



SAFEGUARDING POLICY

LMC is committed to the wellbeing of learners and staff and fully recognises the contribution it can make to protect and support its learners. The College has a duty to safeguard and promote the welfare of learners through the creation and maintenance of a healthy and safe learning environment and promotion of the 'Safe Learner' and Safe College Community.

The Principal and Board of Governors recognise their responsibility in ensuring arrangements are in place to safeguard and promote the welfare of all staff and learners but, especially those of children (under 18 including those accessing LMC at Year 10 and 11) and vulnerable adults (those over 18 with a reduced capacity to give informed consent due to a mental condition, disability or illness). The governing body has appointed designated governors for Safeguarding and Health, Safety, & Wellbeing to work with College staff to monitor compliance and promotion of good practice.

Safeguarding is what we do for all learners and **Child Protection** is what we do for children and young people who have been harmed or are at significant risk of being harmed. This policy adheres to the updated **Keeping Children Safe in Education September 2019**.

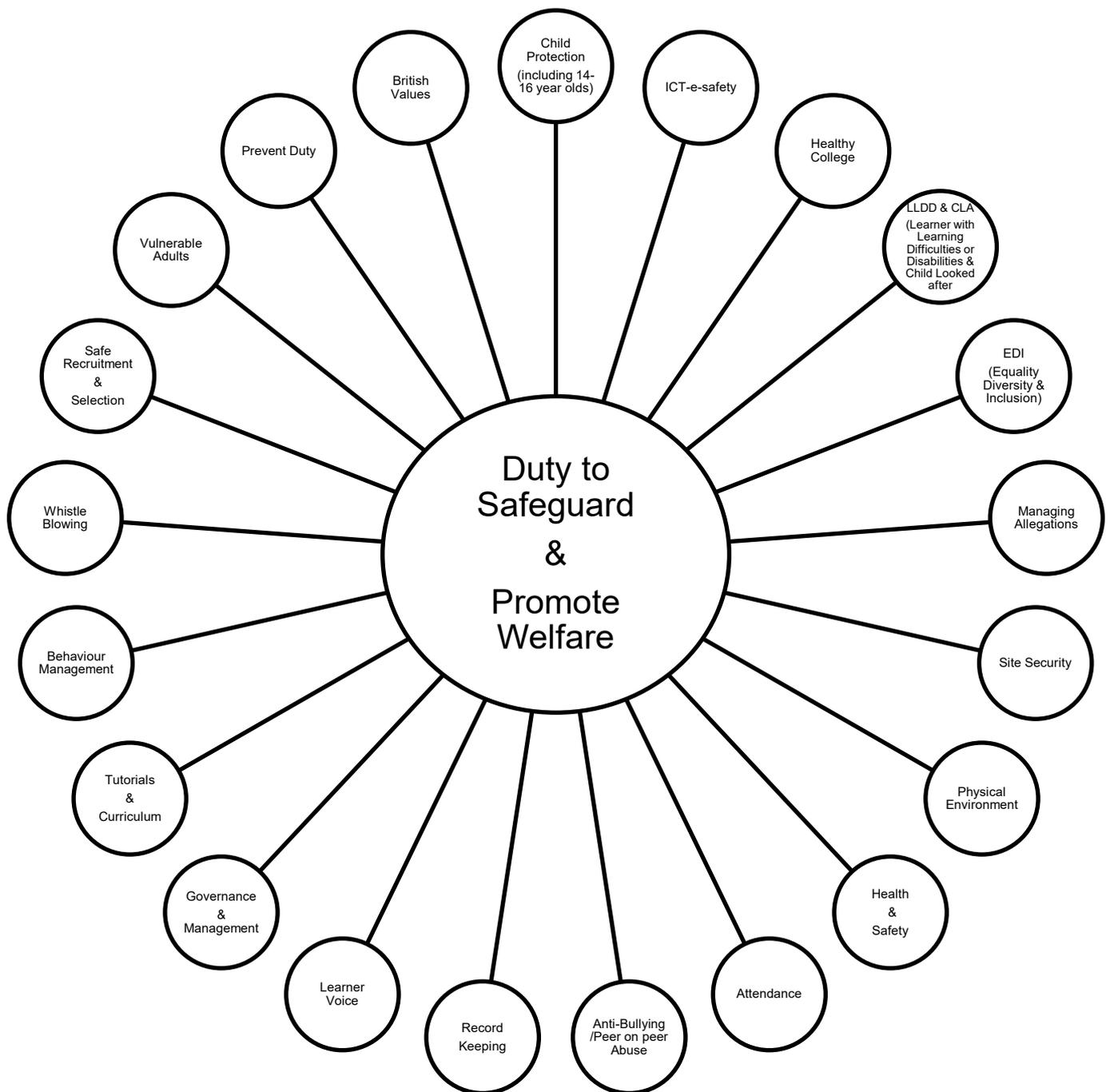
Policies

The College has a range of policies that cover Safeguarding issues including:

- Admissions
- Alcohol & Drugs
- Attendance
- Behaviour (Student)
- Child Protection Policy included in Safeguarding Policy
- Comments, Compliments & Complaints
- Computer Passwords – IT Policy
- Disciplinary (staff)
- Disciplinary & Exclusion (students)
- Educational visits procedure
- Harassment & Bullying
- Induction (Student)
- Managing Allegations - included in Safeguarding policy
- Prevent Duty
- Publicity
- Recruitment
- Safeguarding Policy
- Single Equality Scheme – including Racial Equality & Equal Opportunities
- Tutorial
- Whistle-blowing – review of public interest disclosure

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Wide range of Safeguarding work is summarised in diagram below. All policies are regularly reviewed by SMT and relevant College committees e.g. Health, Safety & Wellbeing.



Delivering the policies

LMC is committed to protecting the safety of all its learners by encouraging self-awareness, providing support and promoting clear lines of communication with staff. The College will:

- Maintain a pastoral system in which learners feel secure and are given opportunities to talk and to be listened to (additional tutorial system for year 10 & 11 learners) and staff can be referred through Personnel to Occupational Health.
- Promote and support learner voice opportunities for students to raise concerns.
- Ensure that Child Protection and vulnerable adult concerns are handled sensitively and in line with College procedures.

- Include Tutorial and Enrichment activities that promote learners awareness of health, safety and wellbeing issues so they can make fully informed life choices.
- Provide learning activities which promote risk awareness as a key concept through which learners are aware of their own duties and responsibilities in creating a safe environment for everyone.
- Provide appropriate services to promote wellbeing amongst staff.
- Provide clear guidelines to staff on all safeguarding issues and their responsibilities.
- Provide training for staff at all levels to support the delivery of a comprehensive safeguarding approach.
- Seek assurance that work based learning venues are safe for all learners and provide information for employers to help them meet their safeguarding responsibilities.
- Ensure that every effort is made to establish effective working relationships with parents/carers and staff from other agencies and providers including schools for year 10 & 11 learners.
- Work collaboratively with a wide range of external organisations locally, regionally and nationally to promote and keep up to date all aspects of the safeguarding agenda

CHILD PROTECTION POLICY AND PROCEDURE (including vulnerable adults)

1. POLICY

1.1 Background

- (i) Lancaster and Morecambe College has a duty to safeguard and promote the welfare of all learners including those accessing year 10 & 11 provision.

‘Information sharing: advice for practitioners providing safeguarding services’

KCSIE (2019), paragraph 78: The Data 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 promote the welfare and protect the safety of children.

- (ii) ‘Keeping Children Safe in Education’ (2019); Working Together to Safeguard Children (2018), published by HM Government, sets out Government guidance on safeguarding children and says that all staff in the education service, including those in further education Colleges are part of the wider safeguarding system for children, so should be aware of the need to alert the relevant services when they believe a child has been abused or is at risk of abuse. In addition, the guidance states that Safeguarding and promoting the welfare of children is everyone’s responsibility.
- (iii) The Sentencing Council's Sexual Offences Definitive Guideline for image classification gives these 3 categories for guidance.
The Indecent Photographs of Children section (page 75) outlines the different categories of child sexual abuse material:
- (a) Images involving penetrative sexual activity; images involving sexual activity with an animal or sadism.
 - (b) Images involving non-penetrative sexual activity.
 - (c) Other indecent images not falling within categories A or B. This can also include cartoon depictions of illicit activities and the pursuit of ‘sex dolls’.

1.2 Introduction

Lancaster and Morecambe College recognises the contribution it can make to safeguard children and vulnerable adults while also considering the wider environmental factors in a child’s life that may be a threat to their safety and / or welfare. This is known as Contextual Safeguarding and is referred to in Working Together to Safeguard Children (2018) and in Keeping Children Safe in Education (2019) Members of staff and learners have a role to play in safeguarding their welfare and preventing their abuse.

Children are defined as those under the age of 18. Vulnerable adults are defined as over 18 with a reduced capacity to give consent to the disclosure of abuse allegations or suspicion due to a mental condition, disability or illness.

