

Policy/Procedure Name: Safeguarding Policy

Policy/Procedure Number: SS004

Date of Approval: April 2024

Review Date: September 2024

Role Responsible: Head of Safeguarding & Wellbeing

Approved By: Executive Team

Safeguarding Is Everyone's Responsibility

Brooklands College is committed to safeguarding and promoting the welfare of all learners. Brooklands College values everyone as an individual, and treats all equally and fairly. The College has a statutory and moral duty to commit to practices that protect children, young people and vulnerable adults from abuse, neglect or significant harm.

Brooklands College is committed to learning, improving and developing and others and will lead by example, we will be consistent in our approach and communicate openly and honestly, ensuring collaborative working relationships with all stakeholders.

The governors and staff recognise that a safe and trustworthy environment combined with clear lines of communication and decisive action, ensures the best outcomes for all learners. The College expects all staff, supply/agency staff, governors, volunteers, sub-contractors, contractors, work placement providers, employers, partners, visitors and external hire clients to endorse and practise this commitment at all times.

1.0 Introduction

Brooklands College, referred to as 'the College' hereafter, has safeguarding statutory duties and responsibilities in relation to its learners as set out below. The policy applies to all staff, supply/agency staff, governors, volunteers, sub-contractors, contractors, work placement providers, employers, partners, visitors, external hire clients and commercial lettings clients, referred to as 'staff' hereafter.

Where College is used for non-College activities, those providers are expected to abide by all College related safeguarding policies and procedures as appropriate, as well as meeting the guidance in Keeping Children Safe in out-of school settings;

[After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers)

The policy also applies to, and should be followed, in relation to a safeguarding incident that happens when an individual or organisation is using College premises for the purposes of running activities for children and adults, where applicable.

In addition, the College works in partnership with a range of agencies to discharge our safeguarding duties. We also work within the framework, policies and procedures of the Local Safeguarding Children Partnership and Local Safeguarding Adult Board respectively, based on the area where the learner lives.

Contact details of the College's safeguarding structure and key contacts are below, along with links to the websites of the Local Safeguarding Children Partnership and Local Safeguarding Adult Board respectively.

2.0 Key Personnel

Job Title	Name	Email
CEO / Principal	Christine Ricketts	christine.ricketts@brooklands.ac.uk
Designated Safeguarding Lead (DSL)	Melissa Breeden	melissa.breeden@brooklands.ac.uk
Deputy Designated Safeguarding Leads (DDSL)	Maureen McDermott Kay Barron Iona Ovenell Vacancy	Maureen.McDermott@brooklands.ac.uk Kay.Barron@brooklands.ac.uk Iona.Ovenell@brooklands.ac.uk
College Counsellor	Lindsay Gomes	lindsay.gomes@brooklands.ac.uk
Safeguarding Governor	Jess Afekoya	jesseadekoya@gmail.com
Head of People, Performance and Development	Donna Wall	Donna.Wall@brooklands.ac.uk

Links to the websites of the Local Safeguarding Children Partnership and Local Safeguarding Adult Board respectively.

[Surrey Safeguarding Children Partnership](#)

[Safeguarding adults - report abuse or neglect - Surrey County Council](#)

3.0 Safeguarding Children

In relation to learners under the age of 18 years old, and classed as a child in law, the College has a statutory duty, as set out in the Education Act 2002 and Children Act 2004, to promote and safeguard the welfare of children and have due regard to guidance issued by the Secretary of State at all times.

The College adopts the definition used in the statutory guidance for schools and colleges: Keeping Children Safe in Education 2023, issued by the Department for Education (DfE), which applies to all children and, defines safeguarding and promoting children and young people's welfare as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.

- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and;
- Taking action to enable children to have the best outcomes.

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer significant harm including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and any kind of child exploitation such as sexual exploitation, criminal exploitation and serious youth violence. Such concerns will be referred into Children Social Care and the Police if appropriate.

4.0 Safeguarding Adults

In relation to learners 18 years and over, and classed as an adult in law, the College has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act 2005 and the Human Rights Act 1998. The College must have regard to guidance issued by the Secretary of State at all times.

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

- Has needs for care and support (whether or not the Local Authority is meeting any of those needs) and
- Is experiencing, or at risk of abuse or neglect; and
- As a result those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Care Act statutory guidance defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect.” The above duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support. Such concerns will be referred into Adult Social Care and the Police if appropriate.

Whilst these duties have to be met for a referral to Adult Social Care and/or the Police, College policy is to safeguard all learners. While a concern may not meet the threshold for such a referral and/or support of these external agencies, the College is committed to safeguarding and supporting all learners as appropriate.

The adult with care and support needs, in need of safeguarding, will hereafter be referred to as the adult throughout this policy.

5.0 Students Potentially At Greater Risk Of Harm

Looked after children, previously looked after children, care leavers & adopted children

Staff should be aware that these learners may need additional services, assistance, protection and consideration.

The Safeguarding & Wellbeing Officer in College is the single point of contact for coordinating support for these learners both internally and externally. The Safeguarding & Wellbeing Team will hold a record of these learners including contact details of the learner’s social worker, virtual school and carer; relevant contact details for previously looked after children; and, the details of the personal advisor and next of kin for care leavers, as appropriate.

For looked after learners, staff are expected to work alongside the Safeguarding & Wellbeing Team to support their education as well as provide relevant information for the students Personal Education Plan meeting and support with the Looked After Child review meetings. In addition, staff working with these learners are required to provide updates to the Safeguarding & Wellbeing Team on attendance, progress, achievements and any concerns. This will allow any issues and/or support needs to be identified early and allow for appropriate action to be taken in response.

College will liaise as necessary with the social worker, personal adviser and/or next of kin regarding any issues of concern affecting the learner.

Learners with Special Educational Needs and Disabilities

Staff should be aware that these learners may face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of learners including communication barriers. Staff must:

- Be aware that these learners may not outwardly show any signs of abuse;
- Further explore possible indicators of abuse such as behaviour, mood and injury without making assumptions that these factors relate to the learner's disability;
- Seek the voice of the learner at all times and not become disproportionately over-reliant on the voice and views of the parent/carer;
- Monitor these groups of learners to ensure that they are not being disproportionately impacted by behaviours such as bullying or peer group isolation.
- These learners will have a support profile in place to guide staff in providing additional support to overcome any barriers.

Learners with a Child protection Plan (CP) or Child in Need (CIN)

Staff should be aware that these learners may need additional support, services, assistance, protection and consideration.

The Safeguarding & wellbeing Team is the single point of contact for co-ordinating support for these learners both internally and externally. The Safeguarding & Wellbeing Team will hold a record of these learners including contact details of the learner's social worker, where relevant, and details of next of kin and any other agencies working with the learner.

Staff are expected to work alongside the Safeguarding & Wellbeing Team to provide regular and timely updates regarding the progress of these learners in college and any areas of concern within or outside of College. In addition, staff working with these learners are required to provide updates to the Safeguarding & Wellbeing Team on attendance, progress, achievements and any concerns. This will allow any issues and/or support needs to be identified early and allow for appropriate action to be taken in response.

College will liaise as necessary with the social worker, external agencies and next of kin, as appropriate regarding any issues of concern affecting the learner.

Learners who may benefit from Early Help support

Staff should be aware that any learner and their family may benefit from early help, which means providing them with support as soon as a problem emerges, at any point in their life. Staff should be aware that some learners may present with multiple and/or overlapping issues. Where a learner and family would benefit from co-ordinated support from more than just College, an inter-agency assessment called an Early Help Assessment will be offered to the learner and family, and with their

agreement, will identify the action to be taken and services to be provided. The Early Help Assessment will identify what help the learner and family require to prevent any needs from escalating to the point where statutory intervention may be required.

The Early Help Assessment is undertaken by a lead professional who provides support to the learner and family, acts as an advocate on their behalf and co-ordinates the delivery of support services.

Although there is not the same statutory early help offered in safeguarding adults, College staff will adopt the same principles and lead on or work with any early help type approach to working with adult learners.

Staff should be particularly alert to the potential need for early help for a learner who;

- are disabled or has certain health conditions, has specific additional needs and/or special educational needs regardless of whether they have a statutory Education, Health and Care Plan;
- are a young carer;
- have a mental health need;
- are showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are frequently going missing/goes missing from care or from home;
- are at risk of modern slavery, trafficking sexual or criminal exploitation;
- are at risk of being radicalised or exploited;
- are in a family circumstance presenting challenges for the learner, such as substance misuse, adult mental health and domestic abuse;
- have a family member in prison, or is affected by parental/carer offending;
- are misusing substances themselves;
- are in a family with circumstances that present a challenge such as drug and alcohol misuse, adult mental health and domestic abuse;
- have returned home to their family from care;
- are a privately fostered child;
- are at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- are persistently absent from education, including persistent absences for part of the College day.

The Safeguarding & Wellbeing Team is the single point of contact for co-ordinating support for these learners both internally and externally. The Safeguarding & Wellbeing Team will hold a record of these learners including contact details of the learner's next of kin and any other agencies working with the learner.

