

Title: Safeguarding Policy

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September 2020

Approved by: Strategic Leadership Group
September 2020

Date of next review: August 2021

Associated documents/policies:

Bath College documents/policies:

- Prevent Strategy
- Accommodation Strategy
- Child Protection & the Protection of Vulnerable Adult Policy
- Health and Safety Manual
- Bullying and Harassment Policy
- Student Conduct and Disciplinary Policy
- Travel Procedures (student trips)
- Student Risk Assessment Policy
- Student Fit to Study Policy
- Recruitment and Selection Policy
- Equality Policy
- E-safety Policy
- Whistle-blowing Policy
- Confidentiality Policy
- Staff Induction Policy
- Staff Code of Conduct
- Control, Restraint and Search Policy
- External Speakers Policy

External documents/legislation:

- Human Rights Act 1998
- Children Act 1989 and 2004
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education Sept 2020
- PREVENT Duty Guidance for Further Education Institutions in England and Wales March 2015
- Safeguarding Vulnerable Groups Act 2006
- Safer Practice, Safer Learning, NIACE guide 2007
- Whose Secret? 2007
- Safeguarding young people on Work-Related Learning including Work Experience DCSF 2010
- The Right to Choose - Multi Agency practice guidelines for handling cases of forced marriage (revised Jan 2013)
- Provision of Therapy for Vulnerable or Intimidated Adult Witnesses Prior to a Criminal Trial 2001

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1. Purpose and Aims

The **purpose** of Bath College's safeguarding procedure is to ensure that we:

- **Are committed** – developing a robust culture of vigilance;
- **Build resilience** – raising awareness of safeguarding and child protection issues and equipping students with the language and skills to keep themselves safe;
- **Establish a safe environment** – in which students can learn and develop within an ethos of openness and are taught to treat each other with respect, to feel safe, to have a voice and are listened to;
- **Support vulnerable individuals** – supporting students who have been abused, have witnessed violence towards others or may be vulnerable to abuse; and
- **Prevent unsuitable people** – from working with young people and vulnerable adults by ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with our students and to maintain an active vigilance thereafter.

The **aim** is to follow the procedures set out by Bath & North East Somerset Community Safety and Safeguarding Partnership, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020 by:

- **Knowing** that safeguarding and promoting the welfare of young people and vulnerable adults is everyone's responsibility and **the voice of the young person is evident**;
- **Protecting** young people and vulnerable adults at our college from maltreatment;
- Establishing **a safe environment** in which our students can learn and develop within an ethos of openness;
- **Preventing** impairment of young people and vulnerable adults' health or development;
- **Ensuring** young people and vulnerable adults at our college develop knowledge & skills in circumstances consistent with the provisions of safe and effective care;
- Offering students balanced curriculum, enabling them to enhance their **safeguarding** skills and knowledge whilst **understanding the risks**;
- Understanding that **no single professional** can have the full picture of a young person or vulnerable adult's needs and circumstances. **Everyone** who comes into contact with young people and their family has a **role to play in identifying concerns, sharing information and taking prompt action**;
- Undertaking the role so as to enable students at our college to have **best outcomes**;
- Ensuring as a college we have a clear understanding of our staff's knowledge and understanding; and embedding safeguarding through clear systems of communication and training so that safeguarding is an **embedded** element of our college.

This policy provides guidance to all adults working within the college, whether paid or voluntary or directly employed by the college or a third party.

- This procedure is available on our website and is available on request;
- It will be reviewed in full on an annual basis or sooner should legislation/guidance change;
- It sets out how the college's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at this college;
- It applies to all staff; paid and unpaid, working in the college including governors;

- It is provided to all staff (including temporary staff and volunteers) at induction, alongside our staff code of conduct. In addition, all staff are provided access to part one, Keeping Children Safe in Education 2020; and
- The college follows the [Bath & North East Somerset Community Safety and Safeguarding Partnership guidance](#).

2. Ethos

The welfare of all our students is of paramount importance. Bath College considers 'student' to be any learner undertaking a full-time, part-time or apprenticeship programme.

We all have a statutory duty to safeguard and promote the welfare of young people and vulnerable adults and to maintain a professional attitude of *it could happen here* where safeguarding is concerned.

Bath College is committed to safeguarding students and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect all students by reporting anything that might suggest there is abuse or neglect. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The college seeks to work in partnership with families and other agencies to improve the outcomes for anyone who is vulnerable or in need.

