SPARSHOLT
COLLEGE GROUP

SPARSHOLT
CAMPUS

ANDOVER
CAMPUS

UNIVERSITY CENTRE
SPARSHOLT

Safeguarding Learners Policy and Procedures

Our Mission

Raising Aspirations, Unlocking Potential, Advancing Futures

Our Values

Excellence, Passion, Teamwork, Integrity, Innovation,

Sustainability, Valuing Others and Supportiveness

Sparsholt College Group

The Sparsholt College Group includes Sparsholt College, Andover College, University Centre Sparsholt, Sparsholt College Services, Westley Enterprises and Andover Town Football Club. Policies apply to each part of the Sparsholt College Group unless specified otherwise.

The *Safeguarding Learners Policy and Procedures* was amended and approved by the Board of Governors in August 2025 and supersedes previous versions.

Originator:	Vice Principal Curriculum & Designated Safeguarding Lead
Located:	College Group websites
	College Group intranet
Due for review:	August 2026

SAFEGUARDING LEARNERS POLICY AND PROCEDURES

SAFEGUARDING LEARNERS POLICY & PROCEDURES

1.   Safeguarding Definition

For the purposes of this document, Safeguarding is defined as:

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

This definition is taken from the guidance document *Working together to Safeguard Children* (2018), which focuses on safeguarding. In addition, the Counter-Terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into extremism/terrorism.

*In the College's context the term 'children' should be taken to include all young people and vulnerable adults.

2. Policy Statement

2.1 Principles

This policy asserts that Sparsholt College Group (the College) will have in place inclusive and integrated 'safer' practices that promote and ensure the safety and well-being of all learners, while recognising the importance of having in place procedures and practices in support of groups of learners that are or become vulnerable. The College understands also that extremism may also lead to significant harm and abuse and, in line with the PREVENT duty, believes that there is an important role for the College in helping people from being drawn into extremist and/or terrorist activities.

The policy provides the framework for promoting and ensuring the safeguarding and protection of all learners at, or associated with the College. The College is committed to safeguarding and aims to create a culture of vigilance.

The College will maintain procedures and practices which safeguard and promote the well-being of all its learners, by identifying and applying best practice within the sector and ensuring that the Learner Safeguarding Policy and Procedures comply with legislative requirements and government recommendations.

Whilst the College will work openly with parents and carers, if it is believed to be in the best interest of the child, it reserves the right to contact Children's Social Care or the police, if appropriate, without notifying the parents.

2.2 Learner Safeguarding Policy Statement

To ensure that comprehensive and effective safeguarding practices exist within the College, and that a culture of adherence to and continuous development of these practices is established and maintained, the College will:

a) Require all staff to provide and assure a safe environment for learners always;

b) Establish and maintain procedures and practices which minimise risks to all learners;

c) Publish and promote the right of every learner of the College to work within a safe and cooperative learning and working environment;

d) Provide information and educate learners (and parents) to equip them with an awareness about how to stay safe by promoting safety - including e-safety - in a proactive way;

e) Educate learners to recognise when they are at risk and how to get help when they need it through:

- The content of the curriculum;
- The content of the pastoral tutorial programme;
- A College ethos which helps learners feel safe and able to talk freely about their concerns, believing that they will be listened to and valued.

f) Maintain recruitment and contracting practices which check the suitability of staff, volunteers and operators of externally contracted services to work with children and vulnerable learners. The College will follow safer recruitment guidance as set

out in KCSIE (Keeping Children Safe in Education).

g) Provide training to maintain the awareness of all staff so that they recognise and react responsibly to apparent and potential instances of abuse or neglect of learners;

h) Articulate and maintain procedures for identifying, investigating and reporting cases (or suspected cases) of abuse or potential for harm to learners;

i) Designate and train staff as members of the Designated Safeguarding Team, equipping and supporting them to investigate and deal appropriately with incidents and allegations of abuse or neglect of learners;

j) Collaborate and cooperate with external agencies to establish, maintain and coordinate procedures and arrangements for ensuring the safety of the College's learners, keeping the welfare of the learner at the centre of any action taken;

k) Consider 'extra-familial harms' outside of the College or their families;

l) Implement the PREVENT Action Plan, including the External Speaker Policy and Procedures included under Appendix 8;

m) Ensure the External Speaker Policy (Appendix 8) is adhered to;

n) Provide staff with guidance to follow when encountering a safeguarding, child protection or PREVENT concern outside of normal working hours (Appendix 9).

2.3   Monitoring and Review

The Strategic Leadership Team (SLT) will monitor the impact of this policy through termly reports to the Wellbeing Committee. The Board of Governors will receive the minutes of Wellbeing Committee meetings and will monitor the impact of this policy through six weekly College Healthcheck reports.

An annual report will be received by the Board of Governors, at which point the Board will consider the effectiveness of the College's Safeguarding Learners' Policy and Procedures and approve revision of the policy as appropriate.

3. Guidance for all Staff

3.1 It is the responsibility of everyone within the College to ensure the safety and well-being of our learners.

It is everyone's responsibility to understand how to recognise, respond to, report and record any concerns about the safety and well-being of any learner as appropriate. Staff must recognise that some learners may not feel ready or know how to inform someone that they are being abused, exploited or neglected, for example. However, staff must retain professional curiosity and report any concerns regardless.

All college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss early help requirements with the Designated Safeguarding Lead (DSL) or Deputy (DDSL). Staff may be required to support other agencies and professionals in an early help assessment. It is therefore important that all staff are aware of the contents of these guidelines. The guidelines cover the following issues:

   a) Background;
   b) Who and what is covered by this policy and procedures;
   c) Safeguarding learners - definitions of learner/child/vulnerable adult;
   d) Safeguarding learners - definitions of abuse/neglect/harm;
   e) High Risk and Emerging Safeguarding Issues
   f) Confidentiality;
   g) Protecting yourself from allegations;
   h) Acronyms used in this document;

a) Background

Education providers of post-16 learning and skills have responsibilities to ensure the safety of children, young people and those adults deemed 'vulnerable'. College staff have an important role in safeguarding as they can identify concerns early, provide help for children and young people, promote their welfare and prevent concerns from escalating. Higher Education providers are expected to provide a safe, healthy and tolerant, inclusive academic community.

The College is committed to the principle and practice of safeguarding learners. The following principles and procedures should be enacted alongside the College's Safeguarding Learner's Policy Statement.

b) Who and what is covered by this policy and procedures

These principles and procedures extend to all learners, all staff, all providers of services to the College, all other users of the College and all College activities.

It is the responsibility of individual members of the College community to adopt the aims and values of these principles and procedures and to ensure that learner safety and well-being is our first responsibility.

The College's commitment to safeguarding learners extends collectively to everyone in the College and all that we do. Procedures and practices developed by College management in these areas should be informed by and comply with the principles and framework set out by

the Safeguarding Learner's Policy and Procedures.

The College will take appropriate opportunities in the following areas of its work to publicise and make explicit its commitment to the principles and practice of safeguarding:

1)   Learners' personal development and tutorial care; via the content of the curriculum and the tutorial system, induction and welcome days. Sparsholt College has a focus on the PREVENT and RESPECT agendas, including a focus on British and College values, as well as online safety. In addition, the student induction guide gives all students advice about where to seek support.

2)   Establishing and promoting College mechanisms for reporting concerns about learner safety and support including peer on peer abuse;

3)   Remote teaching, learning and support

4)   Access to further individual support for learners;

5)   Opportunities for enrichment activities;

6)   Partnerships and collaboration with parents, communities, employers and other agencies;

7)   Staff recruitment practices;

8)   Effective Health & Safety policies and learner involvement in raising and discussing Health and Safety issues;

9)   Staff professional development and training in child and vulnerable adult protection including emerging themes and online safety training;

10) Curriculum and course planning;

11) Contracting with external suppliers to provide unsupervised services to learners;

12) Appropriately restricting access to specific areas of the College, including residential accommodation, changing facilities, etc;

13) Restricting unsupervised access of visitors to areas of College premises that are frequented by learners.

c)   **Safeguarding learners - definitions of Learner, Child and Vulnerable Adult**

Any learner could potentially be the victim of abuse by those known to them or, more rarely, by a stranger, whether that is in a family, an institutional or community setting or by other means, such as via the internet.

These principles and procedures are intended to safeguard all College learners and provide for the College to discharge its legislative obligations to protect learners under the age of 18 years and vulnerable adults. These principles and procedures recognise the following definitions regarding the individual.

Learner – the term 'learner' covers learners enrolled with the College who study on one of the College's campuses or at any of the outreach or Work-Based Learning sites. The policy also covers those learners who are on work placement as part of their course. In addition, it covers prospective learners while visiting the College or attending 'taster days'.

Child – in accordance with The Children Act 1989 (and in the Children Act 2004), and therefore in accordance with the law, the College shall regard any young person below the age of 18 as a child.

Young people aged 18 + - may in some circumstances be regarded as vulnerable because of earlier life-experience and may therefore fall within the remit of The Children Act 1989. The College will act based on individual situations; for example, where a learner is over 18 but wishes to report abuse which took place when they were younger or if there are younger siblings in a family who are thought to be at risk.

Vulnerable Adult – is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000).

Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

A vulnerable adult may be a person who, for example:

1) Has learning disabilities
2) Suffers from mental illness
3) Has physical disability
4) Is a substance mis-user
5) Is homeless
6) Is in an abusive relationship
7) Becomes ill or otherwise vulnerable
8) Is a previously looked after child

d) Safeguarding learners - definitions of abuse/neglect/harm

A learner may be abused or neglected by having harm inflicted upon them by a person failing to act to prevent harm. All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. Learners should not be given the impression that they are creating a problem by reporting incidents. The College recognises the following definitions about abuse, neglect and harm.

<u>What is abuse, neglect and exploitation? Definitions</u>
A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Emotional abuse:

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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. 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 of a child, though it may occur alone.

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.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. 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.

In some cases the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organized abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and exploitation can also be facilitated and/or take place on line.

CSE is a form of child sexual abuse and may include non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images, grooming a child in preparation for abuse (including via the internet) or encouraging children to behave in sexually inappropriate ways.

The experience of female learners who are criminally exploited can be different to that of males. The indicators may not be the same but females are at risk of criminal exploitation too. There is also a link that exists between males and females being criminally exploited and being at higher

risk of sexual exploitation.

Indicators that a child may be criminally or sexually exploited include:

- Going missing for periods of time or regularly coming home late – particular key as children can be missing for days and drug run in other Counties
- Misusing drugs and alcohol
- Association with other young people involved in exploitation
- Having unexplained amounts of money, new high cost items and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- Older males in particular seen to be hanging around and driving
- Having injuries that are unexplained and unwilling to be looked at
- Increase in aggression, violence and fighting
- Carrying weapons – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- Regularly or significantly missing from education and disengaging from previous positive peer groups
- Parent concerns and significant changes in behaviour that affect emotional wellbeing
- Children with older boyfriends or girlfriends (CSE)
- Children who suffer from sexually transmitted infections or become pregnant (CSE)
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos

The College will treat any learner who may be criminally exploited as a victim in the first instance and refer to children's social care. If a referral to the police is also required as crimes have been committed on the College premises, these will also be made.

Peer on Peer abuse – This can take different forms, such as sexual violence and sexual harassment (between two children or group of children of any age and sex), physical abuse such as hitting, kicking or shaking, bullying, initiation/hazing type violence and rituals, Youth Produced Sexual Imagery (sexting), upskirting (which is a criminal offence under the Voyeurism Act) or initiation type violence or rituals. This can take place in person, on line or via a mobile phone (via texting). All staff must understand that even if there are no reports in college, it does not mean it is not happening. As such, any concerns should be raised to the DSL or DDSL. The College has a zero tolerance of all peer-on-peer abuse.

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.