Staff are expected to work alongside the Safeguarding & Wellbeing Team to provide regular and timely updates regarding the progress of these learners in College and any areas of concern within or outside of College. In addition, staff working with these learners are expected to provide updates to the Safeguarding & Wellbeing Team on the attendance, progress, achievements and any concerns. This will allow any issues and/or support needs to be identified early and allow for appropriate action to be taken in response.

College will liaise as necessary with external agencies and next of kin, as appropriate regarding any issues of concern affecting the learner.

6.0 Principles Of The Policy

Safeguarding is the responsibility of all staff, supply/agency staff, governors, volunteers, sub-contractors, contractors, work placement providers, employers, partners, visitors, external hire clients and commercial lettings clients hereafter referred to as 'the College community', with the College playing its part in preventing, identifying and reporting abuse and neglect. The role also includes a responsibility on the whole College community to actively promote the welfare of every learner.

As well as ensuring that safeguarding concerns are addressed, we will also ensure that learners who attend College whether that be in person, remotely or online, are kept safe from harm whilst they are in our charge.

To this end, this policy must be seen in conjunction with other college policies as outlined in external legislation and guidance as set out in Appendix C

Brooklands College will not limit its view of what constitutes abuse, neglect or safeguarding, as they can take many forms and the circumstances of the individual case should be considered.

Six Principles of Safeguarding

The following six principles underpin all safeguarding work in college with the learner and safeguarding being at the forefront:

Empowerment – learners being supported and encouraged to make their own decisions and informed consent. If consent isn't given, but in order to fulfil its statutory safeguarding duties, the College still has to make a referral to Children/Adult Social Care and/or the Police. This will be explained sensitively and supportively along with an explanation as to the reasons why.

Prevention – it is better to take action before harm occurs.

Proportionality – the least intrusive response to the risk presented.

Protection – support and representation for those in greatest need.

Partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability – accountability and transparency in delivering safeguarding.

Aims of this Policy

The aims of this policy are:

1. To ensure that learners are effectively safeguarded from the potential risk of harm at the College and that the safety and wellbeing of the learner is of the highest priority in all aspects of the College's work.
2. To help the College maintain its ethos whereby staff, governors, volunteers, contractors, sub-contractors, employers, work placement providers, partners, learners, parents, carers, guardians, visitors, commercial lettings clients and external hire clients feel able to articulate any concerns comfortably, safe in the knowledge that effective action will be taken as appropriate.
3. To outline the College's commitment to safeguard and promote the welfare of learners.

Purpose of this Policy

To ensure all members of the Brooklands College community:

- Are aware of their responsibilities in relation to safeguarding learners.
- Know the procedures that should be followed if they have a safeguarding cause for concern.
- Know how to access additional information regarding safeguarding.
- Are aware of the key indicators relating to child and adult abuse and/or neglect and wider safeguarding concerns.
- Support the College's commitment to safeguarding, child and adult protection.

Principles

The College community has a statutory duty to safeguard its learners as set out in the 'Introduction' section of this policy.

This College recognises its legal and moral duty to promote the well-being of learners and protect them from harm and respond to safeguarding concerns when they arise.

We believe that every learner has, at all times and in all situations, a right to feel safe and protected from any situation or practice that results in them being physically, or psychologically damaged.

We agree that we have a primary responsibility for the care, welfare and safety of the learners in our care, and we will carry out this duty through our teaching and learning, day to day practices, extracurricular activities, pastoral care and extended College activities. In order to achieve this, all members of the College community, in whatever capacity, will at all times act proactively in learner welfare matters especially where there is a possibility that a learner may be at risk of significant harm.

We will enable learners, through tutorials and PPD lessons, Relationships and Sex Education and other support activities, to develop the skills they need to stay safe from harm. We will also help them to develop the confidence they need to speak up for themselves and others. We will provide effective support, guidance and care if a learner shares a concern with us.

Learners should be able to:

- Recognise and manage risks in different situations.
- Judge what kind of physical contact and behaviour is acceptable and what is not acceptable.
- Recognise when their personal safety is threatened and when and where to get help.
- We will maintain systems that will:
- Prevent unsuitable people working with learners. Safer recruitment process
- Promote safe practice and challenge poor and unsafe practice.

The College seeks to adopt an open and accepting attitude towards learners as part of their responsibility for pastoral care. The College hopes that parents/carers and learners feel free to talk about any concerns and will see College as a safe place if there are any difficulties at home and/or extra familial concerns. Learners' worries and fears will be taken seriously if they seek help from a member of staff. However, staff must not promise secrecy if concerns are such that referral must be made to the appropriate agencies in order to safeguard the learner's welfare and/or protect them from abuse and/or neglect. Learners will be made aware of this legal obligation.

In our College, if there are suspicions that a learner's physical, sexual, mental or emotional wellbeing is being, or is likely to be, harmed, or that they are being neglected or abused in any way, appropriate action will be taken. This action will be in accordance with the safeguarding procedures issued by the Safeguarding Children Partnership, if learner is under 18 or Safeguarding Adult Board, if learner is over 18, of the Local Authority area where the learner resides.

As a consequence, we:

- assert that the whole College community at Brooklands College is an integral part of the safeguarding processes.
- accept totally that safeguarding learners is required and is an appropriate function for all the whole College community, and wholly compatible with their responsibilities.
- recognise that safeguarding learners at Brooklands College is a responsibility of the whole College community.
- will ensure through training that the whole College community are alert to the possibility that a learner is at risk of or suffering harm, and know how to report concerns or suspicions.
- will designate a senior member of staff (DSL / DDSL) with knowledge and skills in recognising and acting on safeguarding concerns. They will act as a source of expertise and advice, and are responsible for coordinating action with the college and liaising with other agencies.
- ensure (DSL / DDSL) that all staff with designated responsibility for safeguarding learners will receive appropriate training.
- will share our concerns with others who need to know and assist in any referral process.
- will ensure that all members of the College community who have a suspicion that a learner may be suffering or may be at risk of suffering significant harm, refer such concerns immediately to the Safeguarding & Wellbeing Team, who will refer on to Children/Adults Social Care in accordance with the policy and procedures of the Local Safeguarding Children Partnership or Safeguarding Adults Board based in the Local Authority where the learner lives. Should a member of the Safeguarding & Wellbeing Team not be available, the member of staff with the concern will themselves make a referral to Children/Adults Social Care, as appropriate.
- will ensure that all staff are aware of the safeguarding procedures of the Safeguarding Children Partnerships and Safeguarding Adult Boards and, where appropriate, the Local Authority, and act on any advice given by them.
- safeguard the welfare of learners whilst in the College, through positive measures to address bullying, especially where this is aggravated by sexual or racial factors, prejudice or discriminatory based, disability or special educational needs, online or social media bullying.

- will ensure through the recruitment and selection of volunteers and paid employees that all people who work at Brooklands College are suitable to work with children and adults who need safeguarding.
- will act swiftly and make appropriate referrals to the Local Authority Designated Officer (LADO) where an allegation has been made that a member of staff has committed an offence against a learner, harmed a learner, or acted in a way that calls into question their suitability for working with learners.

7.0 Children who are Absent from Education

Children missing education are defined as children of compulsory school age who are not on a school roll or receiving suitable education otherwise than at school. Those who have a regular pattern of absent, have not returned to school for 10 days after an authorised absence, or are absent from school without authorisation for 20 consecutive school days or more without permission are at risk of becoming 'children missing in education'. Staff should be alert to the fact that children being absent on repeated occasions and/or for prolonged periods can act as a warning sign of a range of safeguarding issues including criminal exploitation, sexual exploitation or neglect.

Reasons for absences **must** be fully explored by staff with the learner and parents/carers, to enable early identification of emerging issues and/or safeguarding related concerns, to then allow for appropriate support and action to be taken.

A learner going missing from education, particularly repeatedly, could be a warning sign of a range of safeguarding concerns. Staff members should follow the College's procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or sexual/criminal exploitation and to help prevent further incidences.

Learners going missing from education, particularly repeatedly, could be a warning sign of a range of safeguarding concerns.

Where 14-16 learners are still on school roll College staff **must** notify the relevant school link person. Where the learners are on College roll or are being educated as part of their home education provision, then the local authority must be informed via the College's 14-16 lead.

8.0 Online Safety

As schools and colleges increasingly work online, it is essential that learners are safeguarded from potentially harmful and inappropriate online material. Staff must recognise that learners can be both victims and perpetrators of online abuse. Learners need to be safeguarded from the following areas of risks online;

Content – inappropriate and harmful content.

Contact – harmful online interactions.

Conduct – online behaviour that causes or increases the likelihood of being subjected to harm.

Commerce – including online gambling, phishing, financial scams.

Some online risks may lead to the learner being harmed and/or becoming involved in illegal activity including, but not limited to, radicalisation, cyberbullying, hate crime, non/consensual sharing of semi-nude and nude images and/or videos, revenge pornography, harassment, cybercrime, selling and distributing illegal drugs.

As such, leaders and managers must ensure that appropriate measures are in place to protect learners from potential online safeguarding issues (online harms) and ensure that their own online behaviour is not abusive in any way. Measures include:

- Induction and tutorial learning which trains learners to understand the potential dangers online alongside appropriate online behaviour; including regular and timely updates.
- Tutorials PPD lessons learning activity which ensures that learners understand how to report online safeguarding issues.
- Training for staff. Appropriate filters and monitoring of in-College internet access, including the identification of trends and potential issues.

