



# Safeguarding Policy

## 2021 - 2022

This policy is reviewed annually by the Trustees.

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Staff Lead	Designated Safeguarding Lead
Approved by	Trustees

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## History of revisions

### **Version 1**

Thomas Sadler, October 2021

- Original policy



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## **Policy overview**

### **Policy statement**

This policy is for use by all employees and Trustees of Future Horizons Leeds. The college has a legal and professional obligation to safeguard its learners. Future Horizons Leeds fully recognizes the contribution that it can make to protect and support both children and adults at risk of abuse within the college.

The aim of this policy is to safeguard and promote the welfare, health and safety of our learners by fostering an honest, open, caring and supportive environment. We encourage all our learners and staff to talk about their worries and report their concerns to us. The welfare of our learners is of paramount importance.

### **Scope and purpose**

This policy provides definitions of safeguarding and types of abuse, to provide direction and guidance on how to recognise and respond to safeguarding concerns and to ensure that all employees and trustees are aware of the procedures and practice to be followed in all matters relating to the safety and wellbeing of all learners.

This policy applies to all staff, Trustees and visitors to the organisation. We recognise that safeguarding and child protection is the responsibility of all. We will ensure that all parents and other working partners are aware of this policy by displaying appropriate information in our reception areas and on the College website.

Where the College provides services or activities directly under the supervision or management of staff, the College's arrangements for safeguarding will apply. Where services or activities are provided separately by another body, the College will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and adults at risk and that there are arrangements to liaise with the College on these matters.

With regards to safeguarding children this applies to anyone regardless of disability, under the age of 18. An adult in need of safeguarding is 18 or over and in receipt of, or may need, community care services by reason of mental or other disability, age or illness.

This includes those with learning disabilities, physical disabilities, sensory disabilities, mental ill health, who are frail due to their age, with dementia, with brain injuries or with drug or alcohol problems.

This policy is written within the guidelines of the The Leeds Approach: Citizen-Led Multi-Agency Safeguarding Adults Policy and Procedure and Keeping Children Safe In Education.



## **Related Legislation**

The policy is consistent with the following legal duties:

### **The Care Act 2014**

The clear framework setting out how local authorities and others must protect adults at risk of abuse or neglect. The six principles are: Empowerment, Protection, Prevention, Proportionate and least intrusive response, Partnership and Accountability.

### **The Mental Capacity Act 2005**

This sets out very clearly how we assess for capacity and make best interest decisions. The main principles of the act are:

1. A person must be assumed to have capacity unless it is established that they lack capacity.
2. A person is not to be treated as unable to make a decision unless all practicable steps to help them have been taken without success.
3. A person is not to be treated as unable to make a decision merely because it is seen as an unwise decision.
4. Anything done for or on behalf of a person who lacks capacity must be in their 'best interests'.
5. Anything done for or on behalf of a person who lacks capacity must be the 'least restrictive' of their rights and freedoms.

Assumptions about a person's capacity to make decisions cannot be based upon their condition, appearance, behaviour or age.

The Act also covers the criminal act of wilful neglect or ill-treatment of an adult lacking capacity. This is punishable by up to five years in prison.

The Deprivation of Liberty Safeguards (DoLS) are an amendment to the MCA. They state that it is unlawful to deprive someone of their liberty. In some cases, however, where a person lacks capacity to make decisions about their own care and needs to be deprived of their liberty to receive the care they need, a care home or hospital may apply for authorisation to do this.

### **Sexual Offences Act 2003**

This states it is illegal for a person providing care to engage in sexual activity with someone receiving care. Those in 'relationships of care' (social workers, GPs, care and support staff, NHS staff, home care workers, friends who provide care, assistance or services in connection with the person's mental disorder) should not engage in any sexual act with a person with a mental disorder.

This applies both to those who do not have capacity to consent, and those who 'may or may not be able to consent to sexual activities but who are vulnerable to inducements, threats or deceptions because of their mental disorder'.

### **Human Rights Act 1998**

This gives everyone the right to live free from abuse and violence and degrading treatment, under:

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Article 2 – Right to life protected by law

Article 3 – Freedom from torture or inhuman or degrading treatment

Article 5 – Right to liberty and security of person

Article 14 – Freedom from discrimination, including age or disability

## **Health and Social Care Act 2008**

This gives the Care Quality Commission (CQC) its powers to regulate health and social care providers.

The Care Quality Commission has responsibility for registering health and social care providers. The CQC inspect providers against a set of clear national outcomes, including keeping people safe from abuse, making sure staff are fit to carry out their role, and ensuring quality care is delivered and dignity maintained at all times. They also carry out enforcement activity, including fines, prosecutions and closure of services.

CQC will also receive concerns about abuse or standards of care in health or adult social care providers.

