

# Safeguarding and Child Protection Policy 2021 –2022



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*This policy should be used in conjunction with Kirklees College Safeguarding and Child Protection Guidance document.*

## 1. Introduction

Kirklees College recognises that young people and vulnerable adults have a fundamental right to be protected from harm and exploitation and that students cannot learn effectively unless they feel and are safe.

The College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering them support and protection, and accepts that it has a legal and moral responsibility to implement procedures, to provide a duty of care to young people, to safeguard their wellbeing and to protect them from abuse.

This Policy therefore supports all students enrolled at the College.

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and young people.

In accordance with the Counter-Terrorism and Security Act 2015, there is a statutory duty on colleges to “have due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent duty. To fulfil this duty, Kirklees College liaises closely with the local area prevent lead to receive updates regarding local concerns and to refer students of concern to the Channel process.

This Policy represents Kirklees College’s response to the need to protect all students, especially children, young people and vulnerable adults and those with identified needs at all College centres and in the workplace.

Everyone working in, or for, Kirklees College shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for children and young people to learn and develop in our College setting, and
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our College setting

This Safeguarding and Child Protection Policy will be reviewed by the Designated Safeguarding Lead on a regular basis to ensure it remains current and incorporates all revisions made to local or national safeguarding guidance. This policy will be fully reviewed annually and presented to the Governing Body for approval and sign off at the first Autumn term meeting of the Safeguarding Committee. The Governing body receives a Safeguarding Annual Report from the Designated Safeguarding Lead, which reviews safeguarding data and how the safeguarding duties have been discharged.

The Policy will enable Kirklees College to deliver actions and services with procedures which are in accord with:

- ☐ Working Together to Safeguard Children February 2019
- ☐ Keeping Children Safe in Education September 2021
- ☐ Guidance for Safer Working Practice in Education Settings April 2020
- ☐ Prevent Duty Guidance for Further Education Institutions April 2019
- ☐ West Yorkshire Consortium Safeguarding Children Procedures (see link from Kirklees Safeguarding Children Partnership [www.kirkleessafeguardingchildren.co.uk](http://www.kirkleessafeguardingchildren.co.uk) <https://westyorkscb.proceduresonline.com/contents.htm>)
- No Secrets’, the Children Act (1989 and 2004)

- ☐ Education Act 2002
- ☐ Safeguarding Vulnerable Adults Act 2006
- ☐ Protection of Freedoms Act 2012
- ☐ Section 26 (1) of the Counter Terrorism and Security Act 2015
- ☐ Prevent Duty Guidance for Further Education Institutions 2015
- ☐ Mandatory Reporting of Female Genital Mutilation - Procedural Information 2020
- ☐ Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015
- ☐ Inspecting Safeguarding in Early Years, Education and Skills Settings Sept 2019

The Policy should be used in conjunction with the following where necessary:

- ☐ Kirklees College Safeguarding and Child Protection Guidance 2020/21
- ☐ Student Charter: Equality Guidance; Code of Behaviour; Bullying & Harassment Guidance
- ☐ Use the internet safely; Keeping Safe: A guide to safeguarding for students
- ☐ Positive Behaviour Policy
- ☐ Staff Disciplinary, Grievance and Dismissal Procedures
- ☐ Code of Conduct, Values and Behaviours
- ☐ Guidelines on Personal Relationships at Work
- ☐ Guidelines on Student Contact
- ☐ Social Networking Code of Practice
- ☐ Health and Safety Procedures
- ☐ Whistleblowing Procedures

## **2. Values and Behaviours**

British Values are of significant importance to everyone involved in any College activity. College values and British values form the basis of citizenship within our College community and across modern Britain.

We promote all these values to our students and staff and they are embedded across all areas of College activity, at the heart of everything we do.

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

The ethos of Kirklees College is embedded in the following values:

Inclusive  
Nurturing  
Supportive  
Pride  
Integrity  
Respect  
Excellence

### 3. Keeping Children Safe in Education September 2021

Safeguarding and promoting the welfare of children covers more than child protection. The requirements for the College are for policies and procedures that cover arrangements not just for meeting the welfare and safeguarding needs of children, but also the needs of adults at risk and young people, as well as ensuring appropriate practices for staff recruitment and selection and providing a safe and secure environment in which to study. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2020.

The content within this Safeguarding and Child Protection Policy reflects the statutory requirements within DfE Keeping Children Safe in Education September 2021. Safeguarding children in education is set out in two main pieces of statutory guidance, links to the statutory safeguarding guidance are available below.

HM Working Together to Safeguard Children, published 4<sup>th</sup> July 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

DfE Keeping Children Safe in Education 2021 (KCSiE) in force from 1st September 2021

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014057/KCSiE\\_2021\\_September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSiE_2021_September.pdf)

In September 2021 the revised *Keeping Children Safe In Education* came into force. The College has responded swiftly to the revised responsibilities and KC Safeguarding and Child protection Guidance includes reference to the new revisions.

The DfE KCSiE makes changes in three circumstances:

- The legislation to reflect the mandatory Relationship Education, Relationship and Sex Education and Health Education from September 2020.
- Included helpful additional information that will support schools and colleges protect children e.g. mental health, domestic abuse, child criminal and sexual exploitation and county lines.
- Important clarifications which will help schools, colleges and alternative education providers better understand the KCSiE 2021 guidance.

This table explains where key changes were made from KCSiE 2020 to KCSiE 2021:

Summary	About the guidance
What is the status of this guidance	Added - KCSiE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021 Removed link to now withdrawn interim Covid-19 guidance. Added link to departmental advice Sexual violence and sexual harassment between children in schools and colleges.

About this guidance  Who is this guidance for?	Added bullet to clarify that the guidance is also for senior leadership teams.  Added new paragraph to explain that there is a condensed Part one of this guidance at Annex A. We want to give governing bodies and proprietors the freedom to choose the condensed Part one where they think it will be appropriate for those staff not working directly with children.
<b>Part one</b>	<b>Safeguarding information for all staff</b>
Part one	A number of paragraphs have been moved in Part one to improve the flow of this section.
Paragraph 13	Made clear that child protection policies should also include procedures for dealing with peer on peer abuse.
Paragraph 18	New paragraph making clear that victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment
Paragraph 31	Updated to reflect the new UKCIS guidance on the sharing of nude and semi-nude images which has replaced their sexting advice.
Paragraphs 32-35  Paragraphs 36-39	New additional information added on Child Criminal Exploitation (CCE) which includes information on how children can be exploited and makes clear that the experiences of girls being criminally exploited can be very different to boys, indicators of CCE may also be different for girls.  New additional information added on Child Sexual Exploitation (CSE) which makes clear that CSE is a form of child sexual abuse and includes information on what it may involve.