***'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.'* (Keeping Children Safe in Education 2020)**

All staff are encouraged to report any concerns that they have and **not see these as insignificant**. On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over a period of time** and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial to pass on concerns** in accordance with this procedure to allow the Designated Safeguarding Lead to build up a picture and access support for the young person at the earliest opportunity. **See Appendix 1**

3. Key Principles

Students' needs and welfare are paramount at Bath College. All young people and vulnerable adults have a right to be protected from abuse and neglect and have their welfare safeguarded.

They should be **listened to** and their views and wishes should inform any assessment and provision for them. Staff should always act in the **interests of the young person** in order to protect them.

Bath College recognises that scrutiny, challenge and supervision are key to safeguarding all students.

- At Bath College we have a robust safeguarding training schedule for all staff, which is monitored by the DSL and the human resources dept. All staff receive Level 1 safeguarding

training as required in KCSIE 2020 and also receive regular updates through staff meetings, briefings, emails etc. to develop and support robust safeguarding practices amongst all staff;

- Bath College has **clear induction processes** for all staff, agency staff, volunteers and governors, and all required documents and policies are provided both at induction of new staff, and on a yearly refresher basis for current staff. These documents include Part 1, KCSIE 2020; Code of Conduct; the role of the DSL and the safeguarding policy and procedure;
- Bath College is committed to working with other agencies to provide **early help** for young people and vulnerable adults before they become at risk of harm or require a 'child in need' statutory assessment;
- 'Early Help means providing support **as soon as a problem emerges**, at any point in a young person's life, from the foundation years through to the teenage years.' (WTSC 2018);
- 'All staff should be aware of the early help process and **understand their role in it**'. (KCSIE 2020). This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment;
- 'All staff should be aware of the **process** for making referrals to social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.' (KCSIE 2020);
- All staff have equal responsibility to report their concerns about a young person or the behaviour of any adult without delay to the Designated Safeguarding Lead. Whilst the Designated Safeguarding Lead or deputies will normally make referrals, **any staff member can refer their concerns to social care** directly in emergencies or if they feel they need to do so. **(B&NES First Response 01225 396111 or 01225 477929 during office hours, via the Emergency Duty Team outside office hours 01454 61 51 65);**
- Everyone has a responsibility to **escalate their concerns** and 'press for reconsideration' if they believe needs remain unmet;
- Bath College will work in **partnership with other agencies** to promote the welfare of young people and protect them from harm, including the need to share information in order to safeguard them (see 4.13);
- Bath College will **work with other agencies** to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way;
- Bath College follow the Bath & North East Somerset Community Safety and Safeguarding Partnership's procedures and provide them with information as required. [Website](#)
- Staff, young people and families will need support following the referral processes being followed;
- Young people have a right to learn ways to keep themselves safe from harm and exploitation. We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being;
- Safeguarding issues will be addressed through both the curriculum and enrichment activities;
- Student welfare and protection from harm is considered for individuals who are undertaking a work-based learning programme, e.g. apprenticeship. Bath College will work with employers to ensure learners are kept safe when in the workplace; and
- All Bath College policies and procedures, which support our ethos of safeguarding, will be interlinked with this safeguarding procedure.

4. Legislation and Guidance:

Schools and colleges **must have regard** for the DfE statutory guidance '**Keeping Children Safe in Education (DfE2020)**'. ['Keeping Children Safe in Education'](#),

This procedure should be read alongside this statutory guidance and all staff must read and understand **at least part 1 of this guidance**.

Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child /young person is suffering, or is likely to suffer, **significant harm**, to enable them to decide whether they should take any action to safeguard and promote the child/young person's welfare. There may be a need for immediate protection whilst the assessment is carried out. **(See Appendix 1)**

A **child in need** is defined under the Children Act 1989, as a child/young person who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child/young person who is disabled. A social worker will lead and co-ordinate any assessment under section 17 of the Children Act 1989.

Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) **to exercise their functions** with a view to safeguarding and promoting the welfare of children/young people who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under section 157 of the same Act.

In September 2018 the Department for Education published 'Work-Based Learners and the Prevent Statutory Duty'. All assessors and work-based learning staff have had a copy of this document and Bath College have included this information within the documents that they provide to employees.

5. Roles and Responsibilities

Designated and Deputy Safeguarding Leads

The Designated and Deputy Safeguarding Leads (DSL and DDSL) will carry out their roles in accordance with Keeping Children Safe in Education 2020

Keeping Children Safe in Education 2020

The DSL/DDSL will undergo appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 3 years, in line with BCSSP guidance. In addition to the formal training, their knowledge and skills should be refreshed at regular intervals, at least annually through local DSL Briefings, meeting other DSL's, emails and reading statutory guidance.