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

a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)

b. protect a child from physical and emotional harm or danger

c. ensure adequate supervision (including the use of inadequate care-givers)

d. ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The Trigger Trio

The term "Trigger Trio" has replaced the previous phrase "Toxic Trio" used to describe the issues of domestic "violence, mental ill-health and substance misuse" which have been identified as common features of families where harm to women and children has occurred. They are viewed as indicators of increased risk of harm to children and young people and will have a contextual impact on safeguarding.

Domestic Abuse

Domestic abuse is 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; and emotional.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what constitutes a normal relationship. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, and this can have a serious, long-lasting emotional and psychological impact on children; in some cases they may blame themselves for the abuse or may have had to leave the family home as a result.

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

Parental Mental Health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent / carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement
- A child missing school regularly as (s)he is being kept home as a companion for a parent / carer
- A child adopt paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

If staff become aware of any of the above indicators, or others that suggest a learner is suffering due to parental mental health, the information will be shared with the DSL/DDSL to consider a referral to Children's Services.

Parental Substance Abuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a learner is living with parental substance misuse, this will be reported to the DSL/DDSL for referral to be considered for Children's Services.

e) High Risk and Emerging Safeguarding Issues

Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst staff are not trained to make a diagnosis of a mental health problem, they are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood adolescence and into adulthood, and staff should be aware of how these ACES can impact upon their mental health, behaviour and education.

If staff have a mental health concern about a student then this should be reported to the Wellbeing team, and where necessary escalated to the DSL/DDSL where this is also a safeguarding concern.

Extra-familial Harm

Safeguarding incidents and/or behaviours can be associated with factors outside of the College and/or can occur between children outside of these environments. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

For us as a College, we will consider the various factors that have an interplay with the life of any student about whom we have concerns within the College and the level of influence that these factors have on their ability to be protected and remain free from harm.

Serious Youth Violence

There are a number of indicators which may signal that a child or young person is at risk from, or are involved with, serious violent crime. These may include increased absence from College, 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 a child/young person has been approached by, or are involved with, individuals associated with criminal networks or groups.

Radicalisation and Extremism

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Staff will be alert to changes in students' behaviours which could indicate they may be in need of help or protection. The College will collaborate with all statutory partners, the police and the

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local community to identify individuals at risk of being drawn into any form of extremism; assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. The College will adhere to the Counter Terrorism and Security Act (2015),the Prevent Duty and therefore aim to intervene early to protect and divert people away from the risks they may potentially face before illegality occurs. The College will challenge any ideology that supports extremism and/or terrorism to protect vulnerable individuals.

See: http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy and http://www.homeoffice.gov.uk/publications/counter-terrorism/counter-terrorism-strategy

As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British Values through the curriculum.

In the first instance any disclosures, allegations or concerns regarding the above, related to an individual 'child' or 'vulnerable adult', should be reported to the DSL or DDSL who will act appropriately. Any learner who is considered vulnerable to radicalisation will be referred by the DSL/DDSL to Hampshire Safeguarding Children's Services, where the concerns will be considered in the MASH process. If the Police Prevent Officer considers the information to be indicating a level of risk a "channel panel" will be convened and the College will attend and support this process:

- Channel Panel - Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Female Genital Mutilation
Whilst all staff should speak to the DSL/DDSL regarding any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.** If a **teacher**, during their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to

children's social care.

"Honour-based" Abuse (HBA)
Honour-based abuse encompasses incidents or crimes which have been committed to protect or defend the 'honour' of a family or community. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their expectations. Women and girls are the most common victims of "honour based" abuse however it can also affect men and boys. It is important that, if "honour based" abuse is known or suspected, communities and family members are NOT spoken to prior to referral to the police or social care as this could increase the risk to the young person. The DSL/DDSL will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the learner is at immediate risk, the police will be contacted.

Forced Marriage
In the case of children: *'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'* In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

Teenage Relationship Abuse
Research has shown that teenagers do not understand what constitutes abusive behaviours and controlling behaviours which could escalate to physical abuse, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to; or that this abuse is prevalent within teenage relationships. Further research shows that teenagers are likely not to understand what consent means within their relationships. They often hold the common misconception that rape could only be committed by a stranger down a dark alley and do not understand or recognise that it could happen within their own relationships.

This can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged as they are not recognised as being abusive.

In response to these research findings the College will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships.

Sexual Violence and Sexual Harrassment
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.

As a College we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'. This policy should also be read in conjunction with the College's FE Sexual Harassment and Misconduct Policy (Learners). All staff will undertake regular training.

The College will follow the "*Sexual violence and sexual harassment between children in schools*

and colleges" advice provided by the DfE.

Missing, Exploited and Trafficked Children (MET)
Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all these issues, so that cross over of risk is not missed.

Children Absent/Missing from Education
Unexplained absence or patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns. Being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns.

Children Missing from Home or Care
Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place of residence.

Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

As a College, we will inform all parents of learners who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves.

County Lines
A 'county line' describes a situation where an individual, or more frequently a group, establishes and operates a telephone number in an area outside of their normal locality to sell drugs directly to users at street level. This generally involves a group from an urban area expanding their operations by crossing one or more police force boundaries to more rural areas, setting up a secure base and using runners to conduct day to day dealing. Young people are vulnerable to being 'victims' of this crime, with offenders often using coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county line gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. For more information on this see http://www.nationalcrimeagency.gov.uk/publications/620-NCA-Intelligence-Assessment-County-Lines-Gangs-and-Safeguarding/file

The College will be extra vigilant to missing episodes from College, and if a student is suspected to be at risk of or involved in county lines, a safeguarding referral will be made.

Trafficked Children and modern slavery
Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of: movement (including within the UK); control (through harm/threat of harm or fraud); or for the purpose of exploitation.

Any child transported for exploitative reasons is considered to be a trafficking victim.

There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

If staff believe that a learner is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Young people with Special Education needs
Students with SEN are likely to be more vulnerable to all variations of abuse, staff need to be vigilant to automatically assume that behaviours such as withdrawal and sexualised or violent behaviour as a symptom of the SEN, especially if it is out of the ordinary for an individual.

Young people who need a social worker (Child in Need and Child Protection Plans)
Young people may need a social worker due to safeguarding or welfare needs. They may need help due to abuse, neglect and complex family circumstances. Their experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The College will be notified by the local authority if a student has a social worker and the DSL/DDSLs will hold and use this information so that decisions are made in the best interest of their safety, welfare and educational outcomes. This will include timely responding to and reporting of unauthorised absence or missing education where there are known safeguarding risks, and the provision of additional pastoral/ wellbeing and academic support if deemed necessary.

Online Safety
Learners should be safeguarded from potentially harmful and inappropriate online material. The College will, through its tutorial programme, educate learners in their use of technology. This will be supplemented by ensuring staff are suitably trained and that the College utilises appropriate software to prevent access to inappropriate websites. Regular reports will be generated by the software to allow the DSL and safeguarding team to identify any concerns regarding online safety.

The breadth of issues that are categorised within online safety is considerable but can be summarised across four risk areas:

1. Content: being exposed to illegal, inappropriate or harmful material such as pornography, radicalisation, misinformation, disinformation (including fake news) or conspiracy theories.
2. Contact: being subjected to harmful online interactions with other users. This could include peer to peer abuse or adults posing as young adults with the intention to exploit or groom the learner.
3. Conduct: the personal online behaviour of a learner that is likely to cause harm. This can include sharing explicit images.
4. Commerce: the risks associated with this area include online gambling, inappropriate advertising or phishing scams.

The College's E-safety and Online Communications Policy further supports a whole college approach to online safety.

If there are concerns about a learner engaging in cyber-crime behaviour, the College will consider a referral to the Cyber Choices programme led by the National Crime Agency. Where relevant, the College may use the FE Managing Learner Conduct Policy.

LGBTQ+

A learner identifying as LGBTQ+ is not a risk factor for harm in itself. However, others may target them as a result. The College will work with our community to promote equality, diversity and inclusion and ensure that all learners feel safe.

The Wellbeing teams at both campuses will provide a point of contact for learners so that they have a safe space to share their experiences or concerns with staff.

(The College recognises that there also potential risks factors associated with other protected characteristics under the Equality Act 2010 that may create a safeguarding concern. As such, College staff will remain vigilant to identify emerging themes and take necessary action in accordance with this policy.)

f) Confidentiality

Young people aged 16-18 and vulnerable adults have rights to confidentiality which should be respected. Confidentiality is an essential part of the relationship between professionals and young people. The College is aware that the Data Protection Act 2018 and the GDPR (which allow the College to share and withhold personal information) place duties on both the College and its staff to process personal information fairly and lawfully and to keep the information we hold safe and secure. Information which is sensitive and personal, and stored/ shared for safeguarding purposes will be treated as 'special category personal data' / Code 3. This information can be shared without consent where there is good reason to do so, and where the sharing of information will enhance the safeguarding of a student in a timely manner but it is not possible to gain consent, it cannot be reasonably expected to gain consent, or if to gain consent would place the student at risk.

The Date Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

It may be that an individual discloses abuse to a member of staff and does not wish the information to go any further. However, if the member of staff considers that the young person/vulnerable adult (or another minor/vulnerable adult) continues to be at risk, especially where this risk is significant, confidentiality must be breached, though the member of staff must clearly explain why the law and regulation mean this breach is necessary.

The law recognises that disclosure of confidential information without consent may be justified in the public interest to prevent harm to others. Providing there is a lawful basis to process any personal information, the College does not need consent to share personal information. This same restriction with regards to gaining consent also applies in cases concerning potential extremism or radicalisation. The College will undertake to restrict to a minimum the number of people informed, whilst complying with its statutory duties.

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g) Protecting yourself (staff) from allegations:

- Do not under any circumstances give your personal details to a student.
- Never communicate with a student using your personal Facebook or social media site.
- When conducting a 1-1 meeting with a student, try to ensure you are in a room with a glass door where other staff can see you or (preferred option) in a room shared by other staff. If this is not possible, make sure a colleague knows where you are and ask them to call in at a specific point.
- You should not use your car (or College vehicle) to transport a lone student. If in your professional judgement there is a clear duty of care to transport a lone student, you may do so, but only after you have sought permission of a supervisor or line manager and ideally with permission of parents if they are under 18 years old.
- Do not physically touch*****/comfort a student and if they initiate physical contact for whatever reason (recognising that some students with SLDD may do this habitually through showing affection or as a means of communicating) then break away from this as soon as you are able and make a file note.

*See also: '**Use of Reasonable Force Policy'.** Furthermore, if assisting a student 'in- need' (e.g. following a slip and being unable to get their feet without assistance), seek help from others to avoid any physical contact when alone with a student and make a brief file note of your intervention.

h) Acronyms and Specialist terms used in this document

- CEOP – Child Exploitation & Online Protection Centre
- DBS - Disclosing & Barring Service
- DSL – Designated Safeguarding Lead
- DDSL – Deputy Designated Safeguarding Lead
- SLDD - Students with Learning Difficulties and/or Disabilities
- SEN - Special Education Needs

4. WHAT TO DO IN THE EVENT OF AN ALLEGATION OR SUSPICION OF ACTUAL OR POTENTIAL ABUSE/NEGLECT/HARM

4.1 The College recognises that people who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The welfare of the individual is paramount.

Dealing with Disclosures

4.2 If a learner discloses significant personal problems to a member of staff, their disclosure should be acknowledged and taken seriously. Staff should:

- Stay calm and contact your DSL/DDSL *at the earliest opportunity* and inform them of the disclosure so that they can follow up as appropriate.

