted and the possible outcome e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body.

In all cases the member of staff should:

- be treated fairly and honestly and helped to understand the concerns expressed and processes involved
- be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- if suspended, be kept up to date about events in the workplace
- be informed of the outcome in writing within 7 days of the final strategy meeting
- receive information on independent support that is available via Health Assured, a free 24-hour employee assist programme, telephone number 0800 030 5182, or Occupational Health

A named representative will be appointed and will keep the person who is subject to the allegation informed of the progress of the case and consider what other support is appropriate for the individual.

In all cases the relevant regulatory body for the setting should be informed of the allegation and the outcome.

Confidentiality

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered.

Suspension

The need for suspension should be given consideration at the complex strategy meeting. Only the Executive Principal has the power to suspend an accused member of staff/carers/volunteer. Staff or volunteers who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that young people/adults at risk are protected.

Resignations and "Compromise Agreements"

The fact that a person tenders their resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures.

So called compromise agreements, by which a person agrees to resign, must not be used in these cases. In any event, such an agreement will not prevent a referral to the Independent Safeguarding Authority where there is a duty to do so and/or a thorough police investigation where that is appropriate.

Allegations against staff in their personal lives

Childrens: The general principles outlined in these procedures still apply if the concern or allegation arises about a member of staff outside their area of work.

The complex strategy meeting should decide on whether the concern justifies approaching the College for further information or inviting the Executive Principal or DSL to the meeting.

Adults: The College will follow the Cambridgeshire and Peterborough Safeguarding Adult Boards policies and procedures when an allegation is made against a Person in a Position of Trust (PiPot). In relation to this process the person in a position of trust will have had an allegation raised that they may pose a risk to adults at risk because, in their life outside of their work environment, they are alleged to have:

- behaved in a way that has harmed, or may have harmed an adult or child
- possibly committed a criminal offence against, or related to, an adult or child
- behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs”

Information can be found at <http://www.safeguardingcambspeterborough.org.uk/adults-board/information-for-professionals/pipot/>

Disciplinary processes

The Executive Principal/DSL (and LADO) should discuss whether disciplinary action is appropriate in all cases where:

- it is clear at the outset that a police investigation or Adults/Childrens Services enquiry is not necessary
- the Executive Principal/DSL (or LADO) is informed by the police or Criminal Prosecution Service that a criminal investigation and subsequent trial is complete, or that an investigation is to be closed without charge, or prosecution discontinued

The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff and take into account

- information provided by the police or Adults/Childrens Services
- the result of any investigation or trail
- the different standard of proof in disciplinary and criminal proceedings

In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. The LADO and/or Principal/DSL should act jointly with the providing agency, if any, in deciding whether to use the person’s services, or provide future work with children/adults at risk, and if not, whether to make a report for consideration of barring or other action.

If at any stage, new information emerges that requires a child protection referral, the investigation should be held in abeyance and only resumed if agreed with Children’s services and police.

Record keeping

The LADO will write a summary at the conclusion of the enquiry involving a young person under 18 (or 25 with an EHCP), the Executive Principal or DSL will write a summary for investigations involving adults. The Executive Principal or DSL should keep a summary on the member of staff’s confidential personnel file and give a copy to the individual. The record should include details of how the allegation was followed up and resolved, the decisions reached and action taken. It should be kept at least until the person reaches retirement age or for 10 years if longer.

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children’s social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The college has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Referral to barring lists and bodies

In cases where the allegation is substantiated, and individual is dismissed, or the person resigns, the Executive Principal/DSL (and LADO) will determine whether a referral should be made to the Independent Safeguarding Authority for inclusion on the relevant barring lists. If a referral is to be made it should be submitted within 1 month.

Learning lessons

The Executive Principal or DSL (and LADO) should review the circumstances of the case to determine whether there are any improvements to be made to the College's procedures or practice. This meeting should take place within one month following the conclusion of the investigation. Actions arising from the meeting will be monitored by the LADO until the actions are completed.

