

OD 3.1 Safeguarding Procedures

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Date of Origin	Last Updated	Proposed Review Date	EQIA Date	Responsibility For Review
September 2017	September 2017	June 2018		Assistant Principal: Organisational Development

1. Purpose

The purpose of these procedures is to ensure good practice is executed within the college in accordance with Safeguarding Policy OD 3.1, to safeguard the welfare of children, young people and adults at risk within the learner population.

Standard documentation (Appendix 2 to 5) has been prepared, and should be used to support the implementation of this procedure and the system is intended to be transparent, accurate, recorded and available for scrutiny.

For ease of implementation guidance for staff in the execution of the policy has been split into three sections, 1) Child Protections 2) Adult Protection and 3) General Organisational Procedural Guidance.

2. Grounds for a concern

Through day-to-day contact with students, staff in the College are well placed to observe outward signs of harm or abuse or a change in appearance, behaviour, learning pattern or development. Such symptoms could be due to a wide variety of causes inducing: mental ill health, bereavement, changes in family circumstances, drug, alcohol or substance misuse or relationship problems. However, staff must be alert that sometimes this may be due to harm or abuse.

Grounds for a safeguarding concern can arise from a range of circumstances:

1. A child or adult at risk states that abuse or harm has taken place or feels unsafe.
2. A 3rd party or anonymous allegation or concern is raised regarding a child's or adult at risks safety or wellbeing.
3. There are suspicions or indicators that a child or adult at risk may have been harmed.
4. A change in the individual has taken place which has caused concern.
5. There is concern regarding the behaviour of a member of staff towards a child or adult at risk or there is a suspicion that a staff member or volunteer is harming a child or adult at risk.
6. A report has been made to the college that an individual may be a threat to the college community.

Safeguarding concerns which arise through direct disclosure, indirect disclosure via third party or through observation should always be reported to a member of the Safeguarding Team.

See Appendix 1 for Definitions and Categories of Harm

3. Staff Roles and Responsibilities

Staff will respond accordingly to all safeguarding concerns in accordance with the accompanying procedural guidance. Adhering to the Safeguarding policy and procedure is mandatory and safeguarding is the responsibility of every member of college staff. Every member of College staff has a role to play in safeguarding and thus this procedure is relevant and applicable to all staff members and those working on the college premises.

Contractors, volunteers and other people working for or within the College will also be required to operate within the ethos and parameters of the policy and its associated procedures. The policy and procedures apply across all College Campuses and to all staff and students on these premises, including activity conducted by the Students' Association.

The College will ensure that all staff, including temporary, part-time and voluntary staff, who could potentially have unsupervised contact with children and adults at risk are deemed appropriate to work with them in terms of the relevant legislation and implementation of the PVG scheme.

Staff must also be aware of the legal implications that may follow action taken should a case go to court. Any staff member involved in a reported safeguarding disclosure may be cited as a witness if the matter became subject to court proceedings and they would have a legal obligation to comply. Staff are expected to cooperate with Social Work Teams, Police Scotland, Scottish Children's Reporter Administration (SCRA), the Procurator Fiscal, as appropriate if so requested by these agencies.

However, there are some staff who have additional responsibilities in relation to the College's safeguarding arrangements:

Safeguarding Lead/Depute

Within the College's management structure, lead responsibility for safeguarding sits with the Assistant Principal: Organisational Development, with support provided by the Assistant Principal: Quality Enhancement, who acts as Depute Safeguarding Lead. The Safeguarding Lead/Depute will ensure that the College has robust safeguarding arrangements in place, that appropriate training is provided to staff and that systems are in place for documenting and recording safeguarding concerns and are compliant with statutory and legal obligations.

Safeguarding Officers

The College has identified a number of key personnel, who act as Safeguarding Officers, who have a particular responsibility to act as a point of contact for staff raising safeguarding issues. This group is collectively described as 'The Safeguarding Team'. Guidance and support on any safeguarding matter will be available through the

Safeguarding Team on an ongoing basis, and specifically for staff who are involved in a referral under this policy and procedure.

The number of Safeguarding Officers within the staffing team will be kept under regular review, to ensure that adequate support is provided across our campuses. Details of the Safeguarding Team and how they can be contacted will be promoted across the College via Staff Development sessions, Safeguarding Team posters and by identifying members of the Safeguarding Team on The Clan staff portal.

Safeguarding officers have responsibility for liaising with appropriate external agencies and can participate in meetings with external agencies as appropriate in support of the College's safeguarding arrangements.

Line Managers

Within their own teams and areas of responsibility, line managers are responsible for making sure that staff are alert to possible concerns, particularly if teaching children or vulnerable groups and that relevant information is shared with staff to the extent that it is appropriate to do so. Line managers must also ensure that staff for whom they are responsible are aware of the boundaries of appropriate contact with learners, and have a duty to ensure that where a member of staff has been involved supporting a safeguarding incident, that appropriate support is provided to the staff member where required. Referral to Occupational Health Services may be required and can be arranged by line managers or Safeguarding Team members if deemed appropriate.

Section 1: Child Protection

A full summary of procedures relating to Child Protection is provided in Appendix 6.

How to Respond if a Child Discloses Abuse

All staff must understand the College's duty of care to *listen, respond, report* and *accurately record* any concerns, suspicions or disclosures, seeking support from the appropriate personnel from the Safeguarding Team, as required. An initial disclosure could be made to any member of staff and they must respond appropriately in accordance with procedural guidance.

If an allegation is brought to the attention of any member of staff, they should:

- Ensure the child is made aware that the information they provide may have to be shared with other relevant professionals, in line with College confidentiality procedures. Staff must not promise to keep secrets of any allegations or concerns, even if the individual or third party requests it. There can be no guarantee that a source of concern can be kept confidential.
- Allow the child to speak without interruption. The child must give information in their own words, without pressure or suggestion.
- The child must be allowed to give the information they wish, in the order they wish to give it with the level of detail they wish to provide.
- Keep questions to a minimum. Only ask open ended questions such as, "Can you tell me more about that". Ensure that you do not use leading questions or suggest words.
- Listen with care to what the child has to say and show that they are being taken seriously.
- Affirm the individual's feelings and confirm that you know it must be difficult to confide.
- If reasonable suspicion is provided then questioning should stop and a report created.
- Stay calm - and not rush into inappropriate action.
- Always treat individuals with utmost dignity and respect.
- Reassure the child that they were right to share this information.
- Ensure that the staff member clearly understands what the child has said, in order that they can make an accurate report to the Safeguarding Team.