- In exceptional circumstances (where the DSL/DDSL is not available):

  a) Believe what is being said. It is essential that all incidents are taken seriously regardless of the circumstances;

  b) Allow time to listen carefully - do not ask unnecessary questions;

  c) Reassure the learner that it is important to tell you;

  d) Do not appear shocked or make judgments about what is being said;

  e) Do explain to the learner that you may have a **legal** obligation to pass this information on, to protect both them and possibly other members of the family and the public;

  f) Do write down the details - if appropriate ask the learner to write it down, using their own words as much as possible; When the notes are complete, sign your name (and date it) immediately beneath the last line of text. Ask the learner to sign their name too.

  g) Do be alert to the possibility and note details, if you become aware that there could be other children and/or vulnerable adults living in the same house as the disclosing learner and who may also be exposed to risk;

  h) Do contact one of the College DSL's/DDSL's *at the earliest opportunity*. Pass on to the DSL/DDSL all your records and notes – do not keep copies of your notes;

  i) Do treat the information you have received with the strictest confidence. The DSL/DDSL will be responsible for deciding what further action should be taken;

  j) Don't make promises you cannot keep nor any that are not within your gift to make;

k) Don't promise confidentiality

l) Ultimately, all staff have the right to make a referral directly to the police or children's services and should do this if, for whatever reason, there are difficulties following the agreed protocols, e.g. they are the only adult on the College premises at the time, are unable to contact our out of hours' team, are on a residential trip or have serious concerns about sending a student home.

m) All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing and kept confidential and stored securely.
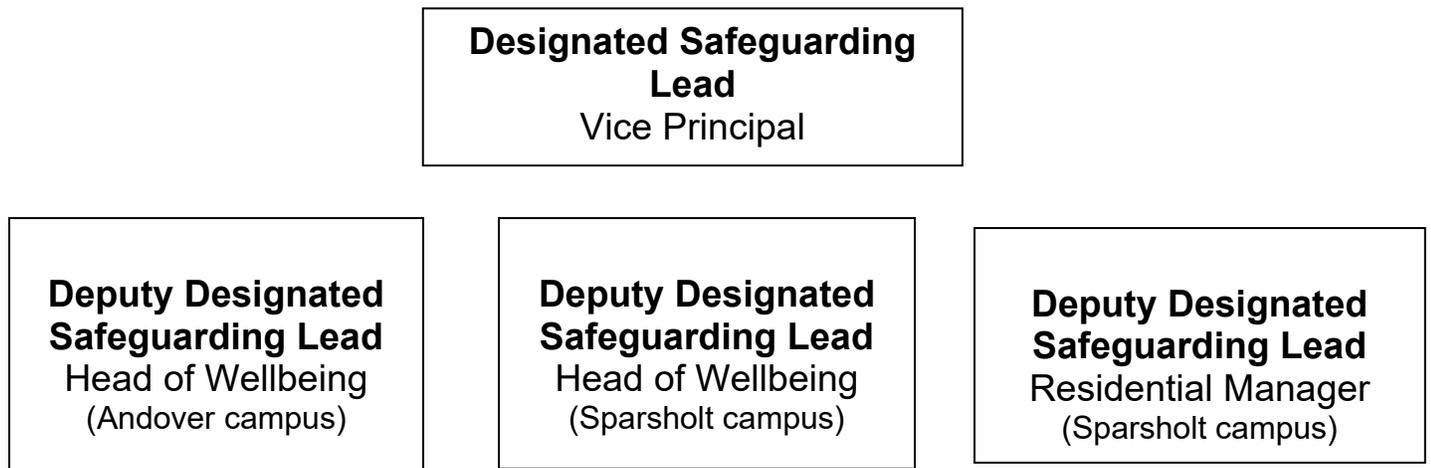
What happens next?

4.3   If any member of staff feels unduly distressed because of receiving a disclosure from a learner, support is available from the Safeguarding Team or the Education Support Partnership.

The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

If a staff member believes that their concerns have not been referred on or that the child remains at risk, they should initially ask the DSL/DDSL to reconsider ensuring that the risks are understood. If this does not result in a satisfactory outcome or the DSL/DDSL rationale appears to miss the risk to the learner, then the College Whistleblowing procedures should be followed. If the DSL/DDSL is unhappy with the response from Children's Services they should consider following the HSCP escalation protocol.

If any member of staff has reason to suspect that abuse or neglect of a learner may be happening, or that any learner is at risk of significant harm, they must discuss their concerns as soon as possible with a member of the College DST.

4.4   The Designated Safeguarding Team

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            ┌──────────────────────────┐
            │  Designated Safeguarding │
            │           Lead           │
            │       Vice Principal     │
            └──────────────────────────┘
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Deputy Designated Safeguarding Lead Head of Wellbeing (Andover campus)	Deputy Designated Safeguarding Lead Head of Wellbeing (Sparsholt campus)	Deputy Designated Safeguarding Lead Residential Manager (Sparsholt campus)

APPENDIX 2

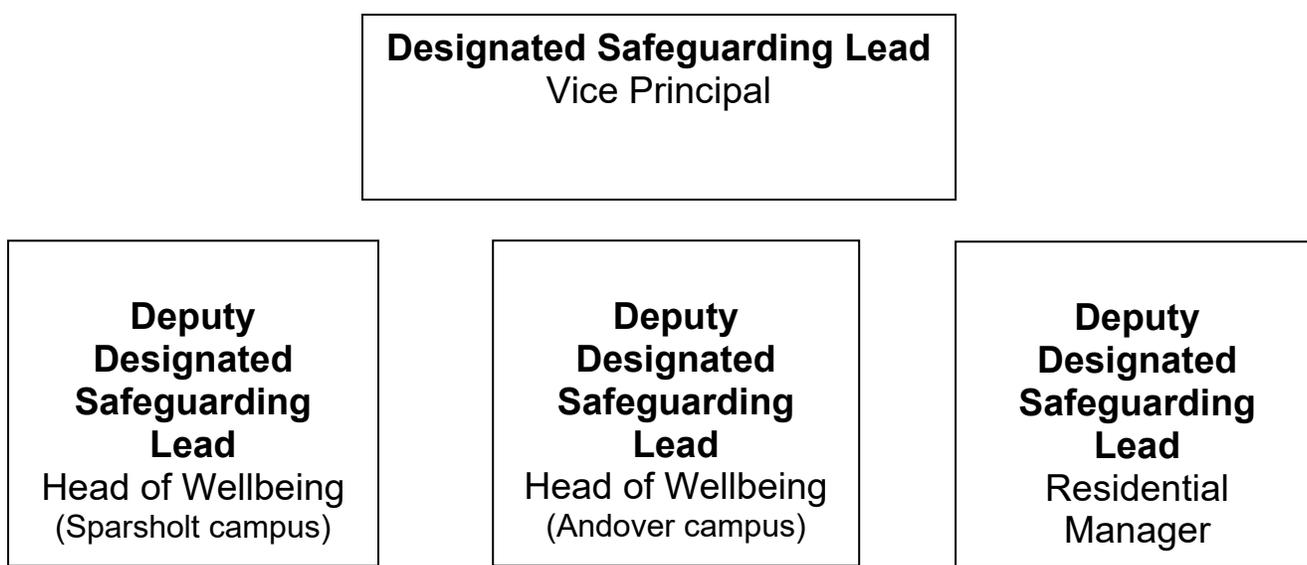**5. INFORMATION AND PROCEDURES FOR THE SAFEGUARDING TEAM**

5.1 Contents:

a) Background

b) The Designated Safeguarding Team (DST)

c) Roles and responsibilities

d) Procedures for investigating and handling an allegation or suspicion of abuse
or neglect

a) Background

While the Police and Social Services have primary responsibility for the protection of
children and vulnerable adults, the College has a duty to protect learners by the prevention
of abuse and neglect and this is achieved through the College's policies and procedures
for safeguarding learners.

The College's duties will be informed and overseen by its designated DST. In conjunction with the
Governing Body, the DST will facilitate a whole college approach to safeguarding. All systems,
processes and policies must have the best interests of the learner at their heart. Systems should be
in place that are easily understood and accessible for learners to confidently use to report abuse
and be confident that these will be treated seriously.

b) The Designated Safeguarding Team

Designated Safeguarding Lead Vice Principal

Deputy Designated Safeguarding Lead Head of Wellbeing (Sparsholt campus)	**Deputy Designated Safeguarding Lead** Head of Wellbeing (Andover campus)	**Deputy Designated Safeguarding Lead** Residential Manager

c) Roles and Responsibilities

Through leadership of and in collaboration with colleague members of the safeguarding team, the DSL (Vice Principal) has overall responsibility for:

1) Advising the Strategic Leadership Team about the appropriate alignment of College policies and procedures to assure the College's arrangements for safeguarding learners;

2) Investigating reported disclosures, allegations (when agreed by the Local Authority Designated Officer- LADO) and suspicions about abuse, neglect, risk suffered by learners or radicalisation;

3) Playing a pivotal role in multi-agency safeguarding arrangements by liaising with the three safeguarding partners (Police, Local Authority, clinical commissioning group- Hampshire Safeguarding Children Partnership) to report suspected incidents affecting learners which fall within the purview of this policy and these procedures, and to represent the College in any subsequent actions to safeguard affected learners;

4) Determining when to call they Police and understanding what to expect when they do;

5) Maintaining the Safeguarding Register and associated thorough and confidential records of reported allegations, suspicions, subsequent investigations and follow- up actions;

6) Regularly reviewing the Safeguarding Register, to identify any emerging patterns of concern raised – since an accumulation of such concerns could prompt an investigation;

7) Keeping up to date the awareness and understanding of the DSL role in learner protection issues, good practice, College procedures, referral protocols and liaison arrangements with external agencies for safeguarding children and vulnerable adults;

8) Providing advice and support to other staff on issues relating to child protection and vulnerable adults;

9) Liaising with the Local Authority and Local Safeguarding Children's Partnership and other appropriate agencies;

10) Liaising with appropriate senior colleagues to ensure safeguards are put in place for learners on work placements;

11) Monitoring that staff receive basic training in safeguarding of young people and vulnerable adults and are made aware of the College's Safeguarding Learners Policy and Procedures.

12) Sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. It is important to recognize that colleges have clear powers to share, hold and use information in these circumstances;

13) Ensuring the College and staff know who the children are that have a social worker, understand their academic progress and attainment, provide additional support when necessary (this may involve other agencies) and maintain a culture of high aspirations for this cohort;

14) Meeting any other expectation set out for DSLs in the current KCSiE statutory guidance.

The Vice Principal: will liaise with the Head of Corporate Governance (Clerk to the Corporation) regarding regular reporting to the Board of Governors on discharge of the College's duties for safeguarding learners and is responsible for reporting deficiencies in procedures or policy identified by the Local Safeguarding Children Partnership (or others) to the Board of Governors through the Clerk at the earliest opportunity.

d) **Procedures for investigating and handling disclosures or suspicion of abuse or neglect:**

Procedure relating to learners aged 16 – 18 years and to vulnerable adults:

1) Any suspicion or disclosure of abuse, neglect, potential for harm or radicalisation that is brought to the attention of any DSL must be brought immediately to the attention of the safeguarding team. This must be done in writing using the Safeguarding Disclosure Form (Appendix 10).

2) The DSL or, in their absence, their designated deputy, will determine the extent and nature of any further enquires or investigations that would be appropriate and will ensure appropriate confidentiality of the learner is maintained;

3) The DSL or, in their absence, their designated deputy is required to report to Social Services, in accordance with Hampshire Local Safeguarding Children Partnership guidelines, any suspicions and to disclose any reports by learners under the age of 18 years and vulnerable adults of abuse and/or neglect. In addition, any suspected case of radicalisation will also be referred as a safeguarding concern to Children' Services Professionals who will refer to the Prevent office. Failure to do so is a failure in the College's duty to care;

4) Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached, then the DSL will contact Children's Services and if appropriate the police. The rationale for this decision should be recorded by the DSL.

NB. The exception to this process will be in those cases of known FGM (Page 16 of this policy).

Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents/carers may place the child at further risk. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police

may need to conduct a criminal investigation. The learner's views should also be taken into account. If a parent informs the College of a concern about their own child, we will inform them of what action we will take with the information they provide.

If there is indication that the learner is suffering significant harm, a call will also be made to Children's Services (0300 555 1384 during office hours or 0300 555 1373) at all other times.

If a learner is in immediate danger and urgent protective action is required, the police must be called. The DSL (or DDSL) must then notify Children's Services of the occurrence and what action has been taken.

