



# Safeguarding Policy and Procedure

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Final

Author:

Head of Student Experience

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Impact Assessment Completed

Yes

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March 2027

Principal's Signature

A handwritten signature in black ink that reads 'Diana Ford'. The signature is written in a cursive style.

## Equality Impact Assessment Form

The completion of the Equality Impact Assessment (EIA) will help us to ensure that our policies, procedures and practices do not discriminate or disadvantage people and also improve or promote equality.

**In relation to: disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.**

1. Please explain if you identified any inequalities or possible discrimination in the policy, procedure or practice.
- 2.

No inequalities or discriminatory practices were identified within this policy and procedure. The Safeguarding Policy and Procedure applies equally to all students and does not exclude or disadvantage any individual or group.

The policy promotes equality by ensuring that all students are safeguarded regardless of their age, gender, disability, ethnicity, religion, sexual orientation, or background. It supports staff in maintaining student wellbeing and positive mental health, enabling all students to feel safe and supported in order to succeed at Shipley College.

The procedure ensures that any safeguarding concern raised by or on behalf of a student is responded to promptly and appropriately, helping to protect students' safety, wellbeing and access to learning opportunities.

3. If identified, how have you changed the policy, procedure or practice to remove or mitigate the inequality or discrimination?

Not applicable

4. Are any follow-up actions required?

None.

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## 1. Purpose

- To provide assurance that the College recognises safeguarding as everyone's responsibility, including governors, the Senior Leadership Team (SLT), managers, staff, students, agency staff, non-payroll staff, visitors, and contractors on site.
- To maintain and further promote Shipley Colleges' culture of safeguarding, in which all colleagues feel confident in meeting their safeguarding responsibilities.
- To set high standards of behaviour for both students and staff.
- To develop staff awareness and understanding of student vulnerability and the causes of harm or abuse.
- To outline how the College contributes to the prevention of harm or abuse by ensuring that concerns relating to the possible harm or abuse of children, young people, and adults at risk are reported at the earliest opportunity.
- To work collaboratively with students, parents/carers, and external agencies to create a safer college environment.
- To ensure that all children, young people, and adults at risk are protected, feel safe, and have confidence that their concerns will be taken seriously and handled sensitively.
- To ensure that all students are treated as individuals and with respect and dignity.
- To support young people to grow up in circumstances that provide safe and effective care, enabling them to achieve the best possible outcomes, ([Working together to safeguard children 2023: statutory guidance](#)).

## 2. Guiding Principles

2.1 The College recognises that staff play a crucial role in identifying early indicators of possible harm, neglect, or abuse, and that all staff must take appropriate action to ensure the safety and wellbeing of students.

### 2.2 In particular, the College takes responsibility for:

- Follow up on concerns when a child, young person, or adult at risk is at risk of abuse or harm.
- Foster a safe culture across the entire college community.
- Ensure college buildings are safe and accessible.
- Establish procedures for reporting and managing allegations of harm or abuse against staff, volunteers, employers of apprentices, placement providers, contractors, or other visitors to the College.
- Work collaboratively with external agencies to achieve the best safeguarding outcomes for students.
- Work with parents/carers to keep students safe.
- Comply with regulations and guidance on staff vetting, including for temporary staff and volunteers, to minimise the risk of recruiting unsuitable individuals.
- Conduct Disclosure and Barring Service (DBS) checks to ensure that all employees, workers, and volunteers are suitable to work at the College.
- Implement the Contractors' Health and Safety Policy and the Contractors' Arrival at Reception Procedure to ensure adherence to safeguarding procedures and risk mitigation.
- Develop and implement procedures for identifying and reporting cases, or suspected cases, of harm or abuse.
- Promote student voice and engagement in creating a safer college.
- Provide appropriate levels of support for students with Special Educational Needs or Disabilities (SEND) to maintain their safety and well-being.
- Ensure that staff, volunteers, non-payroll staff, governors, employers of apprentices, and placement providers receive appropriate safeguarding training and

updates to fulfil their responsibilities in reporting concerns and maintaining a safe environment.

- Promote online safety when students use digital or social media.
- Support students in taking responsibility for their own safety and well-being.

### **3. Scope**

- This policy and procedure apply to the College workforce, governors, employers of apprentices or placement providers, volunteers, and visitors, including contractors, subcontractors, and agency staff working on-site.
- The Governing Body and staff at Shipley College prioritise the responsibility to safeguard and promote the welfare of students, staff, and visitors.
- This policy and procedure help to minimise risk and ensure effective collaboration with other agencies, establishing rigorous arrangements to identify, assess, and support students who are being harmed or are at risk of harm.
- Safeguarding is fully embedded in the College's policies, procedures, practices, and values.
- It is also integrated into the curriculum, enrichment activities, and the physical environment of the College campus.
- Employers providing work experience will receive support from the College to implement appropriate safeguards for students.

### **4. Definitions**

4.1 Child (hereinafter referred to as a child, children or young person).

4.2 A child is defined as a person who is under the age of 18.

4.3 This policy and procedure also apply to 14–16-year-olds who attend College premises. However, if the activity is organised by the school and the young people are accompanied by school staff, any safeguarding concerns raised will be managed by the accompanying school staff following their procedures. In an emergency, College procedures will be applied to ensure the young person's safety, and the appropriate next of kin will be contacted and informed of the situation. For activities organised by the College, such as 'Taster Sessions', where the young people are unaccompanied by school staff or next of kin, College safeguarding procedures will be implemented.

4.4 An adult at risk is someone who:

- Is over 18 years old.
- Has needs for care and support.
- Is being abused or neglected, or is at risk of being abused or neglected.
- As a result of their needs, is unable to protect themselves from harm or neglect.

4.5 At the College, some students will be considered 'Adults at Risk' and are likely to receive services or care overseen by Adult Social Care due to disability, physical health needs, or mental health issues.

4.6 Mental Capacity – A person has mental capacity if they are able to make a specific decision for themselves at the time it needs to be made. Where a person is assessed as lacking capacity to make a particular decision, any decision made on their behalf must be made in their best interests, in accordance with the Mental Capacity Act 2005. A formal mental capacity assessment may be carried out by an appropriately trained professional, such as a Social Worker or healthcare

professional, to determine whether a person has capacity to make a specific decision.

4.7 If a student does not meet the eligibility criteria for support from Adult Social Care but presents a safeguarding concern, staff must still follow this procedure. While the intervention provided by the College may be limited, staff should continue to act appropriately to safeguard the adult, and the individual should be encouraged and supported to seek professional help if they choose to do so.

4.8 Situations in which the College will take safeguarding action for adult students:

- Experiencing a mental health crisis or having a long-term mental health condition that may pose an immediate or ongoing risk to themselves or others.
- Victim of domestic abuse.
- Disclosure that they are a victim of a crime (including historic offences).
- Students who are vulnerable due to their circumstances, for example, homelessness, or adults with substance or alcohol misuse issues.

4.9 Where an adult reports domestic abuse and children reside in the household, we have a duty of care to consider the safety of the children, and make a referral to Social Services, if appropriate.

4.10 Looked After Children:

4.11 Children in care are referred to as Looked After Children. A child is looked after if they are in the care of the local authority for more than 24 hours. Legally, this could be when they are:

- Living in accommodation provided by the local authority with the parents' agreement.
- The subject of an interim or full care order.
- The subject of an emergency legal order to remove them from immediate danger.
- In a secure children's home, secure training centre, or young offender institution.
- Unaccompanied asylum seeking children.

4.12 A young person will stop being looked after when they are either adopted, return home, or turn 18. The local authority will continue to support children leaving care until they reach 21.

4.13 The Local Authority is responsible for the care and support of Looked After Children and care leavers. Any safeguarding concerns or issues raised at the College will be promptly reported to the child's Social Worker or Foster Carer, as appropriate.

4.14 The College works closely with the Virtual School for Looked After Children, which plays a strategic role in ensuring the Local Authority's corporate parenting responsibilities regarding the education of Looked After Children are met. The Virtual School aims to promote achievement, raise attainment, and ensure equality of opportunity to enhance the life chances of all Looked After Children.

## **5. Responsibilities**

### **5.1 Staff Responsibility**

5.2 All staff are responsible for reporting any suspected abuse or disclosure of abuse involving a young person or adult at risk to their line manager, the appropriate

manager, the Head of Student Experience, Student Safeguarding Lead, Student Wellbeing and Safeguarding Officer, or a member of the Senior Leadership Team (SLT).

Staff must:

- Complete mandatory safeguarding training and read all safeguarding updates, including [Keeping Children Safe in Education \(KCSiE\)](#).
- Familiarise themselves with the College's Safeguarding Policy and Procedures.
- Ensure that student welfare and safety are the paramount considerations at all times.
- Not withhold safeguarding information.
- Not investigate concerns or make judgments; this is the responsibility of the appropriate safeguarding authorities.
- Be alert to signs and indicators of possible abuse or harm (see Appendix 1 for definitions).
- Promptly report any safeguarding concerns:
  - If the concern relates to a student, speak to the Student Safeguarding Lead, Wellbeing and Safeguarding Officer or the Head of Student Experience.
  - If the concern relates to a staff member, you can report to the People & Culture Manager, Head of Student Experience or a member of the Senior Leadership Team (SLT).
- Comply with Safer Recruitment processes and checks.
- Always behave in accordance with [Keeping Children Safe in Education \(KCSiE\)](#).