Appendix D: CATEGORIES OF ABUSE (CHILDREN)

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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 - 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.

Neglect - 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.

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers 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
- Ensure access to appropriate medical care or treatment

Emotional Abuse - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment 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.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
 - children in looking at, or in the production of, sexual images,
 - children in watching sexual activities
 - or encouraging children to behave in sexually inappropriate ways
 - grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Appendix E: STAFF GUIDANCE ON DEALING WITH AND REPORTING DISCLOSURE AND CONCERNS OF ABUSE

Who do I report to?

All complaints, disclosures, allegations or suspicions of abuse or any significant concerns about a child or adult at risk must be taken seriously and reported on MyConcern and discussed with a Designated Person as soon as possible or within 24 hours.

If the Designated Person is not available, staff should report to a member of the Extended Leadership Team or Operational Leadership Team.

In emergency situations, seek any necessary medical attention. If a crime may have been committed, the concern, suspicion or allegation should be reported to the Police. The Child or Adult at Risk Protection Coordinator can advise about this.

- Staff must record the following on MyConcern
- Name of learner/supported person
- Date of birth (if unknown, enter 01/01/2000)
- Nature of concern
- Location of concern
- Detail of concern including what immediate action has taken place

If the concern is urgent please tick the relevant box. This must be followed up with a phone call or immediate face to face discussion with a designated person.

Child Safeguarding reporting

If the complaint, disclosure, allegation or suspicion involves a child or young person and should no member of the Extended/Operational Leadership Team be available, staff have a personal responsibility to contact Childrens Social Care (and the Police and / or Ambulance Service as required).

Child Protection issues in relation to learners attending College provision should be referred to the lead on Child Protection in the learner's school/college.

Adult Safeguarding reporting

If the complaint, disclosure, allegation or suspicion involves an adult at risk, and should no member of the Extended/Operational Leadership Team be available, staff have a personal responsibility to contact the relevant safeguarding team

Situations

There may be three different types of situations staff will encounter:

1. A disclosure or allegation of abuse

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

- i. Ensure that the victim of the alleged abuse is safe
- ii. Ensure that any necessary emergency medical treatment is arranged
- iii. Ensure that no forensic evidence is disturbed, lost or destroyed. If it is felt that a crime has been or may be committed, the Police should be contacted
- iv. Listen carefully and stay calm.
- v. Do not put words into the child's or adult at risk's mouth or ask leading or closed questions or judge or condemn the alleged abuser.
- vi. Note the main points carefully, including any key phrases used and record the date, time, place, what the child / adult at risk said, did and your questions etc.
- vii. Do not discuss the allegation of abuse with the alleged perpetrator
- viii. Reassure the person that by telling you, they have done the right thing.

- ix. Inform the child or adult at risk that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter. If a child or adult at risk says they will tell you only if you promise not to pass on the information, explain that this is not possible – even if this means they refuse to say any more.
- x. Update MyConcern and refer immediately to a Designated Person, or if not available, to a Extended/Operational Leadership Team member or a line manager. In the highly unlikely event that none of these are available, the member of staff has a personal responsibility to contact the appropriate Peterborough Agency

Even in the case of no consent for reporting being gained, if the concern, suspicion or allegation of possible abuse is serious and risks being continued or happening to others, then the information should still be reported to the relevant agency

Staff should not investigate concerns or allegations themselves, but should report them immediately to a Designated Person or other Senior Manager.

In the event of a 'Prevent' concern or nagging doubt, this should be passed on to the Police for consideration to send to Chanel by the Designated Person.

Confidentiality: It is not possible to guarantee to a learner/supported person that a disclosure of abuse will be kept confidential. It is possible to guarantee that any information/notes will be kept in a confidential location with strictly limited access.

Role of Designated Person

On receiving a referral, a Designated Person will make arrangements to see the young person or adult at risk and the member of staff to whom they have disclosed within 24 hours.