Lancaster and Morecambe College works with a number of schools and referral agencies to provide learning opportunities for young people at KS4, in year 10 and year 11 of the

school system. The College recognises the need to put in place additional Safeguarding measures to include a specified Year 10 & 11 Co-ordinator to add an additional layer of protection as well as an identified Learning Support Assistant to help provide additional supervision at break times. The College Safeguarding Manager will work with any Safeguarding issues and developments in accordance with need.

1.3 Commitment

The College is committed to:

- (i) Prevention – by providing a safe environment for children and young people to learn in – e.g. robust staff recruitment policies and procedures; ensuring safe recruitment in checking the suitability of staff and volunteers to work with learners; positive College atmosphere; teaching and pastoral support to learners.
- (ii) Protection – identifying those who may be at risk of abuse by following agreed procedures; ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns. In the case of year 10 & 11 learners' additional tutorial, a recognised co-ordinator and supervised breaks will be adhered to.
- (iii) Support – to learners and staff and to children who may have been abused and by taking appropriate action to see that they are safe both at home and in the College, whilst placing the welfare of the individual at the centre of any action taken. The College will endeavour to provide support through:
 - The curriculum to encourage self-esteem and self-motivation.
 - The College culture, which promotes as positive, supportive and secure environment and which gives all learners and adults a sense of being respected and valued.
 - Work with other professionals and agencies who support the learners and their families
 - The development and support of a responsive and knowledgeable staff group trained to respond appropriately in safeguarding situations

1.4 What is Abuse?

It can involve any one or more of the following:

- Neglect
- Physical Injury
- Sexual Abuse
- Emotional Abuse
- Institutional and financial when applied to vulnerable adults

See Appendix 1 for definitions

Some young people may be victims of sexual exploitation, forced marriage or female sexual mutilation. Abuse can happen anywhere and staff should be alert to concerns being raised at College. Training in signs of abuse is given to all staff.

1.5 Responsibilities

- (i) Lancaster and Morecambe College will work together with the Safeguarding Children Partnership (previously known as Lancashire Safeguarding Children Board (LSCB)) and comply with their procedures. It recognises that it has a responsibility towards

children and young people attending or visiting the College to safeguard and promote their welfare and to take appropriate decisions about how this can be achieved. This also includes careful consideration that children are not put at risk on work placements or educational visits. It is not the College's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

- (ii) All staff working with or on behalf of children have a responsibility to protect children and key people have specific responsibilities (the Designated Senior Leader and the Safeguarding Manager as well as the Senior Management Team and selected other managers comprising Safeguarding Team).
- (iii) The College assesses the implications of any issue raised and decides whether it is necessary to take further action itself and / or to review and amend its procedure. This includes information shared by those accessing year 10 & year 11 provision.
- (iv) The nominated persons with responsibility for child protection (the Designated Senior Leader – DSL and Safeguarding Manager) are senior members of staff, who are responsible for:
 - Overseeing the referral of cases of suspected abuse or allegations to Children's Social Care (CSC) and/or Police
 - Providing advice and other support to other staff on issues relating to safeguarding children
 - Maintaining a proper record of any safeguarding children referral, complaint or concern (even where that concern does not lead to a referral)
 - Ensuring that parents of children and young people within the College are aware of the College's safeguarding children policy including those of year 10 & year 11 learners
 - Liaising with the Children's Services Child Protection Officer (Education), Safeguarding Children Partnership and other appropriate agencies
 - Ensuring that appropriate arrangements are made for the pupils from secondary schools who attend College
 - Ensuring that appropriate safeguards are put in place with employers and training organisations that receive learners from the College on long term placements
 - Ensuring that staff receive basic training in safeguarding issues and are aware of College Safeguarding and Child Protection procedures for all age groups
 - Providing an annual report to the Corporation setting out how the College has discharged its duties
 - Reporting deficiencies in procedure or policy identified by the Safeguarding Children Partnership, Ofsted (or others) to the Corporation at the earliest opportunity
 - Ensuring that staff are fully conversant with the Prevent Duty and referring cases of suspected radicalisation to Channel

- (v) In order for the College to carry out its duties for safeguarding, it is necessary to log and review all internet activity by all users of the college internet systems.

This includes but, is not exclusive to, the use of any mobile devices on the WiFi systems, as well as all computers and any other technological devices.

The responsibility for monitoring this activity shall be conducted by the ICT Manager and the Safeguarding Manager, on a weekly basis, who shall review all content that has been flagged for review, by the filtering system.

It is recognised by the college that as part of reviewing such material, the 2 members of staff may well be reviewing illegal content on college PCs and as such all necessary measures will be put in place to support this process.

The categories provided by the filtering system are:

- Abuse
- Adult Content
- Bullying
- Criminal Activity
- Drugs
- Radicalisation
- Suicide

Classification of internet content shall be separated into 5 ratings:

- Danger L1.1, L1.2, L1.3
These are sites and activity with illegal content. Disciplinary procedures will be undertaken and activities and content handed to the authorities as evidence.
- Danger L0
Content will be classed as legal, but does contravene what is acceptable at Lancaster and Morecambe College. The individual will be asked to meet with the Safeguarding Manager / ICT Manager. Possible disciplinary procedures will be instigated.
- Caution
Content that is seen to be against the values of Lancaster and Morecambe College and could be perceived as a gateway to more serious activities. Tutor / Manager of the individual will be notified and feedback sought from them on the reason for browsing.
- Advisory
This content will be logged into a separate system to spot trends and address if a user is a frequent advisory class user. This would be raised to Cautionary in this instance and follow the same procedure.
- None
Standard unreportable internet use. No Action taken.

1.6 This policy applies to all staff, Governors and volunteers and everyone else working on College premises

2. PROCEDURE FOR DEALING WITH SUSPICIONS OR ALLEGATIONS OF ABUSE

2.1 Introduction

- (i) It is important that children (anyone under 18) are protected from abuse. The same principle applies to vulnerable adults. All complaints, allegations or suspicions must be taken seriously.

- (ii) This procedure must be followed whenever abuse is suspected, or an allegation of an incident of abuse has been made and the year 10 and year 11 Co-ordinator must be included if the young person is in that category.
- (iii) This procedure covers allegations of abuse by any person including allegations against members of staff.
- (iv) Learners with behavioural difficulties and disabilities are often vulnerable to abuse. Staff who work, in any capacity, with learners with profound and multiple disabilities, sensory impairment and / or emotional and behaviour problems will need to be particularly sensitive to signs of abuse.
- (v) Students who come from a home environment where there is domestic violence, drug or alcohol abuse, mental health issues may also be particularly vulnerable and in need of support or protection.
- (vi) Children who are Looked After are also vulnerable and in need of enhanced support and protection
- (vii) Children who are accessing learning as part of their year 10 and year 11 provision are also considered vulnerable.
- (viii) 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.

2.2 Responding a disclosure made by a student – guidelines for staff

- (i) If a learner discloses significant personal problems to a member of staff, they should be acknowledged and taken seriously
- (ii) If a member of staff thinks a learner is going to make a disclosure they may wish to say something like this:

“If you tell me about a situation where there is a serious risk of harm to you or someone else I can’t guarantee I can keep this information to myself and may have to pass it on to the Safeguarding Team”.

- (iii) The person may choose not to continue:

If this is the case encourage them to see one of the Pastoral Mentors, or the year 10 & 11 Co-ordinator if appropriate, who are part of the Safeguarding team, or arrange for them to use a privately located telephone for helpline support

- (iv) If the person chooses to continue:
 - Listen carefully to what is being said
 - Keep questions to a minimum, just to clarify what is being said
 - Avoid leading questions or comments (just repeat back what you have heard to check you have understood)
 - Don’t be judgemental
 - Reassure the person that they are right to tell
 - Tell the person what you are going to do next and assure them they will be kept informed of all developments
 - Explain that you may have a legal obligation to pass the information on to protect both them and possibly other members of the family and the public (see 2.3)

- (v) Staff should never:
- Investigate, suggest or probe for information
 - Make promises about confidentiality or keeping secrets
 - Speculate or accuse anybody or confront another person allegedly involved
 - Jump to conclusions or offer opinions
 - Assume someone else will take responsibility
 - **Fail to pass the information to the Safeguarding Team**
- (vi) Make a full record of the nature of the allegation using the Safeguarding Alert found on Ontrack as well as any other relevant information including (see Appendix 2 for template): (this must be factual)
- The contact details of the learner making the allegation
 - The date and time of report
 - Names of those present during the allegation / disclosure
 - Date, time and place of the alleged abuse
 - Name of the person who has allegedly been abused if different from the above
 - An account of the allegation
 - Nature of the alleged abuse
 - A description of any injuries observed (if applicable)
- (vii) The allegation should be reported electronically via a safeguarding alert to the Safeguarding Team via Ontrack as soon as possible or in any event within 24 hours, all records and notes should be passed on (no duplicates should exist). The information must be treated with strictest confidence – the need to know basis must be employed. The Safeguarding Team then decides what further action should be taken. The Safeguarding Team will strictly adhere to LCC and CAF guidance.
- (viii) The College has no investigative role in child protection but, the DSL and Safeguarding Manager will make the final decision as to whether the allegation is reportable or not. If the allegation is reportable then the DSL or Safeguarding Manager must report the matter to the Children’s Social Care team in the learner’s usual area of residence. (Unless it is an allegation against a member of staff, in which case any referral is made to Lancashire’s Safeguarding Co-ordinator or the local Lancashire Local Authority Designated Officer).
- (ix) The DSL and Safeguarding Manager considers the information and whether dealing with ‘risk’ or ‘need’. The DSL and/or Safeguarding Manager should discuss with other agencies what action should be taken. This should include a decision as to whether it is necessary to inform the parents of the young person. A record should be made of the conversation to include the name of the duty Child Protection Officer / social worker who took the call.
- (x) Staff must adhere to LMC Safeguarding policy and procedure however, statutory guidance does state that referrals can be raised and any concerns made directly with Children’s Social Care Services. Any referrals made must be reported to the DSL or Safeguarding Manager.