Paragraph 44	Mental health - additional information on resources.
Paragraphs 46-50	Peer on peer (child on child) abuse – additional information added which highlights the importance of staff recognising the signs of peer on peer abuse and knowing how to respond to reports.
Paragraphs 51-52	Serious Violence - additional information on risk factors added
Paragraph 63	New paragraph which highlights the importance of social care assessments considering children being harmed outside the home on contextual safeguarding
Paragraphs 71-72	Record keeping – additional information added which makes clear what records should include

<b>Part two</b>	<b>The management of safeguarding</b>
Part two	A number of paragraphs have been moved in Part two to improve the flow of this section.
Paragraph 79	New paragraph relating to schools or colleges with charitable status
Paragraph 82 Paragraph 83	New section on 'Whole school and college approach to safeguarding' this make clear the importance of safeguarding. Strengthened systems that should be in place and how they should be more child centric.
Paragraph 85	Reference to peer on peer abuse and reporting systems and added information schools and colleges should include in their child protection policy.
Paragraph 105	Additional information added which makes clear about powers to hold and use information when promoting children's welfare
Paragraphs 117 and 118	New paragraphs added on the importance of online safety training for staff and the requirement to ensure children are taught about safeguarding, including online safety.
Paragraph 121	New information added on a one stop shop for teachers which includes teacher training modules on RSHE
Paragraphs 123 - 135	New section covering online safety, remote learning, filters and monitoring, information security, cyber crime, reviewing online safety provision and information and support.
Paragraph 141	Added reference to lower level concerns linked to section 2 of Part four.

Paragraph 143	New paragraph added on teacher dismissal and consideration whether to refer to the Secretary of State.
Paragraph 145	Further clarification on peer on peer abuse and makes clear there should be a zero tolerance approach to abuse
Paragraphs 155-156	New paragraphs that cover the use of school/college premises for non school/college activities.
Paragraphs 157-158	New paragraphs on alternative provision which makes clear that governing bodies and proprietors of these settings should be aware of the additional risk of harm that their pupils may be vulnerable to.
Paragraphs 165-168	New paragraphs to reflect elective home education.



Paragraphs 172-175	Additional information about DfE's programme to help schools with preventing and tackling bullying, mental health and behaviour in schools.
<b>Part three</b>	<b>Safer recruitment</b>
Part three	The whole of Part three has been substantively restructured to align it with the recruitment process- however legal duties have not changed.
Paragraph 212	Added information about the Education and Training (Welfare of Children) Act 2021 which extends safeguarding provisions to post 16 education.
Paragraph 213	Added information about the use of birth certificates (where available) to check an individual's identity.
Paragraph 229	Explanation about when separate barred list checks must be carried out.
Paragraph 237	Clarification about s128 checks.
Paragraph 242	Clarification on how to check prohibitions, directions, sanctions and restrictions, including children's barred list checks.
Paragraph 262	Clarification about overseas checks and what further checks could include.
<b>Part four</b>	<b>Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors</b>

Part four	<p>Following requests via the consultation for further information on low level concerns, we have separated Part four into two sections – Section one for allegations that may meet the threshold and Section Two for allegations/concerns that do not meet the threshold i.e. low level concerns.</p> <p>As such we have included in Section Two, information about concerns that do not meet the harm threshold. This includes what a low level concern is, making the link between low level concerns, staff code of conduct and safeguarding policies, and recording and sharing information with relevant parties including whether this information should be included in references.</p> <p>As of 29/07/2021 we have revised further to align new section with paragraph 74.</p>
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<b>Part five</b>	<b>Child on child sexual violence and sexual harassment</b>
Paragraphs 428-434	A reminder that staff should read this alongside the Sexual violence and sexual harassment advice. Making clear that it can happen inside or outside of school and online.
Paragraphs 435-436	New paragraphs highlighting the importance of acknowledging and understanding the scale of harassment and abuse
Paragraph 441	New paragraph which highlights the need to be aware that children might not tell staff about their abuse and that it maybe that staff overhear a conversation or the child's behaviour changes etc.
Paragraph 442	New information to highlight that how a school or college responds to an incident will impact future victims of sexual violence or sexual harassment.
Paragraph 450	Highlights a zero tolerance approach to sexual violence and sexual harassment
Paragraph 452	Clarification about regularly reviewing actions e.g. for patterns of inappropriate behaviour and bail considerations.
Paragraph 454-455	New section on unsubstantiated, unfounded, false or malicious reports which provides a reminder about recording concerns and what to do when a report is found to be unsubstantiated, unfounded, false or malicious.

Paragraph 456	A reminder to schools and colleges that sexual assault can result in a range of health needs and signposts to sources of support.
Paragraph 464	Further information about harmful sexual behaviour and signposting to sources of support.
<b>Annex A</b>	<b>Safeguarding information for school and college staff</b>
	A new condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.
<b>Annex B</b>	<b>Further information</b>
Child criminal exploitation and child sexual exploitation	Further information to clarify these types of abuse.

Modern slavery and the National Referral Mechanism	Additional information provided.
County lines	Additional information.
Cybercrime	New paragraphs added.
Domestic Abuse	Updated to reflect Domestic Abuse Act 2021 which will introduce the statutory definition of DA and recognises children as victims of DA in their own right.
Peer on Peer abuse	Additional information added.
Preventing radicalisation	Additional information provided on what terrorism looks like and more information on Channel.
<b>Annex C</b>	<b>Designated Safeguarding Lead (DSL)</b>
Information sharing and child protection file	Information added about keeping and storing records, where a concern about a child has been identified. Removed bullet points that were duplicated.
<b>Annex D</b>	<b>Online Safety</b>
	Added and updated links to further guidance.

KCSiE 2021 sets out what colleges should and must do to safeguard children. The guidance in KCSiE 2021 has been further strengthened to make clear the roles and responsibilities of all staff but particularly those with Designated Safeguarding Lead (DSL) responsibilities and Governing bodies.