Filtering & Monitoring

College has in place appropriate IT filtering and monitoring systems to safeguard learners in regards to online harm related risks. These systems assist in blocking harmful and inappropriate content. These systems are regularly reviewed, and at least annually, to ensure they are effective and fit for purpose for the College community. If a staff member has a concern linked to IT filtering and monitoring systems, harmful and/or inappropriate content, they **must** alert the Colleges IT department and central Safeguarding Team respectively.

9.0 Specific Safeguarding Issues

Whilst specific safeguarding issues are detailed below, this list should not be read as exhaustive.

Prevent

It is important that all learners are protected from the risk of radicalisation. Section 26 of 'the Counter-Terrorism and Security Act 2015' (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". It is the responsibility of Brooklands College in its capacity as a provider of further and higher education respectively, to have regard to this duty. The duty also requires the College to 'actively promote' the Fundamental British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

For further details see the College's separate Prevent Policy.

Female Genital Mutilation

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

Section 5B of the FGM Act 2003 places a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report personally to the police 'known' cases of FGM in under 18s which they identify in the course of their work, where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. This duty does not apply in 'at risk' or suspected cases. The Safeguarding & Wellbeing Team must make an appropriate referral to Children's Social Care if it is believed that a student has been subjected to FGM. In these cases, parents will **not** be informed before seeking advice. This duty does not apply in 'at risk' or suspected cases. For all other College staff, normal safeguarding procedures apply in the reporting of FGM cases.

The Home Office guide 'Mandatory Reporting of Female Genital Mutilation – procedural information' provides further information.

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Colleges can play an important role in safeguarding children from forced marriage. The minimum marriage age has now been raised from 16 to 18 years old meaning individuals must be aged 18 and over to get married. It is now a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion is not used. As with the existing forced marriage legislation, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), County Lines and Serious Violence

CSE and CCE are both forms of abuse which occur in person or online and involve a group or individual taking advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity even when the activity appears consensual. Both males and females can be victims, though their experiences may differ. Exploitation is also an integral part of county lines activity which involves gangs and organised criminal networks in exporting illegal drugs into other areas within the UK.

Staff should be aware of indicators that may highlight that a student is at risk from or involved with CSE, CCE, county lines or serious and/or gang related violent crime.

Peer on Peer Abuse (referred to in pre-18 education as 'Child on Child' abuse)

Staff should be aware that learners are capable of abusing their peers. This is generally referred to as peer on peer abuse. Peer on peer abuse can take place in or out of College, online and/or in person and can include, though not limited to, bullying, cyberbullying; sexual violence and sexual harassment; physical abuse; sharing semi and/or nude images (also known as sexting); initiation/hazing type violence and rituals; and upskirting. It can also include abuse in intimate, personal relationships or

causing someone to engage in sexual activity without consent. Whilst staff need to be aware of the gendered nature of peer on peer abuse, all peer on peer abuse is unacceptable and will be taken seriously.

The College will not tolerate peer on peer abuse. Every report of peer on peer abuse will be taken seriously and considered on a case by case basis, supported by other agencies, such as children's social care and the Police as appropriate.

Staff have an important role to play in preventing and responding where they believe a learner is at risk. Staff must challenge inappropriate behaviour between peers. It is not appropriate to downplay certain behaviours or to ever consider peer-on-peer abuse to be excused as "banter". To do so, can lead to a culture of unacceptable behaviour, an unsafe environment or a culture that normalises abuse which would be in contradiction with this policy and would not encourage learners to come forward to report abuse.

Staff must adopt the attitude of 'this could happen here' and remain vigilant, rather than waiting for a disclosure, recognising that learners may not always make a direct disclosure and information may come from overheard conversations or behavioural changes. Staff must reassure the victims that they are being taken seriously, will be supported and kept safe. Staff must report such allegations to the Duty Manager who will record the allegations, facilitate the allegations being investigated and the outcome. The Duty Manager will inform the Safeguarding & Wellbeing team if a Safeguarding concern is identified.

The Duty Manager will assess the risk to the victim and alleged perpetrator. The Duty Manager will consider the victim, especially their protection and support; the alleged perpetrator; and, all other learners (and if appropriate adult learners and staff) at college and any actions appropriate and proportionate to keep them all safe.

The Duty manager will consider manage the following options;

- Manage internally;
- Early help;
- Refer to social care;
- Report the police.

The support for the victim and alleged perpetrator will also be tailored on a case-by-case basis. Support may be provided by College, external agencies or a combination of both. A whole College proactive approach is adopted to preventing peer on peer abuse and includes;

- Mandatory staff training;
- Student awareness through tutorials and PD lessons
- College stance on zero tolerance to peer on peer abuse articulated through college policies, tutorials and training.

Learner on Learner Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment are not acceptable and will not be tolerated by Brooklands College. Sexual violence and sexual harassment can take place in or out of College, online and/or in person, and can include, though not limited to sexual assault, sexual comments, physical behaviour, online sexual harassment and, upskirting which is now a criminal offence.

Staff must adopt the attitude of 'this could happen here' and remain vigilant, rather than waiting for a disclosure, recognising that learners may not always make a direct disclosure and information may come from overheard conversations or behavioural changes. Staff must reassure the victims that they are being taken seriously, will be supported and kept safe. The College will not tolerate learner or

learner sexual violence and/or harassment. Every report of sexual violence or sexual harassment will be taken seriously and considered on a case by case basis, supported by other agencies, such as children's social care and the Police as required. Staff must report such allegations to the Safeguarding & Wellbeing Team and Duty Manager who will record such allegations and the outcome on Brooklands Safeguarding system "My Concern" on the relevant learner files.

College will make an immediate assessment of the risk and needs of the students involved following the report of sexual violence. The risk assessment will consider the risk posed to all learners, staff and the wider College community and adequate measures will be put in place to protect them and keep them safe. College will consider the need for a risk assessment on a case by case basis for reports of sexual harassment.

The risk and needs will consider the victim, especially their protection and support; the alleged perpetrator; and, all other learners (and if appropriate adult learners and staff) at College and any actions appropriate and proportionate to keep them all safe.

The response to manage the report of sexual violence or sexual harassment will be proportionate to the case and will include one or a combination of the following options;

- Manage internally;
- Early help;
- Refer to social care Police or both

The support for the victim and alleged perpetrator will also be tailored on a case-by-case basis. Support may be provided by College, external agencies or a combination of both.

A whole College proactive approach is adopted to preventing learner on learner sexual violence and sexual harassment and includes;

- Mandatory staff training;
- Student awareness through tutorials & PD lessons
- College stance on zero tolerance to learner on learner sexual violence and sexual harassment articulated through policies, tutorials and training.

Unsubstantiated, unfounded, false or malicious reports

If a safeguarding report is determined to be unsubstantiated, unfounded, false or malicious, College will first consider if the learner making the allegation has done so as a cry for help, needs other help or may have been abused or harmed in some other way by someone else. If appropriate, a referral to social care will be made. If a report is determined to be deliberately malicious or invented, the College may decide to follow its own Behaviour Policy as a mechanism to respond to such a report.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone, of any, or no, gender, can be a victim.

Domestic Abuse (DA / DV)

The Domestic Abuse Act 2021 now creates a statutory definition of domestic abuse as;

“Behaviour of a person (“A”) towards another person (“B”) is “domestic abuse” if— (a) A and B are each aged 16 or over and are personally connected to each other, and (b) the behaviour is abusive”.

In summary, the Act emphasises that domestic abuse is not just physical violence or threatening behaviour, but can also be coercive or controlling, emotional, sexual and/or economic abuse. As part of this definition, children are explicitly recognised as victims if they see, hear or otherwise experience the effects of abuse.

As a result, staff should now be aware that the definition of child abuse has been updated to include harm experienced by the impact of domestic abuse. This includes ill treatment that is not physical as well as the impact of witnessing ill treatment of others. It can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

See Appendix B for the Summary of KEY Legal and Government Requirements

Operation Encompass

The College has been given the opportunity to take part in a project that is run jointly between schools and Colleges, Surrey Police & Surrey County Council. This project is known as Operation Encompass. Operation Encompass is the notification to the College that a child (under 18) may have been affected by a domestic incident. This will be done by the start of the next College day.

Operation Encompass ensures that a specifically trained member of College staff, known as a Designated / Deputy Designated Safeguarding Lead (DSL / DDSL) is informed. The DSL / DDSL can then use the information, in confidence, to ensure the wellbeing of the learner. The College will look to make provisions or adjustments to assist the learner. Our College is keen to offer the best support possible to all of our learners and we believe this will be extremely beneficial for all those involved.

This expands the list of potential threats to young people’s safety to include domestic abuse, including controlling or coercive behaviour and the impact this has on children. Reference is made to the fact that the harm may be indirect and non-physical in cases of controlling/coercive behaviour and economic abuse.

10.0 Making a referral

Staff must have an attitude of ‘it could happen here’ where safeguarding is concerned. Staff must remain vigilant to concerns rather than waiting for a disclosure, recognising that learners may not always make a direct disclosure and information may come from overhearing conversations or observing behaviour changes. Staff must act immediately on any concerns they have and always in the best interests of the learner. Staff must reassure learners that they are being taken seriously, will be supported and kept safe. Staff must never make a learner feel like they are creating a problem when reporting a concern.