The DSL continually develops an understanding of the community that Bath College serves, the risks and resilience.

DSL/Deputy DSL will refer cases of suspected abuse to the local authority children's social care as required. They will represent the college at child protection conferences and core group meetings. The DSL will be the expert within the college to support staff in liaising with other agencies, making assessments and referrals. Any staff member may be required to be part of strategy discussions with other inter-agency meetings and contribute to the assessment of the child/ren.

The DSL/Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- 'When to call the police' will help designated safeguarding leads understand when they should consider calling the Police and what to expect when they do

[NPCC Guidance 'When to call the Police'](#).

The DSL/Deputy DSL will support staff who make referrals to First Response

The DSL/Deputy DSL will refer cases to the Channel programme where there is a radicalisation concern as required, and also support staff who make referrals to the Channel programme.

The DSL/Deputy DSL will refer cases where a crime may have been committed to the Police as required.

The DSL/Deputy DSL and the HR Department will maintain robust systems to monitor and record training of all staff and volunteers. The Head of Governance will monitor the training of governors and the College Safeguarding Governor. Training is delivered in-line with BCSSP training strategy and KCSIE 2020 recommendations. This will include bulletins, briefings and staff development day training as well as external events attended. Regular updates to be shared with staff.

The DSL will ensure all staff and regular visitors have training on how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information accurately. Staff/volunteers will not make promises to any child and will not keep secrets. Every young person will know what the adult will have to do with any information they have chosen to disclose to a staff member/volunteer.

The DSL monitors the ProMonitor confidential comments system and other recording systems set up to record cause for concerns on students to ensure the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information is kept in-line with the General Data Protection Act.

DSL will share risks and resilience of student proportionately with staff members/volunteers on a "need to know and in the student's best interest" and this is recorded and monitored to ensure risks/progress of student is understood. The DSL will clearly state reasons for sharing this information and that this is carried out in strict confidentiality.

DSL ensures systems in place to induct new staff/governors are robust and monitored and non-compliance shared with Senior Management Team/Governance body. DSL to ensure induction policy is updated annually in-line with Keeping Children Safe in Education.

DSL ensures each member of staff has access to and understands the college's safeguarding and child protection policy and procedures, especially new and part time staff.

DSL understands and supports the college with regards to the requirements of the Prevent duty and is able to provide advice and support to staff on protecting students from the risk of radicalisation.

DSL will 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.

DSL will ensure that social care are notified if a student with a child protection plan is absent for timetabled sessions without explanation.

DSL as required, will liaise with the "case manager" and the LADO (designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member, agency staff or volunteer).

DSL will liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff. Risk assessments will be completed as required and should where appropriate involve other agencies.

The DSL or DDSL is available during college term time and non-term time to discuss any safeguarding concerns. Bath College has cover arrangements in place to cover any out of hours/out of term activities.

The College at times may require further assistance from interpreters to support children and families. These services will be accessed with support of the DSL.

6. Governing Body

The Governing Body and Principal are accountable for ensuring the effectiveness of this procedure and college compliance. The Governors have a named champion within Safeguarding, this is **Erica Draisey**.

The Principal has appointed **Jayne Davis** as the Designated Safeguarding Lead who is part of the Senior Management Team.

The Principal has identified **Sally Eaton** as Deputy Designated Safeguarding Lead.

They are trained to the same safeguarding standard as the DSL (training compliant with BCSSP requirements). The DSL can delegate activities to Deputy Designated Safeguarding Lead, yet the ultimate responsibility still remains with the DSL, the lead responsibility should not be delegated. In the absence of the DSL or Deputy DSL, the duty safeguarding leads will take the lead on safeguarding with clear direction from the Senior Management Team.

Work-Based Learning

Anna Wheeler has been identified as the WBL Safeguarding link. Trained to Level 2 Safeguarding to support the promotion of Bath College Safeguarding policies and procedures with employers and to link with the DSL in relation to any safeguarding concerns.

What to do at Bath College if you are worried a learner is in need of help or protection

Staff member has concerns about a learner's welfare

Is the learner at immediate risk of harm?