- Make notes recording exactly what the child has told them (in the child's own words). Staff should then record information on the Safeguarding Referral Form (Appendix 2) and Record info as soon as possible, on the same day.
- Information contained on a Safeguarding Referral Form must be relevant, accurate, signed, and dated as it may become a legal document. Use succinct factual information and a summary of your responses/actions taken. Precision is important if legal action is deemed necessary by the Social Work Department or the Police.
- Explain to the child that information will be handled sensitively and only conveyed to individuals who need to support them. It is good practice to seek an individual's consent to refer the matter to the Safeguarding Team but staff must report issues with or without consent if abuse is suspected. Explaining matters in a caring and sensitive manner should establish cooperation.
- Consult the Safeguarding Team and their Line Manager immediately, ensuring that they communicate all the information accurately to enable them to offer support and appropriate guidance. You must not be a delay in deciding to initiate procedures due to specific Safeguarding Team staff absences. An alternative Safeguarding Team member must always be identified and the process invoked. Grounds for concerns should always be treated as a priority for action.
- Staff should seek personal support through the Safeguarding Team if they have found dealing with child protection issues(s) difficult or distressing. The Occupational Health Team are available to provide further support where a staff member may have found involvement in the process distressing and needs further support.

Staff Members should not:

- promise secrecy
- ask the child to repeat facts unnecessarily
- ask leading questions or probe for detailed information
- seek proof
- delay in responding to or recording disclosures
- panic or display strong emotional responses, expressing disbelief or shock to disclosed information
- investigate
- evaluate grounds for concern
- provide personal or third party experiences
- take sole responsibility for further action

Staff must be aware that it is the responsibility of Social Work to investigate allegations of child abuse and such investigations are conducted by specialist highly trained individuals, skilful in such investigations, in cooperation with the police. Our role is to record and report information shared by learners that may require further investigation by the appropriate authorities.

All staff must follow College procedures for recording and storing confidential information in accordance with the college policy on data management. No information should be referred to an external agency by any member of staff out with the Safeguarding Team or the College's Senior Management Team.

Recording Information

If you have a concern regarding a child or adult at risk or a concern is declared to you, it is imperative that you record the relevant information in the following ways. Guidance on completion of documentation can be sought from Safeguarding Officers.

If a child discloses to you that they are being harmed, you should complete the Safeguarding Disclosure Form (Appendix 2). This should be completed immediately and it should contain full information. This form must then be passed immediately to a member of the Safeguarding Team for consideration and potential action.

The Safeguarding Team:

Safeguarding staff must treat all allegations as a priority for urgent consideration and take action, which they deem in their professional judgement to be in the child's best interests. It is imperative that staff act swiftly, appropriately and proportionately where there are reasonable grounds for concern.

Consultation with another Safeguarding Team colleague to confirm the appropriateness of a proposed course of action following an initial disclosure will provide team members with peer support and to reach a consensual decision regarding the disclosure. Guidance from the Depute Safeguarding Lead or Safeguarding Lead is imperative prior to external contacts being made and consent for external referral must be granted. Alternatively, guidance can be sought from an appropriate member of the Senior Management Team where no senior members of the Safeguarding Team are available for consultation.

Where action is deemed necessary, Safeguarding staff will:

- Notify the duty social worker at Social Work Office within working hours, or contact the Social Work Emergency Out-of-Hours Service.
- Urgent circumstances may require involvement of police to ensure an individual's protection.
- Immediate contact must be made with HR if a staff member is alleged to have been involved in abuse or harm.
- Collate and hold information in a confidential incident file.
- Share information only on a need to know basis.

- Keep an open mind about the information disclosed.

Reports to the Social Work Department must include the following:

- Details of grounds for concern as detailed on the Disclosure Form.
- Contact details and particulars of the child.
- The immediate support needs of the child.
- How and when parents/ guardians are notified, if deemed appropriate within the context of the allegation.
- Any further action required by Safeguarding Officer.

When liaising with Social Work or the Police:

- Establish any action to be taken by Social Work Department or Police.
- The details of the appropriate recipient of the Safeguarding referral within the agency eg) secure email line etc.
- If any record keeping or feedback will be received back from Social work or Police and a timescale, if known.

Completion of the External Referral Form (Appendix 3) is mandatory following any report to the relevant external support agency (Social Work, Police Scotland or Local Education Authority). This form must only be completed by an appointed member of the Safeguarding Team.

Ongoing support:

The college will provide ongoing support for a child at risk through a member of the Safeguarding Team. This will involve follow-up contact with the learner for an appropriate duration, keeping the learner abreast of progress where possible and appropriate.

Section 2: Adult Protection

A full summary of procedures relating to Child Protection is provided in Appendix 7.

How to Respond if an Adult at Risk Discloses Harm

All staff must understand the College's duty of care to *listen, respond, report* and *accurately record* any concerns, suspicions or disclosures, seeking support from the appropriate personnel from the Safeguarding Team, as required. An initial disclosure could be made to any member of staff and they must respond appropriately in accordance with procedural guidance.

Role of the advocate: Where deemed appropriate or necessary a staff member from the Faculty of Supported Learning may be required to act as an advocate in a supportive capacity to aid communication and provide reassurance and support to the adult at risk when discussing a disclosure.

If an allegation is brought to the attention of any member of staff, they should:

- Ensure the adult at risk is made aware that the information they provide may have to be shared with other relevant professionals, in line with College confidentiality procedures. Staff must not promise to keep secrets of any allegations or concerns, even if the individual or third party requests it. There can be no guarantee that a source of concern can be kept confidential.
- Allow them to speak without interruption. They must give information in their own words, without pressure or suggestion.
- The adult at risk must be allowed to give the information they wish, in the order they wish to give it with the level of detail they wish to provide.
- Keep questions to a minimum. Only ask open ended questions such as, "Can you tell me more about that". Ensure that you do not use leading questions or suggest words.
- Listen with care to what they have to say and show that they are being taken seriously.
- Affirm the individual's feelings and confirm that you know it must be difficult to confide.
- If reasonable suspicion is provided then questioning should stop and a report created.
- Stay calm - and not rush into inappropriate action.
- Always treat individuals with utmost dignity and respect.