2.3 Confidentiality

- (i) Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured
- (ii) As far as possible any action taken should be at the student’s request. Staff should try to avoid disempowering the student further by misusing their power to intervene in the situation and assure them that the matter will only be discussed with people

who need to know. (The information must be passed on to the DSL, Safeguarding Manager / Children's Social Care (CSC).

- (iii) Any member of staff involved in a situation where there is a safeguarding issue may wish to seek support themselves from the Safeguarding Manager. If necessary they can talk through a situation without identifying the student.
- (v) The Pastoral Mentors can support a student in dealing with disclosure and the emotional distress associated with abuse.

3. ALLEGATIONS ABOUT A MEMBER OF STAFF

Lancaster and Morecambe College will follow procedures laid down by Lancashire County Council and the Safeguarding Children Partnership.

- (i) Any suspicion, allegation or actual abuse of a child by a member of staff must be reported to the DSL and Safeguarding Manager as soon as possible. If within 24 hours of the initial concern arising it has not been possible to contact the DSL or Safeguarding Manager the matter must be reported to the Principal
- (ii) On being notified of any such matter the DSL or Safeguarding Manager shall:
 - Notify the Principal within 24 hours
 - Take such steps as s/he considers necessary to ensure the safety of the child in question and any other child who might be at risk
 - Report the matter to Children's Services (CS) / Local Authority Designated Officer.
 - Ensure that a report of the matter is completed by the person who reported the original concern
- (iii) If the DSL or the Safeguarding Manager is the subject of the allegation or complaint the matter must be reported to the Principal.
- (iv) If a complaint has been made against the Principal, the Chair of Governors will deal with it.
- (v) Any disciplinary investigation will be conducted in accordance with College disciplinary procedures.

4. WRITTEN RECORDS

- (i) The DSL and/or Safeguarding Manager shall retain a copy of:
 - The report
 - Any notes, memoranda or correspondence dealing with the matter
 - Any other relevant material
- (ii) The DSL and Safeguarding Manager will make a judgement on a case by case basis about which staff need to know what and for what purpose, about a student.
- (iii) Copies of report, notes, etc., should be kept securely locked at all times in room H10.

- (iv) According to current guidance, records should be kept until the person's 25th birthday except if the child is also a CLA and then it is to be kept for 45 years. If the child has a SEN statement then the file needs to be kept indefinitely.

5. TRAINING

Safeguarding and Child Protection will be covered at induction for all new staff and up-date training will be provided at least every three years, as appropriate, to members of staff to ensure that they are aware of these procedures and specialist training will be provided for the DSL, Safeguarding Manager, Senior Management Team and others with safeguarding responsibilities every two years.

6. REVIEW AND MONITORING OF THESE PROCEDURES

It will be the responsibility of the DSL and Safeguarding Manager to review and monitor the procedures and to seek advice of the Safeguarding Children Partnership and to bring about a change in the procedures if necessary.

7. PREVENTION OF VIOLENT EXTREMISM – THE 'PREVENT' DUTY

All FE providers have a duty to safeguard their students, Prevent is about safeguarding our students to keep them both safe and within the law. The Prevent Duty is not about preventing students from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways. Providers from across the sector will find resources here on this website to support them in adopting the Prevent Duty.

What is Extremism?

The Government has defined extremism in the Prevent Duty as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." This also includes calls for the death of members of the British armed forces.

What is Radicalisation?

The Government has defined extremism in the Prevent Duty as: "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups".

What are British Values (See Appendix 5 which includes 'College Values')

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

- 7.1 The Prevent Duty is contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have 'due regard to the need to prevent people from being drawn into terrorism'.
- 7.2 Prevent is 1 of the 4 elements of 'CONTEST', the Government's counter-terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming terrorists or supporting terrorism.

- 7.3 It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 7.4 It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- 7.5 It covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

Source: <https://www.gov.uk/government/publications/prevent-duty-guidance>

- 7.6 In February 2008, the Government published guidance to local partners, including Colleges, on preventing violent extremism. Whilst the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.
- 7.7 Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.
- 7.8 College staff should be aware of signs of radicalisation and have the confidence to report their concerns to their Safeguarding Team (see Appendix 4 for Safeguarding (including Prevent Duty) Flowchart)
- 7.9 Any such concerns should be reported directly to the Safeguarding Manager who will liaise with the local contact at Lancashire Police Prevent Team.
- 7.10 The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate, but challenging extreme views. It will encourage, through its classroom practice, central tutorial, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- 7.11 The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.
- 7.12 The College has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the College and must take such steps as are reasonably practical to secure that, where political issues are brought to the attention of students, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the College and could constitute misconduct.

Combating Gangs, Violence and Weapon Crime

Lancaster and Morecambe College acknowledges similarities with Prevent and approaches to being groomed of learners in relation to Combating Gangs, Violence and Weapon Crime. The College will promote awareness through a centralised tutorial programme, awareness events and contacts/partnerships within the local community.

- 8.1 The College will work in partnership with the relevant authorities including the Police and the Home Office who provide practical help to prevent people from being drawn into Gangs, Violence and Weapon Crime and ensure they are given appropriate advice and support.
- 8.2 College staff should be aware of signs of Combating Gangs, Violence and Weapon Crime and have the confidence to report their concerns to their Safeguarding Team (see Appendix 4 for Safeguarding Flowchart)
- 8.3 Training to ensure staff awareness of Combating Gangs, Violence and Weapon Crime will be included in the induction process and annual safeguarding updating.

- 8.4 Young people and vulnerable groups are particularly targeted by groups who may promote Combating Gangs, Violence and Weapon Crime, and awareness will be developed throughout the Lancaster and Morecambe College Study Programme.
- 8.5 Any such concerns should be reported directly to the Safeguarding Manager who will liaise with the local contact at Lancashire Police.
- 8.6 The College will also promote the ethos of the prevention in relation to County Lines, Combating Gangs, Violence and Weapon Crime agenda by encouraging free and open debate, but challenging extreme views. It will encourage, through its classroom practice, central tutorial, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- 8.7 The College will not host or allow its premises to be used by violent groups and will seek to prevent the distribution of literature or any information relating to Combating Gangs, Violence and Weapon Crime.
- 8.8 Promotion of any organisations linked to Combating Gangs, Violence and Weapon Crime is contrary to the values of the College and could constitute misconduct.

Useful links:

www.preventforFEandtraining.org.uk

http://course.ncalt.com/Channel_General_Awareness/01/index.html

<https://www.gov.uk/government/publications/prevent-duty-guidance>

www.educateagainsthate.gov.uk

<http://www.safecampuscommunities.ac.uk/>

<http://www.360safe.org.uk/>

www.elearning.prevent.homeoffice.gov.uk

www.preventtragedies.co.uk

www.tes.co.uk

https://www.luton.gov.uk/Community_and_living/crime-and-community-safety/letstalkaboutit/Pages/default.aspx

<https://www.gov.uk/government/publications/the-terrorism-act-2006>

<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447595/KCSIE_July_2015.pdf

***Key to staff**

MD	Maggie Dodd	Director of Personal Development and Welfare
WJ	Wes Johnson	Principal
PF	Peter France	Vice Principal Finance and Resources
CR	Charlotte Rawes	Director of Apprentices and Employer Engagement
IP	Iain Parkinson	Director for Curriculum & Innovation
BM	Bev Martindale	Safeguarding Manager
LE	Louise Evans	Estates, Safety and Wellbeing Manager
AB	Angela Bathgate	Personnel and Professional Development Manager

JW	Jonny Wright	Computer Services Operations Manager
JP	John Pollard	Finance Manager
KB	Karen Bujakowski	PA to the Principal
TC	Tim Cross	Safeguarding & EDI Governor
IH	Ian Haines	Health Safety & Wellbeing Governor

Appendix 1

DEFINITION / INDICATORS OF ABUSE

Signs of possible child abuse

It is important to remember that lists such as the one below are neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his / her circumstances.