Yes

No

Telephone a Safeguarding Lead
CCC
SVC
If you cannot get through contact the DSL or DDSL

Then

Fill in a safeguarding referral form and send to safe@bathcollege.ac.uk

Please do not share details with anyone other than the Safeguarding Lead at this point – you can share that you have a concern only.

Safeguarding Lead will decide whether the learner needs the help of other services and will log concerns on safeguarding register.

Safeguarding Lead will take the appropriate action and may refer back to staff member for more information.

Designated Safeguarding Officers (DSO) can be contacted between the hours of 8:30 am and 5:30 pm:

The Safeguarding email address is safe@bathcollege.ac.uk

Designated Safeguarding Lead – Jayne Davis ext 436

Deputy Designated Safeguarding Lead – Sally Eaton ext 563

Duty Safeguarding Lead - Rob Popejoy 541 (CCC) 349 (SVC)

Duty Safeguarding Lead Megan Dyer 541 (CCC) 349 (SVC)

Mental Health Advisor – Ria Elvanidi ext 548

Safeguarding and Welfare Administrator – Daisy Willis ext 486

Or on the Safeguarding Mobiles

CCC #444 or 07815 491988

SVC #445 or 07966 980534

or by calling reception and asking for the Safeguarding team to be called on the radio.

For concerns out of office hours whereby a young person is in danger call the relevant number depending on the young person's home postcode:

MASH - Police **101**

or

Emergency Duty Service (out of hours)

01454 615165 (B&NES)

For concerns about a young person who is in immediate danger call 999

The Governing Body ensures that the DSL understands they have the responsibility in leading safeguarding and child protection across organisation.

The governing body ensures **Safer Recruitment Procedures**, that include the requirement for appropriate checks in line with national guidance, are followed.

There is a current whistle blowing policy that staff have access to. There is a culture evident at Bath College to raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistle blowing procedures.

Further guidance on [whistle blowing](#) can be found at this link. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding a safeguarding or child protection failure internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Designated Lead for Looked After and previously Looked After Children

The designated Lead is: **Jane Hawkins**

Bath College works in partnership with the Virtual School to provide the most appropriate support as identified in the personal education plan.

7. Working with Parents/Carers/Employers

At Bath College we are committed to working in partnership with parents, carers and employers to safeguard and promote the welfare of young people and vulnerable adults, and to support them to understand our statutory responsibilities in this area. The college follows legislation that aims to act in the best interests of the young person.

We are committed to working with parents, guardians, carers and employers positively, openly and honestly. We ensure that we treat them with respect, dignity and courtesy. We respect rights to privacy and confidentiality and will not share sensitive information unless we have permission or if it is necessary to do so in order to safeguard a young person or vulnerable adult from harm.

We will seek to share any concerns we may have about the student before making a referral, unless to do so may place the student at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the college has about a young person will not prevent the Designated Safeguarding Lead making a referral to the Early Help Team in those circumstances where it is appropriate to do so.

In order to keep young people safe and provide appropriate care for them, the college requires accurate and up to date information regarding:

- Full names and contact details of all persons with parental responsibility or next of kin; and
- Emergency contact details (if different from above).

8. Bath and North East Somerset Early Help

Any Child may benefit from Early Help, but college staff should be particularly alert to the potential need for early help for a child who: -

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstances presenting challenges for the child, such as drug or alcohol issues, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

The Designated Safeguarding Lead will ensure staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment.

Every member of staff including volunteers working at the college are advised to maintain an attitude of '**professional curiosity and respectful uncertainty**' where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the interests of the student and have a responsibility to take action as outlined in this policy.

Early intervention is a key part of a wider continuum of services and will work alongside universal services. For early intervention to be successful each stage of the process must be carried out well and followed through by every person who works with children, young people and families and has an individual responsibility for early intervention

Guidance documents can be accessed at the following links:

[B&NES Early Help Assessment](#)

[B&NES Early Help Threshold for Assessment](#)

Concerns about a young person or vulnerable adult should always lead to help for them. Bath College may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed

9. What Happens After a Referral is Deemed Necessary to Escalate Beyond Early Help?

Child in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, she will speak with parents/young person and obtain their consent for referral to the First Response Team (FRT) or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the young person's needs are not being met, the DSL will discuss the issues with the First Response Team. Appropriate staff will be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require section 17 services.

Child Protection (Section 47)

If the local authority have reasonable cause to suspect that a young person or vulnerable adult is suffering, or likely to suffer, significant harm they have a duty to make enquiries under Section 47 to enable them to decide whether they should take any action to safeguard and promote their welfare. This duty also applies if a young person is subject to an emergency protection order (under Section 44 of the Children Act 1989) or in police protective custody under Section 46 of the Children Act 1989.