### 5.3 **Emergency and Immediate Safeguarding Response.**

5.4 Life-threatening or immediate risk: In a life-threatening situation, or if someone is at risk of immediate harm, staff should contact emergency services on 999 without delay.

- Provide clear information: Describe the situation accurately and provide precise details of the location, including street name and postcode, so emergency services can respond quickly.
- Report the concern: As soon as possible, report the safeguarding concern to one of the following:
  - Head of Student Experience
  - Vice Principal Curriculum and Quality
  - A member of the Safeguarding Team
  - A member of the Senior Leadership Team (SLT)
  - Your Line Manager

### 5.5 **Head of Student Experience - Designated Safeguarding Lead (DSL)**

5.6 In undertaking the DSL role, the Head of Student Experience will:

- Report to the Vice Principal – Curriculum and Quality.
- Inform the Safeguarding Liaison Governor of any serious safeguarding concerns.
- Take the lead in ensuring the College fulfils its safeguarding duties towards young people and adults at risk.
- Undertake appropriate safeguarding training and remain up to date with relevant government legislation, statutory duties, and guidance.
- Produce an annual Safeguarding Report for the Governing Body.
- Provide regular safeguarding updates to the Senior Leadership Team (SLT).
- Provide safeguarding advice, training, information, and updates to staff and governors.

- Ensure students are provided with information and guidance to help them stay safe.
- Maintain oversight of all safeguarding concerns raised within the College.
- Act as a source of support and advice where safeguarding concerns about students arise.
- Ensure all cases of suspected or actual abuse involving young people or adults at risk are referred to Children’s Social Care or Adult Social Care, as appropriate.
- Work closely with the People & Culture Manager and the Vice Principal – Curriculum and Quality regarding complaints or allegations of abuse made against a staff member in relation to a student.
- Report allegations or complaints of abuse against a staff member to the Local Authority Designated Officer (LADO) where required.
- Ensure the College’s Safeguarding Policy and Procedures are reviewed annually and shared with staff.
- Ensure the Safeguarding Policy and Procedures are published on the College website.
- Ensure accurate and secure records of safeguarding concerns and actions taken are maintained on CPOMS, the College’s safeguarding recording system.

5.7 In the absence of the Head of Student Experience, a member of the Safeguarding Team or, if appropriate, the Vice Principal - Curriculum and Quality will deal with the safeguarding concern raised.

#### 5.8 **Vice Principal Curriculum and Quality**

5.9 In undertaking this role, the Vice Principal Curriculum will:

- Act as the safeguarding representative on the Senior Leadership Team (SLT) and the Corporation for safeguarding matters.
- Oversee the College’s compliance with its safeguarding duties for young people and adults at risk at risk of harm.
- Oversee that all staff, including volunteers, receive safeguarding training and are aware of the College’s Safeguarding Policy and Procedures.
- Ensure the College handles allegations in accordance with appropriate procedures.
- Oversee inter-agency issues and complaints related to safeguarding.
- Remain up to date with relevant safeguarding legislation, guidance and training.
- Work closely with the Head of Student Experience and other managers to ensure student safety and safeguarding concerns are addressed promptly.

#### 5.10 **Safeguarding Team**

5.11 If necessary, a member of the Safeguarding Team may be required to:

- Assist in managing or overseeing cases of suspected or alleged abuse involving students.
- Be available to listen to staff and provide advice regarding safeguarding concerns raised by students or colleagues.
- Refer staff to relevant sections of the College’s Safeguarding Policy and Procedures if further guidance or information is needed.
- Liaise with appropriate external agencies to support safeguarding processes.
- In the absence of the Head of Student Experience, update the Vice Principal – Curriculum and Quality and People & Culture Manager if a safeguarding concern or allegation is raised against a staff member, employer, or placement provider regarding a student.

5.12 Contact Details of Members of the Designated Safeguarding Team

Click [HERE](#) for contact details for members of the safeguarding team.

### 5.13 **Student Safeguarding Lead and Student Wellbeing & Safeguarding**

- Support a caseload of students where a wellbeing or safeguarding concern has been raised, or where a student has self-referred.
- Maintain accurate, secure, and up-to-date records on CPOMS of safeguarding concerns raised and actions taken to support students.
- Report suspected or disclosed abuse of students to the Head of Student Experience and, where appropriate, refer the concern to Children's Social Care or Adult Social Care.
- Provide guidance and advice to staff on student wellbeing and safeguarding matters.
- Keep the Head of Student Experience informed of safeguarding concerns raised and actions taken to support and safeguard students.
- Attend Child Protection Case Conferences, Child in Need meetings, Personal Education Plan (PEP) meetings, and other relevant multi-agency meetings as required.
- Maintain up-to-date safeguarding knowledge by attending training and completing refresher courses as required.
- Share appropriate safeguarding and wellbeing information with students and staff to promote safety, safeguarding awareness and wellbeing.

### 5.14 **Liaison Governor for Safeguarding**

5.15 In undertaking this role, the Liaison Governor for Safeguarding will, as required:

- Where appropriate, meet with the Principal, Vice Principal – Curriculum and Quality, or Head of Student Experience to discuss serious safeguarding concerns.
- As a member of the Corporation, collectively approve the College's Safeguarding Policy and Procedures and review the annual Safeguarding Report
- Support the Chair of the Corporation in managing any safeguarding allegation made against the Principal or another senior post holder.
- Undertake appropriate safeguarding training alongside members of the Governing Body.
- Attend College Safeguarding Management Group meetings.

## 6. **Dealing with safeguarding concerns**

6.1 Staff should follow the guidelines below:

- Allow the student time to explain their concern; listen attentively, remain patient, and avoid asking leading or excessive questions.
- Reassure the student that they have done the right thing by sharing their concern.
- Help the student to feel safe and supported.
- Explain that you will need to share the information with appropriate College staff so that the necessary support and safeguarding action can be taken.
- Reassure the student that information will be treated confidentially and shared only with those who need to know.
- If making brief notes, check their accuracy with the student where appropriate.
- When emailing sensitive student information, use initials and student ID only, and avoid including the student's name, address, or other identifying details.

- If the safeguarding concern involves a student, contact a member of the Safeguarding Team or the Head of Student Experience without delay.
- If the concern relates to a member of staff, report this to the Head of Student Experience, People & Culture Manager, or a member of the Senior Leadership Team (SLT).
- Where there is a risk of harm, seek immediate assistance and ensure the student is accompanied and supported until the concern has been passed to an appropriate staff member or manager..

6.2 Staff should avoid the following:

- Promising that information will be kept secret.
- Pressuring or encouraging a student to share information they are not ready or willing to disclose.
- Becoming overly involved in the situation or attempting to manage safeguarding concerns independently.
- Contacting students, or allowing students to contact you, outside of normal College working hours unless this forms part of an authorised role or agreed safeguarding arrangement.
- Visiting students outside of the College environment without prior permission from your Line Manager, the Head of Student Experience, or a member of the Senior Leadership Team (SLT).

## **7. Key information for staff**

7.1 All staff should be familiar with the following information

- [Safeguarding Team Contact List](#)
- [Safeguarding flow chart for staff](#)
- [Safeguarding flow chart for students](#)

## **8. Legislation and guidance**

8.1 This Policy is based upon the following legislation and guidance. The College will fulfil local and national responsibilities as laid out in the following documents:

- [Statutory guidance - Keeping children safe in education 2024](#)
- [Working Together to Safeguard Children 2023 - Statutory guidance](#)
- [Statutory guidance on children who run away or go missing from home or care](#)
- [What to do if you're worried a child is being abused: advice for practitioners](#)
- [Guidance Information sharing advice for safeguarding practitioners](#)
- [Children Act 2004](#)
- [Education Act 2002](#)
- [Teachers' standards](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- [Counter-Terrorism and Security Act](#)
- [The right to choose: government guidance on forced marriage](#)
- [Mental Capacity Act 2005](#)
- [Guidance Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\)](#)
- [Female Genital Mutilation Act 2003](#)

## **9. Support for young people and adults with additional needs**

- 9.1 The College recognises that some students may be more vulnerable to abuse, such as students with special educational needs or disability, those living with abuse, violence or drug/alcohol dependency, Looked After Children, homeless, etc.
- 9.2 If the College is considering excluding a student who is vulnerable, is supported by Social Services or there is a multi-agency team working with the student, the College will ensure key agencies are updated on decisions leading to possible exclusion.
- 9.3 The College will follow Bradford SAFER BRADFORD online multi-agency procedures and will, where necessary, follow the guidance on protocols for sharing information with external agencies (See **Appendix 3**):
- 9.4 For further information on the specific forms of abuse and safeguarding issues refer to [Keeping children safe in education 2024 Statutory guidance for schools and colleges](#) Statutory guidance for schools and colleges. Part one: Information for all school and college staff September 2025.