If there is not a risk of significant harm, the DSL (or DDSL) will either actively monitor the situation or consider the Early Help Process.

5) All members of the DST who become involved in any disclosure or indication of suspicion about possible abuse, neglect or potential for harm to a learner, must ensure that details of incidents or observations are accurately recorded, signed and dated and the notes held confidentially and securely (ProMonitor Code 3) by the DSL. This must include recording of verbal conversations in writing.

6) It is the responsibility of the DSL/DDSL who receives a report of concern, no matter how insignificant, to record the details in the safeguarding database, since an accumulation of such concerns could initiate an investigation.

7) In the event of a Higher Education learner attempting, or committing, suicide, the DSL and Vice Principal HE is required to submit a Serious Incident (SI) report to the NHS secure email address – ncish@nhs.net

8) In the event that Police visit a College campus to arrest an individual, the Principal's office should be notified immediately in accordance with NPCC guidance.

Procedure relating to learners aged under 16 years:

The Designated Safeguarding person should:

1) Report the disclosure/incident, without delay, to:

- Social Services
- The College's 14-19 School Links Coordinator
- Vice Principal

2) Report the disclosure/incident, without delay, to the learner's own school Designated Safeguarding Lead and outline the action that is being taken by the College, pending the outcome of investigations by Children's Services.

3) Liaise with the learner's own school, who will act as intermediary for communications between parents/carers/the learner and the school to ensure appropriately controlled and full flow of information.

4) The DSL (or DDSL) must contact Children's Social Care via the Inter-

Agency Referral Form (IARF) making a clear statement of:

- the known facts
- any suspicions or allegations
- whether or not there has been any contact with the learner's family

6.   STAFF RECRUITMENT AND TRAINING POLICY STATEMENT

The College will take rigorous steps to ensure that children and young people under the age of 18 and individuals belonging to vulnerable groups are protected from people who might be considered to pose a risk to them.

New members of staff will be unable to start working with the College without checks being made as outlined below.

The College will comply with the legislation by:

a)   Not engaging a barred person;
b)   By referring individuals that have harmed or may harm a young person or individual belonging to a vulnerable group to the Disclosing & Barring Service (DBS).

The College will seek to be excellent in relation to safeguarding in recruitment and training by:

a)   Ensuring there are standard questions about safeguarding in all interviews;
b)   Making all appointments subject to satisfactory checks by the Disclosing & Barring Service (DBS);
c)   Ensuring all staff in specific roles are added to the annual DBS update services including Wardens, Counsellors, Wellbeing and Nurse.
d)   Engaging all volunteers subject to DBS checks;
e)   Include training on safeguarding issues, and how to recognise, respond, record and report issues of concern relating to learners, as part of staff induction;
f)   Providing Designated Safeguarding Leads with specialist training which will be refreshed every two years;
g)   All other staff will refresh their training every three years, or earlier should there be a change to legislation or process.

The College will pay for DBS and barring checks for all new staff.

6.1   Checks that will be undertaken

In accordance with the Protection of Freedoms Act all regular paid roles within the organisation, are classified as regulated activity and as such are subject to the following checks:

a)   Identity;
b)   Digital Screening;
c)   DBS check (enhanced); including barring list checks
d)   Right to Work in UK;
e)   Qualifications appropriate to role;
f)   Professional status as appropriate;
g)   Health & sickness record

h)   Previous employment history

A role is classed as Regulated Activity only if done regularly. Regular means carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period.

Checks undertaken for members of the Governing Body are:

a)   DBS check (standard)
b)   Identity

Identity Checks for volunteers are:

a)   Identity
b)   Digital Screening;
c)   DBS check (enhanced), including barring list checks;
d)   Right to Work in UK;
e)   Qualifications appropriate to role;
f)   Health check (if role entails teaching/instructing or supporting learners)
g)   Previous employment history

6.2   Professional and character references

Staff are not permitted to begin their employment (or take up residence) until the DBS and barring check has been completed. In exceptional circumstances where the DBS check is yet to be returned, the appointment may begin subject to a rigorous risk assessment and on the permission of the Principal or Deputy Principal until a clear DBS and barring check is received.

It is the responsibility of the HR Department to ensure that all staff employed at the College (directly or through an agency) and all adults living on site have a satisfactory DBS disclosure at the appropriate level.

It is the responsibility of the individual's manager to ensure that a member of employed staff or volunteer does not commence employment until they have received DBS clearance through HR or permission has been obtained from the Principal.

References will be sought where possible before interview and should be from the most recent employer and at least one other employer. Where this is not possible the College will seek references from organisations or individuals who will understand the potential for the applicant to work safely with young people and vulnerable adults and the individual's honesty and integrity.

6.3   Training in safeguarding and child protection

Members of the Board of Governors will be made aware of the Board's responsibility for safeguarding as part of their induction and will undertake the College's Safeguarding e-learning module (including the government e-learning module for PREVENT and RADICALISATION).   Annual refresher training, including the latest KCSiE will be provided.

All new staff will be made aware of the Safeguarding Learners Policy and Procedures during their corporate induction. This policy is accessible to all staff via the Policies & Strategies Hub on Sharepoint.

During their induction, new staff will meet the Deputy Designated Safeguarding Lead (DDSL), where the member of staff's responsibility for safeguarding will be explained, and resources signposted. All staff have access to the College's Safeguarding hub on Sharepoint.

All staff working for the organisation will undertake the College's Safeguarding e-learning module (including the government e-learning module for PREVENT and RADICALISATION) during their initial induction period, which will be no longer than 5 days. Refresher training will be undertaken at least every 3 years. In addition, all new staff will be registered on CPOMS which supports the organisation in ensuring the wellbeing of its students.

Staff involved in the recruitment and appointment of staff will have refresher training every two years.

Members of the DST will be required to undertake specific training with a recognised body e.g. NSPCC or Local Safeguarding Children Partnership at least once every two years.

APPENDIX 4

7   CONTRACTING/OUTSOURCED SERVICES/VISITORS/RESIDENTIAL LEARNERS

7.1   Contractors (not working directly with learners under the age of 19 years or vulnerable adults)

The College will include the requirements for DBS checks where necessary into their procurement and contract processes.

The manager responsible for each contract is required to conduct a risk assessment of the work to be carried out in terms of potential risk to the safety and well-being of learners.

A member of the Designated Safeguarding Team will provide guidance on the level of risk involved and action to be taken, including whether a DBS check is required. This judgment is to be made based on:

a) Proximity of the work to learner areas;
b) The likely degree of access to young people;
c) The period over which the contractor has access to the site;
d) The frequency or intensity of the work to be done.

All contractors required to enter residential accommodation at any point and who have not been subject to DBS clearance through this process must be kept under sufficient staff supervision to prevent unsupervised access to learners or their accommodation.

The College will issue guidance to all contractors working in or near learner accommodation.

7.2   Contractors with direct unsupervised access to learners

The College has determined that, as part of the contractual arrangement with the transport providers, bus drivers should be required to undertake appropriate DBS checks.

7.3   Adults in residence in a College property let to Staff

All adults taking up residence, i.e. staying more than 4 weeks, in College accommodation are required to complete a DBS check. All residential households will be issued with guidance on the supervision of visiting adults.

College staff are responsible for ensuring that their visitors do not have unsupervised access to learners.

7.4   Adults in residence in a College property let to private tenants

Adult private tenants are not subject to DBS check but are required, as part of their letting agreement, not to allow any student (unless the student is a family member and usually resident) to enter their property or access the College other than with the usual

arrangements applying to any visitor.

7.5   Residential students

Individuals applying to study at the College, who declare a criminal record, are discovered to have a criminal record, or have been investigated for possible crimes against children are subject to a risk assessment. This may involve a DBS check and/or a reference from the individual's probation officer or Social Services case worker. The Designated Senior Officer for safeguarding is responsible for ensuring that a risk assessment is conducted, and appropriate precautions put in place.

Residential students have access to a person independent of the College staff and the details of the named individual are available throughout the accommodation blocks. The current individual is PCSO Kerry Croutear.

Students residing in residential accommodation can report concerns to a range of staff members including the wardens, nurse, wellbeing, progress coaches or a member of curriculum staff. This can either be in person or through the various mechanisms in place (such as Say It See It). These reporting routes are promoted throughout their time at College to ensure they have access to a member of staff they feel comfortable with.

7.6   Day visitors

All visitors to the College are required to register at Reception on arrival and departure and are required to wear a distinctive visitor badge to identify them as a visitor throughout their visit.

Where it is not possible to register with Reception for logistical reasons, all visitors will still be issued with a distinctive visitor badge.

7.7   Overnight resident visitors

Only guests who have business with the College are permitted to use the College's hospitality accommodation. Each visitor is required to pre-book and pre-pay for accommodation, which is only available to those who have business with the College. They are required to wear an identifying visitors badge for the duration of their stay. Guests will be given written information about "out of bounds" areas of the campus.

7.8   Use of College premises for non-College activities

Where services or activities are provided by another organisation using the College's facilities, we will seek assurance/evidence that they have suitable safeguarding and child protection policies and procedures in place. These safeguarding requirements are included within hire agreement contracts between the College and the organisation as a condition of use of the premises.

APPENDIX 4.1

SAFEGUARDING: CONTRACTORS

Risk Assessment of work to be carried out in terms of potential risk to the safety and well-being of learners

Contract Title:

Manager responsible for the contract: *[name & signature]*   **Date**: *[of completion of risk assessment]*

a	Proximity of the work to learners	
b	The likely degree of access to young people	
c	The period over which the contractor has access to the site	
d	The frequency or intensity of the work to be done	
Level of risk involved and action to be taken:		
Enhanced DBS Check required:		

DSL Sign off: *[name & signature]*   **Date:**

APPENDIX 5

8   ALLEGATIONS MADE AGAINST STAFF

8.1   Introduction

8.1.1   The College will ensure that allegations or concerns against staff are dealt with in accordance with guidance from DfE and the Hampshire Safeguarding Children's Partnership (HSCP) Procedures.

8.1.2   Complaints or concerns can be managed independently by the College under internal procedures.

Complaints could include:

- Breaches of the Code of Conduct
- Failure to follow College Policies and Procedures
- Any breach of data protection or confidentiality
- Poor behavior management
- Inappropriate use of social media

Concerns could include:

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence of, pupils
- Making (or encouraging others to make) unprofessional comments which demean or humiliate students, or might be interpreted as such.

8.2   Allegations

8.2.1   This should be followed in all cases in which it is alleged that a member of staff (including volunteers and agency staff) has:

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

8.2.1   The College recognises its responsibility for and is committed to ensuring the safety of its learners. It also acknowledges that staff of education institutions have frequent contact with children, young people and vulnerable adults and consequently may have allegations of child abuse made against them. In the case of an agency member of staff, we will immediately contact both the agency and the Local Authority Designated Officer (LADO) ensuring allegations are dealt with properly and support any investigation that is required. The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the allegation may or may not be true. It is imperative that those dealing with an allegation

maintain an open mind, involve the LADO and investigations are thorough and not subject to delay.

8.2.2   The College will report to the LADO a person working or volunteering with children who may not be suitable to do so. This could include:

- Children's Social Care involvement with their own child
- Being the perpetrator of domestic abuse
- Mental ill health or substance misuse issues that may impact the care of children
- Criminal proceedings for hate crime or membership of organisations with terrorist or extreme right-wing links believed to cause harm to others

8.2.3   The College recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College should do so with sensitivity and act in a careful, measured way.

8.2.4   Sources of support available for staff who have had an allegation of abuse made against them, includes:

a) Relevant Trade Union (UNISON, UCU, AMiE)
b) Education Support to staff in FE and HE - 08000 562 561 or www.educationsupport.org.uk
c) The Samaritans - 116 123 or www.samaritans.org

8.3   Receiving an allegation from a child or vulnerable adult

8.3.1   The Designated Safeguarding Lead should report the allegation immediately to the Principal, unless the Principal is the person against whom the allegation is made, in which case the report is made to the Chair or Vice Chair of Governors (in the case of the Chair's absence). The Chair may designate a person to assess the allegation.