Children's Services will convene a Child Protection Conference, once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the young person is judged to be at continuing risk of significant harm. A review conference will take place once a young person has been made the subject of a Child Protection Plan in order to monitor the safety of them and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL and sometimes other staff members may be asked to attend a child protection conference on behalf of the college in respect of individual children. In any event, the person attending will require to have as much relevant up-to-date information/case files about the young person as possible; any member of staff will be required to contribute to this process. The person attending must contribute a

recommendation on the risks/protective factors for the family from their factual information and a view on a need for child protection plan.

Clearly child protection conferences can be upsetting for parents/guardians. We recognise that we are likely to have more contact with parents/guardians than other professionals involved. We will work in an open and honest way with any parent/guardian following a referral to First Response. Our responsibility is to promote the protection and welfare of all young people and our aim is to achieve this in partnership with parents and guardians.

10. Escalation Procedure

B&NES Community Safety & Safeguarding Partnership expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

Where members of staff from any agency feel concerns regarding a young person or vulnerable adult are not being addressed it is expected that the escalation process should be used until a satisfactory conclusion is reached.

The process of resolution should be kept as simple as possible and the aim should be to resolve difficulties at a professional practitioner level wherever possible. It should be recognised that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the college DSL.

Guidance on the B&NES [escalation process](#) can be found via this link.

11. A Safer College Culture

Safer Recruitment and Selection

The college pays full regard to 'Keeping Children Safe in Education Sept 20'. Safer Recruitment practice includes scrutinising applicants, verifying identity, academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks and prohibition checks. Evidence of these checks must be recorded on our Single Central Record.

Cross-college managers have undertaken appropriate training in Safer Recruitment. The recruitment panel for any post will involve one of these trained individuals.

Induction

All staff are aware of systems within the college which support safeguarding, and these are to be explained to them as part of staff induction. This should include:

- The safeguarding policy and procedure;
- The Student Code of Conduct
- Prevent Strategy

- The staff code of conduct;
- The Safer Working Practices document;
- The role of the DSL (including the identity of the DSL and any deputies); and
- Part One, KCSIE 2020.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children and young people. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff Support

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

Use of Reasonable Force

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children and young people. Bath College have a Control, Restraint and Search Policy where this is described in more detail.

12. Keeping Children Safe in Education (2020) Specific Safeguarding Issues:

All staff at Bath College have an awareness of safeguarding issues through regular training and briefings, some of which are listed below. We enable our staff to be aware that these behaviours put children and young people in danger. All staff are aware of the Designated Safeguarding Lead, who is the expert within our college and is there to support staff, volunteers and Governance body further.

- Abuse
- Bullying, including cyberbullying
- Young people and the courts
- Young people with family members in prison
- Young people missing education
- Missing from home or care
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence

- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Missing children and adults strategy
- Online safety
- Peer on peer abuse/child on child abuse
- Private fostering
- Preventing radicalisation
- Sexual violence
- Sexual violence and sexual harassment
- Sexting
- Trafficking
- Upskirting

Peer on Peer Abuse/Child on child abuse

All Bath College staff are aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm; sexting; upskirting and initiating/hazing type violence and rituals. Staff **must challenge** any form of derogatory and sexualised language or behaviour. Staff should **be vigilant** to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should **never be passed off** as 'banter' or 'part of growing up'. The DFE states 'peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Professionals **should not dismiss** abusive behaviour as normal between young people and **should not develop high thresholds** before taking action.' Concerns should be referred to senior staff who may need to consult with the Designated Safeguarding Lead. Victims of peer on peer harm will be supported by Student Services and referred to specialist agencies if appropriate.

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

Bullying Including Cyberbullying

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

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

Guidance on bullying can be [found here](#)

Children/Young People Missing Education

All professionals working with children and young people, as well as the wider community can help by remaining vigilant to children's safety. The law states every child/young person should be receiving an

education, and we stand a better chance of ensuring their safety if we know where and how they are receiving this. *The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.*

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

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

Missing from Home or Care

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

Guidance documents

[B&NES Children Missing Education](#)

Child Sexual Exploitation (CSE)

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. (Child Sexual Exploitation:-Definition and Guidance, Feb 2017. Gov.uk).