Early identification and reporting of concerns is vital to the effective identification, assessment and allocation of appropriate actions, services and referrals. It is not the responsibility of any member of the College community to investigate any suspicions or concerns that a learner is at risk of or is suffering significant harm. The concerns should be reported to the Safeguarding & Wellbeing Team immediately and should also be recorded on the College's “My Concern” system. Staff should provide as much detail as possible about the concern, clarifying the basic facts and including what is known about the learner, any vulnerabilities and wider contextual information especially any known risks or concerns within or outside of the family home. If an alleged crime has been committed, it is necessary to gather the basic facts about the alleged perpetrator (including name, age, address, access to children and adults), but not take any action that might alert the alleged perpetrator.

A safeguarding cause for concern is an action, observation, disclosure or discussion that raises concerns for a staff member about the safety or wellbeing of a learner.

All safeguarding causes for concern must be recorded on the College's "My Concern" system with the Safeguarding & Wellbeing Team. Staff must include any actions already taken, with any further actions required, to be agreed with the Safeguarding & Wellbeing Team along with the named staff member undertaking the action(s). This may include managing support for the learner internally within College's own support systems and services. Whilst awaiting the advice and actions from the Safeguarding & Wellbeing Team, staff must continue to monitor the situation that has led to reporting a cause for concern. If the situation changes in the interim, staff must report immediately any further details. In addition, if the concern is, or becomes, one of immediate suffering or likely to suffer significant harm, staff **must** follow the guidance detailed below.

The Safeguarding & Wellbeing Team will consider if the concern needs to be passed on to Children or Adult Social Care for further action, following the procedures of these agencies respectively for making a referral.

If, at any point, there is a risk of immediate serious harm to a learner or staff believe that a learner is suffering or likely to suffer significant harm, **direct** contact must be made with a member of the Safeguarding & Wellbeing Team immediately so that prompt, appropriate action and referrals can be made to safeguard the learner. If staff are unable to make contact with a member of the Safeguarding Team, a referral **must** immediately be made by that member of staff directly to Children or Adult Social Care, depending on the age of the learner and it must be to the Social Care team in the Local Authority area where the learner resides. In addition, if appropriate, support from the relevant emergency services should be sought (Police/Ambulance/Fire Services).

If a learner has a Social Worker, staff must keep the Social Worker updated on any safeguarding concerns regarding the learner, as well as the Safeguarding & Wellbeing Team.

"My Concern" system provides a confidential, secure, electronic safeguarding file for a learner and will include:

Learner Information.

- Details of other agencies the learner may be working with.
- Whether a child protection, child in need, early help assessment or adult safeguarding arrangements are in place.
- Chronological information including cause for concerns, emails, telephone calls, meeting notes.
- Concerns about and/or contact with the learner, actions taken, decisions reached and outcome.
- Information on any siblings and wider family members, if appropriate.

In College, the Safeguarding & Wellbeing Team holds the safeguarding records for learners on My Concern system, which is locked down separately from the learners' main record, due to the highly confidential nature of a child/adult protection or safeguarding concern. The Safeguarding & Wellbeing Team are responsible for making appropriate records. However, **all** staff are responsible for knowing how to make a referral on My Concern. Staff **must not** use Microsoft Teams or email as a vehicle to communicate and/or share information with the Safeguarding & Wellbeing Team on safeguarding related matters for current learners.

Staff should be aware that records may be shared with others at some stage and in exceptional cases, the possibility that they may become evidence in court proceedings.

As a contingency plan, should staff not be able to access “My Concern” at any time to record a safeguarding cause for concern, an electronic copy of the cause for concern is available for completion. In such circumstances, the safeguarding cause for concern as well as any updates can be sent via email into the Safeguarding & Wellbeing Team email inbox at safeguarding@brooklands.ac.uk. The Safeguarding & Wellbeing Team will then upload this information onto “ My Concern”

The DSL / DDSL and other appropriate professionals will hold meetings to discuss and review all open and high risk concerns. The DSL / DDSL will then be able to:

- Monitor that the agreed actions have been implemented.
- Assess the impact of the actions and the progress being made.
- Agree the next steps.
- Quality assures the written records.
- Collate a report for the governing body outlining the level of child and adult protection concerns and work being undertaken.
- Ensure that clear actions are followed up where there is a child or adult protection plan in place and the outcomes are monitored.
- Ensure the College is represented at relevant meetings.

11.0 Dealing with a serious safeguarding incident

In the event of a serious safeguarding incident, such as the death of a learner, staff must report this into the Executive Team and Safeguarding & Wellbeing Team (DSL/ DDSL) immediately and without delay. The Designated Safeguarding Lead (DSL) will then ensure immediate notification to the Local Safeguarding Partnership

See refer to Death of a Student or Staff Member Protocol policy

If the College is notified by the Local Safeguarding Partnership, Local Safeguarding Board or any other agency of a serious incident involving a learner, the DSL will ensure the College responds in accordance with relevant external policies, processes and procedures.

In addition, the DSL will convene an urgent internal meeting with relevant College managers to discuss and agree an action plan. The action which will include possible effects on staff, students and the wider College community; and any support needed.

All incidents will be reported internally, as a cause for concern on “My Concern” system. The College’s response, actions and decisions taken as a result of a serious incident will all be recorded on the learner’s safeguarding file on “My Concern”

If staff and/or external agencies need to notify of a serious safeguarding incident out of hours and holiday cover arrangements please follow the guidance below.

12.0 Safeguarding & Wellbeing Team - Out Of Hours & Holiday Cover Arrangements

All and any safeguarding concerns should be reported to the Safeguarding & Wellbeing Team throughout the academic year. In a case where a learner may be in imminent danger outside of regular working/College hours, the Police, Social Care or NSPCC should be contacted

All causes for concerns must still be recorded on “My Concern” to ensure that the Safeguarding & Wellbeing Team is then able to follow up on safeguarding concerns during normal college hours.

Staff should use the contact details for the Safeguarding Team of 01932 797 670 or safeguarding@brooklands.ac.uk.

Further details can be found on Brooklands website

<https://www.brooklands.ac.uk/college-life/student-services/safeguarding/>

If staff are unable to make contact with the Safeguarding & Wellbeing Team, a referral must immediately be made by that member of staff directly to Children or Adult Social Care, depending on the age of the learner and it must be to the Social Care team in the Local Authority area where the learner resides. In addition, if appropriate, support from the relevant emergency services should be sought (Police/Ambulance/Fire Services).

Surrey County Council – Emergency Duty Team (EDT)

The Emergency Duty Team provides an emergency social work service for urgent situations which arise out of normal office hours and which cannot be left with an appropriate degree of safety until the next normal working day.

The Emergency Duty Team service is not intended as an alternative means of accessing the usual daily activities of Surrey County Council.

The team operates outside of normal office hours

Monday to Friday 5pm to 9am

Weekends 24 hours a day

The EDT also operates throughout all bank holiday periods

- Tel: 01483 517898
- SMS number: 07800 000 388 (for deaf and hard of hearing callers online)
- To make a call via text direct, please dial 18001 01483 517898
- Email: edt.ssd@surreycc.gov.uk

For concerns about personal safety, contact the Police 999 (emergency) or 101 (non-emergency).

For concerns regarding health and wellbeing, contact your out of hours Doctors or call the NHS Direct on 111.

For safeguarding concerns relating to learners under the age of 18, staff can also contact the NSPCC on 0808 800 5000 or help@nspcc.org.uk

13.0 14-16 Year Olds Enrolled at College

For any learners who are on the College roll, the College safeguarding procedures apply. Where they access provision at other campuses, they should be directly supervised at all times.

Absences must be followed up immediately, and the 14-16 Program Manager will liaise with parent/s and the Education Welfare Service where there are ongoing concerns around attendance.

Should a return home arrangement arise (for example, first aid incident, weather), this is achieved following normal college procedures and in liaison with the learners' parent/carer to ensure safe transportation and arrival home of the learner.

14-16 Year Olds Enrolled at College While Registered as Electively Home Educated

For learners who attend provision at college while registered as EHE, the parent retains responsibility for their education. The College safeguarding procedures apply to these learners. Departments where these learners are based should:

- ensure that these learners are supervised at all times in lessons.
- liaise with the parents/carers regarding any issues of attendance. Absences must be followed up immediately to ensure the safety and wellbeing of the learner.
- ensure that in instances where a return home arrangement arises (for example, first aid incident, weather), this is achieved, in consultation with the school and, following normal College procedures and in liaison with the learners' parent/carer to ensure safe transportation and arrival home of the learner.