- Reassure them that they were right to share this information.
- Ensure that the staff member clearly understands what the individual has said, in order that they can make an accurate report to the Safeguarding Team.
- Make notes recording exactly what the adult at risk has told them (in the individual's own words). Staff should then record information on the Safeguarding Referral Form (Appendix 2) and Record info as soon as possible, on the same day.
- Information contained on a Safeguarding Referral form (Appendix 2) must be relevant, accurate, signed, and dated as it may become a legal document. Use succinct factual information and a summary of your responses/actions taken. Precision is important if legal action is deemed necessary by the Social Work Department or the Police.
- Explain to the individual that information will be handled sensitively and only conveyed to those professionals who need to support them. It is good practice to seek an individual's consent to refer the matter to the Safeguarding Team, but staff must report issues with or without consent if abuse is suspected. Explaining matters in a caring and sensitive manner should establish cooperation.
- Consult the Safeguarding Team and their Line Manager immediately, ensuring that they communicate all the information accurately to enable them to offer support and appropriate guidance. You must not be a delay in deciding to initiate procedures due to specific Safeguarding Team staff absences. An alternative Safeguarding Team member must always be identified and the process invoked. Grounds for concerns should always be treated as a priority for action.
- Staff should seek personal support through the Safeguarding Team if they have found dealing with protection issues(s) difficult or distressing. The Occupational Health Team are available to provide further support where a staff member may have found involvement in the process distressing and needs further support.

Staff Members should not:

- promise secrecy
- ask the adult at risk to repeat facts unnecessarily
- ask leading questions or probe for detailed information
- seek proof
- delay in responding to or recording disclosures
- panic or display strong emotional responses, expressing disbelief or shock to disclosed information
- investigate
- evaluate grounds for concern

- provide personal or third party experiences
- take sole responsibility for further action

Staff must be aware that it is the responsibility of Social Work to investigate allegations of harm to adults at risk, and such investigations are conducted by specialist highly trained individuals, skilful in such investigations, in cooperation with the police. Our role is to record and report information shared by learners that may require further investigation by the appropriate authorities.

All staff must follow College procedures for recording and storing confidential information in accordance with the college policy on data management. No information should be referred to an external agency by any member of staff out-with the Safeguarding Team or the College's Senior Management Team.

Recording Information:

If you have a concern regarding an adult at risk or a concern is declared to you, it is imperative that you record the relevant information in the following ways. Guidance on completion of documentation can be sought from Safeguarding Officers.

If an adult at risk discloses to you that they are being harmed, you should complete the **Safeguarding Disclosure Form** (Appendix2). This should be completed immediately and it should contain full information. This form must then be passed immediately to a member of the Safeguarding Team for consideration and potential action

The Safeguarding Team:

Safeguarding staff must treat all allegations as a priority for urgent consideration and take action which they deem in their professional judgement to be in the adult at risk's best interests. It is imperative that staff act swiftly, appropriately and proportionately where there are reasonable grounds for concern.

Consultation with another Safeguarding Team colleague to confirm the appropriateness of a proposed course of action following an initial disclosure will provide team members with peer support and to reach a consensual decision regarding the disclosure. Guidance from the Depute Safeguarding Lead or Safeguarding Lead is imperative prior to external contacts being made and consent for external referral must be granted. Alternatively, guidance can be sought from an appropriate member of the Senior Management Team where no senior members of the Safeguarding team are available for consultation.

Safeguarding Decisions:

The Safeguarding Officers will undertake consultation with the Safeguarding Lead or Depute, who will then make a decision as to the appropriate action.

Three decisions may be made:

- **No further action required** – concerns have been allayed but written documentation regarding the concern and the reasons for no further action being taken will be kept.
- **Continued monitoring of the situation** – concerns have not been fully allayed but a formal referral to Social Work is not required at that time. Involved parties will continue to listen, observe, record, consult and report.
- **Formal referral** – referral will be made to Social Work Services and or Police Scotland for further investigation.

Where action is deemed necessary, Safeguarding staff will:

- Notify the duty social worker at Social Work Office within working hours or contact the Social Work Emergency Out-of-Hours Service.
- Urgent circumstances may require involvement of police to ensure an individual's protection.
- Immediate contact must be made with HR if a staff member is alleged to have been involved in abuse or harm.
- Collate and hold information in a confidential incident file.
- Share information only on a need to know basis.
- Keep an open mind about the information disclosed.

Reports to the Social Work Department must include the following:

- Details of grounds for concern as detailed on the Disclosure Form.
- Contact details and particulars of the adult at risk.
- The immediate support needs of the adult at risk.
- How and when parents/guardians/support service are notified, if deemed appropriate within the context of the allegation.
- Any further action required by Safeguarding Officer.

When liaising with Social Work or the Police:

- Establish any action to be taken by Social Work Department or Police.
- The details of the appropriate recipient of the Safeguarding referral within the agency eg) secure email line etc.
- If any record keeping or feedback will be received back from Social work or Police and a timescale if known.

Completion of the **External Referral Form (Appendix 3)** is mandatory following any report to the relevant external support agency (Social Work or Police). This form must only be completed by an appointed member of the Safeguarding Team.

Ongoing Support:

The college will provide ongoing support for an adult at risk at risk through a member of the Safeguarding Team. This will involve follow-up contact with the learner for an appropriate duration, keeping the learner abreast of progress where possible and appropriate.

Section 3: General Organisational Procedural Guidance

Disclosure Scotland Checks

Under the Protection of Vulnerable Groups (Scotland) Act 2007, certain roles working with children or adults at risk are considered regulated work. Where an individual has applied for or is undertaking regulated work, it is an offence for such work to be offered or continue if an organization has not taken steps to ensure that individuals are not barred from regulated work in relation to children or adults at risk. The means of checking whether an individual is barred is through a Protection of Vulnerable Groups (PVG) Scheme check. PVG Scheme checks are undertaken via Disclosure Scotland.