The Designated Safeguarding Lead has a responsibility to ensure members of the Senior Leadership Team, staff and governors read and understand the content of DfE KCSiE 2021, and ensure the college's safeguarding arrangements are compliant with all statutory requirements.

It reinforces that all staff must read and understand KCSiE 2021 Part One Annex A, which contains important additional information about specific forms of abuse and safeguarding issues, and be conversant with Part Five Child on Child Sexual Violence and Sexual Harassment.

*DfE KCSiE Part Two: The Management of Safeguarding : Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.*

*These policies should include individual schools and colleges having an effective child protection policy which reflects the whole school/college approach to peer on peer abuse (see para 145); reflects reporting systems as set out at paragraph 83; describe procedures which are in accordance with government guidance; refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners; includes policies as reflected elsewhere in Part two of this guidance, such as online safety (see paragraph 126), and special educational needs and disabilities (SEND) (see paragraphs 185-187); where appropriate, reflects serious violence. Further advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance; is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and is available publicly either via the school or college website or by other means.*

*(KCSiE 2021 paragraphs 84 and 85).*

#### **4. Policy Statement**

Kirklees College is led by a Senior Leadership Team and a Governing Body whose aims are to provide a safe environment and vigilant culture where our students can learn and be safeguarded.

The development and implementation of the Policy is overseen by the Safeguarding Working Group, which has representatives from staff and governors.

There is a training and development plan covering the whole College community.

The College has undertaken a full Prevent Duty risk assessment against the Prevent Duty responsibilities.

A Section 175 Safeguarding Audit is undertaken annually and reported to the Local Authority.

The Policy provides clear direction to all members of the College community to ensure any child protection concerns, referrals and monitoring of actions are handled appropriately.

Further Education Colleges do not have a responsibility to investigate incidents of alleged abuse. However, they do have a statutory duty to assist the local authority with child protection issues and this policy is in line with current national and local policies on the protection of children, young people and vulnerable adults.

Accordingly, all staff will receive a copy of this Policy and Section 1 of 'Keeping Children Safe in Education' 2021.

Safeguarding and promoting the welfare of children means:

- ☐ 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

Safeguarding is not just about protecting children and young people from deliberate harm. It also relates to the broader aspects of care and education including:

- Student's health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of students with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of students with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.
- Appropriate arrangements to ensure college security, taking into account the local context.
- Keeping students safe from risks, harm and exploitation: KCSIE 2021 Annex A.

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse and emotional abuse.
- Contextualised abuse.
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
- Peer on Peer abuse.
- Racist, disability- based, homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation, human trafficking, modern slavery or exploitation.
- The impact of new technologies, including 'sexting' and accessing pornography.
- Child on Child Sexual Violence and Sexual Harassment (defined in KCSiE 2021 Part Five pages 99 to 117).
- Issues which may be specific to a local area or population, for example gang activity, knife crime, youth violence, criminal child exploitation (CCE) and County Lines.
- Family circumstances which present challenges for the student, such as drug and alcohol misuse, adult mental health issues.
- Risk of or from serious violence and violent crime (KCSiE 2021 paragraphs 51 and 52).
- Particular issues affecting students including domestic abuse and violence, female genital mutilation and honour-based abuse and forced marriage.  
<https://www.gov.uk/government/consultations/domestic-abuse-act-statutory-guidance/domestic-abuse-draft-statutory-guidance-framework>
- 'Upskirting'- The Voyeurism (Offences) Act, which is commonly known as Upskirting Act, came into force on 12<sup>th</sup> April 2019. Upskirting is a criminal offence and reportable by all staff (KCSiE 2021, Annex B page 139)

As a general principle, the College has a statutory responsibility to:

- ☐ At all times, and by all means, seek to create a safe environment for the entire college community. This includes using appropriate filters and monitoring systems (E Safe) to ensure maximum levels of online safety.
- ☐ Operate the policy to specifically encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable.
- Acknowledge that abuse may take many forms, for example; physical, sexual, financial and material, emotional, neglect, 'Missing', sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others.
- ☐ Comply with statutory safeguarding legislation including the Prevent Duty.
- Work with external agencies, in particular, the Local Children's Safeguarding Partnership and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken.
- Comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Independent Safeguarding Authority and 'Keeping Children Safe in Education' Sept 2021.
- ☐ Ensure that any safeguarding concern is swiftly referred as appropriate, non emergency referrals to be communicated to partner agencies within one working day of disclosure.
- Comply with 'safer recruitment' procedures and undertake Disclosure and Barring Checks, to ensure that all employees and workers under terms of engagement are suitable to work at the College.
- ☐ Develop and implement procedures for identifying, reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service.
- ☐ Ensure employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to students in the workplace.
- ☐ Educate and support students in staying safe and being healthy including study programme learners, apprentices and work based students.
- ☐ Ensure that any child, young person or individual with additional needs going missing either from education, home or care home, particularly if repeated, is reported to the appropriate authority. All relevant staff are asked to complete registers and follow up unauthorised absences following the relevant College Attendance Strategy, policy and procedure.
- Students who are absent, abscond or go missing during the college day can be vulnerable and at potential risk. Staff will follow the college's procedures for dealing with learners who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future.
- ☐ Consult with students in developing safeguarding policies and procedures.
- ☐ Encourage an atmosphere in which students find trained staff approachable to enable communication of any problems which may be affecting their lives.
- ☐ Provide opportunities for children in need of additional support to identify themselves through the process of applications and enrolment. Students with identified support needs will be monitored through Learning Support.
- ☐ Provide appropriate mandatory training and development in accordance with the requirements of the Staff Development programme and induction, raising awareness of all staff and governors of the need to safeguard children, young people and

vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse.

- Provide environments where everyone feels valued, safe and respected where
- individuals are encouraged to talk and are listened to. This will be achieved by the regular promotion of the College values and embedding these together with British values across every area of College activity.

## **5. Scope**

This Policy applies to all those working in, studying and visiting any College site including students, the College workforce, Governors, volunteers and visitors to the College including contracted services such as agency staff, employers offering work placements, transportation companies and contractors with direct access to children, young people and vulnerable adults.