There can be no overlap between all the different forms of child abuse and all or several can coexist.

N.B. The College does provide services for a number of children (Nursery; Sports activities; The Eden Project) and therefore this list covers all ages from pre-school upwards.

1. Physical abuse

1.1 Definition

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, or otherwise causing physical harm to a child. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer fabricates the symptoms of or deliberately induces ill-health to a child. (Annex A: Keeping Children Safe in Education Sept 2019)

Possible signs of physical abuse

- Unexplained injuries, bites, bruises or burns, particularly if recurrent
- Parental refusal to discuss or inconsistent explanations offered
- Untreated illnesses or lingering injuries or delay in reporting them
- Excessive physical punishment
- Arms and legs kept covered in hot weather
- Shrinking from physical contact
- Fear of returning home or parents contacted
- Fear of undressing
- Fear of medical help
- Aggression / bullying towards others
- Running away
- Unexplained pattern of absences which may serve to hide injuries
- Overly compliant behaviour or watchfulness
- Significant behavioural change without apparent explanation

When considering the possibility of non-accidental injury it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders.

2 Neglect

2.1 Definition

Neglect is the persistent or severe failure to meet a child or young person's basic physical or psychological needs, likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. It may involve a failure to provide adequate food, clothing or shelter; failing to protect a child from physical harm or danger or failing to ensure access to appropriate medical care or treatment including care givers. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.

2.2 Possible signs of physical neglect

- Constant hunger / tiredness
- Poor personal hygiene or inappropriate clothing
- Frequent lateness and / or unexplained non-attendance at College
- Untreated medical problems
- Low self-esteem
- Poor peer relationships
- Stealing / scrounging
- Non-organic failure to thrive

3. Emotional abuse

3.1 Definition

Emotional abuse occurs when there is persistent emotional ill treatment or rejection such as to cause serious and adverse effects on the child's or young persons' behaviour and emotional development. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability, as well as over protection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. 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 present in all forms of maltreatment / abuse of a child, though it may appear alone.

3.2 Possible signs of emotional abuse

- Low self-esteem
- Continual self-deprecation
- Fear of new situations / persons
- Sudden speech disorder
- Significant decline in concentration
- Desperate attention-seeking behaviour
- Socio-emotional immaturity, few friends, do not join in
- Neurotic behaviour e.g. rocking, head banging
- Self-harm or mutilation
- Drug or solvent abuse
- Eating problems (including lack of appetite)
- Compulsive stealing / scrounging
- Inappropriate emotional responses to 'painful' situations
- Extremes of passivity or aggression
- Indiscriminate friendliness

4. Sexual abuse

4.1 Definition

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 sex such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities,

such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place on-line, and technology can be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Possible signs of a sexually abused child

Not all children are able to tell parents that they have been assaulted. Changes in behaviour may be a signal that something has happened.

These are general indicators that a child may be troubled though not necessarily about sexual assault. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that will alert you to a problem. Try to notice all changes in usual behaviour.

It is important to remember that in sexual assault there may well be no physical or behavioural signs.

a) Behavioural

- Withdrawal from friends / peers or over-familiarity with adults
- Fear of a particular individual
- Social isolation – withdrawal or introversion
- Running away from home
- Girls taking over the mothering role
- Reluctance or refusal to participate in physical activity or to change clothes for physical activities
- Low self-esteem
- Hyper-vigilance / frozen watchfulness
- Display of sexual knowledge beyond the child's years, sexualised approaches to or perceptions / descriptions of adults
- Sexual pre-occupation and compulsive sexual behaviour / promiscuity
- Precocious sexual activity / expressing affection in inappropriate ways
- Fear of bathrooms, showers, closed doors
- Fear of medical examinations
- Developmental regression
- Stealing / scrounging
- Psychosomatic factors, e.g. recurrent abdominal pain or headache

b) Physical / medical

- Sleeplessness, nightmares, fear of the dark
- Bruises, scratches, bite marks on top of the thighs or genital areas
- Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Pain on passing urine or recurrent urinary infection
- Stained underwear
- Unusual genital odour
- Anxiety / depression
- Eating disorder, e.g. anorexia nervosa or bulimia
- Discomfort / difficulty in walking or sitting
- Pregnancy – particularly when reluctant to name the father
- Venereal disease, sexually transmitted diseases
- Soiling or wetting in children who have been trained

- Self-mutilation / suicide attempts
- Drug, alcohol or solvent abuse

5. Peer on Peer Abuse

Children can abuse other children. This generally referred to as Peer on Peer abuse and can take many forms. This can include (but is not limited to) bullying (cyber bullying to be included); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexting and initiating/hazing type violence and rituals (*hazing type violence is seen in many different types of social groups, including gangs, sports teams, schools, military units, and fraternities and sororities. ... Hazing is often prohibited by law or prohibited by institutions such as colleges and universities because it may include either physical or psychological abuse*).

Peer-on-Peer abuse will be minimised through the vigilance and awareness of staff to recognise, identify and report via on-track, through the completion of a Peer-on-peer abuse Alert. Students will also be able to report any Peer-on-peer concerns via the Report IT button on the hub.

Further guidance and how to respond to sexting can be found at UKCCIS guidance

6. Sexual Violence and Sexual Harassment between Children in Schools and Colleges (May 2018)

Context

Sexual violence and harassment can occur between 2 children of any age group and gender. It can also happen within a group a children sexually assaulting or harassing a single child or group of children.

Children who are victims of sexual violence and harassment will likely find the experience stressful and distressing. Sexual violence and harassment exist on a continuum and may overlap, they can occur on and off line (both physical and verbal) and are never acceptable. It is importance that all victims are taken seriously and offered the appropriate support. Evidence shows girls, children with SEND and LGBT are at greater risk. Please refer to Keeping Children Safe in Education, updated September 2018.

7. **'Upskirting'** typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence, under the **Voyuerism (Offences) Act**, and equally applies when men or women are wearing kilts, cassocks shorts or trousers.

8. Child Sexual Exploitation

Definition

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group take advantage or an imbalance of power to coerce., manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants., and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victims may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year-old who can legally consent to have sex;
- Can still be abused even if the sexually activity appears to be consensual;
- Can include both contact (penetrative and non-penetrative acts) and non contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and /or enticement-based methods of compliance and may, may not be accompanied by violence or threats of violence;
- May occur with or without the child or young person's immediate knowledge (e.g. through others, copying videos or images they have created and posted on social media);
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources,

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying young people who may be victims of sexual exploitation.

- Children and young people who appear with unexplained gifts or new possessions;
- Children and young people who associate with other young people involved in exploitation;
- Children and young people who have older boyfriends or girlfriends;
- Children and young people who suffer from transmitted infections or become pregnant;
- Children and young people who suffer from changes in emotional wellbeing;
- Children and young people who misuse drugs and alcohol
- Children and young people who go missing for periods of time or regularly come home late;
- Children and young people who regularly miss school or do not take part in education

9. Child Criminal Exploitation – County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural area, market and seaside towns. Please refer to Keeping Children Safe in Education updated Sept 2019 for typical signs and actions.

10. Forced Marriage (FM)

Definition

This is an entirely separate issue from arranged marriage. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties for example). Never the less, some communities use religion and culture as a way to coheres a person into marriage. Schools and Colleges can play an important role in safeguarding children from

forced marriages. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. (If further information is required please see Keeping Children Safe in Education, Sept 2019)

11. Female Genital Mutilation (FGM) Mandatory reporting duty for teachers.

All staff should report concerns to DSL or Safeguarding Manager. There is a specific legal duty on teachers to report issues which concern young women under the age of 18 personally to the police.

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

There are 4 types of procedure:

Type 1 ~ Clitoridectomy – partial/total removal of clitoris

Type 2 ~ Excision – partial/total removal of clitoris and labia minora

Type 3 ~ Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 ~ All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Uphold family honour
- Cleansed and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Young Person talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Young Person's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the Young Person's sibling has undergone FGM

- Young Person talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a Young Person has undergone FGM:

- Prolonged absence from College and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/Colleges act **without delay**.

12. Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of school and colleges safeguarding approach.

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.

Radicalisation refers to the process by which a person come to support terrorism and extremist ideologies associated with terrorist groups (as defined by the revised Prevent Duty Guidance for England & Wales).

Forces that may contribute to vulnerability:

- rejected by peer, faith or social group/family
- pressure from persons linked to extremism
- victim or witness to race or religious hate crime
- conflict with family over religious beliefs/lifestyle/politics
- identity confusion
- recent religious conversion
- change in behaviour or appearance due to new influences
- under-achievement
- may possess literature related to extreme views
- experience of poverty, disadvantage or social exclusion
- extremist influences
- a series of traumatic events – global, national or personal.

13. Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual financial; and
- emotional

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

14. Children & The Court System

Children are sometimes required to give evidence in criminal courts for crimes committed against them or for crimes they have witnessed. The appropriate guide for 12-17 year olds explains each step of the process and supports the special measures that are available. There are diagrams illustrating the structure and the use of video links is explained. See Keeping Children Safe in Education, updated September 2019.

15. Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of Safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying Safeguarding risk and to help prevent the risk of a child going missing in future. Staff should apply and adhere to the LMC's attendance Policy to support this.

16. Children with family members in Prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. For further information please refer to NICCO provides information designed to support professionals with working with offenders and their children.

17. Homelessness

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

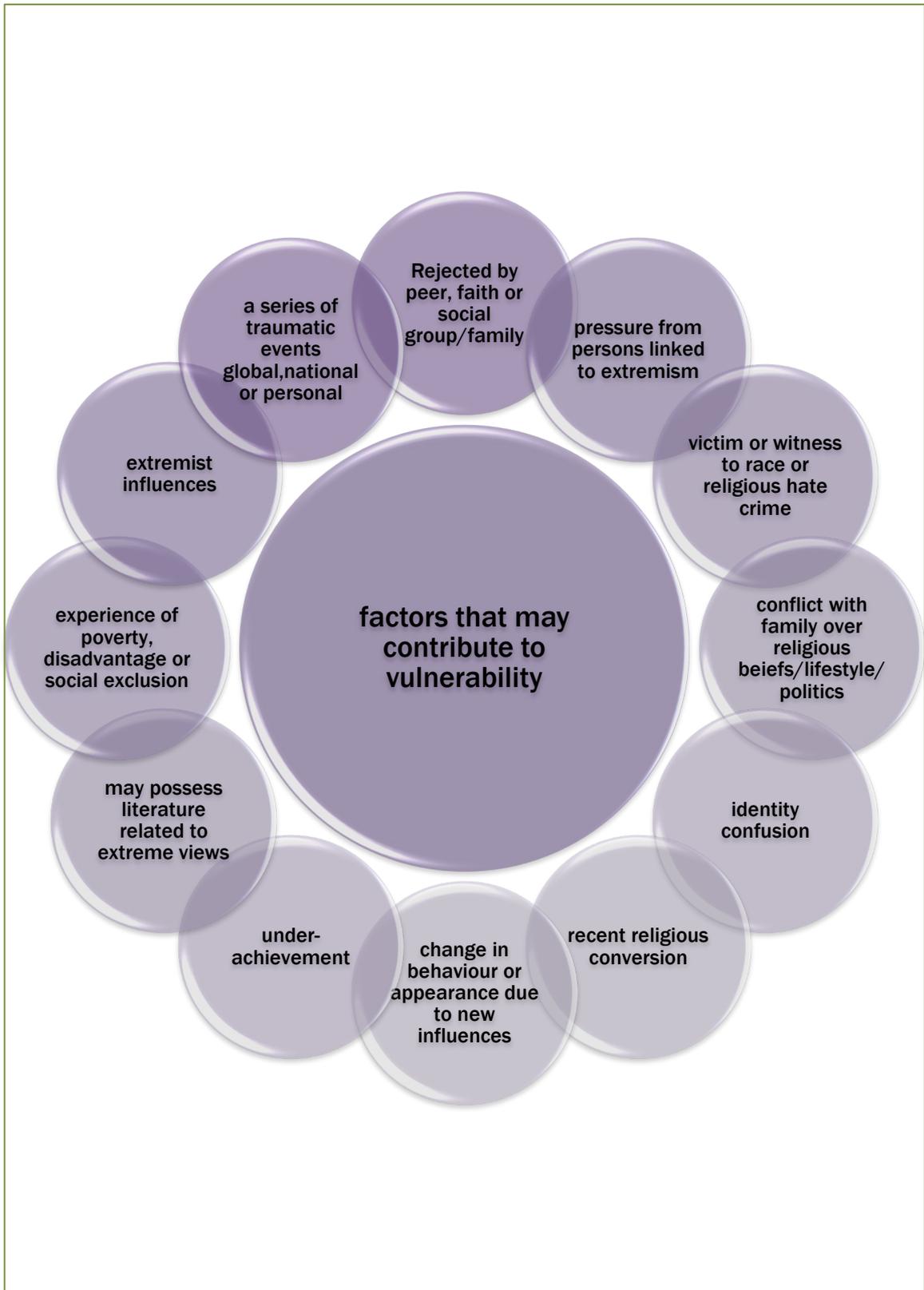
Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with the local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and / or require accommodation.

18. So-called 'honour based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and / or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

Since 31st October 2015 there has been a mandatory reporting duty placed on **teachers**. How to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).



Appendix 2

PROCEDURE FOR MANAGING ALLEGATIONS AGAINST ADULTS WHO WORK IN LANCASHIRE EDUCATION SETTINGS

The Police and Children's Social Care will investigate, not the College.

1. INTRODUCTION

- 1.1 All adults (including volunteers) who come into contact with children and young people have a responsibility to safeguard and promote their welfare. They are also vulnerable to the potential for false, malicious or misplaced allegations being made, either deliberately or innocently, arising from normal and proper association and conduct. However, it is regrettably the case that some adults / professionals have been found to be perpetrators of child abuse and / or for behaving in ways which have harmed children which indicate that they are unsuited to working with them.
- 1.2 Scenarios within which allegations against adults working with children and young people arise can be complex and allegations may emerge for a number of reasons. Those responding to these scenarios need to be sensitive to the needs of all involved and the potential implications of non-adherence to these procedures, which should be applied with common sense and in line with the principles of natural justice.
- 1.3 It is imperative that all staff who may be the subject of an allegation are afforded the same level of advice and support throughout the application of this and / or any related procedure. Compliance with these procedures should help to ensure that allegations of abuse are dealt with expeditiously, consistent with a thorough and fair process.

2. WHAT IS AN ALLEGATION?

- 2.1 For the purpose of these procedures, an allegation is information which indicates that a person who works with a child has:
 - Behaved in a way that has harmed a child, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children

This may be in connection with his / her employment or voluntary activity, or where:

 - Concerns arise about the person's behaviour outside work e.g. with regard to his / her own children
 - Concerns arise about the behaviour in the private or community life of a partner, member of the family or other household member
- 2.2 Where allegations against adults who work with children and young people are concerned, it is the Police and Children's Social Care Services who investigate alleged or suspected abuse or possible criminal behaviour, not the College.
- 2.3 There may be up to 3 strands in considering a concern or an allegation:
 - A police investigation of a criminal offence
 - Enquiries and assessment by Children's Social Care about whether a child or

- young person is in need of services
- Consideration by an employer about whether a disciplinary investigation or action is required in respect of the individual

2.4 If an allegation relating to a child is made about a person who undertakes paid or unpaid care of vulnerable adults, consideration should be given to the possible need to alert those who manage him / her in that role.

2.5 If an allegation can be shown to be deliberately invented or malicious, advice should be sought by the DSL / Principal from the School's Safeguarding Co-ordinator and / or LADO (Local Authority Designated Officer). Consultation with Children's Services may also be necessary in order to ensure that any appropriate support services are provided to a child or young person in need.

3. ROLES AND RESPONSIBILITIES (Also see Appendix 3: Glossary of terms)

3.1 The Safeguarding Children Partnership has responsibility for ensuring there are effective inter-agency procedures in place for dealing with allegations against people who work with children and for monitoring and evaluating the effectiveness of those procedures.

3.2 In order to discharge the duties of the Safeguarding Children Partnership, the College's DSL has overall responsibility for:

- Ensuring that the organisation operates these procedures for dealing with allegations
- Resolving any inter-agency issues that may arise
- Liaising with the Safeguarding Children Partnership (as appropriate)
- Identifying a Senior Manager to whom allegations or concerns should be reported, and a Deputy in his / her absence of if he / she is the subject of the allegation.

4. THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

4.1 The Local Authority has appointed a Local Authority Designated Officer (LADO). The LADO in Lancashire is Tim Booth who can be contacted as follows:
Telephone: 01772 536694
e-mail: Tim.booth@lancashire.gov.uk

4.2 The LADO's role extends across allegations within all agencies and organisations and includes:

- The management and oversight of individual cases
- Providing advice and guidance to employers and voluntary organisations
- Liaising with the Police and other organisations
- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

5. WHAT SHOULD THE RECIPIENT OF INFORMATION WHICH DOES OR WHICH MAY CONSTITUTE AN ALLEGATION DO?

5.1 There are a number of sources from which an allegation may arise, such as a child, parent, carer, member of the public, work colleague etc.

5.2 The person to whom the allegation is reported, initially, should:

- (i) Treat the matter seriously
- (ii) Avoid asking leading questions and keep an open mind
- (iii) Make a written record (signed and dated) of the information provided to them which:
 - Uses the child's / adults own words (also see paragraph 7.4)
 - Makes clear what is being alleged and what is alleged to have happened
 - Makes clear when and where (time, date and location) the alleged incident(s) took place
 - Makes clear who was present, including any potential witnesses
- (iv) Sign and date the written record and pass it, without delay, to the Principal
- (v) The person passing this record to the Principal should not discuss the matter with anyone else, they must be mindful of the danger of impeding a criminal or child protection enquiry and of spreading allegations which may also be defamatory.