## **10. Missing students**

- 10.1 Managing punctuality and attendance effectively is an important factor in ensuring student safety and wellbeing. Students are monitored through the absence line reporting system and register checks at the start of lessons. Unauthorised absence is followed up by the Attendance Officers, with STARS students prioritised for intervention. For 16-19 students, their NOK is contacted first, with the student contacted second if necessary. Any concerns are followed up and, if appropriate, parents/carers are contacted by Course Leaders, Head of Department or Student Experience Team as appropriate.
- 10.2 If a student is an adult at risk the parent/carer must be contacted to inform them of the College's concern. However, for both 16-19 and vulnerable adults, this must not take place in circumstances where informing the parent/carer puts the student at risk.
- 10.3 If a student is reported missing to the College by a next of kin, the police, or an external agency, the information must be passed immediately to the Student Experience Team, the relevant Head of Department (HoD), and the student's Course Leader. Care must be taken not to disclose information to family members or other third parties, particularly over the telephone, as the student may have left home due to personal difficulties or safeguarding concerns.
- 10.4 If a vulnerable student or a student identified as an "at risk" student is missing from College, the Attendance Officer will immediately report the student as missing to the Student Experience Team. A member of the Safeguarding Team will then contact the student, the next of kin (unless there are safeguarding reasons not to do so), and any relevant supporting agency(ies) working with the student or their family. The Head of Student Experience or the member of the Safeguarding Team will decide whether to report the student as missing to the police. This decision will be based on the level of risk identified, the wishes of the next of kin, and any risk assessment plan in place for the student if they go missing from College.

## **11. Child on Child Abuse**

- 11.1 The College recognises that young people are capable of abusing their peers and that child-on-child abuse can manifest in many different ways, including online bullying, sexting, and inappropriate/harmful sexualised behaviours.

- 11.2 Where young people have exhibited inappropriate/harmful sexualised behaviour and/or exhibited inappropriate/harmful sexualised behaviours towards others, contact should be made with the Children's Social Work Service, if appropriate. Good practice dictates that there should be a coordinated multi-agency approach to respond to their needs, which will include parent/carers, youth justice (where appropriate), children's / adults social work service.
- 11.3 If a student has reported being abused by another student, the Head of Student Experience or the appropriate Head of Department should be contacted immediately. If the student is aged under 18 or an adult at risk living at home, then parents/carers need to be contacted (unless there are circumstances not to do so). The College recognises that the welfare of the alleged victim will be the paramount concern. However, it also recognises that hasty or ill-informed decisions can irreparably damage a student's reputation, confidence and/or opportunity to achieve. Therefore, those dealing with such allegations within the College will do so sensitively and will act in a careful and measured way.
- 11.4 It is possible that, during a College investigation, suspension of the alleged perpetrator may take place. If the decision is taken not to suspend the student who is the subject of the allegation, a risk management plan is put in place by the Head of Department with assistance from the Student Experience, Safeguarding Team.
- 11.5 The College will take into account any action taken by the Police or Social Care Services regarding any investigation they undertake, however, the College will follow its own disciplinary procedure to deal with the incident.

## **12. Up skirting**

- 12.1 Up skirting 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.

## **13. Forced Marriage**

- 13.1 Forced marriage is different from, and should not be confused with, 'arranged marriage'. A student who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse, whether physical, psychological, financial, sexual or emotional pressure.
- 13.2 Staff should immediately report students at risk of forced marriage to the Safeguarding Team, Head of Student Experience, or HoD to minimize the risk of harm.
- 13.23 Confidentiality is extremely important in these circumstances. When establishing the student's situation, staff should understand the immediate risk they may be facing. If the student is about to travel overseas, it is crucial to gather as much information as possible from them before they leave the country.
- 13.4 The student's family should not under any circumstances be contacted without seeking permission from the Head of Student Experience or member of the Safeguarding Team. Confidentiality within the College is also essential, as other students may know the family and information may be passed on to them which can put the student at risk.

13.5 The Student Safeguarding Team will offer support and, if appropriate, contact the Police's Forced Marriage Unit for specialist advice.

#### **14. Female Genital Mutilation (FGM)**

14.1 Professionals have a legal duty to report to the police if they discover that female genital mutilation (FGM) has been performed on a girl under 18. Failure to report such cases may result in a College investigation. In all cases, the priority is the protection and welfare of the child, including recognising and acting on any signs of neglect or ongoing risk of harm.

14.2 All professionals must act swiftly to safeguard girls at risk of FGM, particularly if there is evidence that a family member has undergone FGM or if there are indications that the child may be taken abroad to undergo FGM.

14.3 Victims of FGM are likely to come from communities known to practice it. Professionals should be aware that girls at risk of FGM may not yet be aware of the practice or that it may be performed on them. Therefore, sensitivity should always be shown when approaching the subject. Click on the links below for further information:

14.4 [Female genital mutilation \(FGM\) - NHS](#)

14.5 [NSPCC - Female genital mutilation \(FGM\) What is FGM](#)

#### **15. Breast Ironing**

15.1 Much like FGM, breast ironing is a harmful cultural practice and constitutes child abuse. It is classified as physical abuse, and concerns must be reported following the Safeguarding Procedure.

#### **16. Child Sexual Exploitation**

16.1 Child sexual exploitation (CSE) is a type of sexual abuse in which young people are sexually exploited for money, power or status. Young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some young people are trafficked into or within the UK for sexual exploitation. Sexual exploitation can also happen to young people in gangs. Child Sexual Exploitation (CSE) also includes non-consensual sharing of nudes and semi-nude images or videos.

#### **17. Sexual violence and sexual harassment between children in schools and colleges**

17.1 Sexual violence - It is important that school and college staff are aware of sexual violence and the fact children can and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to:

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

17.3 Assault by Penetration: A person (A) commits an offence if a person intentionally penetrates the vagina or anus of another person (B) with a part of their body or

anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

17.4 Sexual Assault: A person (A) commits an offence of sexual assault if a person intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

17.5 Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party).

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

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape.

#### 17.7 **Sexual harassment**

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

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

- Sexual comments, such as telling sexual stories, making lewd remarks, commenting on someone's clothing or appearance, or calling someone sexualised names.
- Sexual "jokes" or taunting, including any behaviour intended to humiliate or intimidate.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or displaying sexualised images, photos, or drawings. Schools and colleges should carefully consider when such behaviour may cross the line into sexual violence, taking into account the experience of the victim.
- Online sexual harassment, which can include sharing sexualised content, sending inappropriate messages, or other digital behaviours of a sexual nature.
- Sexual harassment may occur as a single incident or as part of a wider pattern of harassment or sexual violence. It may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos
  - Sharing of unwanted explicit content
  - Up skirting

- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media
- Sexual exploitation; coercion and threats.

## **18. Domestic Abuse**

- 18.1 The Home Office's definition includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.
- 18.2 Domestic abuse can encompass but is not limited to, the following types of abuse:
- Psychological
  - Physical
  - Sexual
  - Financial
  - Emotional
  - Coercion.
- 18.3 Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- 18.4 Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish, or frighten a victim. This definition includes (so called) honour-based violence, FGM and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

## **19. Radicalisation**

- 19.1 Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. The process of radicalisation is different for every individual and is a process. For some, it can take place over an extended period or within a very short time frame. Staff must be able to recognise possible signs and indicators of radicalisation.
- 19.2 Young people and adults at risk may be at risk of exposure to or involvement with groups or individuals who advocate violence as a means to a political or ideological end.
- 19.3 Young people and adults at risk can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members, groups and organisations or, increasingly, through the internet, including through social media sites. This can put young people and adults at risk at risk of being drawn into criminal activity and has the potential to cause significant harm.
- 19.4 [Proscribed terrorist groups or organisations](#) - This Home Office published document lists the extremist groups or organisations banned under UK law, and provides the criteria that are considered when deciding whether or not to proscribe a group or organisation.
- 19.5 Potential indicators include:

- Use of extremist language or vocabulary
- Possession of violent extremist literature
- Changes in behaviour, language, clothing or appearance
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

19.6 If staff become aware of any concerns regarding any student, staff member or stakeholder, this needs to be reported immediately to the Head of Student Experience or a member of the Safeguarding team.

## **20. PREVENT**

20.1 Prevent is part of the UK's counter-terrorism strategy. It focuses on supporting and protecting individuals who may be at risk of being exploited by those looking to radicalise and subsequently drawn into terrorist-related activity. The programme is to prevent the exploitation of vulnerable people and to keep everyone safe.

20.2 Prevent is one of the Government's counter terrorism strategies and it aims to stop young people becoming terrorists or supporting terrorism.

20.3 The Prevent Strategy (**refer to Appendix 2**)

- Responds to the ideological challenge faced by terrorism and aspects of extremism, and the threat faced by those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

20.4 The government's Channel Process supports people who are at risk of being drawn into terrorist activity. It takes on a multi-agency approach and offers individuals access to services such as health, education, specialist mentoring and other diversionary activities to prevent someone from getting involved in terrorism.

20.5 The College recognises that it has a legal responsibility to fulfil the Prevent Duty to protect students and staff from radicalisation. All staff, students and stakeholders are expected to uphold and promote the fundamental principles of human rights and British Values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

20.6 Building resilience in our students and staff and the promotion of British Values is critical to preventing radicalisation. The College will provide a safe place in which students and staff can discuss issues and promote critical thinking to challenge extremist beliefs and ideologies.

20.7 The College will provide Prevent training to students and staff to raise awareness of the risks and enable the reporting of concerns.

## **21. Internet Safety**

21.1 The internet gives access to a wide range of content, some of which can be harmful. Individuals seeking to exploit young and adults at risk can use the internet, including social media, to groom and take advantage of their vulnerability. The College recognises that these risks are particularly high for young people and adults at risk.