A 'child' is defined as a person aged up to 18.

A 'Young Person' is defined as between 12 and 20.

'Looked After Children', 'Care Leavers' and students with special educational needs up to age 25 may also need additional services, assistance, protection and consideration.

An adult at risk is a person aged 18 years or over 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 is unable to protect him or herself against significant harm or exploitation. It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities, special educational needs, addiction, or who have suffered abuse or trauma.

Kirklees College also recognizes the particular vulnerabilities which may be present within certain cohorts including Estranged (not living with or supported by immediate family), Adopted, CCE (Child Criminal Exploitation), Gang Affiliated, Homeless, Peer Abuse and CSE (Child Sexual Exploitation), Young Parents, Young Carers and Unaccompanied Asylum Seekers.

Students aged 14-16 whose main education provider is a school are covered by all aspects of the Policy when at the College.

In accordance with agreed partnership protocols, there is a separate procedure for Child Protection referrals as schools retain accountability for external referrals.

Should there be an emergency and the College is unable to contact the appropriate school, the College will apply its referral procedures to the situation to ensure a child is safe.

Where an allegation or concern is raised regarding a child in a nursery or crèche funded by DLSF or Care2Learn or a student's child who is funded through any hardship funds to attend an external Ofsted registered provider, the provider staff will be expected to follow their own organisational procedures.

Employers and training organisations will be asked to co-operate with the College in putting in place and subscribing to appropriate safeguards.

Where a placement is long term the college will ensure that additional safeguards are in place, these may include staff who will have had training in child protection and completing risk assessments and arranging placements.

Training organisations will be asked to make a commitment to safeguarding students' welfare by endorsing an agreed statement of principles.

Any person whose normal duties include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically designated to have responsibility for such activities will be subjected to vetting and DBS checking.

Providers will be monitored annually for compliance with process and must report any incidents to the college for any subcontracted provision.

## 6. Intent

The intent of the Safeguarding and Child Protection Policy is to ensure that:

- A safe environment is provided for students at all times in which students can learn and develop.
- Students who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken. This includes the risk of radicalisation as noted in the Prevent duty.
- We practice safe recruitment in checking the suitability of staff and volunteers to work with our students.
- Staff are made aware of issues relating to the welfare of students (more detail of specific safeguarding issues is included in the College Safeguarding and Child Protection Guidance)
- Students who have been abused or harmed are supported in accordance with their Child in Need or Child Protection Plan.
- Students are equipped with the skills they need to keep themselves safe including offering learning opportunities through an *RSHE* curriculum so that they can:
  - Recognise and manage risks including online, sexual exploitation, sexting and running away, as well as radicalisation.
  - Develop healthy relationships and awareness of domestic violence, and abuse which is linked to 'honour' such as female genital mutilation and forced marriage, bullying and peer on peer abuse.
  - Recognise how peer pressure can affect their behaviour.
  - Know that in college we will act swiftly to address any concerns related to serious violence, gang and knife crime or child on child sexual violence or sexual harassment incidents.
- College staff work in partnership with external local agencies, safeguarding partners, parents and carers in the 'best interest of the child'.

## 7. To comply with safeguarding legislation, Kirklees College will ensure that:

- ☐ There is a Designated Safeguarding Lead (DSL), who is a member of the college leadership team, and a minimum of one Deputy Safeguarding Lead for child protection/safeguarding who has received appropriate training and support for this role.
- ☐ The Designated Safeguarding Lead role is written into their job description and clarifies the role and responsibilities included (as defined in KCSiE 2021 Annex C).
- ☐ There is a nominated governor responsible for child protection/safeguarding.
- There is a 'Designated Teacher' for Looked After Children (LAC).
- ☐ Every member of staff (including temporary, supply staff and volunteers) and the governing body knows who the Designated Safeguarding Lead is, their deputies responsible for child protection, and their role.
- All staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead, Deputy Designated Safeguarding Leads or Safeguarding Officers, or to children's social care / police if a student is in immediate danger.
- ☐ All staff and volunteers are aware of the early help process and understand their role in making referrals or contributing to early help offers and arrangements.



- ☐ There is a whistleblowing policy and culture where staff can raise concerns about unsafe practice, and that these concerns will be taken seriously.
- ☐ There is a clear and promoted complaints system in place for students, carers, families and other stakeholders.
- Parents, carers and stakeholders have an understanding of the responsibility placed on the college and staff for child protection and safeguarding by setting out its obligations in the college prospectus and on the college's website.
- Relevant agencies are notified by prior agreement for unexplained absence for a student who is subject to a Child in Need or Child Protection Plan or at risk of 'missing in education' and where no contact can be established with the student, parent, carer or appropriate adult linked to the student.
- ☐ Effective and robust partnership links are developed with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at Child Protection Conferences and Child in Need meetings.
- ☐ Student concerns are documented to support early identification, referral and actions to safeguard.
- All records are kept securely using the college's online secure system CPOMs.
- ☐ The college procedures are followed where an allegation is made against a member of staff or volunteer.
- ☐ Safer recruitment practices are always followed.
- ☐ Confidentiality is consistently applied appropriately.

## **8. Supporting Students**

We recognise that students who are abused or who witness violence may find it difficult to develop a positive sense of self-worth; they may feel anger, distress, fear, helplessness, humiliation and some sense of blame. Life experiences may impact on the mental health of a student including experiencing serious trauma.

The college may be the only stable, secure and predictable element in the lives of students who are at risk. At college their behaviour may be challenging and defiant or they may be withdrawn. We also recognise that some students are more vulnerable than others, which include students with special educational needs and or disabilities.

Our college will support our students by:

- ☐ Developing the content of the curriculum and pastoral support to cover safeguarding issues including online bullying, sexting, child sexual exploitation (CSE), child criminal exploitation (CCE), gangs, youth generated images, female genital mutilation (FGM), preventing radicalisation, peer on peer abuse and anti-bullying.
- ☐ Maintaining a College ethos which promotes a positive, supportive and secure environment, and which gives students a sense of being valued.
- ☐ Maintaining an effective Positive Behaviour Policy with restorative practice at its centre.
- ☐ Proactively ensuring that all students know the college code of conduct and expectations of behaviour, and that as members of our college community they are valued and will be supported to develop personal and social skills including positive behaviour and attitudes.
- Taking all appropriate actions to address concerns about the welfare of a student, working to local policies and procedures in full working partnership with agencies including Kirklees Safeguarding Children's Partnership.
- ☐ Promoting student health and safety.
- ☐ Conducting a rigorous criminal convictions risk assessment process where applicants assessed as low or medium risk receive appropriate support to fully engage with their studies.