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

- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;

- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

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

Guidance documents

- [Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#)
- [Child Sexual Exploitation Protocol](#)
- [Know about CSE](#)
- [Child Sexual Exploitation Leaflet for Professionals](#)

Child/Young Person Criminal Exploitation: County Lines

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

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

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

Guidance Documents:

- [B&NES Multi-Agency Domestic Abuse Statement](#)
- [B&NES Domestic Abuse Partnership links](#)
- [Domestic Violence and Abuse](#)

Drugs

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

Guidance Documents:

- [Drugs Advice for Schools](#)
- [B&NES Drug and Alcohol Service](#)

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

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

Guidance Documents:

- [Safeguarding children in whom illness is fabricated or induced](#)

Female Genital Mutilation (FGM)

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

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

FGM is also linked to domestic abuse, particularly in relation to “honour based violence”.

With effect from 31 October 2015, all colleges are subject to a mandatory reporting requirement in respect of female genital mutilation. When a member of staff discovers (either by verbal or visual disclosure) that an act of FGM appears to have been carried out on a girl aged under 18, that staff member has a statutory duty to report it to the Police. Failure to report such cases will result in disciplinary sanctions.

Members of staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the staff member has good reason not to, they should still consider and discuss any such case with the school or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Guidance Documents:

[BCSSP FMG Multi-Agency Guidance](#)
[Female Genital Mutilation Act 2003](#)

Forced Marriage

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

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

Guidance Documents:

- [Forced Marriage](#)

Mental Health

This non-statutory advice clarifies the responsibility of the school/college, outlines what they can do and how to support a child or young person whose behaviour, whether it is disruptive, withdrawn, anxious, depressed or otherwise, may be related to an unmet mental health need.

Guidance Documents:

- [Mental Health & Behaviour in schools](#)
- [Avon & Wiltshire Mental Health Partnership](#)

Serious Youth Violence

There is no national definition of serious violence. The national Serious Violence Strategy (April 2018), developed to address concerning rises in knife crime and homicide in inner-city areas, focuses on crimes related to the spread of exploitation by so-called 'county lines.' The Youth Justice Board has suggested that serious youth violence includes violent offences with high gravity score, including homicide, robbery, violence against the person and possession of drugs and/or weapons. The Early Intervention Foundation defines it as "community/public space violence committed by young people under the age of 25", while the World Report on Violence and Health defines it as "violence that occurs among individuals aged 10-29 years who may or may not know each other, and generally takes place outside of the home". B&NES Serious Youth Violence Protocol

- [Serious Youth Violence Protocol](#)

Preventing Radicalisation

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

Bath College values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

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

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 2**

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

Risk Reduction

The DSL will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment includes consideration of the use of college premises by external agencies, external speakers and use of IT.

This risk assessment is reviewed throughout the academic year and this information is shared with the DfE HE/FE South West Prevent Lead – Salam Katbi

Response

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

In September 2018 the Department for Education published ‘Work-Based Learners and the Prevent Statutory Duty’.

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

Our College, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: The SPOC for Bath College is Jayne Davis. The responsibilities of the SPOC are described in Appendix 3.

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

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

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

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

Channel

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

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

Guidance Documents:

- Duties relating to the risk of radicalisation is available in the Advice for Schools on [The Prevent Duty](#).
- [B&NES Prevent Guidance](#)
- [Educate Against Hate](#)

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the links below:

[Home Office Preventing Youth Violence and Gang Involvement](#)

[Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

Sexual Violence and Sexual Harassment

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

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

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- Upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitalia or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

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

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

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

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

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

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Bath College Response to a report of Sexual Violence or Sexual Harassment

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

If staff have a concern about a young person or a young person makes a report to them, they should follow Bath College safeguarding referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). College conduct and disciplinary policy will support any sanctions.

Guidance Document:

- [Sexual Violence and Sexual Harassment between children in schools and colleges](#)

Sexting

Sexting is when a young person takes an indecent image of themselves and sends this to their friends or boy/girlfriends via mobile phones. The problem is that once taken and sent, the sender has lost control of these images and these images could end up anywhere. They could be seen by a child's future employers, their friends or even by pedophiles.

By having in their possession, or distributing, indecent images of a person under 18 on to someone else – young people are not even aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003.

Guidance Documents:

- [CEOP](#)

Trafficking

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

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

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

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

Guidance Documents:

- [Safeguarding children who may have been trafficked](#)
- [B&NES Modern Slavery Guidance](#)

On-Line Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

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

Guidance Documents:

- [B&NES E Strategy](#)
- [Children's Commissioner Publications](#)

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

Remote Learning

Bath College will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and Safeguarding in remote education alongside its own policies, procedures and guidance.