## **Public Interests Disclosure Act 1998**

This protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

Workers are protected from dismissal and a right not to be subjected to any 'detriment' from their employer if they make a 'protected' disclosure.

To qualify for protection, disclosures must be concerning something that has happened, is happening or is likely to happen in the future such as criminal offence, breach of a legal obligation, miscarriage of justice, danger to health or safety of any individual, damage to the environment.

**Section 175 of the Education Act 2002** and the Statutory Guidance '**Keeping children safe in education- Statutory guidance for schools and college**', September 2021 and '**Working together to Safeguard Children**' 2018.

## **Associated College Policies and Procedures**

- E Safety Policy
- ICT Acceptable Use Policy
- Harassment and Bullying Policy
- Recruitment and Induction of Staff Policy
- Whistleblowing Policy
- Staff code of conduct (guidance for safer working practices)
- Disciplinary Policy
- Health and Safety Policy
- Medication Policy

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## Roles and Responsibilities

### All staff

- All staff who work with, or on behalf of, our learners have a responsibility to promote their welfare and wellbeing. This includes the responsibility to record and report abuse and to record and report concerns to a Safeguarding Officer using a Cause for Concern form.
- All learners will have individual care plans and risk assessments that staff must familiarise themselves with before working with them.
- Staff are responsible for regularly reviewing care plans.
- Senior leaders, site leaders, teachers, learning coordinators and floor leaders must ensure that all staff are fully aware of what is contained within the care plan and that they are given time to read them.
- The support plans and associated risk assessments detail the support and possible restrictions that must be put in place to keep individuals safe from risks and possible abuse. They also contain information to promote the general wellbeing and health of the individual.
- All staff will receive training at their induction, and this will be refreshed regularly to ensure that they can identify abuse, administer medication and understand organisational procedures and their responsibilities.
- All staff will have Prevent Duty training to enable them to identify those who are at risk of being drawn into radicalisation
- All staff will receive training on how to raise a safeguarding concern and this will be refreshed regularly.
- All staff will receive training in specific areas to develop their safeguarding knowledge, particularly around online abuse and keeping learners safe when accessing the internet.
- As part of Keeping Children Safe in Education 2021, all staff will be required to read part 1 and Annex B and confirm their understanding during their annual appraisal meeting.
- Staff will ensure that good records are kept, particularly financial records, for example any receipts
- The names of the Designated Safeguarding Lead, Deputy Safeguarding Leads and Safeguarding Officers are listed in this document.

### Trustee Board

#### **The Board will ensure the college has in place:**

- Effective policies, procedures and training in order to ensure compliance with safeguarding guidelines and these are updated annually or when required. This includes a 'Code of Conduct' for staff and volunteers.
- Safer recruitment practices including the appropriate use of references, DBS and other checks on new staff and volunteers. Furthermore, senior leaders undertake 'safer recruitment training'.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers, including low level concerns (see Appendix C)
- The Principal is designated to take responsibility for safeguarding and there is always appropriate cover for this role to deal with out-of-term time activities.



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- The Designated Safeguarding Lead, Deputy Safeguarding Leads and Safeguarding Officers undertake appropriate training and that is refreshed every two years and their knowledge and skills are updated regularly.
- Any deficiencies or weaknesses are brought to the attention of the Trustees and will be rectified without delay.
- That there are opportunities to promote good practice in safeguarding, particularly online safeguarding with the curriculum and activities of the college.
- The Chair of the Trustees (or in the absence of the Chair, the Vice Chair) deals with any allegations of abuse made against the Principal, in liaison with the Local Authority Designated Officer (LADO).
- A nominated member of the Trustee Board who has oversight of safeguarding processes. This is currently Michelle Wilman.
- The College works with other agencies and professionals as required to do so and if legal advice and services are needed in a Safeguarding Adults investigation, they will be brought in by the lead agency (health or social care).

### **Principal**

#### **The Principal of the College will ensure that:**

- The policies and procedures are effectively implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children and adults.
- Allegations of abuse or concerns that a member of staff or adult working at college may pose a risk of harm to a young person are notified to the Local Authority Designated Officer (LADO)
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding our learners and that such concerns are addressed sensitively and effectively and in a timely manner.
- Provide ongoing safeguarding supervision to the Designated Safeguarding Lead
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Adult Social Care or the Police.
- A single central record is kept and maintained.

### **Designated Safeguarding Lead**

The responsibilities of the Designated Safeguarding Lead are found in Annex C of 'Keeping Children Safe in Education'. The role must be clearly stated in the job description of those responsible.

The Designated Safeguarding Lead must ensure:

- Provision of information to other agencies on safeguarding and child protection in compliance with section 14B of the Children Act 2004.
- Liaison with the Trustee Board and the Local Authority on any deficiencies brought to the attention of the Trustee Board and how these should be rectified without delay.
- Management and referral of cases of suspected abuse to Adult Social Care, the Police and the Disclosure and Barring Service.