14-16 Year Olds on School Roll but Accessing College Provision

14-16 year old learners still on school roll, but may be attending College through an arrangement with the school, the school has ultimate responsibility for safeguarding those learners. Therefore, any safeguarding concerns that arise through College should be reported into the designated member of school staff immediately. The school and College will then liaise regarding the most appropriate course of action in order to safeguard the learner. If the designated member of school staff cannot be contacted, and the safeguarding concern is one that requires immediate action, College has a responsibility to act immediately to safeguard the learner and notify the designated member of school staff as soon as is practicably possible. Departments where these learners are based should:

- ensure that these learners are supervised at all times during lesson time.
- ensure that these learners are not educated in the same room, at the same time, as a learner aged 19 or over.
- liaise with the school and parents/carers regarding any issues of attendance. Absences must be followed up immediately to ensure the safety and wellbeing of the learner.
- ensure that in instances where a return home arrangement arises (for example, first aid incident, weather), this is achieved, in consultation with the school and, following normal College procedures and in liaison with the learners' parent/carer to ensure safe transportation and arrival home of the learner.
- ensure that any behaviour concerns that may result in the learner being temporarily excluded from College provision, are discussed with the school before any action is taken, such as them returning home

14.0 Safeguarding Structure in College and the Role of Staff

The Designated Safeguarding Lead for Safeguarding and Prevent in this college is:

Head of Safeguarding & Wellbeing

In their absence, these matters will be dealt with by the Deputy Designated Safeguarding Lead:

In case of any serious incident CEO/Principal must be notified immediately

Safeguarding & Wellbeing Officers

There is a **Designated Governor** for Safeguarding and Prevent.

The Head of Safeguarding & Wellbeing provides the day to day operational management of safeguarding across College. This includes managing the Safeguarding & Wellbeing Team to support this operational responsibility. This team works across College providing a range of support, advice and guidance on safeguarding and Prevent, to all departments. The Safeguarding & Wellbeing Team consists of four Safeguarding & Wellbeing Officers and College Counsellor. All safeguarding causes for concerns must be reported through to the Safeguarding & Wellbeing Team.

See Appendix C for the full details of roles and responsibilities of designated safeguarding staff and the role and responsibility of all staff.

Recruitment

In order to ensure that learners are protected whilst at Brooklands College, we will ensure that our staff and volunteers are carefully selected, screened, trained and supervised.

We accept our responsibility to follow the guidance set out in the most up to date version of the statutory guidance 'Keeping Children Safe in Education'. In particular, we will ensure that the following checks are satisfactorily completed before a person takes up a position in the College:

- Identity checks to establish that applicants are who they claim to be including having sight of an applicant's birth certificate, passport and/or driving licence.
- Checking academic qualifications, to ensure that qualifications are genuine.
- The chair of the interview panel has attended Safer Recruitment Training.
- References being undertaken prior to interview and enquiring about suitability to work with children and/or vulnerable adults.
- Previous employment history will be examined and any gaps accounted for.
- Appropriate Disclosure and Barring Service (DBS) checks are completed.
- Online pre-recruitment checks are conducted for shortlisted candidates.

The process will also confirm that the 'Preventing Illegal Working; Declaration of Entitlement to Work in the UK' is completed.

We understand that some people otherwise unsuitable for working with children and adults in need of safeguarding may use volunteering to gain access to children and adults. For this reason, any volunteers in the college, in whatever capacity, will be screened using?????.

The same principles will be applied to the admittance of 'non-staff'; members of staff from partner agencies who work in an unsupervised capacity with learners internal or external to the College premises.

Please refer to the College's Recruitment and Selection Policy for further details.

Induction and Training

All new members of staff will receive induction training, which will give them an overview of the organisation and ensure they know its purpose, values, services and structure, as well as how to identify and report abuse and safeguarding concerns within the appropriate levels of confidentiality.

All new staff (and volunteers) will complete an online safeguarding and prevent training programme prior to commencing work at the College. They will be expected to attend a suite of mandatory safeguarding training during induction which includes general safeguarding awareness, FGM, Prevent, Channel, online safety awareness, expectations/roles/responsibilities in relation to filtering and monitoring training. This will enable staff to effectively fulfil their responsibilities in respect of safeguarding learners. Other training will be provided to staff throughout the academic year as appropriate.

Staff will also receive a copy of the Safeguarding Policy on starting their work at the College. As part of the induction programme, it is mandatory for staff to read and familiarise themselves with the college's safeguarding and prevent related policies and procedures. In addition, staff are expected to read Part 1 of the most recent version of 'Keeping Children Safe in Education' available via:

[Keeping children safe in education 2023 - part one \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106533/Keeping-children-safe-in-education-2023-part-one.pdf)

Staff will be directed to the Safeguarding section of the College's intranet, where they can gain access to copies of all the relevant safeguarding related policies and procedures both internal and external.

All staff should receive annual updates for safeguarding. This can be provided through scenario-based training as well as newsletters, emails, and staff meetings that staff are expected to participate in. In addition to this, all staff are expected to re-read this policy and KCSiE annually, and confirm that they have done so through "My Concern".

The Designated Safeguarding Lead, Deputy Designated Safeguarding Lead will update their DSL every two years.

For any staff visiting the College for short periods and staff who are unable to access face to face safeguarding awareness related training that staff are subject to, the College expects them to complete the online training detailed above as a minimum as well as additional training as directed by the College from time to time. In addition, they will be given access to relevant safeguarding related policies, procedures and information and they will be expected to confirm that they have read and understood their role and responsibility. Training and updates can take place via online platforms (such as Microsoft Teams) where in-person delivery may not be possible.

Conduct of Staff

The College has a duty to ensure that high standards of professional behaviour exist among all staff who come into contact with learners and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. This includes both in person and online behaviour.

At all times, members of staff are required to work in a professional way with learners. All staff should be aware of the dangers inherent in:

- Working alone with a learner.
- Physical interventions.
- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Giving to and receiving gifts from learners and parents.
- Contacting learners through private telephones (including texting), e-mail, social networking websites or messaging facilities.
- Disclosing personal details inappropriately.
- Meeting learners and families outside college hours or college duties.

There is an additional expectation placed on teachers, via the Teachers' Standards whereby teachers are expected to have a clear understanding of the needs of learners and manage behaviour effectively to ensure a good and safe educational environment.

Appropriate training will be provided to staff in relation to the areas listed above.

If any member of staff has reasonable suspicion that a learner is suffering harm and fails to act in accordance with this policy and the relevant Safeguarding Children Partnership and Safeguarding Adults Board procedures, the College will view this as misconduct, and take appropriate action.

An agreed Whistleblowing policy in relation to safeguarding is in place in order to support the college ethos where learners and staff can talk freely about concerns, poor or unsafe practice potential failings knowing they will be listened to and appropriate action taken. If staff feel they are unable to raise their issue internally or feel that their genuine concerns are not being addressed other whistleblowing channels are available including through the NSPCC by contacting help@nspcc.org.uk.

There are a range of mechanisms in place to ensure that learners feel comfortable to express their concerns to staff, for example:

- Progression Coaches
- At any stage of a learner's course as promoted during induction
- To the Safeguarding & Wellbeing email or telephone number
- In person to the Safeguarding & Wellbeing Team
- Drop-in sessions run by the progression Coaches

15.0 Allegations Made Against/Concerns Raised In Relation To Staff, Governors, Volunteers, Contractors, Sub-Contractors, Employers

There are two levels of allegation/concern that may arise against those working in or on behalf of College in a paid or unpaid capacity;

- Allegations that may meet the harms threshold
- Allegations/concerns that do not meet the harm threshold – referred to as 'low level concerns'.

All concerns, regardless of whether they meet the harm threshold or not, should be reported into the Head of Safeguarding and The Head of People Portal (HR), who will then decide on the next steps. Concerns may arise as a result of face to face and/or online behaviour.

Allegations That May Meet The Harms Threshold

This relates to allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in College.

Paid and unpaid staff

Allegations against members of staff, whether paid or unpaid, (including any volunteer, governor, contractor, sub-contractor) must be reported immediately to the CEO, Head of Safeguarding & Wellbeing together with the Head of People Portal (HR). Together they will decide on the next steps.

If the learner is a child (under 18) and anyone makes an allegation (current or historic) or it is suspected that a member of staff may have:

- Behaved in a way that has harmed a child, or may have harmed a child

- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way which indicates s/he may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children

The last bullet point above includes behaviour that may have happened outside of College, but that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate, College will undertake an assessment of transferable risk to children.

This must be reported without delay to the CEO Head of Safeguarding & Wellbeing and the Head of Peoples Portal they will handle such allegations. Basic information about the allegation will be collated and a decision made as to whether it meets the threshold to be reported to the Local Authority Designated Officer (LADO) and if so contact will be made with the LADO immediately. The LADO will discuss the concerns and offer advice and guidance on how the situation will be managed. The College will not investigate the concerns or enter into discussions with the alleged perpetrator without initial advice and guidance from the LADO.

If the learner is an adult (18+) with care and support needs and an allegation (current or historic) is made or it is suspected that a member of staff may have:

- Behaved in a way that has harmed or may have harmed an adult with care and support needs
- Possibly committed a criminal offence against or related to an adult with care and support needs
- Behaved towards an adult with care and support needs in a way that indicates s/he is unsuitable to work with adults with care and support needs
- Behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adults with care and support needs must be reviewed
- May be subject to abuse themselves and as a consequence means their ability to provide a service to adults with care and support needs must be reviewed
- Behaved in a way which questions their ability to provide a service to an adult with care and support needs which must be reviewed e.g. conviction for grievous bodily harm against someone who is not an adult with care and support needs

In the context of staff allegations against adults with care and support needs, the adult safeguarding guidance refers to staff as People in a Position of Trust (PiPoT). Such allegations must be reported without delay to the CEO Head of Safeguarding & Wellbeing and the Head of Peoples Portal, who will handle such allegations in line with the Surrey Safeguarding Adults Board 'Protocol for Responding to Concerns about a Person in a Position of Trust'.