- ❑ Ensuring that procedures are in place to deal with allegations against teachers and other staff including volunteers (KCSiE 2021 Part Four Pages 56 to 68).
- ❑ Providing first aid where and when necessary and meet the health needs of students with medical conditions.
- ❑ Ensuring effective college campus security across all sites.
- ❑ Working with all relevant agencies regarding missing in education, anti-social behaviour / gang activity and violence in the community / knife crime and children at risk of sexual and or criminal exploitation.
- ❑ Safeguarding incidents and/or behaviours can be associated with factors outside the college and can occur between young people outside the college. All staff, but especially the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will consider the context within which such incidents and behaviours occur. This is known as Contextual Safeguarding, which means giving consideration to wider environmental factors which may be a threat to safety and welfare.

## **9. Safer Recruitment and Selection (please download guidance on DBS, Vetting and Barring)**

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

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

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

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

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

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

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

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

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

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

## **10. Safe Practice**

Kirklees College will comply with the current Safe Practice guidance to be found in Kirklees Safeguarding Procedures at [www.kirkleessafeguardingchildren.co.uk](http://www.kirkleessafeguardingchildren.co.uk)

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

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

College staff having concerns about another member of staff:

- should report these concerns to an appropriate colleague e.g. Director of HR, Assistant Principal Student Experience.
- where staff members have concerns about the Principal, these will be reported to the Chair of Governors.
- where staff members have concerns about the Chair of Governors, these will be reported to the Principal and the Local Authority Designated Officer (LADO)

College staff having concerns about safeguarding practices:

- all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding processes and that such concerns will be taken seriously by the senior leadership team (SLT).
- appropriate whistleblowing procedures must be in place within the College and can be read in further detail by accessing the College whistleblowing policy.
- where a staff member feels unable to raise in issue with the senior leadership team or that their genuine concerns are not being addressed, other whistleblowing channels may be open to them by accessing [www.gov.uk/whistleblowing/who-to-tell-what-to-expect](http://www.gov.uk/whistleblowing/who-to-tell-what-to-expect), the whistleblowing charity [Protect](http://Protect) or [www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line](http://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line)
- ESFA has included safeguarding clauses in the funding agreements and contracts from 2017. Whilst the local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting her general duty, that the right organisations are taking action to keep all pupils and students safe. For this reason, we want to be made aware when an institution is itself the subject of an investigation by the local authority or the police. We do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, we require the Chair or Chief Executive of the institution (or senior

designated safeguarding lead) to email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk). ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police.

## **11. Safeguarding Information for students**

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

All students will know that we have a Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSLs) and Safeguarding Support Officers (SSOs) with responsibility for child protection.

All students at Kirklees College are aware of a number of staff who they can talk to if they have any concerns, including the Progress Coach team who are safeguarding trained.

The College's tutorial programme (PAD), delivered by Progress Coaches, strongly promotes key messages relating to all aspects of safeguarding during induction and throughout the academic year.

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

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

## **12. College Training and Staff Induction**

The College's Designated Safeguarding Lead (DSL) and Deputy Safeguarding Leads, with responsibility for child protection, undertake appropriate child safeguarding training and inter-agency working training (provided by the Kirklees Safeguarding Children Partnership).

The DSL and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

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

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

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

All new staff (including temporary staff and volunteers) will be made aware of safeguarding processes and systems within Kirklees College; these are explained to them as a mandatory part of staff induction including: the college Safeguarding and Child Protection Policy; the Employee Code of Conduct and the role of the Designated Safeguarding Lead, Deputy

Designated Safeguarding Leads, Safeguarding Officers and the responsibility to read Keeping Children Safe in Education 2021 Part 1.

All college staff receive safeguarding and child protection training which is updated every three years. In addition to this training all staff members receive child protection and safeguarding updates when required, but at least annually.

All college staff know what to do if a student is raising concerns or makes a disclosure of abuse and / or neglect. Staff will maintain a level of confidentiality whilst liaising with the Designated Safeguarding Lead and / or the core safeguarding team. Our staff will never promise a student that they will not tell anyone about a disclosure or allegation, recognising this may not be in the best interest of the student.

### **13. Confidentiality and Information Sharing**

The College has due regard to GDPR and “Information sharing: advice for practitioners providing safeguarding services” HM Government, 2018

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

*“In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.”*

Keeping detailed and comprehensive records is fundamental to good safeguarding practice. The law does not prevent information about children being shared with specific authorities if it is for the purposes of safeguarding.

GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information can be shared without consent if to gain consent would place a child at risk.

In complying with GDPR in the processing of data, the College acknowledges Schedule 1, 8,1:

‘This condition is met if the processing

- a) Is necessary for the purposes of the prevention or detection of an unlawful act
- b) B) must be carried out without the consent of the data subject so as not to prejudice those purposes’

And 11,1:

‘This condition is met if the processing

- a) Is necessary for the purposes of preventing fraud or a particular kind of fraud’

And 12:

‘This condition is met if the processing is necessary for the purposes of making a disclosure in good faith under

- a) Section 21CA of the Terrorism Act 2000
- b) Section 339ZB of the Proceeds of Crime Act 2002’

And 13, 1:

‘This condition is met if the processing

- a) Is necessary for the provision of confidential counselling, advice or support or of another similar service provided confidentially’

Schedule 1 Part 3 Additional Conditions Relating To Criminal Convictions

27:

‘This condition is met if the process is carried out

- a) In the course of its legitimate activities with appropriate safeguards by a not for profit body’

Where detailed information may form an important part of safeguarding an individual, information may be retained until the person reaches the age of 25.

Other information recorded during the course of study but not required for longer term safeguarding will be deleted one year after the person leaves college.

The College has due regard to "Information Sharing: Practitioner's guide" HM Government, 2015

[www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice](http://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)

*"Where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration".*

The College has a clear and explicit confidentiality policy.