21.2 Staff who are concerned about a student's internet use or communication online should gather any relevant information they can and immediately report their concern to their line manager or a member of the Safeguarding Team. Below are some examples of inappropriate use of IT that should raise safeguarding concerns:

- Inaccurate or misleading information of an extremist nature
- Socially unacceptable material, such as that inciting violence, hate or intolerance, including extremism and radicalisation
- Access to illegal material, pornography, weapons, drugs, etc.
- Risk of grooming which may lead to acts of violence.
- Accessing age-inappropriate material

21.3 The College has an Acceptable Use Policy (AUP) for IT in which students and staff are made aware of Internet safety. The College has in place the following mechanisms to ensure that students remain safe from; bullying, grooming, radicalisation, violent extremism or any other potential abuse of young people and adults at risk:

- Appropriate staff, including the IT Manager, can monitor any aspects of computing facilities used by staff, students, guests and governors.
- Internet usage is logged, and if necessary, the College email account and activity can be suspended by the IT Manager.
- Any breaches of IT security by students are reviewed by the Head of Student Experience, and breaches by staff are reviewed by the Vice Principal Finance and Premises. Any safeguarding concerns are routinely reported to and reviewed by the Senior Leadership Team (SLT).
- Established Firewalls will block inappropriate materials from being accessed and an alert raised to the IT department.
- Any instances of misuse of the internet or college sites by students will be dealt with in line with the College Positive Behaviour and Disciplinary Procedure.
- Google SafeSearch is activated across the College and will block inappropriate content from being accessed through Google Search results pages.
- LANschool software provides additional protection by allowing teaching staff to monitor classroom activity and identify any suspicious materials or potential risks to students.
- It is the responsibility of all staff to ensure that any concerns related to extremism or radicalisation are promptly reported, following the safeguarding reporting procedure.
- The College is aware that students may use mobile phones without accessing the College Wi-Fi and is alert to the need for vigilance.

## **22. Supporting Students to Keep Safe**

22.1 Students will be encouraged and supported in reporting any concerns to a member of staff or the Student Experience Team.

22.2 Students will be informed how to stay safe online, whether in College, at work experience or away from College.

22.3 Students will be provided with information on online safety during Induction, Future Leaders, PSHE, their course sessions, and through resources shared via the student portal to promote safety and wellbeing. This will include guidance informing students that they can speak to any member of staff they trust or the Student Experience Team, who will offer support and guidance.

- 22.4 The ILT Services Acceptable Use Policy (AUP) is made available to staff to guide students on the acceptable use of the College's IT devices and WIFI use.
- 22.5 Staff will encourage students to take responsibility for their own safety and wellbeing and to avoid putting themselves at risk.
- 22.6 Staff must ensure that all online interactions with students maintain professional boundaries at all times.

### **23. Maintaining a Safe Environment**

- 23.1 Shipley College aims to ensure that all buildings used by the College for teaching and learning are accessible and provide a safe environment for students to study and staff to work.
- 23.2 Access to College buildings is controlled and restricted, as far as reasonably practicable, to legitimate users only. All users are required to wear and display ID badges that clearly indicate their status (e.g., student, staff, visitor, governor). Students must swipe their ID badges to enter College buildings, while visitors are required to use the intercom system and report to Reception upon arrival.
- 23.3 Dynamic lockdown may occur in response to a threat. The College will promptly restrict access and egress to a site or building (or part of it) through physical measures. Three short blasts of fire alarm will initially signal the implementation of the lockdown process. A lockdown is to prevent students, staff or visitors from moving into dangerous areas and to prevent or slow down attackers from accessing College buildings (or part of). For information on the College Lockdown procedure, refer to - [Annexe Ja Business Continuity - Dynamic Lockdown Procedure](#).
- 23.4 Shipley College is committed to continuous improvement in Health & Safety and to achieving the highest possible standards of practice across the College.
- 23.5 Details of all accidents are kept and Health & Safety Manager reports are submitted to the Health & Safety Committee on a termly basis and to the Corporation annually, noting any trends and actions to prevent or reduce Health & Safety issues.
- 23.6 The Head of Learning Support is responsible for assessing the needs of students with Special Educational Needs concerning students who have physical and/or medical requirements and sensory impairment and put in place Personal Emergency Evacuation Plans (PEEP).
- 23.7 It is the responsibility of all staff and students to ensure the appropriateness of printed and/or online materials both in or around the College. If anyone is in doubt about the appropriateness of any communication, they can refer this to the Head of Marketing and Communication, Head of Student Experience or Vice Principal Finance and Premises, or member of the SLT.

### **24. Management of Student Behaviour**

- 24.1 It is essential that students feel safe and are able to learn in a positive environment. Inappropriate behaviour that causes distress or puts others at risk is promptly addressed and stopped.

- 24.2 The College prioritises the safety of all students and promotes positive behaviour to create a safe and supportive environment, free from all forms of bullying, including cyberbullying.
- 24.3 Student behaviour in breach of the 'Positive Behaviour Policy and Student Disciplinary Procedure' will be investigated and action taken.
- 24.4 Staff are provided with guidance on managing challenging behaviour to help de-escalate potentially difficult and disruptive situations.
- 24.5 Staff are encouraged to address student misconduct informally whenever possible, aiming to improve behaviour at the earliest opportunity.
- 24.6 When there is a concern about a student's behaviour, the Course Lead will develop a Positive Behaviour Plan with SMART targets to support improvement. Depending on the student's age, next of kin may also be involved.

## **25. If a student is required to be moved from home to a Place of Safety**

- 25.1 If a student discloses a concern, such as domestic violence, abuse, or threat of forced marriage and may require a place of safety:
- Staff must report the concern immediately to the Safeguarding Team or contact the Head of Student Experience.
  - Member of the Safeguarding Team will liaise with external agencies to facilitate the process.
  - The student may be removed on the same day or within a very short time after disclosure, depending on the urgency of the case.
  - The student should be advised not to return home to collect belongings in cases of high risk. This can be done at a later time under police escort.
  - Under no circumstances should the student's next of kin be contacted.
  - A member of the Safeguarding Team or Head of Student Experience will contact the relevant organisation, such as the police or Social Services.
  - If next of kin contacts the College, take their details and pass them on to the Head of Student Experience. No information should be shared with the caller, including the whereabouts of the student.
  - The member of the Safeguarding Team managing the incident will update relevant staff, managers, and Security Support Officers, as appropriate, to ensure the safety of the student, other students, and staff.

## **26. Students who may Present a Risk to Others, including Sex and Violent Offenders**

- 26.1 Where information indicates that a student or prospective student may pose a risk to other students or staff, a risk assessment will be completed by the Head of Student Experience in conjunction with the relevant Head of Department. The risk assessment will determine whether the College is a suitable environment for the individual to enrol or continue their programme of study. If it is decided that the person may enrol or continue at the College, the Head of Student Experience, together with the Head of Department, will recommend and implement appropriate arrangements to mitigate any identified risks to students and staff.
- 26.2 The College recognises its role in supporting the rehabilitation of offenders, helping them reintegrate successfully and providing opportunities to lead fulfilling lives.

## **27. Attendance at External Safeguarding Meetings**

- 27.1 If curriculum staff are contacted by external agencies to attend an external safeguarding meeting, they should refer the request to Head of Student Experience or member of the Safeguarding Team.
- 27.2 External student safeguarding meetings will be attended by a member of the Safeguarding Team, the SEND Team Leader, the Head of Learning Support, or another appropriately nominated staff member or manager, depending on the nature of the meeting. Meetings may take place in person or, more commonly for multi-agency meetings, online.

## **28. Contacting next of kin and/or External Agencies to Protect Children, Young People and Adults at Risk**

- 28.1 In cases where the College has reason to believe that a child, young person, or adult at risk may be experiencing harm, ill-treatment, or neglect, the Safeguarding Team will seek advice from Social Services or the appropriate external agency, or report the concern.
- 28.2 Where possible, the College will contact the next of kin and seek their consent before making a referral to an external agency. However, if contacting the next of kin is likely to increase the risk of harm, or if consent is refused but a safeguarding concern exists, the Head of Student Experience, or a delegated representative, will decide whether to seek advice or make the safeguarding referral.

## **29. Multi-agency Working**

- 29.1 The College will work in partnership with external agencies to ensure the best interests of the student are met. Referrals will be made by a member of the Safeguarding Team. The College will collaborate with Social Services and, where necessary, attend meetings or provide reports as required. Where a student is subject to an inter-agency Child Protection Plan or a multi-agency Risk Assessment Conference (MARAC), the College will contribute to the preparation, implementation, and review of the plan, as appropriate.
- 29.2 More specifically:
- 29.3 The College will work in partnership with other agencies in the best interest of the student. Therefore, we will, where appropriate, liaise with schools, Social Services, Youth Offending Team, Police or other statutory agencies offering support to the young person or vulnerable adult.
- 29.4 Reporting of a safeguarding concern to Social Services should be made by the safeguarding team to the Social Services Duty Team. Where a young person or adult at risk and already has a Social Worker assigned, the College will directly contact the social worker.
- 29.5 The College will attend inter-agency meetings, including Initial and Review Child Protection Conferences, Planning and Core Group meetings, and Family Support Meetings.
- 29.6 If no College representative is available to attend, written information will be provided to ensure the College's input is recorded.