This protocol must be followed in all cases by the College when it becomes aware of a concern where information (whether current or historical) is identified in connection with:

- The PiPoT's own work / voluntary activity with Adults and / or Children
- The PiPoT's life outside work i.e. concerning adults with care and support needs in the family or social circle
- The PiPoT's life outside work i.e. concerning risks to children, whether the individual's own children or other children

Children - whilst the PiPoT protocol is concerned with potential harm to adults with care and support needs, if the allegation is such that there is a concern that the person may also pose a risk to children, then Children's Services and/or LADO must be informed as appropriate.

Staff, Volunteers and Visitors not employed by the College including Supply/Agency Teachers & staff, sub/contracted staff, visitors, partners, commercial lettings clients and private hire clients, partners
In some circumstances, College will have to consider an allegation against an individual not directly employed by us, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency, contracted staff, commercial lettings clients. Whilst College is not the employer in these instances, we should still ensure allegations are dealt with appropriately. In no circumstances should College decide to cease to use an individual due to safeguarding concerns, without finding out the facts and, where appropriate, liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome.

All concerns must be reported without delay to the CEO Head of Safeguarding & Wellbeing and the Head of Peoples Portal who will handle such allegations. Basic information about the allegation will be collated and a decision made as to whether it meets the threshold to be reported to the Local Authority Designated Officer (LADO) and if so contact will be made with the LADO immediately. The LADO will discuss the concerns and offer advice and guidance on how the situation will be managed. The College will not investigate the concerns or enter into discussions with the alleged perpetrator without initial advice and guidance from the LADO.

Concerns That Do Not Meet The Harm Threshold - Low Level Concerns

College adopts and promotes a whole college approach to safeguarding which includes an open and transparent culture whereby any concern in relation to an individual working in or on behalf of college will be dealt with promptly, proportionately and appropriately. This will enable early identification of any concerning behaviour, minimise the risk of abuse, and ensure clarity about professional boundaries in accordance with the values and ethos of working in or on behalf of college.

A 'low level concern' does not mean that it is insignificant, it just means that it does not meet the harm threshold. A low level concern is any concern, that an individual working in or on behalf of College may have acted in a way that;

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to LADO.
- It can be any concern, no matter how small, including a nagging doubt or sense of unease.

Allegations or concerns against members of staff, whether paid or unpaid, employed by the College or not (including any volunteer, governor, contractor, sub-contractor, partners, commercial lettings or private hire clients) must be reported immediately to the CEO Head of Safeguarding & Wellbeing and the Head of Peoples Portal. They will decide on the next steps.

Examples include but are not limited to;

- Being over friendly with learners and/or having favourites
- Taking photographs of learners on personal mobile phones
- Engaging with a learners on a one-to-one basis in a secluded area behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Any low level concerns raised in regards to non- College employees or volunteers, will be directed to the relevant point of contact in the organisation that they represent or other relevant body, as appropriate.

Physical Contact and Restraint

Members of staff may have to make physical interventions with learners. Members of staff will only do this in line with College policy. Staff should recognise the additional vulnerability of learners with SEN, disabilities or medical conditions when reasonable force is used in response to risks presented by incidents involving these learners.

Relevant staff should undertake restraint training before implementing physical interventions. Training should be updated every 3 years.

Private Fostering

Private fostering is a private arrangement whereby a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or close relative (the child's grandparent, brother, sister, aunt, uncle, step-parent, legal guardian or other person with parental responsibility). The arrangement is made between a parent and carer, for 28 days or more. If the College becomes aware that a learner is being fostered privately, they must notify the Local Authority Fostering Team to ensure that the learner is being safeguarded and their well-being promoted.

Subcontracting

The College is committed to ensuring that all students in our subcontracted provision are safeguarded. Through due diligence, quality audits and unannounced visits we gather evidence to provide assurance and intervene if necessary.

Where the College contracts its services to outside providers, we will ensure that these providers have received the appropriate training in safeguarding and PREVENT and have relevant policies and procedures in place. We will ensure there are arrangements in place to link with the College on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider.

Contracting

All contractors are required to have a DBS if they wish to work unsupervised. Where a contractor does not have a DBS they must be supervised by a member of staff at all time while on either campus.

- The college is responsible for determining the appropriate level of supervision.
- Colleges should always check the identity of contractors and their staff on arrival at the college.
- Contractors are on the College's Single Central Register held in one central point

Photographing Learners under the age of 18

We will not allow images of learners to be used on College websites, social media, publicity, or press releases, without express permission to do so. The College cannot however be held accountable for photographers or video footage taken by parents or members of the public at college functions.

On the occasions that the College has a photographer or videographer present at events or for other purposes we will inform and seek additional permissions to use any footage or photographs taken on any media.

Risk Assessments

The College uses risk assessment to inform the planning of safeguarding activities. This may include individual learner risk assessments where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial. There may be occasions when the College assesses the risk of an individual as too high for the College to manage the risk at that time. If this is

the case, this will be communicated to the individual along with the reason(s). If the individual wishes to appeal the decision, they may do so by following the College's complaints procedure. In some cases the risk assessment may indicate that it is possible for the learner to be engaged in an online learning programme. Risk assessments are reviewed and updated on a regular basis as needed and at least once every year.

Confidentiality and Sharing Information

The College, and all members of staff at the College, will ensure that all data about learners is handled in accordance with the requirements of the law and any national and local guidance. All matters relating to safeguarding will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#).

Any member of staff who has access to sensitive information about a learner or the learner's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know when there is a legal duty to share information.

Regardless of the duty of confidentiality, working within the remit of our safeguarding duties, if any member of staff has reason to believe that a learner may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Safeguarding & Wellbeing Team.

We will raise awareness of the safeguarding responsibilities with parents and carers. We will also, if appropriate, share concerns about the welfare of a learner with a parent or carer. The College is committed to working with parents positively, openly and honestly. We will share with parents any concerns we have about their child, in line with our safeguarding duties, unless doing so may place the child at risk of harm.

In accordance with the requirements of "Working Together to Safeguard Children (2018)" and 'The Care Act Statutory Guidance (2014)' and GDPR, we will share information about safeguarding concerns with other relevant agencies on a need to know basis. In addition, other relevant agencies may contact us for information that we hold in relation to a learner. Any requests around learner details or information in relation to a safeguarding concern should be referred immediately to the Safeguarding & Wellbeing Team so that a prompt decision can be made about what information can and will be shared.

Staff must recognise the need to comply with relevant legislation and guidance in relation to data protection, confidentiality and information sharing.

Retention of Safeguarding Records

Child protection and safeguarding records will be kept until the child is 25 (which is seven years after they have reached school leaving age) unless there are exceptional statutory, regulatory, legal or security circumstances that would require the records to be kept for longer periods.

Adult protection and safeguarding records will be kept for 6 years plus current, otherwise known as 6 years + 1 unless there are exceptional statutory, regulatory, legal or security circumstances that would require the records to be kept for longer periods.

Monitoring our Progress

The College will collect and analyse data and information to measure our progress towards the values set out in this Safeguarding Policy. We will use the views of learners, parents, carers and other stakeholders to inform the changes and improvements we make. The College will keep accurate

records of safeguarding, child and adult protection issues that have been brought to our attention and will use accurate and up to date information to inform our strategic and operational decision making.

16.0 Guidance For Staff Should There Be A Partial Or Whole College Closure

Staff should continue to adhere to this policy during periods of partial or whole College closures, the main difference being that contact with learners and key staff will transfer to telephone, email and/or online contact, as appropriate.

Our safeguarding principles in accordance with 'Keeping Children Safe in Education' (KCSIE) 2021, will always remain the same:

- Safeguarding remains everyone's responsibility.
- Staff and anyone else working for or on behalf of College must continue to follow Colleges safeguarding policies and related procedures.
- the safety, welfare and best interests of all our learners always comes first. Our safeguarding responsibilities continue to encompass children, young people and adults at risk and in need of safeguarding.
- If anyone has a safeguarding concern about any learner they should continue to act and act immediately, in line with our established safeguarding policies and procedures.
- DSL or DDSL's are available as detailed in this policy.
- unsuitable people are not allowed to enter our workforce and/or gain access to children and/or adults with care and support needs.
- learners should continue to be protected when they are online and/or working remotely in some other way.
- All staff and volunteers will have access to members of the Safeguarding & Wellbeing Team on a daily basis, and can contact them via phone, email or through Microsoft Teams.
- Out of hours and holiday cover arrangements are as detailed in this policy.
- The DSL/Deputy DSL will continue to be the first point of contact operationally for raising a safeguarding concern, updating safeguarding files and, as required, liaise with social workers where they require access to learners in need and/or to carry out statutory assessment with the College.
- The DSL/Deputy DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.
- Online safety during partial or whole College closure will remain a priority and all staff/volunteers will continue to look out for any signs that indicate a learner may be at risk online and will report and respond to concerns in line with this policy. In particular, staff should be vigilant to online bullying, sexting, radicalisation, peer on peer abuse, criminal and sexual exploitation. Learners are encouraged to report concerns to a member of staff or a trusted adult at home. Parents/carers are encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented.
- College will continue to provide a safe online learning environment where expectations with regards to online behaviour and education will continue to be implemented in line with existing policies in line with relevant policies and procedures.