The College policy indicates:

- When information must be shared with Police and Kirklees Multi-Agency Safeguarding Hub (MASH) where a young person is / may be at risk of significant harm.
- When the young person's and/or parent's confidentiality must not be breached
- That information is shared on a need to know basis

Once a disclosure and referral have been made, information is assessed for indications that the person is at risk of harm from others or to themselves.

Information will be shared with the DSL (or Safeguarding Team) and/or other agencies/professionals who are able to take protective action

All information regarding child protection issues will be kept in secure electronic files.

The College is obliged to work and share information with external agencies charged with the protection of children and young people. This includes Social Services, the police, local schools, LADO, the Multi Agency Safeguarding Hub (MASH), based on the 'need to know' principle.

The College commits to share information with MASH and allows access to students on-site if required.

The College works closely with the area Prevent team and through them refers to the Channel process when necessary.

The College has developed systems to ensure effective communication between local agencies.

Note: 'confidentiality' is often misunderstood. An over emphasis on confidentiality can leave young people or vulnerable adults in danger of harm. If something is confidential, this does not mean that it cannot be shared. GDPR should be no barrier to information sharing about a person in need, as long as appropriate protocol is followed.

However, it is important to:

- Share only what it is necessary to share to protect a young person or a vulnerable adult
- Record what is shared, and with whom
- Record reasons for sharing

For further information refer to: *Information sharing: advice for practitioners providing safeguarding services.*

Inform the individual making the disclosure that information they provide will be shared, why and with whom.

#### **14. Student Contact Details**

Kirklees College will endeavour to keep up to date and accurate information in order to keep students safe regarding:

- names and contact details of persons with whom the student normally lives
- names and contact details of all persons with parental responsibility (if different from above)
- emergency contact details (if different from above) Note that two emergency contacts are required.

- any relevant court orders in place including those which affect any person's access to
- the young person (e.g. Children and Families Court Order, Injunctions etc.)
- if the young person is or has been subject to a Child Protection or Child In Need Plan
- any other factors which may impact on the safety and welfare of the child

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

## 15. Roles and Responsibilities

**The Chair of Corporation** has responsibility for allegations if the allegation is against the Principal. Their initial role would be to gather witness statements. There would need to be an internal investigation, pending the content, with the Designated Governor responsible for Safeguarding co-ordinating the process.

### **The Governing Body:**

There is a designated governor for safeguarding. It is their responsibility to liaise with the local authority and/or partner agencies on issues of child protection and where allegations of abuse are made against The Principal. He/she will notify the ESFA where the College, or one of its subcontractors, is subject to a safeguarding investigation by the police or the local authority. The Governing Body must consider and approve the College's Safeguarding Policy and annually review its implementation. The designated Governor is responsible for liaising with the Principal and Designated Safeguarding Lead over matters regarding safeguarding, including:

- Governing bodies must ensure that they comply with their duties under legislation. They must have regard to the Keeping Children Safe in Education guidance, ensuring that policies, procedures and training in their colleges are effective and comply with the law at all times.
- Governing bodies should have a senior board level lead to take leadership responsibility for their college's safeguarding arrangements and that this is explicit in their Job Description.
- Governing bodies should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote student's welfare.
- Governing bodies should ensure that all staff in their college read at least Part One of the Keeping Children Safe In Education guidance.
- Governing bodies should ensure that all relevant staff members undergo child protection training which is updated regularly, in line with Kirklees Children's Safeguarding Partnership guidance.

The Governors have an established Safeguarding Committee which meets on a termly basis to receive reports and updates on legal responsibilities and ensure that the Local Authority procedures are being followed appropriately.

The Governing Body is responsible for determining whether any safeguarding incident that results in or risks significant harm to learners and/or other people who come into contact with the College through its work should be reported to the College's charity regulator as a significant incident.

The Governing Body does not:

- Have a role in dealing with individual cases
- Have a right to know the details of individual cases (unless it is in relation to an allegation against the Principal).

**The Designated Safeguarding Lead:**

(DSL: Assistant Principal Student Experience) There is a senior lead on safeguarding within the College. It is their responsibility to ensure standardisation and parity between areas of safeguarding practice and policy. This member will report at least annually to the Corporation regarding the appropriate policies and procedures and will provide a statistical analysis of safeguarding incidents and all training and related CPD undertaken.

The DSL will also provide advice and support to staff on child welfare and child protection matters, take part in strategy discussions and inter agency meetings and ensure strategies and policies are agreed, implemented and effectively delivered. The DSL will refer to LADO as appropriate.

**The Deputy Designated Safeguarding Leads:**

(DDSLs) will ensure that procedures are followed across the College and that referrals are made to Social Services and other external agencies in accordance with Local Authority procedures.

**Designated Teacher for Looked After Children:**

The Children and Social Work Act of 2017, places responsibilities for 'designated teachers' to have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

A member of staff will be identified who has responsibility for promoting the educational achievement of children who are looked after and / or are leaving care. They will have the appropriate training to carry out this role effectively and will work with the Virtual School to ensure that the progress of each student is supported. We also recognise those students who were previously Looked After potentially remain vulnerable and all staff will be informed of the importance of maintaining support for them through their time in college. PEP meetings with the Virtual School for all LAC students will be attended and progress / concerns discussed and logged.

**Curriculum Area Managers:**

are responsible for ensuring learners are taught about safeguarding, including e learning and Prevent, through teaching and learning opportunities in the curriculum.

**The Curriculum Area Manager for Alternative Pathways:**

has responsibility for students aged 14-16 in safeguarding matters.

**The Progress Coach Teams:**

act as a central point of contact for all students and staff in relation to immediate referral of low level or non complex safeguarding issues. These staff, whose role is to initiate appropriate and timely referrals, disseminate key information, promote initiatives throughout College and raise student awareness of the key aspects of safeguarding and welfare.

**The Staff Development and Organisational Development Manager:**

is responsible for arranging induction safeguarding training for all new staff and ensuring opportunities exist for refresher training on a 3 year cycle. Prevent refreshers will also be based on a 3 year cycle with appropriate updates as and when necessary.

**The Human Resources Team:**

is responsible for the safe recruitment and employment of staff, DBS and barred list checks, central record and staff safeguarding training ensuring all recruitment checks are completed and the Single Central Record (SCR) is maintained.