All posts within the College are considered as childcare posts under PVG legislation and the College requires that all new and existing staff are members of the PVG Scheme in relation to regulated work with children. All appointments at the College are subject to a PVG Scheme check, which confirms that an individual is not barred from working with children. The College's activities do not fall within the scope of regulated work with adults.

PVG Scheme Checks also disclose any previous convictions, cautions, reprimands or other information that a Chief Constable considers is relevant to the post for which an individual has applied. This information will also be taken into account when considering an individual's suitability for employment with the College. Further details are available in the College's recruitment and selection procedures and PVG Scheme Policy.

The only exception to the requirement to undertake PVG Scheme checks relates to staff involved in the delivery of learning and teaching under contract to the Scottish Prison Service, which is not considered as regulated work. However, this group of staff are still subject to a criminal record check which will take the form of an Enhanced Level Disclosure check, undertaken through Disclosure Scotland.

The College will also undertake PVG Scheme checks for students undertaking a placement as part of their course in regulated work with either children or adults at risk. This will be managed by relevant the faculty management team.

The College's Safeguarding Lead is the Lead Countersignatory for PVG Scheme checks and is the main point of contact with Disclosure Scotland. The Lead Countersignatory is supported by designated countersignatories within Human Resources and faculties involved in student placements. The Lead Countersignatory will ensure that regular training and updates are provided to the Countersignatory Team to ensure that they are aware of their responsibilities.

Engagement with External Agencies & Groups

To meet our general safeguarding responsibilities and to ensure that appropriate decisions are taken in relation to safeguarding particular individuals and groups, the College will engage with a range of external agencies. This may include schools, local and central government, social work/criminal justice teams, Disclosure Scotland, services involved in supporting specific individuals and, in some cases, Police Scotland. We will also engage with a number of sources of guidance and training providers.

Much of this engagement will be at a general level and will build on existing links and partnerships. Where specific engagement is required in relation to a particular individual in connection with the completion of a risk assessment, all engagement will be with the individual's consent. The College will process all information in accordance with the Data Protection Act 1998 and will only share this information to the extent permitted by law and to ensure that appropriate decisions can be made regarding that individual's study or employment with the College.

The decision to report a staff member or learner to the police or to make a statutory referral under the Protection of Vulnerable Groups (Scotland) Act 2007, Adult Support and Protection (Scotland) Act 2007 or the PREVENT duty will be taken by the Safeguarding Lead/Depute or, in their absence, by a member of the Senior Management Team.

Risk Assessments

A Summary of the Risk Assessment Process for Learners or Prospective Learners is provided in Appendix 9.

Learners

The College recognises that access to education can have a transformative effect on an individual's circumstances and can play a key role in encouraging positive life changes. However, in some cases, where a student discloses a previous history of offending, or that s/he is subject to any legal conditions or restrictions that may affect their ability to access College or, for existing students, to complete their course successfully, the College will undertake a formal risk assessment (see Appendix 4: Risk Assessment Meeting Matrix and Appendix 5: Risk Assessment Report Form) at the earliest practical opportunity when safeguarding concerns have been raised. Risk assessments will also be undertaken where the College receives information from the police or a third party regarding a prospective or current learner or staff member.

In liaising with third party referral agencies in relation to students with previous history of offending it may be useful for Safeguarding officers to pose the following questions:

1. In your opinion does this person cause a risk to members of the public attending New College Lanarkshire?
2. Does this person fully understand that the College are bound by the terms of its Protection of Children and Adults at Risk Policy and the College PVG Policy?
3. Can you write to me detailing the circumstances around this person's offence which may be pertinent?
4. Are you aware that the College is required to carry out a risk assessment which will determine whether or not it is suitable for this person to attend College?
5. Are you aware that the results of a risk assessment may restrict this person's movement around the College campus, if they are accepted as a learner?

For the purposes of this policy, a 'prospective learner' means an individual who has made an application to study at the College or who has contacted the College to disclose information as a precursor to the application process. A delay on permitted entry to college may be required in the case of an applicant, or a leave of absence may be arranged if safeguarding concerns are raised during a period of study, to facilitate the risk assessment process to be conducted and a decision to be reached. The decision of the Safeguarding Lead / Depute shall be binding. However, if a learner or prospective learner is dissatisfied with the way in which a decision has been reached, this can be raised via the College's Complaints Handling Policy and Procedures.

In circumstances where a risk assessment is required in relation to a prospective or current student's access to College, the Safeguarding Lead/Depute will arrange for this to be completed by two Student Advisers. The assessment itself will consist of discussing the disclosure with the student and, with their consent, any other party who may be able to provide additional information, such as a social worker, previous school, key worker or any specialist service with whom the individual has engaged. The purposes of the risk assessment will be to establish the facts of the circumstances and associated risks. This may include discussion with appropriate faculty staff.

The completed risk assessment documentation(Appendix 4 and 5) will be forwarded to the Safeguarding Lead/Depute who will be responsible for reaching a decision on whether the student can be offered a place at College, or continue with their current programme of study. In reaching a decision, the Safeguarding Lead/Depute may consult with appropriate senior and faculty staff. Proportionality will be applied in consideration of the potential risks posed and in reaching a decision with regards to the future in the college of the individual concerned.

Risk Assessments for Staff

A summary of procedures pertaining to risk assessments for staff is contained in Appendix 10.

If the police or other appropriate agency notifies the College of a known offence or suspected risk of offending against children, young people or adults at risk by a member of staff, the Safeguarding Lead / Depute will request that the police confirm the information in writing. If the person is considered to represent a risk, the Safeguarding Lead / Depute will have an initial discussion with the relevant Vice Principal to undertake a risk assessment and to consider what action, if any, may be required in accordance with the College Staff Disciplinary Policy and Procedure.