8.3.2   The Principal or designated person will then:

a)   Obtain written, signed and dated details of the allegation from the person who received it. The written details should be countersigned and dated by the Principal or designated person;

b)   Record any known information about the alleged incident, including times, dates, locations and names of potential witnesses.

8.4 Initial Assessment by the Principal (or designated person)

8.4.1 The Principal (or DSL) should make an initial assessment of the allegation, consulting with the DSL and the Local Authority Designated Officer (LADO) as appropriate. If the allegation of harm is towards an adult learner, the DSL will determine if the Police need to be called and/ or an Adult Services referral is required.

NB. It is important that the Principal (or DSL) does not investigate the allegation. The initial assessment is based on the information received and is a decision whether or not the allegation warrants further investigation.

8.4.2 Potential outcomes (following consultation with LADO as appropriate) are:

a) The allegation represents inappropriate behaviour or poor practice by the member of staff but is neither potentially a crime nor a cause of significant harm to the child or vulnerable adult. The matter should be addressed in accordance with College disciplinary procedures.

b) The allegation is either a potential criminal act or indication that the child or vulnerable adult has suffered, is suffering or is likely to suffer significant harm. The LADO will report the matter to the Police and/ or Social Care.

c) Should the individual be dismissed because of the consideration of the allegations, the College will refer details to the Disclosure & Barring Service (DBS) if it is felt that there are grounds for believing the individual may be unsuitable to work with children. If the member of staff is a teacher registered with the Society for Education and Training (SET) consideration will also be given to referring the details to that professional body. The College will also consider whether to refer the case to the Secretary of State via the Teaching Regulation Authority.

d) The allegation can be shown to be false because there is sufficient evidence to disprove the allegation.

8.4.3 The following definitions will be used when determining the outcome of alleged investigations:

- **Substantiated**: there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

8.5 Enquiries and Investigations

8.5.1 Child or Adult protection enquiries by Social Services or the Police are not to be confused with internal disciplinary enquiries by the College. The College may be able to use the outcome of external enquiries as part of its own procedures. The child and adult protection agencies, including the Police, have no power to direct the College to act in a particular way; however, the College will assist the agencies with their enquiries.

8.5.2 If an internal investigation may prejudice a Police or Social Services Investigation then the College will give consideration to holding in abeyance any internal enquiries whilst the formal police or other formal agencies investigations proceed. Such abeyance of internal proceedings will be reviewed on a regular basis.

8.5.3 If there is an investigation by an external agency, for example the Police, the Principal (or DSL) will normally be involved in, and contribute to, the inter-agency strategy discussions (LADO led for harm to a child). The Principal (or DSL) is responsible for ensuring that the College gives every assistance with the agency's enquiries. They should ensure that appropriate confidentiality is maintained, where possible, in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or DSL) should advise the member of staff that they may consult with a representative, for example, a trade union.

8.5.4 Subject to any objections by the Police or advice from the LADO or Social Care, the Principal (or DSL) will:

a) Inform the child/children or parent/carer alleging that the investigation is taking place and what the likely process will involve;

b) Ensure that the parents/carers of the child making the allegation are informed that the allegation has been made and what the likely process will involve;

c) Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve;

d) Inform the Chair of Governors of the allegation and the investigation.

8.5.5 The Principal (or DSL) should keep a written record of all actions taken in connection with the allegation.

8.6 Suspension of Staff

8.6.1 Suspension is not automatic. In respect of staff (other than the Principal, Senior Post-holders and the Head of Corporate Governance (Clerk to the Corporation) suspension can only be imposed by the Principal, the Deputy Principal or the Director of Finance & Facilities in accordance with the Disciplinary Policy and Procedure (staff). There are separate procedures in respect of the Principal, Senior Post-holders and the Head of Corporate Governance (Clerk to the Corporation) which determine that suspension can only be imposed by the Chair of Governors (or in their absence the Vice Chair).

8.6.2 Consideration may be given to alternatives to suspension: e.g. agreement to refrain from attending work; change of, or withdrawal from, specified duties.

8.7 Allegations Adjudged to be Without Foundation

8.7.1 It is recognised that false allegations may be indicative of problems of abuse elsewhere in the life of the accuser. A record should be kept, and consideration given to a referral to Children or Adults Social Care in order that other agencies may act upon the information

8.7.2 In consultation with the designated senior member of staff, the Principal should:

a) Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. The staff member should be advised about the Education Support Partnership for counselling/support

b) Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome

c) Where the allegation was made by a child or vulnerable adult other than the alleged victim, consideration is to be given to informing the parents/carers of that child or vulnerable adult

d) Prepare a report outlining the allegation and give reasons for the conclusion that it has no foundation and confirm that the above action is taken

8.8 Record keeping

8.8.1 It is important that documents relating to an investigation are legible and complete and are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details should be retained on the member of staff's personnel and confidential file.

8.8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College's statutory duty to inform the Disclosure & Barring Service (DBS).

8.9 Monitoring Effectiveness

8.9.1 Where an allegation is made against a member of staff, at the end of the investigation and any disciplinary procedures, the senior member with lead responsibility should consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and policies and/or should be drawn to the attention of the Governing body. Consideration should also be given to the training needs of staff.

9   **WORKPLACE LEARNING AND EMPLOYER RESPONSIVE LEARNERS**

9.1   **Work Placements**

Any disclosure will be dealt with using the Safeguarding Learners Policy and Procedures.

9.2   **Employer responsive**

The following checks for College learners based with Associates will take place and will continually be reviewed for effectiveness, with any identified amendments being made as appropriate:

a) Monitoring visits with Associates will require inspection and monitoring of documentation pertaining to health and safety, equality and diversity and safeguarding of learners

b) Learner files will be examined to identify learner progress and identify any safeguarding issues

c) Associated learners will be contacted via telephone to check progress, including: establishing whether the learner feels safe; if they feel able to report if they do not feel comfortable with any aspect of their environment both physical and personal; and if they know who to report to

d) Associates will be asked to evidence how they will progress a child protection or vulnerable adult issue and for the name of their child protection coordinator or designated safeguarding officer.

APPENDIX 7

10   LEGISLATION AND GUIDANCE

10.1 In making its commitments to safeguarding learners, the College recognises that its practices are also bound by a broad framework of legislation, and statutory or national guidance including:

a)   The Children Act 2004 and 1989
b)   Local Safeguarding Children protocols and guidance
c)   UN convention on rights of the child
d)   GDPR (2018)
e)   Human Rights Act 1998
f)   Employment Protection Act 1975
g)   Employment Relation Act 1999
*Safeguarding Children in Education
h)   Protection from Harassment Act 1997
i)   Special Educational Needs and Disability Act 2001
j)   Safer Recruitment 2015
k)   Forced Marriage (Civil Protection) Act 2007
l)   The Safeguarding Vulnerable Groups Act 2006
m) Equality Act 2010
n)   Keeping Children Safe in Education (current version)
o)   Working Together to Safeguard Children (2018)
p)   The Counter-Terrorism and Security Act 2015
q)   Sexual Violence & Sexual Harassment between Children in Schools and Colleges (2017)
r)   FGM Act 2003 Mandatory Reporting Guidance (2016)
s)   Office for Students guidance on Student wellbeing and protection
t)   Office for Students guidance on Freedom of Speech and Prevent duty

10.2 Associated policies and procedures:

a)   Bullying and Harassment Policy and Procedure (Learners)
b)   FE Managing Learner Conduct Policy & UCS Student Conduct Policy
c)   Staff Recruitment Policy
d)   Health and Safety Policies
e)   Work Placement Policy
f)   Whistleblowing (Duty to Act) Policy and Procedures
g)   E–Safety and Online Communications Policies
h)   Use of Reasonable Force Policy
i)   FE Sexual Harassment and Misconduct Policy (Learners)

10.3 The procedures of the Hampshire Safeguarding Children Partnership can be accessed at:
https://www.hampshiresafeguardingchildrenboard.org.uk/procedures/4lscb-procedures/

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11 EXTERNAL SPEAKER POLICY AND PROCEDURE

1. Aim

1.1. The aim of this policy is to ensure that the student and staff experience at the College Group is enriched by input from external speakers and organisations, and that any benefits and risks are considered appropriately in advance of a speaker event.

2. Background

2.1. The College Group has a long history of attracting external speakers to enrich the experience of students, staff and the community. This process seeks to capture the benefits that visiting speakers might bring and to meet the requirements of the of the Higher Education (Freedom of Speech Act) 2023, the requirements of the Office for Students and the Prevent Duty Guidance for Specified Authorities in England and Wales.

3. Policy statement

3.1. The College Group recognises the value that external speakers bring to the organisation and its staff and students, and seeks to encourage the provision of enrichment to students and staff through exposure to high quality visiting speakers and organisations

3.2. The College Group confirms its commitment to freedom of speech within the organisation.

3.3. This policy seeks to reduce the likelihood that visiting speakers or organisations might seek to act unlawfully such as to promote extremist views, to promote discriminatory ideas or attempt to radicalise students and staff.

3.4. In addition, it seeks to reduce or eliminate any risks of disruption or poor behaviour, for example as the result of a controversial or popular speaker's presence in the College Group.

4. Scope

4.1. This policy applies to
- Student or member of staff (including the governing body) of the College Group.
- person who has applied to become a member of academic staff within the College Group.
- person who was, or was at any time invited to be, a visiting speaker.

5. Risk assessments and risk register

5.1. We will undertake a risk assessment for every external speaker we engage with. This will include keeping a record of any concerns raised and reasons why, or why not, a speaker was engaged and event held.

5.2.   A risk register of all external speakers who are considered will retained by the PA to the relevant Vice Principal and shored on the SLT SharePoint noting the details of the booking and where potential risk was identified. The Vice Principal will refer a potentially contentious meeting onwards to the Principal as outlined in the College Group Freedom of Speech Code of Practice.

6. Procedure

6.1.   Organiser's of a visiting speaker or organisation event will, in advance of the event, complete a risk assessment which includes consideration of the speaker(s) and content of any presentation, and the potential audience to whom it is intended to be delivered. The risk assessment is available in Appendix 8.1.

6.2.   Where a speaker or organisation requests to come to the College Group to speak to students and/or staff, the member of staff who is contacted, or the member of staff who leads the organisation of the event, will use the same risk assessment as provided below.

6.3.   If the topic is potentially politically contentious or likely to compromise the College Group's values, the organiser will discuss concerns related to the speaker(s) and the content of the presentation with the relevant Vice Principal and, if there is a Prevent concern, to the SLT Prevent lead..

If required, the Vice Principal (or SLT Prevent lead) will recommend to the Principal that the visiting speaker or organisation be vetoed or suggest additional controls (and update the risk assessment) to allow the event to go ahead. The Principal will decide on the most appropriate course of action and report to the Board of Governors as per the process for contentious meetings outlined in the College Group Freedom of Speech Code of Conduct.

6.4.   Copies of the risk assessment will be held on the SLT SharePoint.

6.5.   Where any visiting speakers or organisations address students, the organiser must ensure that at least one member of staff, who has received Prevent training (preferably the event organiser) is present at the event to ensure that any extremist views presented can be challenged.

6.6.   All visiting speakers are expected to conform with the Visitor Code of Practice (Appendix 8.2).

7.   Review

7.1.   This policy will be reviewed every three years, or when relevant legislation or government guidance is revised.

APPENDIX 8.1

PREVENT RISK ASSESSMENT: VISITING AND GUEST SPEAKERS AND ORGANISATIONS

ABOUT THE EVENT	
Organiser's Details	
Full Name(s)	
Status e.g. staff	
Contact email	

DELIVERER DETAILS				
Speaker		Speaker/Guest A*	Scores	Mark score
		Ex-student	1	
Organisation		Previously approved speaker	1	
Contact Details		WP provider	2	
		New speaker	3	
		Previous Visits B*	Scores	Mark score
		6 to 10	1	
		2 to 5	2	
		Less than 2	4	
		Total Score	A* x B*	
		Risk Rating Score		
		Rate the total score here	Scores 1-2 Scores 2-4 Scores 5+	5 yr check 3 yr check Annual check
Topic –	*Does it have the potential to promote extremism or public order offence? If yes, refer to Vice Principal for sign off.*			
Date and location			**Start and finish time**	
Age of student group	16-18	19+ FE	HE	

College Organiser's Declaration: I declare that the information provided here is to the best of my knowledge a true and accurate statement of intentions and requirements. I understand and agree that this event/workshop request is concordant with College Values and policies.