After speaking with the young person or adult at risk, a decision will be made on what action is to be taken. Actions will be assigned on MyConcern and may also be followed up verbally. It is important that if you receive an action via MyConcern, the action is completed and recorded on MyConcern.

The Designated Person will act on the advice given by the referral agency, including whether the parents / carers should be informed.

If the Police have been contacted and are due to attend a site, the Designated Safeguarding Lead or Executive Principal must be informed

The Designated Person will inform the referrer of their decision and update as appropriate.

The Designated Person will then decide if further support is required such as counselling, mentoring etc.

2. A significant concern

If you have a significant concern about a child, young person or adult at risk create a record on MyConcern and discuss this concern with your line manager. After discussing the concern, you or your manager should (if the manager also has concerns) speak to the learner/adult at risk and decide to either:

- refer to a Designated Person or,
- consider offering support such as Counselling or Mentoring etc.

If you are still unsure of what action to take after discussing it with a colleague, a Designated Person will be happy to talk it over with you.

Parents / Carers will be consulted, if appropriate, and their consent obtained before any referral is made about their child to any other agency under local “children in need” procedures. With older young people, it may be appropriate to act on their consent alone. However, even if asked to do so, staff cannot guarantee to consult parents or carers first, or to keep children’s or adult at risk’s concerns confidential, if referral must be made to the appropriate agencies in order to safeguard the child’s or adult at risk’s welfare.

3. A nagging doubt or low-level concern

Sometimes, things that seem to be insignificant or trivial at the time, turn out to be vital pieces of information later.

Examples could be a learner/supported person whose behaviour has changed, or who seems preoccupied or unable to concentrate; who looks obviously unwell or has injuries. Other examples include:

- Poor-quality, unappetising food provided by the parent/carer
- Personal care needs not being met
- Changes in the behaviour and demeanour
- Signs of neglect such as clothes being dirty

If there has been no specific incident or information, create a MyConcern record recording the nagging doubt/low level concerns form. Try to identify what is really making you feel worried.

Appendix F: PREVENT STRATEGY

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. Nationally, there have been occasions where 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.

Whilst City College Peterborough values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values, we also recognise that free speech is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The college fully recognises its statutory duty to identify and support learners at risk and is clear that this exploitation and radicalisation should be viewed as safeguarding concern.

The college governors, the Executive Principal and the Designated Safeguarding Lead will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment may include consideration of the college's premises by external agencies, anti-bullying policy, online-safety and other issues specific to the college's profile, community and philosophy.

The College's SPOC (Single Point of Contact) will be the lead for safeguarding in relation to protecting individuals from radicalisation, sharing relevant information in a timely manner with the appropriate agency, including Channel.

The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical - an attack is expected imminently
- Severe - an attack is highly likely
- Substantial - an attack is a strong possibility
- Moderate - an attack is possible but not likely
- Low - an attack is unlikely

The current threat level from international terrorism in the UK and is SUBSTANTIAL¹⁰ which means that a terrorist attack is high likely. The local Prevent concerns include:

Islamist Terrorism – the threat is due to the Islamist extremist ability to radicalise people, particularly those with mental health conditions or individuals who are isolated, online.

Extreme Right Wing - this is an increasing threat locally and nationally and whilst reporting includes some adults there is an increasing number of young people under the age of 18 being radicalised. There has been a growth in nationalist material online, white supremacist literature and Nazism.

¹⁰ As a September 2022

[Incel](#) ideology is also growing as well as a developing stream which [crosses conspiracy theorists linked to COVID19 with far-right ideology](#).