The reporting process for concerns during remote learning is the same as face to face. Staff are asked to be mindful of what they are experiencing online and to continue to be vigilant.

13. Educational Visitors to College

The college will undertake a risk assessment and use their professional judgement and experience when deciding whether to engage any volunteer. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments or volunteers;
- Whether the individual/company has other employment or undertakes voluntary activities where references can be obtained, and suitability recorded;
- Whether the role is eligible for an enhanced DBS check;
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2020; and
- We have clear visitor’s procedure that enables us to offer student experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the college.

14. Managing Allegations against Staff and Volunteers

Bath College ensures there are procedures in place to manage allegations of abuse against staff members or employers in work-based learning settings.

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for all students at Bath College. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

We will take all possible steps to safeguard our students and to ensure that the adults in our college are safe to work with children. We will always ensure that the procedures outlined in B&NES *Safeguarding Children's Board Protocol: Managing Allegations of abuse Against Persons who work with Children and role of LADO* and Part 4 of 'Keeping Children Safe in Education', DfE (2019) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). **The LADO can be contacted on:**

T: 01225 396810

E: sarah.hogan@bathnes.gov.uk

If an allegation is made or information is received about an adult who works at Bath College or an employer involved in work-based learning, which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Deputy Principal immediately. Should an allegation be made against the Principal, this will be reported to the Chair of the Governing Body. In the event that neither the Deputy Principal nor Chair of Governing Body is contactable on that day, the information must be passed to and dealt with by either a member of the Senior Management Team or the Vice Chair of Governors.

The Deputy Principal or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors should contact **the LADO directly on 01225 396810**

General guidance on [whistle blowing](#) can be found at this link

The NSPCC [whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

The College has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child/young person, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

Reflecting the changes set out in KCSIE 2020 regarding concerns about a member of staff, the DSL will seek the advice of the LADO where there is a risk of harm due to actions outside of College by a member of staff, not linked to children or young people.

15. Vulnerable Young People

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

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

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

Heightened vulnerability linked to:

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

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

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

Children and young people say they need:

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

Looked After Children:

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

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

Name of LAC designated member of staff: - Jane Hawkins

They play a crucial role leading the responsibility for helping college staff understand how things affect how looked after children learn and achieve.

They will:

- Promote a culture of high expectations and aspirations for how looked after children learn;
- Make sure the young person has a voice in setting learning targets;
- Be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning;
- Make sure that looked after children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home; and
- Have the lead responsibility for the development and implementation of the child's personal education plan (PEP) within the college.

Guidance Document:

- [Designated Teacher for Looked After Children](#)

16. Communication – Confidentiality/Information Sharing

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018). Bath College works closely with B&NES Children's Social Care and, where appropriate from a placing local authority.

As a college we recognise the importance of information sharing between professionals and local agencies. We follow [best practice guidance](#).

The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a college we **adhere to data protection**, yet we **do not allow this to stand in our way** in the need to promote the welfare and protect the safety of the young people in our care.

17. Managing Complaints

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

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

Safeguarding concerns should be raised with the college immediately. If a concern or a child is **at immediate risk then the individual needs to contact B&NES First Response on 01225 396111** All visitors are given a safeguarding leaflet which outlines how to share concerns and also code of conduct expected by visitors/contractors.

18. Site Security

Bath College provides a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on the site have to adhere to the rules which govern it. . Therefore;

- Visitors gain access through the main entrances;
- Visitors, volunteers, staff and students must only enter through the main entrances and will be issued with a blue lanyard and visitor's pass. Bath College has a clear system of ensuring visitors are to be accompanied/supervised by regulated staff member. Any visitor on site who is not identifiable by visitors pass will be challenged by any staff member and this will be reported to the DSL;
- Health and safety audit to be completed annually with risk assessment and will form part of Governors annual report. This will include a fire evacuation and evacuation/lockdown Prevent risk assessment;
- Risk management of site security is managed by senior management; and
- Health and safety checklists are carried out regularly in relation to work-based learning employer premises.

Appendix 1

Definitions and Indicators of Abuse

1. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

2. Physical Abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;

- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. Exploitation

Child Sexual Exploitation occurs when a child or young person, or another person, receives "something" (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Bath & North East Somerset Children's Social Care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and County Lines)

5. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. Responses from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household;
- Evidence of coercion and control.

7. Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child's means of communication;
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

Appendix 2

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that college staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration; and
- Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Family members convicted of a terrorism act or subject to a Channel intervention;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix 4

Role of the B&NES LADO

The LADO's role is to advise the employer whether or not informing the parents of the child/ren involved will impede the disciplinary or investigative processes. If it is agreed that the information can be fully or partially shared, the employer should inform the parent/s. In some circumstances, however, the parent/s may need to be told straight away (e.g. if a child is injured and requires medical treatment). If that is the case then Children's Social Care should also advise and a decision made about proceeding under the LADO procedures or if Section 47 enquiries need to be initiated.

The parent/s and the child should be helped to understand the processes that are being undertaken. Taking into account their age and level of understanding. If the allegation is made against a member of school staff then this should be referred to the Senior Human Resources Consultant in the first instance who should immediately discuss the allegation with the LADO. The purpose of an initial discussion is for the LADO jointly with the named senior officer to consider the nature, content and context of the allegation and to agree a course of action.

The employer should seek advice from the LADO, the police and / or LA children's social care about how much information should be disclosed to the person against whom the allegation has been made. Subject to any restrictions on what information that can be shared, the employer should, as soon as possible, inform the person against whom the allegation has been made about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the DBS or regulatory body). During these processes, 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. Ofsted should be informed of any allegation or concern made against a member of staff in any day care establishment for children under 8 or against a registered child minder. They should also be invited to take part in any subsequent strategy meeting / discussion.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed. [Guidance for Safer Working Practice for Adults who work with Children](#) | is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

Who to refer concerns to:

Bath & North East Somerset LADO: Sarah Hogan – LADO@bathnes.gov.uk (01225 396810)

Further advice on Safeguarding matters can also be obtained from:

Local Contacts

NSPCC

Harmful Sexual Behaviour project: **0844 892 0273**

Local Advice

National Contacts

- Police (Non-emergency 101)
- CEOP (Child Exploitation and Online Protection) <http://ceop.police.uk/>
- Professionals Online Safety Helpline – 0844 381 4772 www.saferinternet.org.uk/helpline
- Internet Watch Foundation (IWF) – <http://www.iwf.org.uk>
- Safer Internet Centre – helpline@saferinternet.org.uk
- Childline – 0800 1111 www.childline.org.uk
- Ofsted – General enquiries : 0300 123 1231
About Schools: 0300 123 4234
Concerns : 0300 123 4666

e-mail: enquiries@ofsted.gov.uk

- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) www.educateagainsthate.com
- **NSPCC** Harmful Sexual Behaviour project: **0844 892 0273**

Useful websites

- Child Exploitation and Online Protection Centre (CEOP) – www.ceop.police.uk & www.knowaboutcse.co.uk
- NSPCC – 24 hour Child Protection Helpline 0808 800 5000
<https://www.nspcc.org.uk/>
- WOMENS AID - 24 Hour Helpline: **0870 2700 123**
http://www.baneswomensaid.org/contact_us/
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999.
www.unicef.org.uk

External partners in Safeguarding

The college is committed to working in partnership to ensure the safeguarding of all learners, and particularly children and vulnerable adults. Examples of key partners include:

- B&NES Children's Services and their Designated Lead Officer for Safeguarding
- Avon and Somerset Police
- Neighboring local authorities as above
- Local Safeguarding Children's Board (Bath College is an associate member)
- B&NES Safeguarding Adults Coordinator
- The Virtual Head for Looked After Children
- PREVENT Board
- All secondary schools from whom the college has pre-16 learners
- Any schools or other providers with whom the college shares collaborative delivery or franchises provision for post-16 learners
- Southside Family Project
- Youth Connect
- Sirona Care and Health
- Parents and Carers
- Diocese of Bath and Wells

Useful Contacts

The Senior Designated Safeguarding Lead (DSL) is:

Jayne Davis

Deputy Principal of Curriculum and Quality

Email: Jayne.Davis@BathCollege.ac.uk

Phone: 01225 328**783**

Location: Herschel Building, City Centre & Cam Building Somer Valley Campus

The Assistant Principal for Welfare & Inclusion is:

Sally Eaton

AP Welfare & Inclusion

Email: Sally.Eaton@bathcollege.ac.uk

Phone: 01225 328**563**

Location: Herschel Building, City Centre or Wellow Building, Somer Valley Campus