Referrals to Police Under Prevent Strategy:

Should concern be raised regarding a student or staff member under the terms of the PREVENT strategy contact should be made directly with the Assistant Principal for Organisational Development who is the Single Point of Contact (SPOC) in relation to engagement on PREVENT issues and is also the College's designated Safeguarding Lead. Concerns should be recorded on the Safeguarding Disclosure Record Form (Appendix 2) and forwarded to the Assistant Principal for Organisational Development to determine if external contact should be made and the referral will be recorded on External Referral Form (Appendix 3).

Staff Training

The College will ensure that all staff are provided with regular safeguarding training relevant to their posts regarding their legal and professional obligations to protect children and adults at risk from harm, abuse and exploitation, as well as in the execution of the policy and its associated procedures.

This will range from general safeguarding awareness sessions, to sessions focused on supporting particular groups e.g. school pupils or in relation to mental health. Specific additional training will be provided to staff with additional responsibility within our safeguarding arrangement, such as Safeguarding Leads and the Safeguarding Team.

General information will be provided to new staff during their induction period and safeguarding training will be mandatory. Regular refresher training will be offered throughout each academic year and existing staff will be expected to attend a training session at least once every three years.

Safeguarding Team members will attend specific Safeguarding training as deemed appropriate by the Safeguarding Lead and/or Depute and will meet on a biannual basis to reflect on safeguarding issues experienced and to share good practice.

Retention of Records

All safeguarding records are stored securely and in accordance with the Data Protection Act 1998. Records of individual concerns will be held by the relevant member of the Safeguarding Team and a summary of all concerns will be retained centrally. Case files will be securely archived at the point that a learner leaves the College.

In line with guidance from the College's insurers and taking account of the fact that there have been a number of historical investigations held into safeguarding concerns within Scotland and the UK, the College will retain all safeguarding records for a minimum period of 25 years. This also applies to the information relating to any member of staff against whom action was taken in relation to a safeguarding concern raised in connection to his or her employment at the College.

Appendix 1:

Definitions and Categories of Harm

Physical Injury and Neglect

Actual or attempted physical injury to a child, young person or adult at risk including the administration of toxic substances, where there is knowledge, or reasonable suspicion, that the injury was inflicted or knowingly not prevented.

Physical injury may include a serious incident or a series of minor incidents involving bruising, fractures, scratches, burns or scalds; deliberate poisoning, attempted drowning or smothering, Munchausen Syndrome by proxy, serious risk of actual injuries resulting from parental lifestyle prior to birth, for instance, substance abuse, physical chastisement deemed unreasonable.

This occurs when the essential needs of a child, young person or adult at risk are not met and this is likely to cause impairment to physical health and development. Such needs include food, clothing, cleanliness, shelter and warmth. A lack of appropriate care, including access to health care, may result in persistent or severe exposure, through negligence, to circumstances which endanger the child, young person or adult at risk.

Physical neglect may also include a failure to secure appropriate medical treatment for the child, young person or adult at risk, or when an adult carer persistently pursues or allows the child to follow a lifestyle inappropriate to the child's developmental needs or which jeopardises the child's health.

Sexual Abuse

Any child, young person or adult at risk may be deemed to have been sexually abused while any person(s), by design or neglect, exploits them directly or indirectly, in any activity intended to lead to the sexual arousal or gratification of that person or any other person(s) including organised networks. This definition holds whether or not there has been genital contact and whether or not the child or adult at risk is said to have initiated or consented to the behaviour.

Sexual abuse may include activities such as incest, rape, sodomy or intercourse with children, lewd or libidinous practices or behaviour towards the children, indecent assault of children, taking indecent photographs of children, or encouraging children to become prostitutes or to witness intercourse or pornographic materials.

Activities involving sexual exploitation, particularly between young people, may be indicated by the presence of one or more of the following characteristics – lack of consent, inequalities in terms of chronological age, developmental stage or size, actual or threatened coercion.

Emotional Abuse

Emotional abuse is a failure to provide for the basic emotional needs of a child, young person or adult at risk such as to have a severe effect on their behaviour and development. This may include situations where, as a result of persistent behaviour by the parent(s) or care giver(s), children, young people or adults at risk are rejected, denigrated or made scapegoat, inappropriately punished and/or denied opportunities for exploration, play and socialisation appropriate to their stage of development.

Emotional abuse can also occur where a child, young person or adult at risk is placed in a state of fear or alarm by the use or implied use of threats. Isolation preventing the forming of friendships also is a form of emotional abuse.

Sustained or repeated abuse of this type is likely in the longer term to result in failures or disruptions of development of personality, an inability to form secure relationships and may additionally have an effect on intellectual development and educational attainment.

Human Trafficking

Human Trafficking involves the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation.

Exploitation:

This includes the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

Financial Harm

Financial harm can include the theft, fraud, exploitation, pressure in connection with wills, property, inheritance, financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Forced Marriage

Forced marriage is a marriage in which one or both of the parties is married without his or her consent or against his or her will. If it is identified or suspected that a College learner is at risk of being forced to marry against their wishes, this should be reported immediately to a member of the Safeguarding Team who will take the appropriate action and provide guidance and support to the learner and their department.

Honour Based Violence:

Honour based violence is a spectrum of criminal conduct with threats and abuse at one end of the spectrum and honour killing at the other. Such violence can occur when perpetrators believe that a relative/community member who may be a child has shamed the family and or the community by breaking their honour code. Consequently, punishment may be administered in the form of assault, abduction, confinement, threats or murder.

Radicalisation

As part of our safeguarding policy and the Equality Act 2010 all staff have a duty to demonstrate and help develop values which underpin an awareness of social and moral responsibility in modern Britain. Protecting those who are vulnerable and at risk of radicalisation is a job for all of us.

We must therefore respond to the ideological challenge of terrorism and the threat we face from those who promote it so we can help prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.

**Appendix 2: Safeguarding Disclosure Record Form -
to be passed to Safeguarding Team**

Safeguarding Disclosure Record Form	
Name of person reporting incident:	
Position:	
Name of child or adult at risk:	
Date of birth of child or adult at risk:	
Course and campus attended:	
Address of child or adult at risk:	
Name of secondary school (if applicable):	
Parent/carer/next of kin name and address:	
Parent/carer/next of kin contact number:	
Date and time concern was brought to your attention:	
Your observations:	

Incident Record Form cont.**Record exactly what was reported by the child or adult at risk:**

(Record actual details. Do not ask leading questions. Continue on separate sheet if necessary)

Action taken:**Signature of staff member:****Print name:****Date:**

Data Protection: The personal data contained in this form will be held confidentially and only disclosed to a third party in the processing of the incident.