**The Head of Student Recruitment and Applications:**

is the first point of contact in relation to learner criminal convictions and disclosures. Referrals will be made to Assistant Principal Student Experience / DDSLs.

**The Head of Security and Head of Health & Safety:**

are the designated persons for estates, facilities and security in relation to safeguarding, providing suitable systems to ensure the safety of visitors and all who visit a College centre,



ensuring all risks are adequately controlled and regularly reviewed, as necessary including the use of contractors. Centre risk assessments will be annually updated and promoted.

**The Curriculum Assistant Principals:**

are responsible for ensuring learners are taught about safeguarding, including e learning, tutorials and through teaching and learning opportunities.

**All College staff:**

All staff have a key role to play in identifying concerns and provide early help for students.

To achieve this, they will:

- Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to.
- Ensure students know that there are staff in college who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for students to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend appropriate training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a student is being abused or is at risk of harm.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out in this policy and take account of guidance issued by the DfE KCSiE 2021 Part 1.
- Notify the DSL or their Deputy of any student on a Child Protection Plan or Child in Need Plan who has unexplained absence.
- Have an understanding of early help and be prepared to identify and support students who may benefit from early help.
- Have a responsibility to report safeguarding issues to the Designated Safeguarding Lead, Deputy Designated Safeguarding Leads, Safeguarding Support Officers or Progress Coaches.
- All new staff will undertake a Corporate Induction day to ensure they are fully appraised of current safeguarding policy and procedures.
- All College staff will undertake an appropriate level of training to raise awareness and highlight key issues. This training will take place as a minimum every 3 years via briefings and e-learning packages.

**The Head of IT Services:**

has responsibility for implementing processes to ensure effective internet monitoring and clear rules and regulations for staff and students, for On Line Safety in general and is responsible for updating acceptable use and other relevant policies regarding College use of IT.

# Safeguarding & Child Protection during COVID-19

1. Context
2. Vulnerable students and Contact Plans
3. Reporting a concern
4. Safer Recruitment
5. Safeguarding Training and Induction
6. Peer on peer abuse
7. Online safety
8. Mental Health
9. Parents and carers
10. Key Contacts

## 1. Context

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19 and this has implications for our current Safeguarding Policy and arrangements.

This Addendum to our Safeguarding Policy sets out some of the adjustments Kirklees College is making in line with the changed arrangements in the college and following advice from government and local agencies.

<https://www.kirkleessafeguardingchildren.co.uk/home/coronavirus-covid-19/>

Despite the changes, the College's Safeguarding Policy is fundamentally the same: the welfare of children and young people always comes first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access online resources). Staff may be aware of the mental health of both students and their parents or carers, and should refer to safeguarding about any emerging concerns.

## 2. Vulnerable students and Contact Plans

Vulnerable students include those who have an allocated social worker and those children and young people with education, health and care plans (EHCPs).

Those who have a social worker include students who have a Child Protection Plan and

those who are looked after by the Local Authority. A student may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989. Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Kirklees College will continue to work with and support students' social workers to help protect vulnerable students.

We have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker and those with an EHCP.

**For students subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker:** contact will be made by the safeguarding team twice weekly with these students in agreement with the family and social worker. Where families have requested this to be once per week, this has been discussed and agreed with the allocated social worker.

**For students who are Looked after Children and recent Care Leavers:** contact will be made by the LAC Support Team who will call daily, weekly or twice weekly as agreed with the student, carer and social worker.

**For students with an EHCP:** Support Workers and Learning Support Advisors will maintain regular contact as agreed with students and parents / carers. Support can be delivered through individual arrangements based on curriculum activity.

**For students on the edge of social care involvement or pending allocation of a social worker, or identified as high risk:** contact will be made by the safeguarding team once per week for a welfare check. The Progress Coach team will also be contacting students to ensure the necessary level of support is offered.

NB: Where necessary, contact will be made remotely through telephone calls/Skype or other appropriate methods.

### **3. Reporting a concern**

***Staff should continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not.***

COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Staff will continue to log confidential comments using our college system, CPOMs. If access to CPOMs to log confidential comments isn't possible, staff will email concerns to [safeguarding@kirkleescollege.ac.uk](mailto:safeguarding@kirkleescollege.ac.uk) where a member of the safeguarding team will respond to the concern and log on to CPOMs. This email address is monitored by all safeguarding staff.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team (listed below) who will follow appropriate measures in seeking the appropriate and necessary support. Out of hours guidance can be found in the Safeguarding Guidance 2019-20 and also here:

<https://www.kirkleessafeguardingchildren.co.uk/procedures-local-protocols-and-guidance/>

Should a child or young person be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure, available here:  
<https://www.kirkleessafeguardingchildren.co.uk/procedures-local-protocols-and-guidance/>

#### **4. Safer Recruitment**

All new starters must have either a face to face or an on-line induction. They must read the college Safeguarding and Child Protection Policy, the Positive Behaviour Policy, the Whistleblowing Policy and the staff Code of Conduct. The Designated Safeguarding Lead or Deputy will ensure new recruits know who to contact if worried about a child or young person and ensure the new starters are familiar with the child protection procedure. All new starters or volunteers need to confirm that they have read Part I and Annex A of Keeping Children Safe in Education.

It remains essential that unsuitable people are not allowed to enter the young people and children's workforce or gain access to children. If we recruit new staff, we will continue to follow the relevant safer recruitment processes for our setting and part three of KCSIE 2021.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where we are utilising volunteers, we will continue to follow the checking and risk assessment process as set out below. Under no circumstances will a volunteer who has not been checked be left unsupervised (out of the line of sight) or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in schools and colleges, will be in regulated activity. We will obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity.

Existing volunteers in the regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we will undertake a risk assessment and use our professional judgment and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity.

In doing so we will consider:

- the nature of the work with children and young people;
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check. Details of the risk assessment should be recorded.

Regarding members of the college workforce already engaging in a regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school or college to support the care of young people and children. The type of setting on the DBS check, for example, a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should make a risk assessment as they would for a volunteer (see above).

Whilst the onus remains on us to satisfy ourselves that someone in our college has had the required checks, this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

### **Single Central Record**

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that we are aware, on any given day, which staff/volunteers will be in the school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR) up to date.