29.7 Where a young person or adult at risk is subject to a Child Protection Plan or a multi-agency risk management plan, relevant College staff will contribute to the preparation and implementation of these plans, as appropriate.

### **30. Apprentices and Students on Work Experience**

30.1 All organisations employing an apprentice or hosting a student on work experience must have a valid Health & Safety check in place. This includes confirmation of risk assessments, appropriate supervision, and relevant training to ensure a safe and healthy working environment.

30.2 The College will ensure that when students undertake work experience the environment is safe and risks are minimised or removed.

30.3 Before starting work experience, students are reminded by their course team and the Work Experience Team how to report safeguarding concerns. This includes concerns about themselves, service users (if relevant), and any children or adults at risk they may work with. Where possible, students should follow the employer's safeguarding procedures and report concerns to the appropriate staff member in the workplace. If they feel unable to do this, they can speak to their course team or a member of the Safeguarding Team in Student Experience. The Safeguarding Team will record the concern and seek guidance from the Vice Principal Curriculum and Quality, particularly if the concern relates to service users.

30.4 Consideration of Safeguarding in Higher-Risk Situations. The College will give special consideration to safeguarding in the following situations:

- Regular lone working with an employer over extended periods
- Placement located in isolated environments where students work one-to-one
- Work placement involving a high degree of travel on a one-to-one basis
- Work placement including a residential element
- A safeguarding disclosure is made.

### **31. Procedure to follow if a Shipley College student reports a safeguarding concern whilst on work experience**

31.1 This procedure applies where a Shipley College student discloses or reports a safeguarding concern during their work placement. Concerns may range from lower-level inappropriate behaviour to serious incidents involving harm or criminal activity.

31.2 Types of Concerns Covered; this includes, but is not limited to:

- Behaviour that may leave a child, young person, or adult at risk feeling unsafe
- Behaviour towards a child, young person, or adult at risk that indicates a potential risk of harm
- Behaviour which may have harmed a child, young person, or adult at risk
- Behaviour which may constitute a criminal offence against, or related to, a child, young person, or vulnerable adult.

31.3 The Following Steps Must Be Followed by the Staff Member Taking the Student's Account:

- Reassure the student that reporting safeguarding concerns is important and that the matter will be taken seriously and followed up appropriately.
- Take a written account of the concerns raised by the student, including as much detail as possible (e.g. names, dates, times, locations, and any witnesses).

- Establish whether the student has reported the concern to anyone at the workplace and record what response, if any, was given.
- Clarify any points requiring further information. Record the questions asked and the student's responses. Avoid leading questions.
- Once the student has completed their account, read the written record back to them and ask them to confirm that it is an accurate reflection of what they have said.
- Inform the student that they must not return to the workplace without the prior permission of the Head of Department or the Work Placement Team.
- If the student is under 18 and lives with a parent/carer, inform them that the parent/carer will be contacted. If the student is aged 18 or over, ask whether they consent to their parent/carer being informed (unless there is a safeguarding reason to override this).
- Remind the student, where appropriate, that they should not discuss the matter with others.
- The staff member to pass on the written report to the Head of Student Experience or a member of the Safeguarding Team in Student Experience.

#### 31.4 Dependent on the seriousness of the incident:

- Where the incident is assessed as presenting a minor level of risk and requiring no more than increased vigilance or awareness by the Placement Organisation, the Vice Principal Curriculum & Quality, Head of Student Experience or the Placement Team Leader should inform the Placement Organisation of the concerns raised.
- However, where there is a credible reason to believe that a child, young person, or adult at risk may be at risk of harm, the matter must be reported without delay to the Police or the appropriate safeguarding agency by the Head of Student Experience or another appropriate senior member of staff. All decisions and actions taken must be recorded in writing in accordance with College safeguarding procedures.

31.5 If the safeguarding concern is related to a vulnerable adult, then the incident will be reported via [Report a safeguarding adults concern](#) or using the online reporting form [Multi-Agency Safeguarding Hub \(MASH\) Adult at Risk Form](#)

31.6 If in doubt, Social Services must be consulted to determine whether the College should contact the Placement Organisation. If advised that contact is appropriate, the Placement Organisation should be informed in line with that advice and reminded of the College's safeguarding duty to notify Social Services. If advised not to make contact, that instruction must be followed. All advice received and actions taken must be recorded in writing.

31.7 The College strives to maintain the highest level of trust and cooperation with Placement Organisations. An allegation of safeguarding misconduct may place strain on that relationship, particularly in relation to the timing and extent of communication from the College. Where it is not possible for the College to share information with the Placement Organisation, the College should acknowledge this, apologise for any resulting difficulty, and explain that it is unable to provide further details at that stage due to safeguarding obligations.

31.8 When contacting the student's Next of Kin, no information must be disclosed regarding the identity or names of external service users or workplace staff.

## **32. Trip, Visit or Residential**

32.1 If a disclosure is made by a student on a trip, visit or residential, the senior member of staff responsible for the students will initially deal with the disclosure and contact their Line Manager or a member of the Safeguarding team for advice. Guidance will be offered on how best to deal with the concern.

## **33. Safer Recruitment and Pre-employment Vetting**

33.1 The College is fully committed to following safer recruitment, selection, and pre-employment vetting procedures in line with [Keeping Children Safe in Education](#). As recommended, online checks are conducted for all shortlisted candidates.

33.2 The College maintains a single central record evidencing all relevant vetting checks, including:

- DBS check at the appropriate level, including the Barred List check
- Verification of identity
- Verification of qualifications
- Right to work in the UK

33.3 Reference checks are also carried out, with at least two references confirming the candidate's suitability required prior to the commencement of employment.

33.4 All recruitment materials include a statement of the College's commitment to safeguarding and promoting the wellbeing of students.

33.5 Recruitment panels always include at least one person who has completed safer recruitment training.

33.6 The College ensures that any individual prohibited from teaching is not appointed to undertake teaching work.

33.7 The College ensures that employed individuals are not disqualified under the Childcare (Disqualification) Regulations 2009.

33.8 Appropriate DBS risk assessments are undertaken as required, through the College People & Culture department.

33.9 Online pre-recruitment checks are conducted for all shortlisted candidates to verify identity, employment history, and professional status.

## **34. Whistle Blowing, including Low Level Concerns**

34.1 All staff have a duty to raise any concerns regarding child protection or the safeguarding of adults at risk. This includes concerns about the attitudes or actions of colleagues. Staff are made aware of the expected standards of staff behaviour and are encouraged to raise concerns, ranging from Low-Level Concerns to more serious matters, in accordance with the College's procedures. The policies that set out expected behaviour standards and provide guidance on how to raise concerns include:

- Employee handbook
- Staff Code of Conduct
- Whistleblowing Policy & Procedure.
- Grievance Policy & Procedure

- 34.2 The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally.
- 34.3 All concerns raised will be reviewed by the appropriate College Manager to determine the most suitable course of action. More serious allegations will be managed in accordance with the procedures outlined in Section 36 of this policy.
- 34.4 Concerns classified as Low-Level Concerns will be recorded in a central, confidential register maintained by the People & Culture Department. Appropriate actions may include informal discussions, targeted training and/or letter of concern.
- 34.5 Where multiple Low-Level Concerns are recorded against the same member of staff, these will be escalated to a formal documented action.
- 34.6 Refer to Appendix 4 - for 'Procedure on Reporting Low-level Concerns'.

### **35. Staff Update and Training**

- 35.1 Safeguarding forms part of the induction programme for all new staff and volunteers.
- 35.2 The College provides appropriate mandatory safeguarding training and regular updates. Compliance with mandatory training requirements is monitored to ensure that staff understand and fulfil their responsibilities to safeguard and promote the wellbeing of students and staff.
- 35.3 All staff, volunteers and governors are required to read the statutory guidance Keeping Children Safe in Education. This document, issued by the Department for Education (DfE), supports governing bodies, leaders and staff in understanding and fulfilling their duties to safeguard and promote the welfare of children. It sets out the actions schools and colleges should take and the legal duties with which they must comply.

### **36. Dealing with Allegations of Abuse against Members of Staff, Employers of Apprentices, Placement Providers, Volunteers, Contractors, Visiting Professionals or visitors.**

- 36.1 If an allegation is made against a member of staff involving a student at the College, the People & Culture Manager, the Head of Student Experience or Vice Principal Curriculum and Quality must be informed immediately. The matter will be investigated under the Staff Disciplinary Procedure and Code of Conduct. Depending on the nature and severity of the allegation, the Local Authority Designated Officer (LADO) will be contacted for guidance, in line with statutory requirements.
- 36.2 These procedures apply to all staff, whether teaching, administrative, management or support staff, as well as to volunteers, contractors, employers of apprentices, placement providers and visiting professionals.
- 36.3 The College recognises that the welfare of the child, young person or adult at risk is paramount. The College also recognises that hasty or ill-informed decisions concerning a member of staff may irreparably damage an individual's reputation, confidence and career. Allegations will therefore be handled with sensitivity, fairness and due process, and decisions will be taken in a careful, measured and proportionate manner.