5.3 Where there is an immediate risk to a child or young person, an urgent referral to Children's Social Care should be made in accordance with the Safeguarding Children Partnership procedures. This will normally be undertaken by the Principal although, in the unlikely event that the Principal is unavailable, another senior member of staff i.e. Designated Senior Leader (DSL) or Safeguarding Manager should be notified in order to take necessary action and avoid delay. The allegation issue can be followed up once any immediate risk issues have been addressed.

6. INITIAL ACTION BY THE DESIGNATED SENIOR LEADER

6.1 It is imperative that the DSL, Safeguarding Manager, Principal and staff are clear that where allegations against adults who work with children and young people are concerned, it is the Police and Children's Services who investigate alleged or suspected abuse or possible criminal behaviour. Therefore, the DSL or any other person should not investigate the matter by interviewing the accused person, any child(ren) or potential witnesses.

6.2 Without interviewing anyone, the Principal will collate any other information at their disposal i.e. what else is known about any of the individuals (adult(s) and children / young people) involved e.g.

- Names, dates of birth, home addresses
- Length of service
- Specific role within the organisation
- Previous / current level of contact with the child(ren) involved
- Details of any relevant plans pertaining to the child(ren) implicated (e.g. behaviour management plan, child protection plan, Learners with disability).
- Whether there have been any previous relevant concerns / allegations / disciplinary issues in respect of any of the individual's implicated.

- Whether the adult subject has any children of their own or children who reside at their home address
- Check to see whether any other (contemporaneous) records exist which might relate to the alleged incident i.e. incident / accident forms, care and control / behaviour management records.

6.3 The DSL, Safeguarding Manager & Principal should then seek advice from one of the Officers at LCC in all cases except those where the allegation is unquestionably false or trivial.

7. DSL'S CONSULTATION WITH SAFEGUARDING

7.1 Once the DSL, Safeguarding Manager & Principal has collated the information above s/he should liaise with the LCC team:

7.2 Some allegations will be unquestionably false e.g. the individual was not in school on the day in question. Alternatively, information may actually constitute a complaint or concern about an individual's conduct which can and should be dealt with by the school / setting via internal processes and procedures. However, it is always advisable to seek advice from one of the LCC Officers above in the first instance.

7.3 Consultation with the aforementioned Officer(s) will focus upon the decision about whether or not this is a matter which meets the criteria at paragraph 2.1 and what, if any, further action will be taken, when and by whom i.e.

- Does a referral need to be made to LADO?
- Do referrals need to be made to Children's Services and / or Police and, if so, who will make them?
- Is a strategy discussion to be had and / or does a strategy meeting need to be convened (paragraph 10)?
- Suspension / interim management arrangements
- Any immediate or interim management / support options in respect of the child or young person
- What information may / may not be provided to staff / subjects / parents at this stage? Consideration needs to be given at this stage to that information which must, can and / or cannot be provide to the (adult) subject of the allegation, and by whom; the reason for any decision not to disclose particular information must be recorded by the DSL. Such processes need to be undertaken with extreme care i.e. downloading files may compromise individuals and investigative processes and such tasks are best left to the Police. Simply secure any equipment and be very mindful of confidentiality issues if you need assistance to do this.

7.4 In some cases, following consultation with an Officer of the Authority, it may be agreed that the DSL, Safeguarding Manager & Principal should try and obtain more detail in order to inform a decision about a next course of action. That being the case, the following boundaries should be adhered to in respect of speaking to those potentially involved and the securing of potential 'evidence':

- Some children and young people may be able to provide their own written account of an alleged incident or interaction. If they are to be asked to produce such an account this needs to be handwritten in ink, in an environment where possible collusion (if there is more than one young person involved) can be avoided, timed, signed and dated by them.

- Where allegations related to mobile telephones or ICT use for example, any school equipment which may need to be examined by CS and / or Police should be secured, discreetly (including documents which have allegedly been produced, exchanged, altered etc.) i.e. as part of a lesson
- In undertaking any of the above the DSL, Safeguarding Manager & Principal needs to be clear about the potential for interfering with any future investigation.

7.5 In order to share information and make the most informed decision possible, the Officer who is consulted will check any relevant systems for further information and have discussions with other colleagues, as appropriate.

7.6 Where there is a reasonable cause to suspect that a child has suffered, is suffering or is likely to suffer significant harm, or where a lack of clarity remains, the a strategy discussion (usually via telephone) will take place within 24 hours. This will involve Children's Services, the Police, LADO and the DSL. In some cases it may be that the strategy discussion will agree upon the need for immediate investigative or protective action i.e. Section 47 or criminal investigations.

7.7 Alternatively, a strategy discussion may indicate that no further action is required from investigative agencies and that the matter can therefore be dealt with by the College in accordance with internal procedures. In other cases, a formal strategy meeting may need to be convened. In all cases, decisions about or enquiries by CS and / or Police will preclude a disciplinary investigation or 'internal' process by the College, so as to prevent the potential impediment of criminal and / or child protection enquiries.

8. REFERRALS TO LADO

8.1 If it is agreed that the allegation meets any of the criteria in paragraph 2.1 the DSL, Safeguarding Manager & Principal should refer the matter to the LADO within 1 working day. This is done by forwarding the completed allegation notification form electronically and this will be e-mailed to you by the School's Safeguarding Team / person from the Local Authority with whom you have consulted. A copy should also be retained for the school / setting's own record.

8.2 Where the DSL, Safeguarding Manager (or Principal) disagrees with the advice offered following consultation, s/he should contact the LADO via telephone in order to discuss their concerns.

9. SUSPENSION ISSUES AND SUPPORT FOR STAFF

9.1 Discussions about suspension may take place at an early stage and while other professionals may wish to express a view, the decision to suspend rests ultimately with the College (refer to College disciplinary procedures) and should be in accordance with the College's own policy (refer to College disciplinary procedures).

9.2 Suspension is not and should never be an inevitable or automatic response to an allegation, neither is it a disciplinary sanction. Recourse to suspension should not occur without good reason and / or without consideration having been given to appropriate alternatives. However, in some cases it might properly considered in certain circumstances, e.g.

- (i) Where there is or may be ongoing risk to an individual because of someone's continued presence on site
- (ii) In order to prevent the impediment of a criminal or child protection enquiry

- (iii) Because the allegation made is so serious that dismissal for gross misconduct is possible

9.3 Whether a member of staff is suspended or not, in any case where a formal notification to LADO is made then, the staff member / adult(s) must:

- (i) Be provided with a copy of this procedure (including Appendices)
- (ii) Be advised to seek advice and support from their Association / Trade Union

10. STRATEGY MEETINGS

10.1 If a multi-agency strategy meeting needs to be convened (this should occur within 5 working days of a referral to CSC), this will be co-ordinated by Children's Social Care and chaired by an Independent Reviewing Officer (IRO). Attendees should provide a written report.

10.2 In convening a strategy meeting consideration should be given to inviting two appropriate representatives from all of the agencies involved with a child / family, alongside representatives from inspectorates where this is in line with notification requirements. While there may be a need to invite certain professionals with particular expertise on a case by case basis, Police, Children's Services and the College (except where to do so may impede an investigation or place a child or young person at increased risk) should always be invited.

The adult subject(s), any children / young people and Parent / Carers will not be invited to attend a strategy meeting. The meeting will:

- Share all relevant information
- Consider the current allegation or concern and review any previous allegations or concerns made against the member of staff and / or the establishment
- Decide whether there should be a Section 47 enquiry / criminal investigation if not already commenced
- Scope and plan any Section 47 enquiry / criminal investigation
- Consider, if a Section 47 enquiry is appropriate, whether a complex abuse investigation is applicable
- Identify who may need to be interviewed
- Set time-scales
- Decide who to inform and when (subject of allegations, child, parents) and agree who is responsible for doing this (it will usually be the employer).
- Make recommendations regarding suspension, disciplinary, competency, regulatory or complaint procedures be undertaken
- Agree criteria for re-referral where new evidence comes to light suggesting that a further strategy meeting needs to be convened
- Agree arrangements for the outcome of any internal process to be reported to the LADO and chair.
- Set a date for a review strategy meeting which should occur, wherever possible, within 28 days of an initial strategy meeting.

11. REVIEWING THE STRATEGY DISCUSSION OR MEETING

- 11.1 The time taken to investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness and complexity of the allegations. However, it is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation and every effort should be made to manage cases in order to avoid unnecessary delay. The LADO will monitor and record timescales in respect of all cases and liaise with Senior Officers / DSL, Safeguarding Manager & Principal in the event of delay.
- 11.2 The review strategy meeting will draw together all relevant information following the completion of enquiries by Children's Services, Police and any other agency (as appropriate), and make multi-agency decisions about any further action to be taken in the case, including timescales for completion. It is imperative that written reports are produced by all agencies for reviews which make clear the findings of any enquiries, including reason(s) for taking no further action. A final outcome in line with definitions at paragraph 14.3 will also need to be formally recorded and included in any minutes.
- 11.3 Where difficulties have been encountered by investigative agencies the review will also provide an opportunity to clarify what these are, to identify solutions, make further plans and agree upon timescales.
- 11.4 Should enquiries take longer than the initial four weeks / 28-day period, then the strategy meeting should reconvene every four weeks to ensure that there is ongoing review and to avoid unnecessary delay.
- 11.5 The LADO will monitor the progress of cases either via:
- Review strategy discussions / meetings, or
 - By liaising with Police, Children's Services, employers and regulatory bodies / inspectorates as appropriate.