What happens if the Safeguarding Policy is not adhered to?

We will not tolerate behaviour which breaches the Safeguarding Policy and will initiate disciplinary or other action, if circumstances warrant, against those who contravene the guidance contained in it.

Raising Awareness of the Safeguarding Policy

It is important that the whole College community recognise the role they play in safeguarding. Safeguarding is a topic covered within the induction of every member of the college community as follows:

Staff:

Staff undertake online safeguarding and Prevent training prior to commencing their employment. Once employed, staff attend a suite of mandatory safeguarding training which includes general safeguarding awareness, Prevent, online safety awareness, expectations/roles/responsibilities in relation to filtering and monitoring training. Within the training staff are made aware of the following:

- The safeguarding policy and the procedure for reporting safeguarding concerns “My Concern”
- The key College personnel to whom the concern must be reported.
- The responsibility of all members of staff under the safeguarding policy and procedure.

Working Together to Safeguard Children (July 2023).

[Working Together to Safeguard Children 2023 - GOV.UK](#)

Keeping Children Safe in Education (2023).

[Keeping children safe in education 2023 - GOV.UK](#)

Care Act 2014 statutory guidance.

[Care and Support Statutory Guidance - GOV.UK](#)

All new staff are required to read at least part 1 of the Keeping Children Safe in Education 2023 guidance.

[Keeping children safe in education 2023 - Part one: Safeguarding information for all staff](#)

All staff must attend refresher safeguarding training at least every three years. This will normally be achieved by attending an in-house training session.

All staff must receive safeguarding updates at least annually. This may take the form of e-bulletins, briefings or meetings with peers from other agencies.

Volunteers:

Volunteers undertake the same training as members of staff.

Governors:

Governors undertake a rolling programme of training which includes safeguarding.

There is a link governor for safeguarding and PREVENT who undertakes at least bi-annual visits to the Safeguarding & Wellbeing Team as part of their oversight and governance role. The Board of Governors receive at least an annual report updating them on the current position regarding safeguarding in the college and any external policy and procedural changes. In addition, any high profile safeguarding cases are reported to the Chair of Governors and the link governor.

Work Placements / Employers/ Sub-contractors:

Sub-contractors include any employer working with a learner and must be given access to the college's Safeguarding Policy and Procedures and information about how they can report any concerns. They must:

- Identify a key employee who will act as the main contact for the learner on experience or placement for the purpose of safeguarding.
- Instruct the key employee on the College's Safeguarding Policy and Procedures and identify who their key contact is within College for any safeguarding concerns.

Students:

Within the induction programme learners will be made aware of the following:

- What constitutes abuse, neglect and wider safeguarding concerns.
- The reporting procedure for self-referral or concerns connected to a third party.

Throughout the academic year, learners are required to attend tutorials covering key Safeguarding themes.

17.0 Appendix A

Linked Policies And Procedures

Code of Conduct for Employment - HR038

Complaints Policy and Procedure

Data Retention Policy

Data Protection Policy.

Disciplinary Procedure (Staff).

Email Policy.

GDPR Data Protection Policy

Gifts and Hospitality Policy.

Grievance Procedure.

Harassment and Bullying Policy.

Health and Safety Policy.

IT Security Policy

Prevent Policy.

Recruitment and Selection Policy.

Social Media Policy.

Use of Force to Control and Restraint Policy.

Whistleblowing Policy.

Work Placement Policy.

Administering Medication Policy

- 14-16 Admissions Policy
- 14-16 Direct Entry Policy
- 14-16 Attendance Policy
- 14-16 Behaviour Support & Disciplinary Policy

Location And Access To This Policy

This policy is available on the Brooklands college website and on the StaffNet.

More information about safeguarding for public, children, young people, adults, parents, carers, College staff and other professionals can be found on;

Surrey Safeguarding Children Partnership

<https://surreyscp.org.uk/>

Surrey Safeguarding Adults Board

<https://www.surreysab.org.uk/>

18.0 Appendix B

Summary of KEY Legal and Government Requirements

Female Genital Mutilation Act 2003

Provides the legislation around what FGM is and the laws that relate to it. This Act was amended by the Serious Crime Act 2015 to include mandatory reporting for regulated professionals.

'Working Together to Safeguard Children' (2023)

This guidance outlines how we should all work together to safeguard and promote the welfare of children.

'Keeping Children Safe in Education' (2023)

Provides further guidance as to how colleges should fulfil their duties in respect of safeguarding and promoting the welfare of children in their care.

'Education Inspection Framework for Further Education and Skills'

The inspection report will include a written judgement stating whether the provider's safeguarding of all learners is outstanding, good, requires improvement or inadequate. This written judgement will

appear in the effectiveness of leadership and management section of the inspection report. In arriving at this judgement inspectors will take into account the criteria and guidelines listed in the inspection handbook.

In the context of inspection, inspectors will check the arrangements a provider has made to meet safeguarding statutory requirements; safeguarding arrangements are required by law to minimise any risk of, and protect young people from, harm and abuse while they are following learning programmes or courses at a learning provider.

Ofsted is required to inspect the extent to which colleges discharge their duties under 'section 175' of the 'Education Act' (2002) and report on these safeguarding outcomes for children and young people with specific reference to:

- The effectiveness to which institutions take reasonable steps to ensure that children and young people are safe.
- The effectiveness of institutions in helping to ensure that children and young people feel safe.

'The Early Help Assessment' (EHA)

The EHA is a standardised approach to conducting assessments of children's additional needs and deciding how these should be met. It is used by practitioners across services in England to record concerns about a child. As part of the safeguarding procedures the college may complete an EHA on behalf of a child who is deemed to have welfare needs.

Counter-Terrorism and Security Act 2015

Section 26 of 'the Counter-Terrorism and Security Act 2015' places a duty on certain bodies, including Further and Higher Education establishments, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". The duty also requires bodies to 'actively promote' the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

'The Care Act 2014'

The Care Act 2014 defines the process for assessing an adult's need for care and support and deciding whether a person is eligible for publicly funded care and support.

The Act also, for the first time, sets out a clear legal framework for how local authorities and other parts of the health and care system, including education, should protect adults at risk of abuse and neglect.

The Human Rights Act 1998

The Human Rights Act 1998 gives an individual legal protection of their human rights, such as right to life and right to education. It sets out a minimum standard of how public bodies, including Further and Higher Education Colleges, should treat individuals. It ensures that public bodies think about an individual's basic rights in the course of fulfilling their duties.

The Mental Capacity Act 2005

The Mental Capacity Act 2005 applies if an individual has a mental health problem and does not have the capacity to make certain decisions and this can be in the short term or permanently. It provides a framework to guide professionals in making decisions in the best interest of the individual when they have lost capacity temporarily or permanently.

'Protection of Freedoms Act' (2012)

The Protection of Freedoms Act, 2012 established the Disclosure and Barring Service (DBS) that carries out functions previously undertaken by the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). This includes setting out the type of activity in relation to children and vulnerable adults that is classed as 'regulated activity' and subject to appropriate vetting and monitoring.

'The Children Act' (2004)

The Children Act, 2004 defines statutory leadership roles for the safeguarding of children, the joint planning of children's services and how organisations should safeguard children and promote their welfare.

The Act defines safeguarding as the protection of children and young people from maltreatment including preventing the impairment of their health or development and ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care.

'The Sexual Offences Act' (2003)

The Sexual Offences Act 2003 defined a range of criminal offences involving the abuse of a position of trust.

The Act's provisions mean that, subject to a number of limited defences (as set out in sections 23 and 24 of the Act), it would be a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent, even if the basis for their relationship is consensual. A relationship of trust exists where a member of staff or volunteer is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken.

The Education Act (2002)

Section 175 of the 'Education Act' (2002) provides that:

"The governing body of an institution within the further education sector shall make arrangements for ensuring that their functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children receiving education and training at the institution."

The Children Act 1989

Part III of The Children Act 1989 outlines the requirement for local authorities to provide services for children and their families:

Section 17 of the Act determines that it is the duty of every local authority to safeguard and promote the welfare of children within their area. It is under this section of the legislation that concerns about the welfare of a child will be referred to social care

Section 47 of the Act determines the duty of every local authority to investigate where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. It is under this section of the legislation that concerns about the abuse or neglect of a child will be referred to social care

19.0 Appendix C

Roles and Responsibilities of Governors, Executive, DSL, DDSL and all Staff

The Executive Team is responsible for:

- Giving a consistent and high profile lead on all safeguarding issues.
- Promoting the College's approach to safeguarding inside and outside the institution.
- Making sure the safeguarding policy and all supporting policies and procedures are understood and followed.
- Ensuring safeguarding, child and adult protection underpin all relevant policies and procedures.
- Allocating sufficient resources and time to enable designated staff to discharge their responsibilities, including taking part in strategy discussions and other interagency meetings, and contributing to the assessment of children.
- Ensuring all staff feel able to raise concerns about poor or unsafe practice.
- Ensuring a whole College approach is facilitated ensuring the best interest of the learner at all times.