City College Peterborough has a part to play in fostering shared values and promoting cohesion and should understand the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings. This strategy has five key objectives:

- i. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner/supported person's voice.
- ii. To break down segregation among different communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all in playing a full and active role in wider engagement in society
- iii. To ensure learner/supported person safety and that the College is free from bullying, harassment and discrimination
- iv. To provide support for learners/supported people who may be at risk and appropriate sources of advice and guidance
- v. To ensure that learner/supported person and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives, the strategy will concentrate on four areas:

I. Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners/supported people, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner/supported person voice and participation
- Building staff and learner/supported person understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

II. Teaching and Learning

To provide a curriculum and support provision which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights through promoting "British Values"
- Encouraging active citizenship/participation and learner voice.

III. Learner Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective learner support services
- Listening to what is happening in the College and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping learners/supported people and staff to know how to access support in College and or through community partners
- Supporting at risk learners through safeguarding processes
- Focussing on narrowing the attainment gap for all learners

IV. Managing Risks and Responding to Events

To ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Completing an annual assessment and creating an action plan
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College
- Understanding and managing potential risks within the College and from external influences
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremism within the College
- Ensuring plans are in place to respond appropriately to a threat or incident within the College
- Developing effective ICT security and responsible user policies.

In the event of a concern involving links or acts of terrorism staff members should complete a MyConcern referral form and report to their Designated Person or line manager immediately. The Designated Person will refer concerns via normal safeguarding concerns route or to

For advice and to make a referral:

Tel: 01480 847743

e-mail: maru.cp@cambs.pnn.police.uk

or by contacting the Prevent team: Prevent@cambs.pnn.police.uk

Referral will NOT mean criminalising or adversely affecting people's future.

For more information, please refer to:

- The Prevent Duty Guidance updated April 2021, and available at [Prevent duty guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/prevent-duty-guidance)

Appendix G: CATEGORIES OF ABUSE: ADULTS AT RISK

The guidance for the Care Act (2014) identifies areas that may constitute abuse and neglect

Physical Abuse

Physical abuse causes harm. It includes assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

Domestic Violence

This includes psychological, physical, sexual, financial, emotional abuse and so-called 'honour' based violence.

The terms "honour crime" or honour-based violence" or "izzat" embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder, where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour. In transgressing this correct code of conduct, the person is perceived as having brought "shame" or dishonour" to the family or community.

The age range for this abuse type covers everyone 16 years and over. It can be a single event of a number of incidents and can include coercion or controlling behaviour as well as violence and abuse.

Neglect and Acts of Omission

Neglect is the persistent or severe failure to meet a person's basic physical and / or psychological needs. This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect is not always intentional and may be due to carers not coping or struggling to cope.

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Self-neglect, albeit recognised for many years, is now specifically identified in the Care Act (2014) and the statutory guidance. Addressing the issue at both a practice and managerial level can be extremely complex and challenging. Self-neglect and Adult Safeguarding: Findings from research (Braye et al, 2011) is a report to government concerning the issues and will be useful to practitioners in this difficult area

Sexual Abuse

Sexual abuse involves a child, young person or adult at risk being forced or coerced into participating in or watching sexual activity. It includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography*, subjection to pornography or witnessing sexual acts, sexual acts or sexual assault to which the person has not consented or was pressured into consenting.

**Sending or posting sexually suggesting images (sexting)*

All learners/supported people should be aware that making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

All members of staff (including non-teaching) will be made aware of how to recognise and refer any disclosures of incidents involving 'youth produced sexual imagery'.

CCP will follow UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2016) to assess the risk and to determine the most appropriate course of action. This may include police involvement.