12. RESIGNATIONS AND COMPROMISE AGREEMENTS

- 12.1 The fact that a person tenders his or her resignation or ceases to provide their services must not prevent an allegation from being followed up in accordance with these procedures and a formal conclusion reached.
- 12.2 A compromise agreement by which a person agrees to resign, the employer agrees not to pursue disciplinary action and both agree a form of words to be used in any future reference must not be used in situations to which this procedure applies where there has been an allegation within the definition at 2.1.
- 12.3 Wherever possible, the subject should obviously be given an opportunity to answer the allegation and make representation as soon as possible. However, any enquiries and investigations should continue to a conclusion even if the person refuses to co-operate; decisions will be taken on the strength of what is known in the event that an individual chooses not to make representations. Where other factors impact (e.g. illness) decisions will need to be taken about how best to initiate or conclude any enquiries in order to avoid delay. The College's HR section will give advice consistent with other College policies.

13. DISCIPLINARY CONSIDERATIONS

- 13.1 Where the initial consideration decides that the allegation does not meet the criteria at paragraph 2.1, it will be dealt with by College in accordance with our internal procedures and as quickly as possible.

- 13.2 If disciplinary action is required it should be carried out in accordance with College's disciplinary procedures.
- 13.3 If the Police or CPS decide not to charge or to administer a caution, or if the person is acquitted, the Police should ensure that all relevant information is made available to the employer's senior manager without delay. Where this does not occur the LADO will liaise with the Police Senior Manager.
- 13.4 If the person is convicted, the Police should inform the employer and LADO immediately to enable the employer to take any appropriate action.

14. RECORD KEEPING AND DEFINING OUTCOMES

- 14.1 A clear and comprehensive summary of the case record will be kept on a person's confidential personnel file and a copy given to the individual.
- 14.2 A record will include details of how the allegation was followed up and resolved, the decisions reached and the action taken. It will be kept at least until the person reaches normal retirement age or for ten years if longer.
- 14.3 The record should also contain details of the category into which the allegation falls:
- **Substantiated:** a substantiated allegation is one which is supported or established by evidence or proof
 - **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:** this means that there is insufficient identifiable evidence to 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.
- 14.4 The record will provide accurate information for any future reference and provide clarification if a future CRB or DBS disclosure reveals an allegation that did result in a prosecution or conviction. This record will prevent unnecessary re-investigation if the allegation should re-surface; it is intended to protect children and adults alike.
- 14.5 The College Personnel Manager will alert those with a need to know that information in addition to that contained in an employee's personnel record may also be held by the LADO.
- 14.6 The College will adhere to its policy and procedures regarding the disclosure of information relating to allegations in response to requests for employment references.

15. MONITORING PROGRESS

- 15.1 The LADO will keep comprehensive records in order to ensure that each case is being dealt with expeditiously and that there are no undue delays. The record will assist the Safeguarding Children Partnership to monitor and evaluate the effectiveness of the procedures and provide statistical information to the DCSF as required.
- 15.2 The Police can consult the Crown Prosecution Service (CPS) at any stage regarding the evidence needed to charge a person, but they should also set target dates for reviewing the

progress of the investigation and consulting the CPS about charging, continuing or closing the investigation.

16. REFERRAL TO DCSF / INDEPENDENT SAFEGUARDING AUTHORITY OR REGULATORY BODY

- 16.1 If an allegation is substantiated and the person is dismissed or the person's services are ceased, or if the person resigns or otherwise ceases to provide his / her services, this should be referred to the DBS in order for them to consider whether the individual should be barred from, or have conditions imposed in respect of, working with children.
- 16.2 The LADO can and should offer this advice although recommendations may already have been made at a strategy meeting. If such a referral is required then it should be made by the employer within one month of the decision to refer.
- 16.3 In cases where any doubt or lack of clarity remains regarding a referral to DCSF / ISA, the employer should liaise with the LADO in order to ascertain what, if any, action still needs to be taken, by whom and within what timescale.
- 16.4 It is imperative that the final outcome of all cases are relayed to the LADO in order that the appropriate records can be maintained: Tim.booth@lancashire.gov.uk. Where this does not happen, the LADO will actively pursue the relevant information which needs to be provided without delay.

APPENDIX 3: GLOSSARY OF TERMS, ROLES AND RESPONSIBILITIES

Local Authority Designated Officer (LADO)	<p>Located within the Safeguarding Unit at County Hall, Preston, Tim Booth is Lancashire's LADO and he is responsible for the management and oversight of all allegation cases across the county, providing advice and guidance to employers and voluntary organisations, liaison with Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.</p> <p>Tim.booth@lancashire.gov.uk</p>
Independent Reviewing Officer (IRO)	<p>While they are employed by the Children's Services, the IRO team is not attached to another CS team or service. IROs chair strategy meetings and child protection conferences.</p>
School's Safeguarding Service / Safeguarding Unit	<p>School's Safeguarding Co-ordinator and School's Safeguarding Officer act as points of contact and a source of advice for any school or setting where a safeguarding or allegations issue arises.</p>
Children's Services (CS)	<p>Children's Services includes, among various other services, Children's Social Care (CSC – formerly Social Services) and the Safeguarding Unit. The Safeguarding Unit is one of a number of non-locality based / centrally managed services and this is where the LADO, Senior IRO and Schools Safeguarding team are located.</p>
Public Protection Unit (PPU)	<p>Specialist Police teams which consist of detectives trained specifically to deal with child protection cases. PPU officers deal with suspected intra-familial abuse cases and allegations against adults working with children and young people, although they also contain domestic violence and offender-specific officers too.</p>
The Safeguarding Children Partnership	<p>The Safeguarding Children Partnership (formerly LSCB) has responsibility for ensuring there are effective inter-agency procedures in place for dealing with allegation against people who work with children and for monitoring and evaluating these.</p>
Single Point of Contact (SPOC)	<p>SPOC is designed to ensure all safeguarding alerts and concerns are received in a consistent process and acted upon in accordance with local multi-agency policies and procedures.</p> <p>The primary duty is to act as a Single Point Of Contact for people who wish to raise an alert or concern.</p>

APPENDIX 4: INFORMATION FOR STAFF AND VOLUNTEERS FACED WITH AN ALLEGATION

A quick guide for staff and volunteers who work in schools / education settings who are faced with an allegation

Introduction

Any allegation of abuse is obviously likely to cause a great deal of anxiety and concern. This quick guide is appended to the procedure for managing allegations against adults who work in Lancashire schools and education settings. It is intended to provide you with a broad overview of some of the key issues and to signpost you to appropriate information, advice and support.

Professional Associations and Trade Unions

You should have already been advised to contact any professional association that you are a member of. If you haven't already done that you should do it now as they are well placed to offer advice and support in these difficult circumstances.

Suspension

Suspension is not a sanction or automatic response to an allegation; alternatives to it will have been discussed and carefully considered prior to a decision to suspend being taken. In taking a decision to suspend, your employer will have taken into account the views of the Authority's Safeguarding Co-ordinator and LADO, Human Resources professionals, the Police and Children's Social Care – if they are involved. Suspension is not, in any way, an indication that a conclusion has already been made. Suspension is considered in all cases where:

- Someone's continued presence on site may pose a risk to someone
- To enable a child protection or criminal enquiry to proceed un-impeded
- It is serious enough to have the potential for there to be grounds for dismissal

Following a suspension you should be invited to a meeting with your employer to discuss your return to work.

Investigative processes

As the procedure states, the allegation may be the subject of an investigation by Children's Services or the Police. At the conclusion of any investigation by CS or the Police, or if these agencies decide that they do not need to conduct an investigation, the matter will be handed back to the school / your employer to deal with. If this involves an internal disciplinary investigation, you will be provided with advanced notice of any meetings, together with the right to be represented by a representative of a professional association, as required under the College's disciplinary procedure (which you should ask for a copy of). It may also be the case that you will be provided with advice, guidance, training and / or support in respect of any issues that have emerged following this allegation. You should think about what would be of particular use to you and be prepared to make this clear to your employer.

Confidentiality

Clearly, allegations of abuse are extremely sensitive matters and all reasonable steps will be taken in order to ensure that any information pertaining to them will be dealt with in strictest confidence and on a 'need to know' basis. In the unlikely event that the matter becomes subject to speculation outside of the workplace / in the public domain, advice will be sought regarding any action that may be required to address and manage this. Again, this will be done with the utmost sensitivity and in consultation with you and any other individuals who may be affected.