- 36.4 The Staff Code of Conduct Policy provides a framework for acceptable standards of behaviour and supports the College's vision, purpose, values and expected behaviours. Staff are required to adhere to the Code at all times, including at work-related social events, whether on or off College premises and outside normal working hours.
- 36.5 The Code incorporates the professional conduct standards of any relevant professional bodies of which staff are members. It explicitly states that staff must not enter into any romantic or sexual relationship with a student, regardless of the student's age. A breach of this requirement may constitute gross misconduct.
- 36.6 Under the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over to engage in a sexual relationship with a person under 18 where the adult is in a position of trust, even if the relationship is perceived to be consensual. This applies to all College staff, as students may regard any member of staff as being in a position of trust.
- 36.7 Staff must maintain professional boundaries at all times, including when using electronic communication and social media. Personal social media contact with students or their next of kin, whether initiated by the member of staff or the student, should be avoided to ensure professional boundaries are maintained and the Staff Code of Conduct is not breached.
- 36.8 A member of staff who receives an allegation about another member of staff, or who observes behaviour that gives cause for concern, must:
- (a) Inform the People & Culture Manager or the Head of Student Experience immediately, providing as much factual detail as possible.
  - (b) Not discuss the matter with any other person, including the member of staff against whom the allegation has been made.
  - (c) If the alleged victim is a student, the Head of Student Experience or member of the Safeguarding Team will meet with the student and, where appropriate, their parent, carer or family member and will offer appropriate support.

### **37. Enquiries and Investigations Following Allegations Against a Member of Staff**

- 37.1 The College may take account of the outcome of any external agency investigation when progressing its own internal procedures.
- 37.2 The College may seek guidance and suspend its internal enquiries while formal Police or Social Care investigations are ongoing, as proceeding simultaneously may prejudice the external investigation. Any subsequent internal enquiries will be conducted in accordance with the College's Staff Disciplinary Procedures.
- 37.3 Where an external agency investigation is undertaken, for example by the Police, the College will contribute to, cooperate with, and provide appropriate assistance to external agencies during their enquiries
- 37.4 Subject to objections from the police or other investigating agencies, the Safeguarding Lead, nominated senior manager, People & Culture Manager or the Principal, as appropriate will:
- If appropriate, notify the student's next of kin that an investigation is taking place and explain the process involved.

- Inform the Designated Safeguarding Governor, or if unavailable, the Chair of Governors, of the allegation and the progress of the investigation.
- Ensure that the People & Culture Manager maintains a written record of all actions taken in relation to the allegation and its outcome.

### **38. Suspension of Staff**

- 38.1 Suspension will not be an automatic response to an allegation but may be considered at any stage of an investigation. Suspension is not an indication of guilt and does not constitute a disciplinary sanction. It is intended to mitigate risk and/or to enable a fair and impartial investigation to proceed.
- 38.2 Suspension will only be considered where there is a legitimate reason. Examples may include:
- Where a student is at risk of harm.
  - Where the allegation is sufficiently serious that it could constitute gross misconduct and potentially justify dismissal.
  - Where suspension is necessary to ensure the efficient conduct of the investigation.
- 38.3 The SLT will consider and review the decisions as to who is informed of the suspension and investigation.
- 38.4 Where a referral to the Local Authority Designated Officer (LADO) is being considered, the Duty LADO should be contacted for threshold advice before the referral is completed or submitted.
- 38.5 The resignation of a member of staff should not prevent an allegation from being fully considered and followed up in accordance with College procedures.
- 38.6 Records of all communications with external agencies must be provided to the People & Culture department for secure recording and retention.

### **39. Records**

- 39.1 Only relevant documentation relating to an investigation will be retained. All records must be stored securely and confidentially, together with a clear written record of the outcome.
- 39.2 Where disciplinary action is taken, details will be retained on the member of staff's personnel file in accordance with the College's Retention and Disposal Policy.
- 39.3 Any safeguarding information relating to a student will be recorded on CPOMS in line with College safeguarding procedures
- 39.4 Where a member of staff resigns before the disciplinary process is concluded, they will be informed of the College's statutory duty to make a referral to LADO or the Disclosure and Barring Service (DBS), where the legal threshold for referral is met.

### **40. Investigating Allegations Involving Indecent Images of Children**

- 40.1 These guidelines are designed to protect staff from being placed in a compromising position and to ensure that any potential Police investigation is not compromised or prejudiced.

- 40.2 The taking, making, possessing, distributing or sharing of an indecent image of a child is a criminal offence. For the purposes of the law, "making" an image includes downloading it from the internet or creating an electronic copy.
- 40.3 If a member of staff becomes aware of the creation, downloading, distribution, sharing or storage of such images, they must immediately inform the Head of Student Experience, People & Culture Manager or a member of the Senior Leadership Team (SLT).
- 40.4 Staff must not attempt to view, copy, forward, download or otherwise handle any suspected indecent images of children.
- 40.5 The IT Network Manager will take immediate steps to secure and isolate the device (e.g. PC, laptop or other equipment) and preserve evidence in a secure location pending further investigation by the appropriate authorities.

#### **41. Location of this Policy**

- 41.1 This Policy will be held on the staff portal and College Website.

#### **42. Related to other College Policies and Procedures /documents**

- Health and Safety Policies and Procedures
- ANNEXE J Business Continuity - Dynamic Lockdown Procedure
- Student Positive Behaviour Policy
- Admissions Policy and Procedure
- Fitness to Study Procedure
- Acceptable Use Policy (AUP) for IT
- Policy and Procedures for Events Involving External Speakers
- Recruitment, pre-employment & DBS Policy and Procedure
- DBS Procedure
- Grievance Policy & Procedure (Incorporates dealing with bullying & harassment)
- Disclosure & Barring Service (DBS) Procedure
- Whistleblowing Policy and Procedure
- Staff Code of Conduct
- Disciplinary Policy (not applicable to Senior Post-holders)
- Procedure for Personal Consent Required Regarding the Use of Digital Images, Printed Images and/or Video Recording
- Visitor Policy
- Freedom of Expression Policy
- Prevent Risk Assessment and Action Plan
- Online Learning Policy and Procedure
- Policy and Procedure for Events Involving External Speakers

#### **43. Monitoring and Reporting**

- 43.1 The Senior Leadership Team (SLT) and Governing Body will review the Safeguarding Policy and Procedures annually and formally approve it. They will also monitor and evaluate the effectiveness of the Policy and its implementation.

## **APPENDIX 1 - Definitions and indicators of abuse**

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Examples which may indicate neglect:**

- Constant tiredness or listlessness
- Poor concentration
- Dirty or unkempt
- Poorly or inappropriately dressed for the weather
- Poor attendance or often late
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or searching for food or other necessities
- Failure to achieve developmental milestones, for example, intellectual or social development, weight

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

### **Examples which may indicate physical abuse:**

- Patterns of bruising or injuries; inconsistent account of how bruising or injuries occurred - finger, hand or nail marks, black eyes, bite marks, burns, scalds  
Lacerations, fractures, bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

**Sexual violence or abuse** involves forcing or enticing a young person or adult at risk to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts, including, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet).

### **Examples which may indicate sexual violence abuse:**

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Eating disorders, for example anorexia nervosa and bulimia
- Self-harming, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour
- Touching others inappropriately
- Depression, withdrawal, isolation from peer group

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

### **Examples which may indicate emotional abuse:**

- Overreaction to mistakes, continual self-deprecation
- Delayed physical, mental, and emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away / going missing
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia

**Child Sexual Exploitation** is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person or adult at risk under the age of 18 into sexual activity; in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Children with Disabilities**

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

- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint

- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing
- Unwillingness to try to learn a child's means of communication
- Misappropriation of a child's finances
- Invasive procedures

## **Self-harm**

Self-harm describes any behaviour where someone causes harm to themselves, usually as a way to help cope with difficult or distressing thoughts and feelings. It most frequently takes the form of cutting, burning or non-lethal overdoses.

Self-harm usually starts as a way to relieve the build-up of pressure from distressing thoughts and feelings. This might give temporary relief from the emotional pain the person is feeling. It is important to know that this relief is only temporary because the underlying reasons still remain. Soon after, feelings of guilt and shame might follow, which can continue the cycle. Learning new coping strategies to deal with these difficulties can make it easier to break the cycle of self-harm in the long term.

While it is true that anyone can be affected by self-harm, some people are more at risk of self-harm than others.

Some factors that might make someone more at risk are:

- Experience of mental health disorders, depression, anxiety
- Difficulties at home,
- Transitions and changes
- Arguments or problems with friends
- Bullying
- Alcohol and drug use.

Further information or support is available through the websites and contact details below:

- <http://www.harmless.org.uk/>
- [www.selfharm.co.uk](http://www.selfharm.co.uk)
- [www.youngminds.org.uk](http://www.youngminds.org.uk)
- <https://www.samaritans.org/>
- [www.b-eat.co.uk](http://www.b-eat.co.uk)
- [Student Wellbeing & Mental Health site on the Student Portal](#)

## **Adult Safeguarding**

In terms of an adult qualifying for support from Adult Social Care an 'adult at risk' is someone who is aged 18+ who:

- Needs care and support,
- Is experiencing, or is at risk of abuse or neglect, and
- As a result of their need for care and support they are unable to protect him or herself against abuse, neglect or risk of it.