Emotional or psychological abuse

Emotional or psychological abuse occurs where there is persistent emotional ill treatment or rejection. It includes emotional abuse threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling,

intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse

Financial or material abuse occurs where there is deliberate misappropriation of another's possessions. This can include theft, fraud, internet scamming, coercion in relation to an adult's financial affairs to arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern Slavery

This encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers' and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

Discriminatory Abuse

Discriminatory abuse is motivated by oppressive or discriminatory attitudes towards a person's disability, race, gender, age, religion, cultural background or sexual orientation and it may manifest itself as unequal treatment, verbal abuse, inappropriate use of language, derogatory remarks, harassment, and deliberate exclusion

Organisational/Institutional Abuse

Institutional abuse can occur within an institution charged with the care of a person. This can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Radicalisation

Radicalisation is the process by which people come to support terrorism and violent extremism and, in some cases, then to participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or single indicator of when a person might move to adopt violence in support of extremist ideas. Potential diagnostic indicators may include use of inappropriate language, possession of violent extremist literature, behavioural changes and so on. If members of staff do have concerns about a young person, they should seek advice from the Safeguarding Officer immediately.

Forced Marriage

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.

This is not the same as an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses.

Who is at risk?

Learners/supported people, male or female, from as young as 11 may be at risk of being forced into marriage by parents. They may be pressurised and then agree to marry one of the prospective candidates without time for reflection. The younger learners/supported people may be betrothed with the expectation that they will enter full married state at a later stage of their lives.

In the UK, young people can be forced into a legal marriage from age 16 or undergo a religious ceremony at an earlier age and suffer sexual abuse.

The key motives for forcing a learner into marriage have been identified as:

- Controlling unwanted behaviour and sexuality (including perceived promiscuity such as kissing or hand holding, or being gay, lesbian, bisexual or transgender) - particularly the behaviour and sexuality of women

- Controlling unwanted behaviour, for example, alcohol and drug use, wearing make-up or behaving in a 'westernized manner'
- Preventing 'unsuitable' relationships, e.g. outside the ethnic, cultural religious or caste group
- Protecting 'family honour' or 'izzat'
- Rejecting a proposal of marriage
- Responding to peer group or family pressure
- Attempting to strengthen family links
- Achieving financial gain
- Ensuring land, property and wealth remain within the family
- Protecting perceived cultural ideas
- Protecting perceived religious ideals that are misguided
- Ensuring care for a learner or adult at risk with special needs when parents or existing carers are unable to fulfil that role
- Assisting claims for residence and citizenship.
- Long standing family commitments

Appendix H: TRANSPORTING YOUNG PEOPLE AND ADULTS AT RISK

Where organisations make arrangements for the transportation of young people and adults at risk, the members of staff and volunteers involved will undertake a risk assessment of the transportation required. This will include an assessment of the following areas:

- Ensuring that all vehicles are correctly insured for the purpose.
- Ensuring the driver has a valid and appropriate license for the vehicle being used.
- All reasonable safety measures are available i.e. fitted, working seatbelts.
- An appropriate ratio of adults per young person; recommendation of 1 adult to 10 young people or adults at risk
- Ensuring drivers have adequate breaks
- When transporting young people and adults at risk, wherever possible they should be in the back of the car for health and safety reasons.
- Where practicable and planned, written parental or carer consent will be requested if staff or volunteers are required to transport young people and adults at risk.
- Latest national and local COVID 19 legislation and guidance on transportation

To safeguard the member of staff or volunteer the following good practice is required:

- Agree a collection policy with parents or carers which will include a clear and shared understanding of arrangements for collection at the end of a session.
- Always tell another member of staff that you are transporting a young person or adult at risk, give details of the route and anticipated length of the journey.
- Take all reasonable safety measures e.g. Young person or adult at risk in the back seat, seatbelts worn.
- Where possible, have another adult accompany you on the journey.
- Call ahead to inform the young person / adult at risk's parents or carer that you are giving them a lift and inform them when you expect to arrive.

All adults should:

- ensure they have up to date and appropriate insurance
- ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive
- be aware that the safety and welfare of the child/vulnerable person is their responsibility until they are safely passed over to a parent/carers
- record details of the journey in accordance with agreed procedures
- ensure that their behaviour is appropriate at all times
- ensure that there are proper arrangements in place to ensure vehicle, passenger, and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven
- ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned

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