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) for Safeguarding and Prevent will:

- Chair a termly Safeguarding meeting for governors.
- Produce a full update on the level of concerns and any action plan that will be monitored by the Safeguarding
- Ensure that appropriate procedures and policies are in place and are followed with regard to learner safeguarding issues.
- Act as a dedicated resource available for other staff, volunteers and governors when they may have safeguarding concerns to discuss.
- Have the status and authority within the college management structure to carry out the duties of the post – they must therefore be a senior member of staff in the College. All members of staff - including volunteers - must be made aware of who this person is and what their role is.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children’s Single Point of Access (C-SPA), and act as a point of contact and support for College staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and using the Prevent referral form to refer cases by email to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey
- The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264)
- Not be responsible for dealing with allegations made against members of staff but will assist where appropriate in any such investigations ensuring referrals are made to the DBS LADO and Police where appropriate.
- Ensure that the College is represented at safeguarding Child and Adult Protection meetings and that the required reports are written and available within the appropriate timescales as prescribed by the relevant Safeguarding Children Partnership or Safeguarding Adults Board and discussed with families in advance of meetings if appropriate.
- Ensure each member of staff and volunteers at the College, parents, carers, governors, contractors and sub-contractors and regular visitors are aware of, understand and can readily access the Safeguarding Policy.
- Liaise with the Principal / SLT to inform him/her of any safeguarding issues and ongoing investigations and ensure there is always cover for the role.
- Ensure parents and carers are aware of the Safeguarding Policy in order to alert them to the fact that the college may need to make referrals of concerns to outside agencies including Children’s and Adults’ Social Care and the Police. Raising parents’ awareness may avoid later conflict if the College does have to take appropriate action to safeguard a learner.
- Ensure that this policy is updated and reviewed annually, or more regularly if legislative changes require, and work with the designated link governor for safeguarding to ensure this takes place.
- Attend training at least every two years in how to identify abuse and know when it is appropriate to refer a case. The DSL will also attend any other relevant training courses or workshops that will enable her/him to fulfil their role and have a good understanding of the processes, procedures and responsibilities of other agencies.
- Have a working knowledge of how the Safeguarding Children Partnership and Safeguarding Adults Board respectively operate and the conduct of child and adult protection related meetings and be able to attend and contribute to these when required, to enhance the implementation of any plan to protect and safeguard the learner.
- Liaise with other agencies and build good working relationships with colleagues from these agencies.

- Oversee the work of the Safeguarding and Wellbeing Team. This Team provides expertise, advice and coordinates action within the college over child and adult protection cases. Staff report concerns to this Team and this Team will be responsible for coordinating action regarding a referral by liaising with Children's and Adults' Social Care and other relevant agencies over suspicions that a learner may be or at risk of suffering harm.
- Will ensure detailed accurate secure written records of referrals/concerns are kept and ensure that these are held in a secure place.
- Help promote the educational outcomes of learners, in particular those with a social worker.
- Ensure that the local authority is alerted when a child leaves college and the new college is not known, so that the child's name can be included on the database for children missing education.
- Ensure that when a child leaves College, their child protection file is transferred securely to the new school or College as soon as possible and confirmation of receipt is obtained. In addition to the child protection file, the DSL will consider sharing any safeguarding information with the new school or College in advance of the learner leaving, if it would be appropriate to do so.
- Attend regular training on how to identify abuse and know when it is appropriate to refer a case, attend any relevant training courses or workshops and then ensure that any new or key messages are passed to other staff, volunteers and governors.
- Have a working knowledge of how Surrey Safeguarding Children's Partnership and Surrey Safeguarding Adults' Board operate and the conduct of child and adult protection related meetings. The DSL will also attend and contribute to these when required, enhancing the implementation of any plan to protect and safeguard the learner.
- Act as a point of contact. Ensure that the Safeguarding & Wellbeing Team make themselves - known to all staff, volunteers and governors - including new starters, supply teachers, supply staff - and ensure those members of staff have had training in safeguarding including child and adult protection. This should be relevant to their needs and roles to enable them to identify and report any concerns immediately.
- Ensuring a whole College approach is facilitated ensuring the best interest of the learner at all times.
- Have lead responsibility for oversight of IT filtering and monitoring, ensuring standards are met in line with relevant guidance, staff and governors receive adequate training and understand their role and responsibilities in this area.
- Fulfil any additional responsibilities as set out in statutory guidance which may be amended from time to time.

The Deputy Designated Safeguarding Lead (DDSL)

In addition to the role and responsibilities of all staff the Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

College counsellor

The counsellor works across both campuses, they

- Report to the member of staff with lead responsibility (DSL/DDSL)
- Have received additional training in safeguarding and how to manage safeguarding concerns and incidents
- Know how to make an appropriate referral
- Are available to listen to all students studying with the College
- Provide individual counselling sessions for students who are experiencing personal difficulties and work with them in accordance with the BACP Ethical Framework.
- Provide awareness training i.e. mental health, anxiety, self-harm to staff via team meetings and or professional development days
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student and rationale for decisions made and action taken.

Designated Safeguarding Governor

The Governing Board - via the Clerk - will ensure that the Designated Governor for safeguarding is able to carry out his or her duties, including accessing training. The Board - via the Clerk - will also ensure that the designated Governor will complete a safeguarding meeting twice each year in order to feedback to the Board and confirm that:

- Brooklands College is carrying out its duties to safeguard the welfare of learners.
- Members of staff and volunteers are aware of current safeguarding policies and procedures and that staff receive training where appropriate.
- Safeguarding is integrated into the College's induction procedures for all new members of staff and volunteers and supply staff.
- The College follows the procedures agreed by the relevant Local Safeguarding Children Partnerships and Local Safeguarding Adults Boards respectively and any supplementary guidance issued by the Local Authority.
- All staff and volunteers are vetted to ensure that only persons suitable to work with children and vulnerable adults shall work in the College.
- Where safeguarding concerns about a member of staff are raised, appropriate action is taken in line with Safeguarding Children Partnerships/Adults Board 'Allegations against Staff Procedures' and DfE guidance for dealing with allegations of abuse against teachers and other staff. In addition the college takes due note of the 'Guidance for Local Authorities, Head Teachers, School Staff, Governing Bodies and Proprietors of Independent Schools' (October 2012).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/276783/Behaviour_and_Discipline_in_Schools_-_A_guide_for_headteachers_and_school_staff_final_draft_2_.pdf

The Designated Governor will complete a report after each visit and provide verbal feedback to the following Board meeting on the outcome of the visit. The Designated Governor will also be invited to the Safeguarding Strategy meeting

Head of Peoples Portal (HR)

Head of Peoples Portal is responsible for human resources policies and procedures that relate to safeguarding in particular with regard to Safer Recruitment guidelines.

The Head of Health & Safety

The Head of Health & Safety is responsible for all Health and Safety policies and procedures that relate to safeguarding.

Head of Estates

Head of Estates is responsible for estates policies and procedures that relate to safeguarding.

IT

Logixx is responsible for ensuring filtering and monitoring systems are effective and fit for purpose from a safeguarding perspective.

Executive Team / Managers

- Putting the safeguarding policy and supporting policies and procedures into practice.
- Making sure all staff know their responsibilities and receive support and training to carry these out.
- Following the relevant procedures to manage safeguarding issues raised by staff or students.

All Staff

- Acting in accordance with this policy at all times.
- Identifying learners who may be in need of extra help, who are suffering or likely to suffer significant harm. All staff have a responsibility to take appropriate action as described in this policy, working with other services as needed.
- Ensuring that the same duty of care is applied to online learning, as is to face-to-face learning.
- Dealing with safeguarding issues and being able to recognise potential harm, ensuring they are alert to the signs/indicators of abuse and neglect.
- Alerting the Safeguarding & Wellbeing Team of any invitations to attend statutory child or adult protection meetings including child protection conferences, core groups, child in need meetings, team around the family meetings, adult safeguarding meetings, looked after child reviews, personal education plan meetings, education, health and care plan meetings. The Team can help staff to adequately prepare for the meeting so that the relevant information is presented in the relevant format. If staff attend the meeting, they must at the earliest convenience send in an update to the central team for learners file and include any actions and decisions made at the meeting especially those that are pertinent to the College.
- Keeping the Safeguarding & Wellbeing Team up to date with ongoing concerns regarding a learner in need of safeguarding and/or who is working with statutory services such as Social Care. This may include, for example, a dip in attendance, concerning behaviour, a change in presentation.
- In the absence of a member of the Safeguarding & Wellbeing Team, taking action to safeguard the learner including making referrals to external agencies if appropriate.
- Raising awareness of this policy with learners and what might happen if they have a concern about a learner.
- Referring concerns immediately to the central Safeguarding Team.
- Promoting the college's approach to safeguarding and protecting learners.
- Understanding their role in relation to the requirement to safeguard and promote the welfare of learners and protect them from harm.
- Knowing how to support and respond to a learner who discloses abuse or neglect or a wider safeguarding concern.
- Working with DSL and Safeguarding & Wellbeing Team and may be asked to support Social Workers to make decisions about learners.

- Always acting in the interest of the learner.