The abuse could: happen once, be repeated, be a deliberate act, be unintentional (perhaps due to a lack of understanding) or the abuse could be a crime. Abuse can be

caused by anyone: a partner, relative, friend, neighbour, a paid or volunteer carer, other service users, someone in a position of trust (e.g. college staff) or a stranger.

### **Different Kinds Of Abuse Which An adult at risk May Experience**

- **Physical abuse** – being hit, kicked, locked in a room or inappropriate restraint
- **Sexual abuse** – such as being made to take part in a sexual activity when the adult has not given or is not able to give consent.
- **Psychological abuse** – such as being shouted at, ridiculed, bullied or being made to feel frightened.
- **Financial or material abuse** – such as theft, fraud, exploitation, pressure in connection with financial matters or misuse of someone else's finances.
- **Neglect** – involves the failure to provide care or support that results in someone being harmed.
- **Discriminatory abuse** – involves treatment or harassment based on age, gender, sexuality, disability, race or religious belief.
- **Modern slavery** – includes human trafficking and forced labour.
- **Organisational abuse** – if these forms of abuse are caused by an organisation then this may be called organisational abuse.
- **Domestic violence and abuse** - when the abuse occurs between partners or a family member.
- **Self-neglect** – is when an adult declines essential support with their care and support needs, and this has a substantial impact on their overall wellbeing.

## **APPENDIX 2 - Prevent Strategy**

Prevent is part of the Government's initiative to develop a robust counter-terrorism Programme entitled CONTEST'.

The UK faces a range of terrorist threats. Terrorist groups who pose a threat seek to radicalise and recruit people to their cause.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical - an attack is expected imminently
- Severe - an attack is highly likely
- Substantial - an attack is a strong possibility (Current National Threat Level - Feb 2023)
- Moderate - an attack is possible but not likely
- Low - an attack is unlikely

The threat level from international terrorism in the UK in the recent past has fluctuated between severe and moderate.

Further Education colleges are major education and training providers for the 16 – 25 year age group, particularly young people from ethnically diverse, and socially and economically disadvantaged areas. The age and profile of our students make it crucial to be involved in the Prevent strategy. Colleges have a part to play in fostering shared values and promoting cohesion. Colleges should focus on the risks of violent extremism, which represents the greatest threat at the national level while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings.

For this strategy, violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.

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

- At all times, and by all means, seek to create a safe environment for the entire college community
- Operate the policy to specifically encompass children, young people, adults at risk and adults who may be temporarily vulnerable
- Acknowledge that abuse may take many forms; physical, sexual, financial and material, emotional, neglect, Female Genital Mutilation (FGM), forced marriage, hate crime, radicalisation and risk to self and/or others.
- Work with external agencies, in particular, the Police Prevent Team, Hate Crime, Bradford Children's Safeguarding Board and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken.

This strategy should be used in conjunction with the following:

- Safeguarding Policy and Procedure
- Positive Behaviour Policy and Student Disciplinary Procedure
- Staff Code of Conduct
- Acceptable Use Policy for IT
- Health and Safety Procedures
- Business Continuity Policy, and Annexes

### **KEY OBJECTIVES (embedded in British Values)**

- To promote and reinforce shared values; to create space for free and open debate; and to listen and support the student voice.
- To break down segregation among different student communities including supporting interfaith and intercultural dialogue and understanding, and to engage all students in playing a full and active role with wider engagement in society.
- To ensure student safety and that the College is free from bullying, harassment and discrimination.
- To provide support for students who may be at risk and develop appropriate sources of advice and guidance.
- To ensure that students, apprentices and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation.

### **PRINCIPLES**

This strategy is not directed at any specific ideology, religion, religious group or religious faith, or at the proponents of any other sets of beliefs. Its principal aim is to ensure that the College can monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent extremism in the name of ideology or belief. The strategy commits the College to the promotion of cohesive and inclusive College/community relations which do not allow any particular individual or group of individuals to be marginalised, stigmatised or excluded from college life.

### **Leadership and Values**

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, apprentices, staff and visitors and promotes respect, equality, diversity and inclusion, and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, student voice and participation
- Building staff and student understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### **Teaching and Learning**

To provide a curriculum which builds the resilience of students by promoting student voice and undermining extremist ideology. This will be achieved by:

- Embedding equality, diversity and inclusion, student wellbeing and community cohesion
- Promoting social and emotional aspects of learning - engaging students in social action - people coming together to help improve their lives and solve the problems that are important in their communities.

- Adapting curriculum to recognise local needs, challenge extremist narratives and promote universal rights - community cohesion
- Teaching and learning strategies which explore controversial issues and promote critical analysis
- Encouraging active citizenship and student voice

### **Student Support**

To ensure that staff feel confident to support students by working with other professionals, family members and communities. This will be achieved through:

- Maintaining strong links with key professionals and external agencies, such as the Local Authority Prevent Coordinator, Prevent Regional HE/FE Coordinator, Social Services, Local Authority Designated Officer (LADO), the Prevent Counter Terrorism Police, Neighbourhood Police team, etc.
- Remaining vigilant about what is happening in the College and the community
- Challenging discriminatory behaviour
- Helping staff to understand how to access support in the College and external organisations, such as Breaking The Cycle - Youth Workers to offer support to young people being groomed or at risk of being involved in organised crime.
- Making referral to the Prevent Channel programme which adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

### **Managing Risks and Responding to Events**

The College will monitor risks and deal appropriately with issues which arise. It will do this by:

- Understanding and managing potential risks of the threat from violent extremism and the impact on students, staff and more generally on the College
- Responding appropriately to events in local, national or international news that may impact on students, staff and communities
- Ensuring measures are in place to minimise the potential for any acts of violent extremism within the College campus, and plans in place to respond to any threat.
- Having effective ICT security and an Acceptable Use (AUP) Policy.
- Promoting awareness across the whole college
- Responding swiftly to signals or a report of any potential threats.

### **Referral Process for Concerns Involving Terrorism or Radicalisation**

Report student concerns directly to the Head of Student Experience, Student Wellbeing and Safeguarding Officer, manager or member of the SLT. Staff concerns can be reported to the Head of Student Experience, People & Culture Manager or member of the SLT. If this is not possible, speak to your Line Manager.

The Head of Student Experience or the appropriate member of staff dealing with the concern will:

- Accurately gather all relevant information
- Speak to the student and/or member of staff
- Speak to the Police and/or the Local Authority Prevent Coordinator or report the concern using - [ACT: Action Counters Terrorism](#) - Prevent Radicalisation and Extremism by Acting Early
- In an emergency, life-threatening situation or where they have reflected on a situation and feel it cannot wait until the next day, the staff member may report the concern to ACT Early Support Line on 0800 011 3764. However, they must inform the Head of Student Experience, Vice Principal Curriculum Quality or their Line Manager as soon as possible.



## **APPENDIX 3 - Protocol on Sharing Information with External Agencies**

### **Information Sharing**

Sharing information when working with children and young people is often necessary. However, how much information to share, with whom and when, can have a profound impact on individuals' lives. It could ensure that an individual receives the right support at the right time and prevent a need from becoming more acute and difficult to meet. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.

When there is a concern that a child is at risk of significant harm, all relevant information held by the establishment must be shared with third parties such as Social Care Services, police and health professionals. Section 47 of the Children Act 1989 and sections 10 and 11 of the Children Act 2004 empower all agencies to share information in these circumstances.

On occasions when safeguarding concerns exist for a child or adults at risk in the context of a family situation and siblings attend other educational establishments or the children are known to other agencies, it may be appropriate for the designated safeguarding staff to consult with, on a confidential basis, their counterpart from other establishments or other agencies to share and jointly consider concerns.

Under section 29 of the Data Protection Act, the police are allowed access to college records in certain circumstances such as criminal investigations.

It is good practice to seek consent from the child or adult at risk or their parent/care before sharing information. Children over the age of 12 years are considered to have the capacity to give or withhold consent to share their information unless there is evidence to the contrary; therefore, it is good practice to seek their views. If the student is over 16, they should be involved in decision-making about information sharing, unless they do not have the capacity to give consent.