Date received by Safeguarding Team:**Name of receiving Safeguarding Officer:****External referral made****Y/N****if Yes Date actioned:**

**Appendix 3: External Referral Form:
(Only to be completed and actioned by a member of the Safeguarding Team)**

External Referral Record Form (attach Safeguarding Disclosure Record Form)	
Name of child or adult at risk:	
Course and campus attended:	
Date of birth of child or adult at risk:	
Address of child or adult at risk:	
Details of parent/guardian/next of kin:	
Is the individual looked after at home or accommodated?	Yes/No
Details of support needs (if appropriate):	
External Agencies Contacted By Safeguarding Team	
Police	Yes/No
If yes - please give details including date and time:	
Name and contact number of person reported to:	
Details of advice received:	
Social work	Yes/No
If yes – please give details including date and time:	
Name and contact number of person reported to:	
Details of advice received:	

Referral Record Form cont.	
Local authority/education department/school	Yes/No
If yes - please give details including date and time:	
Name and contact number of person reported to:	
Details of advice received:	
Are you aware of previous notifications of concern? If so please provide details	
Notes:	
Safeguarding Officer signature :	
Print name:	
Contact number:	
Email:	
Date:	
Copy to:	Police Social Work Education Department School
	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Remember to maintain confidentiality to protect the child. Only discuss this incident with those who need to know.

Data Protection

The personal data contained in this form will be held confidentially and only disclosed to a third party in the processing of the incident with the agreement of the individual concerned.

Appendix 4: Risk Assessment Meeting Matrix

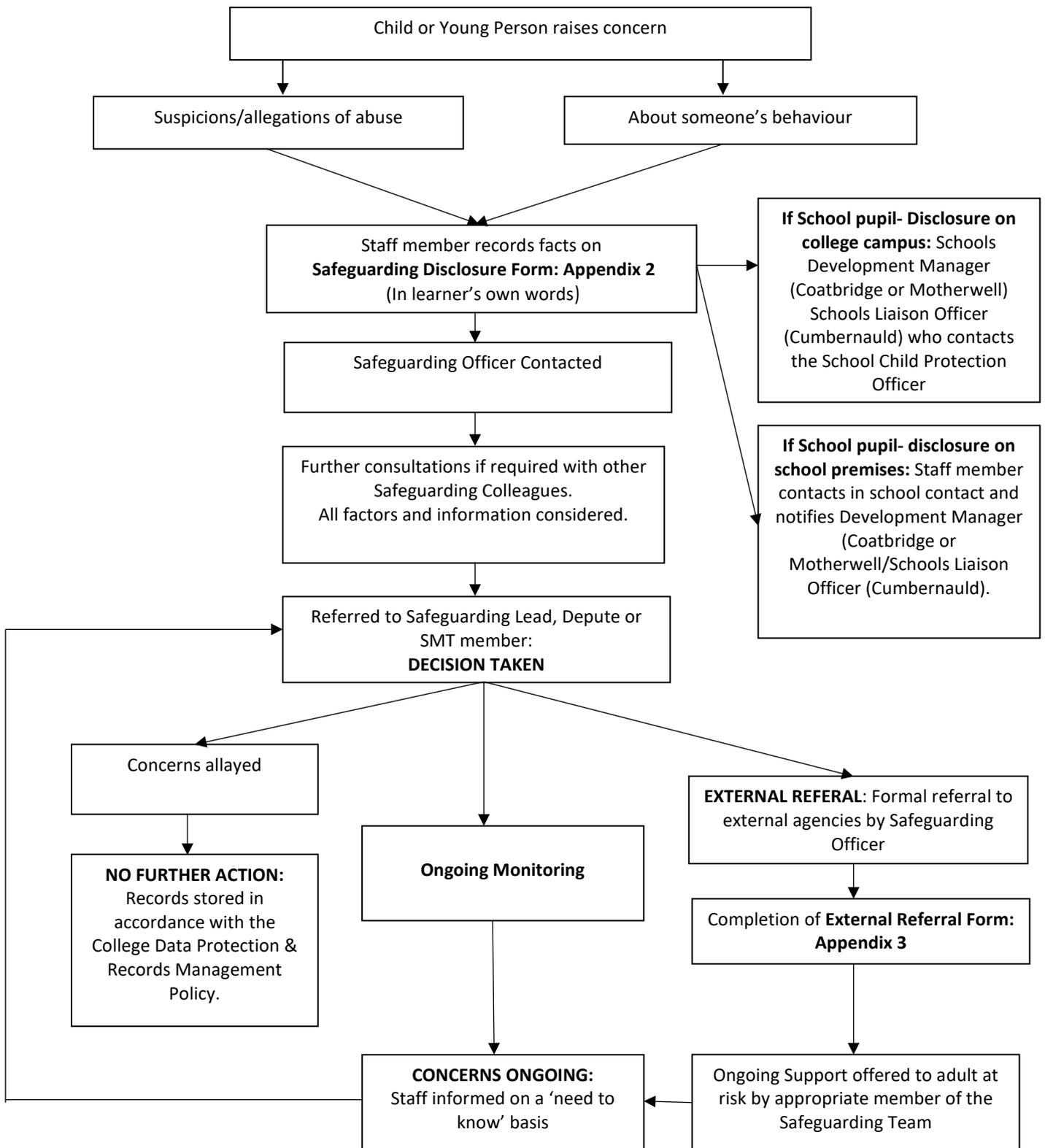
Date of Meeting:	
Location of Meeting:	
Attendees and designations:	

Name of Individual:	
Date of Birth:	
Address:	
Course and Campus:	
Can you tell us in your own words the details of your offence?	
Can you tell us when this happened?	
Can you tell us are you under any restrictions as a result of your offence? <ul style="list-style-type: none"> • Nature • Start • Location(s) if appropriate • End date • Implications for placements, course visits etc? 	
MAPPA Level (if appropriate)	
Name and details of Victim (to establish not a member of college community)	
Can you tell us if you are involved with any other statutory agencies?	
Can you tell us if there are any limitations on activities you may undertake at college?	
Social Work Comments/assessment of risk:	
Additional Questions or comments?	
Documents Provided	Yes/No State:

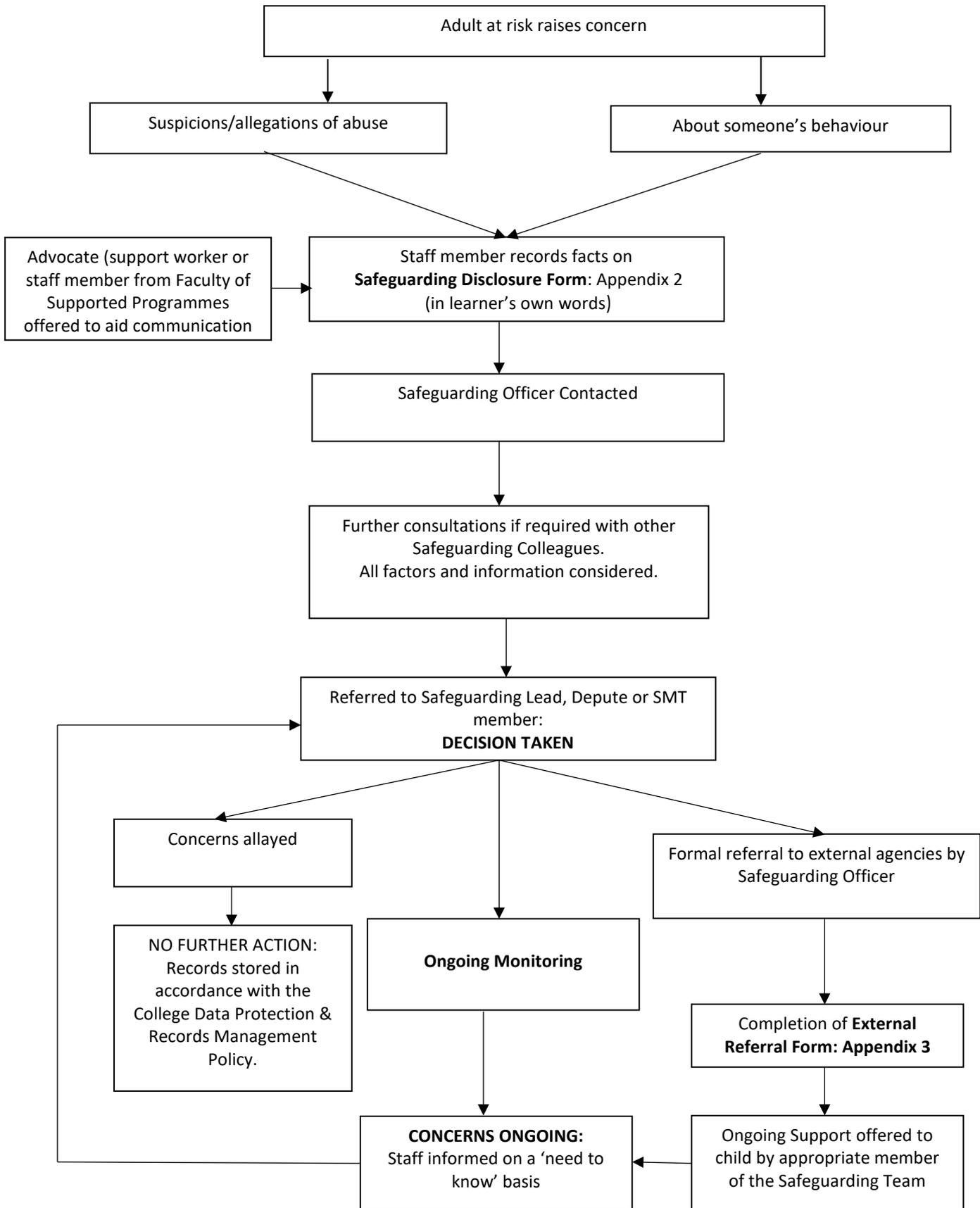
Appendix 5: Risk Assessment Report Form

RISK ASSESSMENT			
Learner Attending College Course:			
Prospective learner:			
Campus:			
Date of Birth:			
Address:			
Assessed Risk	Details	Comments	
Type of course			
Types of activities included in course			
Potential movement around College			
Internet access requirements			
Requirement to interview Social Work Department			
Requirement to interview learner			
Identification of vulnerable learner groups associated with learner's attendance			
Conclusions:			
Safeguarding Officer(s) Name:	Signature	Signature	Date:
Name:			
<p>Data Protection The personal data contained in this form will be held confidentially and only disclosed to a third party in the processing of the incident with the agreement of the individual concerned.</p>			

Appendix 6: Summary of Procedures for responding to suspicions of abuse against or information regarding a Child



Appendix 7: Summary of Procedures for responding to suspicions of harm regarding an adult at risk



Appendix 8: Code of Conduct for Staff

The College recognises that it is not practicable to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with children and adults at risk. However, below are standards of conduct that staff are required to meet in fulfilling their roles and duty of care within the College.

This code aims to assist in the safeguarding and promotion of the welfare of children and adults at risk and in the protection of children, adults at risk and members of staff. The code also applies to volunteers and any other people who may work in an unpaid capacity on College premises, and to individuals supporting work placements for our students.

All staff and others working in the College are required to implement the Safeguarding Policy and Procedure at all times and should routinely act to promote the welfare of children and adults at risk, prevent harm and report any harm that is discovered or suspected.

All staff shall:

- Consistently display high standards of personal behaviour and appearance in line with the professional role being undertaken at the College. This high standard includes ensuring that language used is never inappropriate, offensive or abusive.
- Carry out their role in a manner that respects diversity and promotes and ensures quality.
- Wherever possible, avoid situations where they will be completely unobserved with an individual student, for example, during interviews. An attempt should always be made to arrange for individual contact to take place where the student and staff member can be clearly observed by others e.g. in a room with a glass door or in a room with the door open, if appropriate.
- Ensure that any overly enthusiastic personal feelings that are expressed to a member of staff by a student are immediately reported to the staff member's Line Manager and/or the Safeguarding Coordinator.
- Report immediately to their line-manager and/or the Safeguarding Coordinator any incident in which they accidentally hurt a student, or cause distress in any manner, or a student appears to be upset by their actions, or misunderstands, or misinterprets something they have done.
- Obtain prior permission from the student and/or their parents/carer to use cameras or video recording equipment to record images of the student. Seek advice from the Safeguarding Coordinator on when and how it might be appropriate to contact a carer/parent.