Signature(s) ………………………………………………………………………………………………   Date …………………………..

When completed this form should be submitted for consideration by the relevant Approving Manager not less than 20 working days before the date of the proposed event/workshop

Approving Manager's Signature ……………………………………………………………….   Date …………………………..
                    On completion of event and visiting speaker signature (overleaf) please return to your CA/PA

APPENDIX 8.2

VISITOR CODE OF PRACTICE

The College Group aims to enrich the experience of students, staff and the community by capturing the benefits that visiting speakers bring. To enable the College and all its stakeholders to maximise these opportunities we would like to ensure that you are aware of the College's mission and values.

College's mission is *"'Raising Aspirations, Unlocking Potential, Advancing Futures"*

Our College Group values are:

> *Excellence*
> *Teamwork*
> *Supportiveness*
> *Sustainability*
> *Innovation*
> *Valuing others*
> *Integrity*

The College Group is also committed to promoting British Values, and the Prevent Strategy which has the specific aim of preventing people from being drawn into terrorism or extreme ideology.

During your visit to the College Group we would like to ensure that you understand, respect and promote our mission and values.

Please sign below to state that you understand the information contained within this document and are happy to respect and promote our values.

Name   …….

Company   …….

Date   …….

Signature   …….

On completion of event please return to your CA/PA

OUT OF HOURS SAFEGUARDING, CHILD PROTECTION & PREVENT GUIDANCE

SPARSHOLT CAMPUS:

All staff should be aware that the campus Head of Wellbeing is a deputy designated safeguarding lead (DDSL) and the first point of contact for disclosures. The Residential Support Manager and the Vice Principal, the Principal and Chief Operating Officer may also be contacted. The Vice Principal Curriculum (Andover) is the college Designated Safeguarding Lead (DSL). There is further information available on the safeguarding flowchart accessible to staff on the College intranet site.

From 8:30am onward, through to the end of the working day Monday-Friday (term-time only), the DSL Team should be contacted in the following order:

1. Head of Wellbeing Sparsholt - 01962 797274 or 797579
2. Residential Support Manager, - 01962 797285. Mobile 07872 422365
3. Vice Principal (DSL) - 01264 360001. Mobile 07872 423675
4. Principal's Office (Principal and the Chief Operating Officer) - 01962 797222. Mobile 07540 668438

Scenarios

In exceptional circumstances, you may find yourself privy to a safeguarding or child protection concern that requires immediate attention. In such circumstances this guidance should be followed, this includes when receiving (not exhaustive):

- Notification of homelessness
- Notification of harm or risk of harm such as an assault by another
- Notification of refusal to return home for disclosed or undisclosed reasons
- Notification of thoughts of suicide or self-harm

Judging the immediacy of the risk

There are varying levels of risk when encountering a safeguarding concern, inevitably personal judgment will be required as to the seriousness and urgency of the situation and the appropriate course of action. The safety of the individual concerned and of those around them is paramount. If you receive information where there are clear indications that the student is in imminent and serious danger, the DSL should be notified immediately in the following order:

Out of hours DSL contact numbers

1. **Residential Support Manager - 07872 422365**
2. **Vice Principal – 07872 423675**
3. **Principal - 07540 668438**
4. **Duty Warden - 07715 043855, (01962) 797538**

Ultimately, all staff have the right to make a referral directly to the police or children's services and should do this if, for whatever reason, there are difficulties following the agreed protocols, e.g. they are the only

adult on the College premises at the time, are unable to contact our out of hours' team, are on a residential trip or have serious concerns about sending a student home.

Hampshire Children's Services: 0300 555 1384.
Out of hours: phone **0300 555 1373**   email **out.of.hours@hants.gov.uk**

Isle of Wight Children's Services: 0300 300 0117: **available 24 hours**
Portsmouth Children's Services: 0845 671 0271. Out of hours: **0300 555 1373**
Southampton Children's Services: 02380 833 336. Out of hours: **023 8023 3344**

If a student is in immediate danger or at serious risk of harm call the police on 999

ANDOVER COLLEGE:

All staff should be aware that the campus Head of Wellbeing is a deputy designated safeguarding lead (DDSL) and the first point of contact for disclosures. The Vice Principal, Principal and the Chief Operating Officer may also be contacted. The Vice Principal Curriculum is the college designated safeguarding lead (DSL).

From 8:30am onward, through to the end of the working day Monday-Friday (term-time only), the DSL Team should be contacted in the following order:

1. Head of Wellbeing, - 01264 360032
2. Vice Principal & DSL - 01264 360001. Mobile 07872 423675
3. Principal's Office (the Principal and Chief Operating Officer) , - 01962 797222 Mobile 07540 668438

Scenarios

In exceptional circumstances, you may find yourself privy to a safeguarding, child protection or PREVENT concern that requires immediate attention. In such circumstances this guidance should be followed, this includes when receiving (not exhaustive):

- Notification of homelessness
- Notification of harm or risk of harm such as an assault or abuse
- Notification of refusal to return home for disclosed or undisclosed reasons
- Notification of thoughts of suicide or self-harm

Judging the immediacy of the risk

There are varying levels of risk when encountering a safeguarding concern, inevitably personal judgment will be required as to the seriousness and urgency of the situation and the appropriate course of action. The safety of the individual concerned and of those around them is paramount. If you receive information where there are clear indications that the student is in imminent and serious danger, the DSL should be notified immediately in the following order:

Out of hours DSL contact numbers

5. **Vice Principal (DSL) – 07872 423675**
6. **Principal – 07540 668438**
7. **Duty Warden - 07715 043855, (01962) 797538**

Ultimately, all staff have the right to make a referral directly to the police or children's services and should do this if, for whatever reason, there are difficulties following the agreed protocols, e.g. they are the only adult on the college premises at the time, are unable to contact our out of hours' team, are on a residential trip or have serious concerns about sending a student home.

Hampshire Children's Services: 0300 555 1384.
Out of hours: phone 0300 555 1373   email **out.of.hours@hants.gov.uk**
Wiltshire Multi-Agency Safeguarding Hub (MASH) 0300 456 0108 (08:45am-5pm Mon-Thurs, 8:45am-4pm) Friday
Wiltshire Emergency Out of Hours Service 0300 456 0100 (5pm - 8.45am)

If a student is in immediate danger or at serious risk of harm call the police on 999

SAFEGUARDING DISCLOSURE FORM

Step 1 – Where possible get the learner to a member of the Safeguarding Team immediately. If this is not possible ask the student to STOP, explain you will need to share your concerns with the College's Safeguarding Team. Take the time to read the guidance on the form, then complete as fully as possible and return to the Safeguarding Team as soon as possible. It is also vital that the student understands what happens next.

Learner's name:			
Learner's mobile number:		**Course & Tutor:**	
Date and time of disclosure:		**D.of.B**	
Name and role of person raising concern:			
Names of any other witnesses to the disclosure:			
Names/Ages of any other children that may be at risk (e.g. siblings, friends)			
Name of Parent/s/Guardian:			

Step 2 - Please record all conversations regarding the disclosure or concerns on this sheet only. PLEASE DO NOT ASK ANY QUESTIONS other than to clarify facts. NEVER ASK WHY. Please just write down what the learner says word for word (this may include slang terms, swearing and potentially graphic content) along with any responses you make. Please use the body map, where appropriate, to illustrate the location of any injuries. This sheet must be signed and dated in two places by the student and you. One at the bottom of the second page and one immediately after the last written word in the 'Details of Concern' box. This is done so that no other information may be added after your conversation has finished.

Please do not take any photocopies of your notes or put any notes about this on our systems. This disclosure form and all other notes must be handed to a member of the Safeguarding Team immediately.

Details of concern
Where? When? What? Who (names ages of victim/perpetrator/parents/other children that may be at risk)? Behaviours? Injuries?   Remember use the learners words and facts only.

Sign after last written word, use another form if necessary.

Step 3 – Please explain to the learner that you will need to share this form with the Safeguarding Team and they will probably need to discuss these concerns further with parents and possibly make a referral to Children's Services or the Police. Where possible they will discuss this decision with the learner in advance and keep them informed of any decisions. The Wellbeing Team will be able to offer ongoing support to the learner. Please ask the learn to sign to confirm their understanding and that the record is accurate.
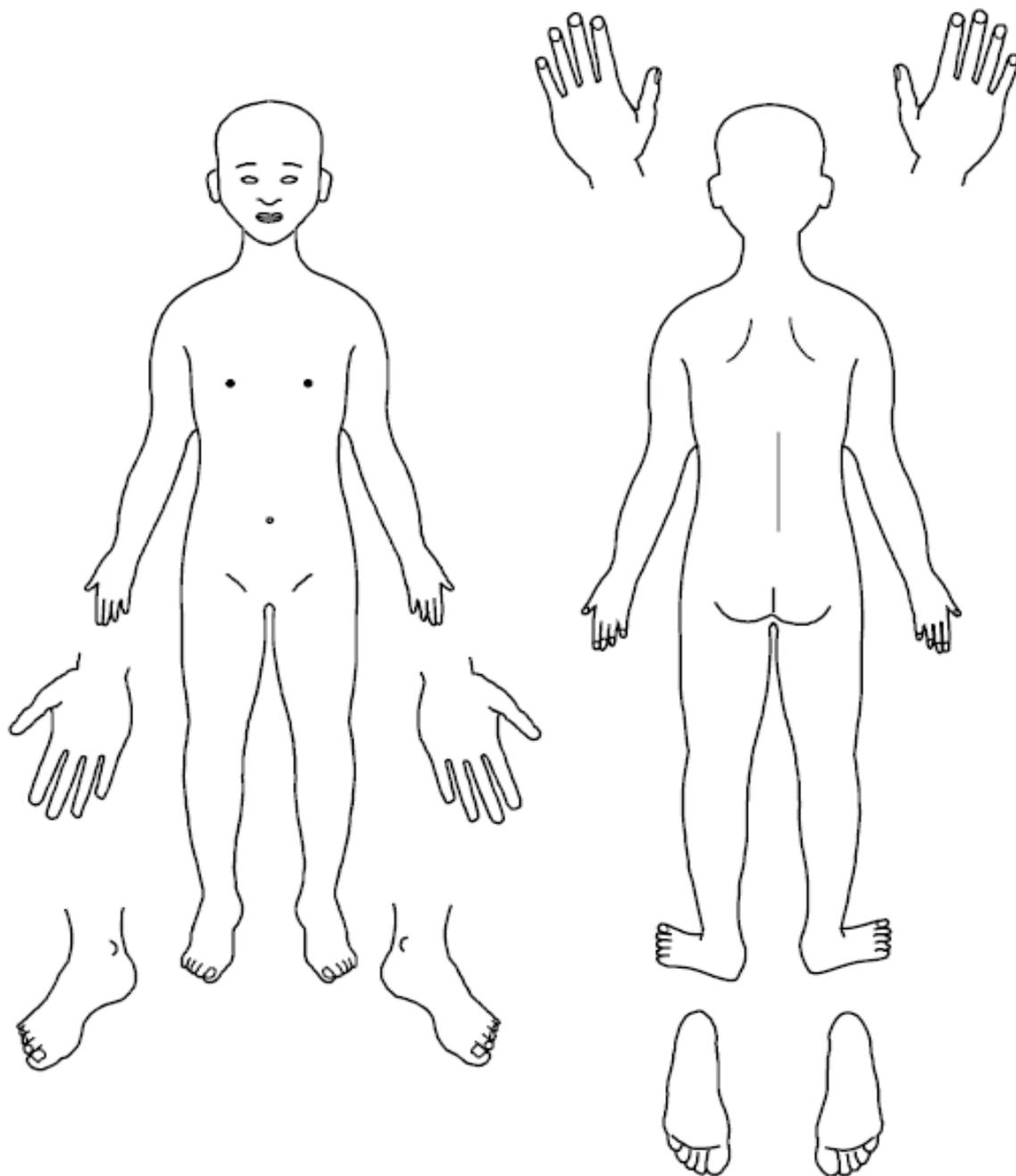
Staff Name:	**Signature:**
Learner Name:	**Signature:**

Please return the form to a member of the Safeguarding Team IMMEDIATELY.