Five frequently asked questions

❖ When will I be given the opportunity to respond to an allegation?

The principles of natural justice dictate that any person accused of something should be afforded an opportunity to know what is being alleged and to respond. How and when that occurs will depend upon the nature of the allegation and any enquiries that are being made in respect of it. Rest assured, you will certainly be provided with information and an opportunity to respond as soon as possible.

❖ If I am to be spoken to or interviewed by Police and / or Children's Services (i.e. a social worker) when and where will this happen?

Again, the need for sensitivity and discretion is at the forefront of everyone's mind in dealing with matters of this sort. In the event that you do need to be spoken to or interviewed then this will be arranged and handled with the utmost discretion. Again, you should seek advice from your Union / Association regarding any additional advice and support that you may need in the event that you are to be interviewed formally.

❖ What information about this process, including meetings and / or investigative processes, will be available to me following an allegation and during a subsequent investigation?

If you are faced with an allegation you should be provided with a copy of the 'Procedure for Managing Allegations'. This will inform you of the process(es) that need to be followed by your employer and the relevant authorities / agencies in dealing with the allegation. Minutes of the strategy meetings (see sections 10 and 11) are confidential documents and are not disclosed to any third parties (i.e. those not in attendance) as a matter of course. Once any enquiries have been concluded a request for a summary of any such meeting can be made to the Chair of the meetings and you should seek advice from your Union / Association in the event that you wish to access this. For obvious reasons, the disclosure of any records / potential evidence held by investigative agencies is subject to the usual rules of confidentiality and Data Protection / Freedom of Information Act legislation.

❖ What records will be kept, by whom and for how long?

In line with the relevant national guidance, the employer and LADO are required to keep a record of all allegations for ten years or until you reach retirement age whichever is the longer. Such records are maintained for the protection of adults and children alike and you should be provided with a copy of the record that is kept by your employer.

❖ Will this impact upon any future CRB or DBS disclosure or references if I apply for another job?

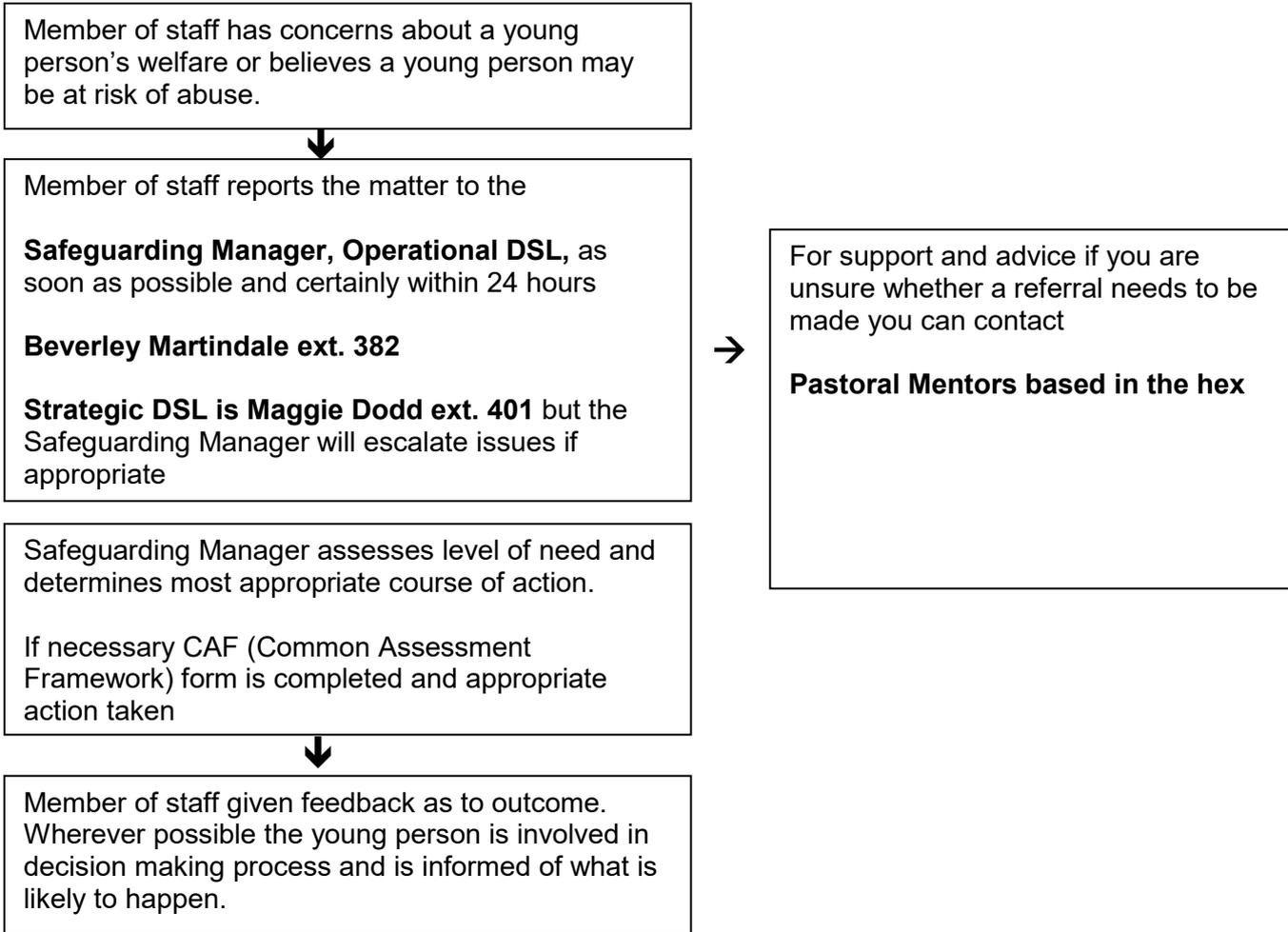
DBS information is disclosed at the discretion of the Chief Constable although discussions about DBS disclosures may occur during the course of multi -agency strategy meetings.

Employers will provide details of any allegations that have been made against individuals in the event that they are asked for a reference by a prospective employer; this is in line with best (safe recruitment and selection) practice and is intended to ensure that clarity is achieved which protects adults and children alike i.e. it will prevent unnecessary re-investigation in future and leave no doubt that appropriate and robust procedures were followed and the matter dealt with appropriately at the time.

Do take time to read the managing allegations procedure and appendices carefully and liaise with your Union / Association representative and Contact Officer, where applicable, in the event that you need to clarify anything.



**Safeguarding and Child Protection Procedure
(including Prevent Duty)
(Children under 18 and Vulnerable Adults)**



If a student makes a disclosure or staff member has concerns

Staff should not

- Do nothing / assume that another agency will act or is acting.
- Promise confidentiality / say you can keep a secret – you may have to pass information on.
- Attempt to resolve the matter themselves.

Staff should

- Listen.
- Take young person seriously
- Act without delay, complete a Safeguarding Alert through Mark book (if concerned but unsure whether issue needs to be reported, talk your concerns through with one of the named people above)



The importance of British Values at Lancaster & Morecambe College

At Lancaster & Morecambe College, British values are of paramount importance to us. We see British values as underpinning what it is to be a citizen in a modern and diverse Great Britain.

As well as actively promoting these values to our students, we are also embedding these into student work across all curriculum areas.

In 2014, the department of Education published guidance on promoting British values in schools to ensure young people leave school and college prepared for life in modern Britain and these values were first set out in the 'Prevent' Strategy in 2011.

The five part definition of British values is as follows:

- Democracy
- The rule of Law
- Individual liberty
- Mutual respect
- Tolerance of different faiths and beliefs

With these values in mind, at Lancaster & Morecambe College, we aim to:

- Help students to become valuable and rounded members of society who treat others with respect and tolerance, regardless of background.
- Promote the basic British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different beliefs and faiths to students.
- Ensure young people understand the importance of respect and leave college fully prepared for life in modern Britain
- Celebrate difference and promote diversity.
- Encourage an understanding of the difficulties other cultures face where such values are not respected.

We are also taking action to:

- Embed different materials about democracy and how the law works into different college curriculum areas
- Ensure that all our students have a voice that is listened to and valued and demonstrate how democracy works through promoting our Student Ambassadors and encouraging students to feedback to us through Student Surveys and the student representatives

- Use opportunities such as general elections and debates to promote British values and help students to argue and defend different points of view
- Develop and encourage extra-curricular activities amongst students which promote fundamental British values such as an active Law Society, Faith and Belief groups and a peer support scheme
- Actively consult with our student representatives to gather student views and feedback on key college policies that effect the student body
- Encourage student participation in working with the wider community and commemorating key events such as Holocaust Memorial Day and Armistice Day to gain an understanding of how British values have evolved
- Encourage students to become responsible learners and to actively participate in their own learning and development

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Reviewed by:	DSL & Safeguarding Manager
Date of next review:	September 2020