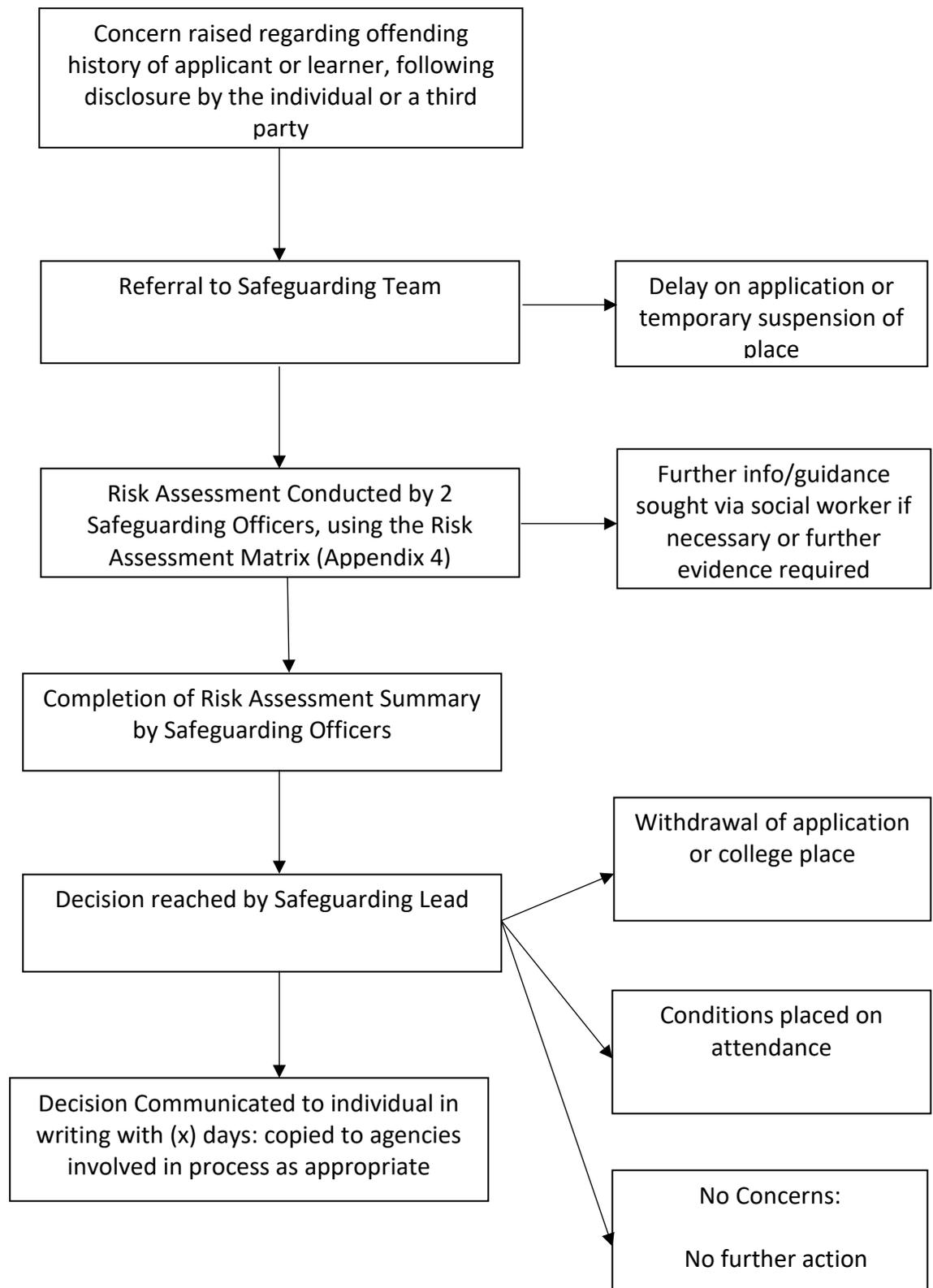
Everyone should also be aware that staff shall not:

- Spend time alone with a student away from others and outside the normal classroom/tutorial/professional situation. This includes spending time alone with someone in a virtual or on-line environment.
- Become friends with students within social networking environments unless the interaction is on the basis of College business.
- Develop friendships with students out-with College organised activities.
- Overtly criticise students or use sarcasm where it may cause a student to lose self-esteem or confidence.
- Physically restrain a student unless the restraint is to prevent physical injury of the individual or another person. In all circumstances, physical restraint must be appropriate and reasonable.
- Take a student to their home unless this has been arranged as part of a College activity. If it should arise that a situation demands that a student is taken to a staff member's home, it should only take place with the full knowledge and consent of the relevant line manager and/or the student's parents/carer.
- Travel alone with a student in a vehicle, however short the journey. Where circumstances require the transportation of a student in a vehicle, another member of staff or a volunteer should also travel in the vehicle. In an emergency situation, e.g. a medical emergency, where it is essential that a staff member/volunteer transports a student on their own, it is vital that the appropriate Curriculum Leader, or the Safeguarding Coordinator or a member of the College Senior Management Team and the parents/guardians are notified immediately.

Further, staff shall never:

- Engage in rough physical or sexually provocative games, including horseplay with students.
- Allow or engage in any form of inappropriate touching.
- Permit a student to use inappropriate language unchallenged.
- Make sexually suggestive comments to, or within earshot of a student, even in fun.
- Allow allegations made by a student to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that a student can do for themselves.
- Agree to meet a student on their own out with College activity.

Appendix 9: Summary of Risk Assessment Process for Learner or Prospective Learner



Appendix 10: Summary of Risk Assessment Procedure for Staff Member