The SCR can, if we choose, provide the means to log everyone that will be working or volunteering in college on any given day, including any staff who may be on loan from other institutions. The SCR can also, if we choose, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

### **5. Safeguarding Training and Induction**

The Local Authority is delivering DSL training remotely until further notice whilst there remains a threat of the COVID-19 virus. The DSL will communicate with existing staff any new local arrangements, so they know what to do if they are worried about a child.

The DSL will deliver updates at regular intervals to staff teams and at least annually. Where new staff are recruited, or new volunteers enter school, they will continue to be provided with a safeguarding induction.

### **6. Peer on peer abuse**

We recognise the potential for abuse to occur between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim measure and similar. When making contact with these families, our staff may ask about relationships between learners.

If we receive a report of peer on peer abuse, we will follow the principles as set out in part 5 of KCSIE and those outlined within the college Safeguarding and Child Protection Policy. We will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded, and appropriate referrals made.

<https://www.gov.uk/government/publications/what-parents-and-carers-need-to-know-about-early-years-providers-schools-and-colleges-during-the-coronavirus-covid-19-outbreak/what-parents-and-carers-need-to-know-about-early-years-providers-schools-and-colleges-in-the-autumn-term>

## **7. Online safety**

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for on line working have been issued:

<https://www.kirkleescollege.ac.uk/wp-content/uploads/2020/03/VIDEO-CONFERENCING-PROTOCOLS.pdf>

With such different arrangements in place, young people could be at greater risk of on line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place. The College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

## **8. Mental Health**

- Where possible, college will continue to offer our current support for students' mental health. Students who access counselling will do this remotely.
- College will also signpost all students, parents/carers and staff to other resources to support good mental health at this time.
- When setting expectations for students who are learning remotely and not attending college, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.
- Staff and volunteers will be alert to mental health concerns in students who are at home, and act on these immediately by liaising with the DSL/ DDSL.

This college is committed to ensuring the safety and wellbeing of all its students and we will continue to be a safe space for students to attend and flourish. Staff and volunteers will be aware of the possible effects that this period may have had on students' mental health. They will look out for behavioural signs, including students being fearful, withdrawn, aggressive, oppositional or excessively clingy, to help identify where pastoral support may be needed.

Restrictions to movement and contact with other people means students could be more likely to be at risk of mental health problems. The Department for Education have produced guidance to support parents:

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

## **9. Parents and Carers**

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. We have set out the College's approach, including the sites students will be asked to access and named who from the college (if anyone) their student is going to be interacting with online.

## **10. Key Contacts**

<b>Role</b>	<b>Name</b>	<b>Contact number</b>	<b>Email</b>
Designated Safeguarding Lead	Polly Harrow	07850518700	Pharrow@kirkleescollege.ac.uk
Deputy Designated Safeguarding Lead	Nathan Shaw	07969504415	nshaw@kirkleescollege.ac.uk
Deputy Designated Safeguarding Lead	Rory Hillas	07500104155	rhillas@kirkleescollege.ac.uk
Designated Safeguarding Officer	Amie Fuller	07866795073	afuller@kirkleescollege.ac.uk
Designated Safeguarding Officer	Megan Paskin	07816539965	mpaskin@kirkleescollege.ac.uk
Principal & Chief Executive	Palvinder Singh	01484 437000	palvindersingh@kirkleescollege.ac.uk
Chair of Governors	Gerard Hetherington		ghetherington@kirkleescollege.ac.uk
LADO	Sandra Shaw	01484 221126	LADO.cases@kirklees.gov.uk

## Support Information

College staff can access government guidance as required on the issues listed below at a number of GOV.UK website addresses

[www.gov.uk/government/publications/preventing-and-tackling-bullying](http://www.gov.uk/government/publications/preventing-and-tackling-bullying)

[www.gov.uk/government/publications/children-missing-education](http://www.gov.uk/government/publications/children-missing-education)

[www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care](http://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care)

[www.gov.uk/government/publications/missing-children-and-adults-strategy](http://www.gov.uk/government/publications/missing-children-and-adults-strategy)

[www.gov.uk/CSE-definition](http://www.gov.uk/CSE-definition) and a guide for practitioners

[www.gov.uk/domestic-violence-and-abuse](http://www.gov.uk/domestic-violence-and-abuse)

[www.gov.uk/government/publications/drugs-advice-for-schools](http://www.gov.uk/government/publications/drugs-advice-for-schools)

[www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced](http://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced)

[www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief](http://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief)

[www.gov.uk/government/publications/female-genital-mutilation-guidelines](http://www.gov.uk/government/publications/female-genital-mutilation-guidelines)

[www.gov.uk/forced-marriage](http://www.gov.uk/forced-marriage)

[www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence](http://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence)

[www.gov.uk/government/policies/violence-against-women-and-girls](http://www.gov.uk/government/policies/violence-against-women-and-girls)

[www.educateagainsthate.com/](http://www.educateagainsthate.com/)

[www.gov.uk/government/publications/mental-health-and-behaviour-in-schools](http://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools)

[www.gov.uk/government/publications/prevent-duty-guidance](http://www.gov.uk/government/publications/prevent-duty-guidance)

[www.gov.uk/government/publications/children-act-1989-private-fostering](http://www.gov.uk/government/publications/children-act-1989-private-fostering)

[www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/](http://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/)

[www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/](http://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/)

[www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance](http://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance)

[www.kirkleessafeguardingchildren.com](http://www.kirkleessafeguardingchildren.com)

Child Protection in Education (CAPE): [www.cape.org.uk](http://www.cape.org.uk)

Prevent: [www.kirklees.gov.uk/beta/community-safety-partners/prevent.aspx](http://www.kirklees.gov.uk/beta/community-safety-partners/prevent.aspx)

Keeping Children Safe Online: [www.ceop.gov.uk](http://www.ceop.gov.uk)  
[www.ceop.org.uk/thinkuknow](http://www.ceop.org.uk/thinkuknow)  
[www.childnet-int.org](http://www.childnet-int.org)

DotCom Childrens Foundation: [www.dotcomcf.org/](http://www.dotcomcf.org/)

Bullying & child abuse : [www.anti-bullyingalliance.org.uk/](http://www.anti-bullyingalliance.org.uk/)  
[www.kidscape.org](http://www.kidscape.org)  
[www.childline.org](http://www.childline.org)