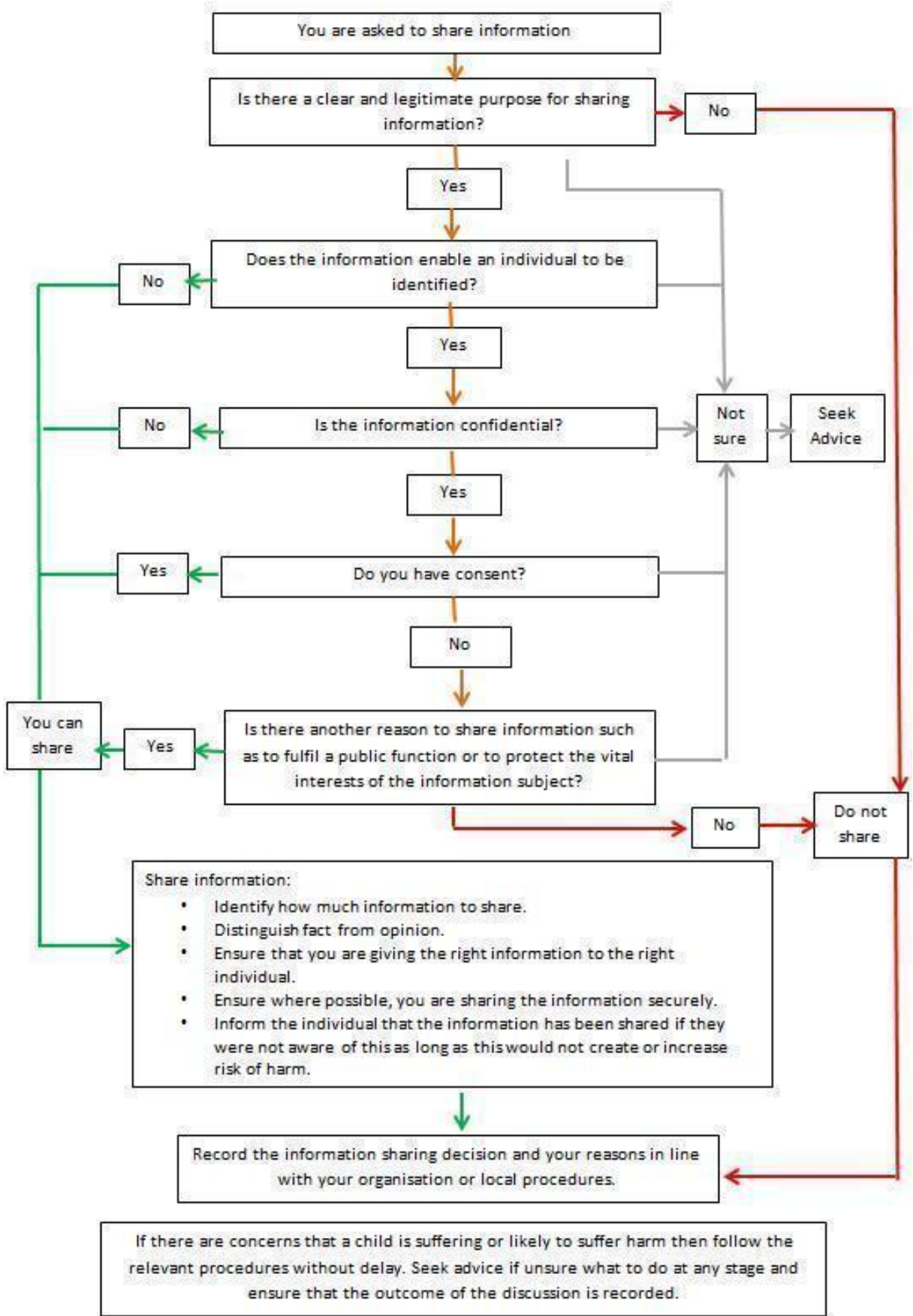
However, consent is not always a condition for sharing and sometimes we do not inform the child or family that their information will be shared if in doing so it would:

- Place the person at risk of significant harm
- Prejudice the prevention, detection or prosecution of a crime
- Lead to unjustified delay in making enquiries about allegations of significant harm to a child or serious harm to a vulnerable adult.

### **Related Government guidance**

- [Information sharing advice for safeguarding practitioners](#)
- [Working together to safeguard children](#)

**Flowchart of key questions for sharing information** (whether you are asked to share information or wish to share information).



(Flowchart from HM Government *Information Sharing: Guidance for practitioners and managers*)

## The Seven Golden Rules to Sharing Information

1. The **Data Protection Act 1998** and **human rights law** are not barriers to justified information sharing and retention. Instead, they provide a framework to ensure that personal information is shared appropriately.
2. Be **open and honest** with the individual (and/or their family, where appropriate) from the outset about why, what, how, and with whom the information will or could be shared. Seek their agreement unless doing so would be unsafe or inappropriate.
3. If in doubt about sharing certain information, seek **advice from other practitioners** without disclosing the individual's identity where possible.
4. **Share with informed consent** whenever appropriate. If an individual does not consent, respect their wishes where possible. However, information may still be shared without consent if, in your judgment, there is a valid reason to do so, such as when safety is at risk. Any decision should be based on the specific facts of the case.
5. **Consider safety and wellbeing**: Make information-sharing decisions based on the safety and wellbeing of the individual and others who may be affected.
6. Ensure that information shared is **necessary, proportionate, relevant, adequate, accurate, timely, and secure**. It should only be shared with those who need access, be accurate and up to date, shared in a timely manner, and done securely.
7. **Keep a record** of your decision and the reasons behind it—whether you choose to share information or not. If you do share, document what was shared, with whom, and for what purpose.

## APPENDIX 4 - Safeguarding Contact Details

Staff	Role	Contact Details
Shoeb Desai	Head of Student Experience (Designated Safeguarding Lead)	7290 / 7281
Tara Phillips	Student Safeguarding Lead	7302 / 7281
Chris Verney	Student Wellbeing & Safeguarding Officer	7279/ 7281
Nick Glossop	Head of Learning Support	7260
Azz Haris	People and Culture Manager	7249
Martin Maran	Health and Safety Manager	7224
Greg O'Shea	Vice Principal - Curriculum and Quality	7205
Ruth Tomlinson	Vice Principal - Study Programmes	7277
John Flaherty	Vice Principal Finance and Premises	7237

### Reporting a student safeguarding concern

If your concern is related to a student, contact the:

- Student Safeguarding Lead,
- Student Wellbeing and Safeguarding Officer or the
- Head of Student Experience.

They will take responsibility of the safeguarding concern and deal with it appropriately. You can also email at [wellbeing@shipleigh.ac.uk](mailto:wellbeing@shipleigh.ac.uk) or use the [Student Safeguarding Concern Form \(Staff Use\)](#)

### Reporting a staff safeguarding concern

If a staff member has a concern regarding another member of staff:

- Speak to the People & Culture Manager.
- If the People & Culture Manager is unavailable, contact a member of the Senior Leadership Team (SLT) or the Head of Student Experience.

### Concerns Outside College Hours

If your concern arises outside of College hours and an external safeguarding contact is required, the following information is provided:

#### Safeguarding Children (young people).

During office hours call Children's Social Care Initial Contact Point on 01274 433999 - (8.30 am to 5pm Monday to Thursday, 8.30 am to 4.30 pm on Friday)

At all other times, Social Services Emergency Duty Team - 01274 431010 (outside office hours)

[Bradford Children and Families Portal A place for professionals and members of the public to contact us, make a referral, enquiry, obtain further advice and guidance.](#)

## **Safeguarding Adults at Risk**

### **To report adult safeguarding concern**

Alternatively, Contact 01274 431077 to speak to a member of the Multi-Agency Safeguarding Hub (MASH) who will provide support, advice and guidance to report concerns - (8.30 am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday)

Out of hours Emergency Duty Team - Telephone: 01274 435400 (outside office hours)  
Note: If a young person or adult at risk is in immediate danger, contact the Police by dialling 999 for urgent assistance.

## **Mental health and wellbeing**

Information on looking after your mental health and wellbeing is available on the [Student Wellbeing & Mental Health site](#) on the student portal.

Other useful websites offering support with mental health include:

- [www.childline.org.uk](http://www.childline.org.uk)
- [www.mind.org.uk](http://www.mind.org.uk)
- [www.mindmate.org.uk](http://www.mindmate.org.uk) (for children & young people)
- [www.nhs.uk/conditions/stress-anxiety-depression/talking-to-children-about-feelings/](http://www.nhs.uk/conditions/stress-anxiety-depression/talking-to-children-about-feelings/)

## **APPENDIX 5 - Procedure for Staff on Reporting Low-level Concerns**

A low-level concern is a term used in safeguarding to describe behaviour by a member of staff towards students or colleagues that does not meet the threshold of harm or abuse but still causes some concern. It refers to actions that are inconsistent with the expected professional standards.

### **Key points:**

1. Below the harm threshold: The behaviour is not considered abuse or serious misconduct but is still inappropriate, concerning, or not in line with professional expectations.
2. Examples may include:
  - Making an offhand remark that could be misinterpreted.
  - Being overly familiar with students (for example, excessive attention or inappropriate jokes).
  - Minor breaches of school/college policies or professional boundaries.
3. Purpose of reporting: Recording low-level concerns allows the organisation to spot patterns early and prevent escalation, ensuring all staff act professionally and uphold the ethos and values of the institution.
4. Who reports it: Low-level concerns should be reported to the People & Culture Manager or the Head of Student Experience so they can be logged and monitored.

Think of a low-level concern as a “yellow flag” rather than a “red flag”: it highlights potential issues early before they become serious.

### **How to Report a Low-Level Concern?**

All low-level concerns should be reported to the People & Culture Manager. If this is not possible, you should speak to the Head of Student Experience, a member of the Senior Leadership Team (SLT), or your Line Manager.

The concern will be recorded and managed in accordance with the College’s safeguarding procedure.

### **Concerns Raised about Supply Staff and Contractors**

Low-level concerns relating to agency staff or contractors will be recorded, and the relevant agency or employer will be notified by the People & Culture Manager, including any actions taken by the College.

### **What Information will be Recorded?**

The record will include:  
Details of the concern, the context in which it arose and actions taken.

All records will be kept confidential, stored securely, and managed in accordance with Data Protection legislation.

The College will retain information relating to low-level concerns for at least as long as the individual remains employed, or for 10 years after the issue arises, whichever is longer.