Actions taken			
Date	**Person taking action**	**Action taken**	**Outcome of action**

Name & Designation of Safeguarding Staff receiving the Disclosure:	
Signature:	

SKIN MAP

    Name of Learner: _____

    Date of birth: _____   **Date of recording:** _____

BROOK SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures

- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

APPENDIX 11.1

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN RISK AND NEEDS ASSESSMENT TEMPLATE

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions
Red Behaviour:					
Red Behaviour:					
Amber Behaviour:					

<u>**APPENDIX 12**</u>

<u>**SELF-HARM AND SUICIDAL BEHAVIOUR**</u>

1.   Introduction

This appendix has been put in place to ensure that we have a consistent approach from staff who deal with learners who self-harm or present with or display suicidal behaviour.

Any young person or vulnerable adult who actively engages in self -harming behaviour, intent to self-harm, suicidal thoughts, plans or behaviour, should be taken seriously and appropriate help and intervention offered at that point.

Definitions and Meanings:

Suicide	Self-harm, resulting in death The act of killing oneself deliberately
Attempted Suicide	Self-harm with intent to take life, resulting in non-fatal injury
Suicidal Ideation	Suicidal thoughts about how to kill oneself
Suicide Plan	A clear plan outlining the process to be followed in order to commit suicide
Deliberate Self harm/Self-harm	In its broadest sense, self-harm describes a wide range of things that people do to themselves in a deliberate and usually hidden way, which are damaging. These include:

- Cutting behaviours

- Other forms of self-harm, such as burning, scalding, head banging, hair pulling

- Self-poisoning / overdosing.

The difference between **attempted** suicide and deliberate self-harm / injury is not always clear. Self-harm is **not** a common precursor to suicide. It can mean different things to different individuals.

Throughout this appendix, a range of different roles are referred to:

- DSL – Designated Safeguarding Lead
- DDSL – Deputy Designated Safeguarding Lead
- WP – Wellbeing Practitioner
- PC – Progress Coach
- CL – Curriculum Leader

2. Responding to Incidents of self-harm and suicidal behaviour on College grounds

Staff member witnesses/is informed that a learner has self-harmed, is planning to self-harm or is feeling suicidal

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- Locate learner
- Call for help from a colleague/emergency services
- Help to calm the learner and offer them reassurances
- The learner should not be left alone at any point if there is the possibility that they continue to pose a risk to themselves or others
- If they have the means to self-harm this should be removed from their possession but not in a way that places anyone else at risk. Their bag can be searched if you have suspicion
- In exceptional cases, the adoption of the College's Use of Reasonable Force policy may be applied
- If first aid is required, call for a first aider or the college nurse

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- Inform DSL/DDSL
- In consultation with the DSL/DDSL, parents/carers should be informed regardless of age unless there is a clear reason not to
- If learner does not require emergency services or to visit the hospital and they are no longer considered a risk they should go home in a safe and supported way (for residential students, refer to the process below)
- If they require further medical attention, parents/carers must be informed and either the parent/carer will take them to the hospital, an ambulance will be requested or a member of the college staff will take the student to the hospital
- Emergency services must be contacted if the injury is life-threatening or if the student is suicidal and continues to pose themselves a risk

Protocol for Residential Students
- Call the on-call warden to assist
- Call the out of hours on call (Residential Manager/Vice Principal/Principal) to advise them of the incident and for additional guidance and support
- Call the next of kin of the learner if under 18. Call the next of kin of the student if over 18 if the on call manager has advised this
- Tell the learner, if you are able, that you will be calling their next of kin
- If the learner is under 18 either the full time warden or the on call warden will need to accompany the learner to the hospital
- Provide regular updates to the warden on campus and to the out of hours on call person

IF THE CHILD/YOUNG PERSON IS TAKEN TO HOSPITAL, EMERGENCY PROTOCOLS FOR TREATMENT AND CARE WILL BE IMPLEMENTED AND A CAMHS REFERRAL WILL BE MADE BY THE HOSPITAL

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After the incident:
- The incident must be logged on to the learner's ProMonitor (Confidential Comments) page by the member of staff who responded to the incident
- The DSL/DDSL (including residential manager) will consider what support, if any, is required from additional services
- The DSL/DDSL (including residential manager) will arrange a return to College meeting or conduct a Fitness to Study hearing
- Subject to the outcome of the meeting, a stay safe plan should be put in place
- Relevant staff members should be made aware of the requirements of the plan and a copy added to the learner's ProMonitor page

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If they are not already known to the Wellbeing Team, a referral should be made and they should be assigned to a WP and added to the Cause for Concern register (C4C).

A supportive attitude, respect and understanding of the young person or vulnerable adult, along with a non-judgmental stance, is of prime importance. Note also that a young person or vulnerable adult who has a learning disability may find it more difficult to express their thoughts and feelings.

It is important to consider those who dealt with the situation and any individuals who witnessed it. Relevant support should be put in place given that it is likely to have caused distress. In the case of a learner, please refer to the Wellbeing Team. Where a member of staff requires support, please consult with their manager and/or HR.

3.   Assessing risk

There is a need to initiate a prompt assessment of the level of risk self-harm presents.
Unless the learner is in obvious emotional crisis, kind and calm attention to assuring that all physical wounds are treated should precede additional conversation with the learner about the non-physical aspects of self-harm. Questions of value in assessing severity might include:

- Where on your body do you typically self-harm?
- What do you typically use to self-harm?
- What do you do to care for the wounds?
- Have you ever hurt yourself more severely than you intended?
- Have your wounds ever become infected?
- Are your parents aware that you have self-harmed?
- Have you ever seen a doctor because you were worried about a wound?

Collecting basic information is also important in determining the need for engagement of outside resources. Questions might include aiming to assess:

- history
- frequency
- types of method used
- triggers
- psychological purpose
- disclosure
- help seeking and support
- past history and current presence of suicidal ideation and/or behaviours

In general pupils are likely to fall into one of 2 risk categories:

Low risk learners
Learners with little history of self-harm, a generally manageable amount of stress, and at least some positive coping skills and some external support.

Higher risk learners
Learners with more complicated profiles – those who report frequent or long-standing self-harm practices; who use high lethality methods, and/or who are experiencing chronic internal and external stress with few positive supports or coping skills.

The CAF (Common Assessment Framework) pre-assessment checklist, CAF or Thresholds Chart can also be used as a framework to help practitioners assess children and young people's additional needs for services earlier and more effectively.

If the assessor and/or young person agree a referral to CAMHS is needed, a referral should be sent the same day.

4.   Confidentiality

The learner must be involved wherever possible and consulted on his, her or their views and their request for information should be respected wherever possible.

It is important not to make promises of confidentiality that you cannot keep.

Professionals should tell a learner when they may have to share information without their consent.

Wherever possible the information given to professionals by a learner should not be shared without the learner's permission except in exceptional circumstances. Such exceptional circumstances will include:

- Urgent medical treatment is required
- The safety and wellbeing of a learner is at risk or there is the possibility of harm to other (i.e. child protection or suicide)
- By virtue of statute or court order
- For the prevention, detection or prosecution of serious crime

If there is reasonable professional concern that a learner may be at risk of harm this will always override a requirement to keep information confidential.

5.   Multi-agency Response

Wherever there is a serious concern for a learner, a multiagency planning meeting should take place, without delay to include relevant College staff and the DSL/DDSL. Depending on the circumstances of the individual, this may be arranged through, for example, hospital staff, the College or by Social Care if the learner is considered to be in need or at risk. Advice can be sought from the MASH.

The purpose of a meeting is to:

• Consider the concerns;
• Devise a care plan to support the learner in the community and within the education environment;
• Consider support services for the family (external to College);
• Agree plans for an inter-agency assessment and management of risk.

6.   Where the learner is a Carer for a Child or is Pregnant

Where a learner, who is a carer for a child or is pregnant, self-harms, or threatens to do so, a referral must be made to the MASH in respect of the child/unborn baby.

7.   Return to college following a self-harming incident or suicide attempt

<u>**Before**</u> a learner is permitted to return to college to continue with their studies, following a safeguarding incident, the college will:

- Ensure the College DSL/DDSL is made aware.
- Arrange a Return to College meeting to take place with the college's DSL/DDSL and the learner along with a WP/PC/CL or person chosen by the learner. **In this meeting they will**:

- Refer to and consider the Fitness to Study Policy;
- Develop a stay safe plan with the learner to identify what can be done to support and assist the individual where possible, identify, assess and mitigate risks;
- Inform key staff of the plan and control measures in place, **after the meeting the College will;**

- Regularly review the individual's needs in liaison with College's DSL/DDSL, WP and PC.
- Liaise with other services and professional organisations where appropriate

- Ensure that the Residential Manager is involved in any meeting involving learners residing on campus

8.   Relevant Associated Policies

- FE Fitness to Study Policy
- HE Fitness to Study Policy
- Fitness to Practice Policy for Veterinary Nursing Students
- Safeguarding Learners Policy and Procedures
- Learner Search & Confiscation Policy
- Use of Reasonable Force Policy

WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

While the College has a separate whistleblowing policy, this is a summary sheet that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the whistleblowing policy and should be read in conjunction with the College policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing learners at risk, you should in the first place make the DSL/DDSL aware, or if appropriate, the Principal.

If your concern is about the Principal, you should raise this with the Chair of Governors by contacting the Head of Corporate Governance (Clerk to the Corporation) via email clerktothecorporation@sparsholt.ac.uk.

If you would prefer to raise your concerns outside of the college, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organisations or make contact with Hampshire County Council.

If you believe that a member of the college staff is harming a learner (an allegation) and this has been reported to the DSL/DDSL or Principal and no/insufficient action has been taken, or the member of staff you have concerns about is the Principal, then you are able to contact the LADOs on 01962 876364 or child.protection@hants.gov.uk

If you believe that a learner is being abused by individuals outside the college, you are able to make a referral to Children's Social Care by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours)

<u>**APPENDIX 14**</u>

<u>**REMOTE TEACHING, LEARNING AND SUPPORT**</u>

Remote teaching and learning

If you plan to record or livestream lessons for delivery via an online platform, you need to assess any risks and take appropriate actions to minimise harm.

The key safeguarding issues to consider are:

- Place: Teaching should take place in an appropriate area (for example, not in bedrooms), ideally against a neutral background where nothing inappropriate can be seen or heard in the background
- Platform: Make sure the online platform you use is college based; don't use your own personal account or a free platform (such as YouTube or Facebook) as this does not allow you to restrict the audience
- Dress code: Staff and students must wear suitable clothing, as should anyone else in the household who may be visible
- Language: Must be professional and appropriate, including any family members in the background
- Group size: Live teaching and learning should take place in groups. If a 1:1 is conducted, such as a tutorial, turn off the video image function, and use to share resources only
- Group type: Be sensitive to the needs of individual students, particularly SEND students, to ensure your platform is accessible to all
- Timing: Live classes should be kept to a reasonable length of time and occur within the College timetable
- Recording: Live classes should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed

Contacting students at home

During a period of forced closure staff may need to contact students individually, for example to undertake an individual tutorial or conduct a wellbeing meeting.

The key safeguarding measures to take are:

- Use College accounts to communicate via email or online platforms, never your own personal accounts
- Make sure any phone calls are made from a blocked number so your personal contact details are not visible
- If you are accessing students' or families' contact details at home, ensure you comply with the Data Protection Act 2018

Managing risk during a period of forced closure

Children and young people are likely to spend more time online during a period of forced closure, or in the case of a pandemic where social distancing is necessary. During such instances the College aims to continue to deliver teaching and learning remotely, in addition to providing all learning support and

learner support functions as usual. The College tutorial programme already educates students on how to keep themselves safe online, and how to protect themselves from potential harm and inappropriate material online. Students, parents and carers will be reminded of the benefits and risks of being online, whether socially or in lessons in the event of a forced closure.

Reporting Safeguarding disclosures or concerns

The mechanism of reporting will remain the same. If anyone has a safeguarding concern they should continue to act and act immediately. Staff should complete the Safeguarding Disclosure Form as fully as possible and return to the safeguarding team as soon as possible (Appendix 10).

For immediate support staff should contact the DSL/DDSL using the contact details on the 'Out of Hours' Guidance document (Appendix 9).

If you are concerned that any member of staff within the college is not following safeguarding processes or behaving in a way that is placing learners at risk, you should follow the whistleblowing in a safeguarding context procedure which is set out in Appendix 13.

Risk assessing individual students

In the event of a forced closure the wellbeing team will identify which students have the greatest vulnerability and prioritise these students for remote support. This will ensure the College can continue to fulfil any safeguarding duties according to child need.

The College Cause for Concern (C4C) database is currently used to grade the level of risk of all students.

- Red - most risk of harm or neglect and fewest protective factors (includes those with a child protection plan): reviewed weekly as a minimum
- Amber - a moderate risk of harm, but with some protective factors (include those identified as 'Child in Need'; and those with a social worker): reviewed fortnightly
- Blue - some concerns escalating or unmet needs; or have been red or amber and need monitoring: reviewed monthly
- Grey- no known risk or concerns: reviewed every 6 weeks

During a period of forced closure risk factors will be higher and some students may warrant a 'grade' higher than usual. The wellbeing team will determine the level of support to offer each student and enact this remotely.

Young people may be worried about the impact of a pandemic, social distancing or self-isolation. Those who already have mental health difficulties such as anxiety might be finding things particularly tough. The wellbeing and pastoral support tutors (PSTs) will communicate with all students to inform them about what's happening and check how they're feeling. Regular wellbeing updates will be shared with students via the College website and Moodle/L-Edge (VLEs).

All contact with students will be recorded on Promonitor. Colleagues are reminded to consider the location of their remote working, and that if the screen is visible in non-secure areas, for example, at home, that there can be a data breach, if other members of the family can see it.

The most vulnerable students may potentially need a home visit, so that they can be seen in person, probably by the DSL/DDSL. (All usual measures around staff safety to be taken into account.) The frequency of any visit should be related to risk. In cases of self-isolation, aiming to view through a window

may be appropriate. For any student with a social worker, other professionals should be kept informed. This is especially important, since for many students, college is a protective factor and when it is missing, the risk may increase and Children's Services may need to reassess the case. Staff should attend Child Protection and Child In Need meetings virtually wherever practical or possible.

Many students rely on Free School Meals (FSM) and therefore may be more at risk during a period of forced closure. In such an event the College will authorise a system of vouchers that can be 'cashed' in stores, rather than providing a meal.

Students with SEND

Students with special educational needs and/or disabilities (SEND) may be offered the opportunity to remain in college during a period of forced closure (for example, a pandemic) in order to safely meet their needs.

In circumstances where the parents do not want to send the young person to college, for example they have underlying health conditions that put them at severe risk, the College will continue to deliver teaching and learning in addition to academic and wellbeing support remotely.

The Additional Learning Support (ALS) team will assess the level of risk and support required based upon the students EHCP and their known 'ways of working'. This will vary from daily contact with the students, to weekly 1:1s with the student and/or parent.

Academic staff will be mindful of learner needs when setting online learning, and in some cases will provide alternative learning materials to meet the student's needs.

Young people with autism spectrum conditions may well find it difficult to accept that 'college' work should be done at home - they find ordinary homework difficult to accept. Their levels of anxiety will be higher than usual and may lead to more panic attacks or 'melt-downs'. Staff will be mindful of this and will be guided by the ALS team on the volume of work set and required level of engagement.

APPENDIX 15

Learners At Risk

1.   Introduction

The College has a duty of care to do all it reasonably can to support students to complete their programme of study and attain the best possible outcome. As part of this it is important that we encourage learner engagement with all aspects of their programme and monitor their progress.

The College will identify young people and vulnerable adults at risk and the measures we will take to maximise the success of these learners in addition to the useful help and support that we offer to all learners.

The College will ensure appropriate support is provided to remove barriers to achievement so that all learners achieve equally well and achievement gaps do not exist.

2.   How the College identifies and supports Vulnerable Children

The College has dedicated procedures in place to identity and support vulnerable young people and adults. Utilising information from multiple sources, the College produces a Risk of NEET Indicator (RONI) Tracker which risk rates the learners on the list against a range of criteria. This information is shared with key college staff to ensure that appropriate support is implemented when the learner commences their studies at the college. Once the learners are identified at risk, staff are made aware of the vulnerabilities of these learners and the support that is put in place to help reduce the impact of their vulnerabilities. The college ensures that all such learners are supported within and beyond the college context by all relevant multi-agency services. The College tracks the progress of this group of learners closely.

3.   Definition of Vulnerable Children and Students at Risk Indicators

The college uses the Department of Education definition of vulnerable young people. In the context of our college community vulnerable young people are those:

o   are assessed as being in need under section 17 of the Children Act 1989, including students who have a Child in Need (CIN) plan or are on a Child Protection Plan (CPP).

o   who are looked after children (LAC) and/or are in foster care. In addition to children who have returned home to their family from care and privately fostered children.

o   Children who have an Education and Health Care (EHCP) plan.

o   Children who have been assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services) - this includes: children for whom home life is known to be particularly challenging or high risk due to instances of domestic abuse, substance misuse, parental mental ill health, high levels of neglect and pupils who are under assessment with Children's Social Care.
o   Children that the college believe who are vulnerable but who have not reached the threshold for intervention from Children Social Care including children and families that are assessing Early Help.

o   Children with learning difficulty, additional and/or who are disabled and/or have a specific or special

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need.

o   Children with behavioural and/or complex emotional needs.

o   Children at risk of becoming NEET (Not in education, employment or training) – including children with low attendance who are risk of dropping out or been withdrawn from college provision and/or at risk of exclusion. These include children who have an education history of non-engagement and/or are persistently absent from education, including persistent absences for part of the college day.

o   Those living in temporary accommodation and/or children who are estranged from family.

o   Those who are young carers (children who are carers for family members including parents/other adults and/or siblings).

o   Children and young adults who are care leavers.

o   Children with health, medical and mental health needs (medical illness, injury, psychological condition or disability).

o   Children who have an unspent criminal conviction or a record of re-offending.

In addition, Children with the following vulnerabilities are defined as per the Keeping Children Safe in Education guidance and should be identified to Safeguarding:

o   Children who are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

o   Children who are frequently missing/goes missing from care or from home;

o   Children at risk of modern slavery, trafficking, sexual or criminal exploitation;

o   Children at risk of being radicalised or exploited;

o   Children with a family member in prison, or is affected by parental offending;

o   Children misusing drugs or alcohol themselves;

o   Children at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.

4.   How risk will be determined

Initial risk will be determined at the application and enrolment stages of the learner journey. To this end the College will work in partnership with the Local Authority, schools and other agencies.

Learner confidentiality is paramount. The college will ensure that information is only shared where it can be shown it is for the purpose of providing appropriate support and minimise the risk of underachievement or disengagement.

We will monitor the learners closely to ensure that the risk status of a learner is reviewed as the learner progresses through their programme. Learners not previously at risk may become so, either because they develop one of the characteristics that makes them vulnerable, or due to engagement issues such as poor

attendance, punctuality, behaviour or incomplete work.

5.   **How information about vulnerable students will be communicated and monitored**

Information that is relevant to support the learner during their studies is recorded on ProMonitor. The information on ProMonitor should be relevant to help learners succeed. Information should be added to ProMonitor throughout the learner journey by staff who work closely with them.

Highly sensitive information, e.g. information relating to a safeguarding issue, will be held in an electronic form on CPOMS and which is accessed only by a small number of relevant staff and based on a need to know basis. Details of this arrangement will be available from safeguarding staff.

Teaching staff and Progress Coaches are responsible for monitoring attendance and performance of their learners and will share information about progress with relevant support staff including Wellbeing and ALS.

The Strategic Leadership Team will be responsible for monitoring and taking appropriate management action at strategic level.

6.   **Monitoring progress**

ProMonitor enables the ongoing monitoring of learners' progress. It provides an overview of learner attendance and current performance including timely completion of work, target grade achievement and progress.

The College will act to deal with learners falling below the expected progress and put support and other interventions in place.

APPENDIX 16

SAFEGUARDING TEAM

Designated Safeguarding Lead

Ben Stokes, Vice Principal: ben.stokes@sparsholt.ac.uk / 01264 3600001 / 07872423675

Sparsholt Campus Deputy Designated Safeguarding Leads

Kymmy Lewis, Head of Wellbeing Sparsholt kymmy.lewis@sparsholtservices.ac.uk / 01962 797579

Residential Support Manager - 01962 797285

Andover Campus Deputy Designated Safeguarding Lead

Corrina Simmonds, Head of Wellbeing Andover corrina.simmonds@sparsholtservices.ac.uk / 01264 360032

Cross College Deputy Designated Safeguarding Lead

Liz Wilson, Director of Student Experience & Inclusion liz.wilson@sparsholt.ac.uk / 01962 797403

In the first instance please refer all disclosures/concerns to the Campus Leads.

If the concern is regarding a member of staff, please pass to Ben Stokes (Vice Principal & DSL) or Julie Milburn (Principal).

APPENDIX 17

Lone Working with Learners

Whilst lone working with learners is generally discouraged, there are times where it may be necessary. This is largely attributable to the College's foundation provision where staff members provide one-to-one support to learners with learning difficulties. For example, they may support the learner to attend an offsite gym focused on their physical therapy or support them to access a work placement. Where this is the case, the Assistant Principal will provide confirmation and approval to do so whilst adhering to the steps outlined below to ensure staff safeguard themselves and their learners.

What is classified as lone working?

In the context of this section, lone working with learners is defined as someone who is 'alone' with a learner offsite. Providing one-to-one tuition at the end of a lesson or in a study centre onsite is not deemed to fall under this process as it is covered elsewhere in the Safeguarding Learners Policy to ensure a safe and supportive environment.

What are the risks of lone working?

Lone working with learners is not necessarily dangerous but potential risks do stem from a lack of communication and supervision or the inability to access immediate help from colleagues. Situations that could pose risks and should be considered, but not limited to, are:

- Aggression from learners
- Injury, sickness or medical condition
- Nature of the tasks involved
- Poor accessibility or communication

Things to consider before lone working

Prior to the commencement of any lone working, the Assistant Principal will consider a number of key factors:

- If there is an alternative to the proposed arrangement
- If consent has been obtained from parents/guardians (and other relevant agencies, if applicable)
- Whether there is a requirement for additional training, such as the administration of medicine
- Timetabling implications
- Transport to and from the offsite placement
- Accessibility and communication when staff are offsite.

Once these factors have been considered, the Assistant Principal will produce a risk assessment that will be dynamic in nature so that it responds to the needs of those involved. The risk assessment must include strategies to ensure the member of staff maintains their own safety and that of the learner, including how to respond to a potential medical situation, how to stay in contact with colleagues at the college, and how to respond to any specific needs of the learner offsite. Where necessary, the risk assessment may be completed with the assistance of the Health & Safety Officer. Only on completion of this process can lone working commence.