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- Coordination of the wider Safeguarding Team including designation to Deputies and regular meetings with Deputies and Officers.
- Act as a source of support, advice and expertise within the college.
- To attend and contribute to Safeguarding Adults Reviews when required.
- Be alert to the specific needs of adults with care and support needs, those with special educational needs, young carers, looked after or previously looked after young people and those at risk due to their own or family members mental health needs.
- Ensure each member of staff has access to and understands the College's Safeguarding Policy, especially new or part-time staff who may work with different educational establishments.
- Ensure all staff can recognise and report any concerns immediately.
- Keep detailed, accurate and secure written records or concerns and referrals.
- Obtain access to resources and effective training for all staff and attend refresher training courses every two years. Keep up to date with new developments in safeguarding by accessing briefings and journals.
- Where learners leave the college, ensure their safeguarding file is handed to the Designated Safeguarding Lead and signed for in the new college as soon as possible.
- Maintain and monitor safeguarding records, including monitoring and acting upon individual concerns, patterns of concerns or complaints, in accordance with the section on 'Records, Monitoring and Transfer' below.

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## **Awareness, Recruitment and Monitoring**

### **Support for staff**

As part of their duty to safeguard and promote welfare and safeguarding, staff may hear information, either from the learner as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a safeguarding concern, they should in the first instance speak to a Safeguarding Officer. The Safeguarding Officer should seek to arrange the necessary support.

### **Raising awareness**

Learners at Future Horizons are the recipients of specific learning and advice about keeping safe and living a healthy lifestyle, which includes mental wellbeing. This is delivered in a variety of ways such as structured sessions delivered by teachers and learning coordinators or informal support and advice delivered by our team of support workers. This awareness raising includes the safe use of the internet and other types of social media and awareness of the 4 C's of online safety – Content, Contact, Conduct and Contract. This may include covering relevant issues through Sex and Relationships Education (SRE) or through Personal, Social, Health and Economic education (PSHE).

### **Working with parents/carers**

The College will:

- Ensure that parents/carers understand the responsibility placed on the college and staff for safeguarding via the College website.
- Undertake appropriate discussion with parents/carers prior to involvement of Adult Social Care or another agency, unless to do so would place the learners at risk of harm or compromise an investigation.
- Inform parents/carers of learners who are over 18 and do not have the mental capacity to make their own decisions regarding concerns. Those aged over 18 who do have mental capacity should be asked whether they want their parents/carers to be informed or not.

### **Recruitment and selection of staff**

The College's safer recruitment processes will follow the Statutory Guidance: Keeping Children Safe in Education September 2021, Part Three: Safer Recruitment

The College will provide all the relevant information in references for a member of staff about whom there have been concerns about inappropriate conduct. Cases in which an allegation had been proven to be unsubstantiated, unfounded false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The College has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meeting and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction.



In line with statutory requirements, at least one person conducting an interview must be safer recruitment trained having undertaken safer recruitment training either online or by attending the local authority one day safer recruitment training course.

The college will maintain a single central record of all recruitment checks carried out for staff.

## Records, monitoring and transfer

- Well-kept records are essential to good safeguarding practice. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.
- Records relating to actual or alleged abuse or neglect are stored apart from normal learner or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.
- Safeguarding records are stored securely, with access confined to specific staff e.g. Designated Safeguarding Leads, Deputies and Safeguarding Officers.
- Safeguarding records are reviewed at weekly safeguarding meetings to check whether an action or update is needed. This includes monitoring patterns of complaints or concerns about individuals and ensuring these are acted upon.
- When learners transfer their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these with discussion or explanation and to obtain a signed and dated record of the transfer. Files requested by other agencies e.g. Police should be copied and must have clear authorisation to do so.
- All staff should have a due regard to the data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR.
- When records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the inquiry. We will retain these records at least until the individual has reached normal pension age or for 10 years from the date of the allegation if that is longer.



## Guidelines and process for referral

### **Specific guidance for Safeguarding Adults at Risk of Abuse**

#### **Abuse**

Abuse is a complex issue. Every effort will be made to ensure that individuals wishes are ascertained and considered before any action is taken.

These guidelines aim to outline the 6 key competencies that all staff must demonstrate:

1. Understanding the definition of an adult who may be vulnerable as defined by the Care Act 2014.
2. Understanding the types and signs of abuse as defined by The Care Act 2014
3. Understanding the importance of whistleblowing procedures
4. Understanding the importance of creating a safe environment in order to minimize the risk of abuse and harm.
5. Understanding their role as part of a multi-agency structure and within internal policies and procedures including how to report and record concerns of abuse using appropriate systems.
6. Raise awareness of legislation applicable to roles and responsibilities.

#### Definitions of Abuse

A violation of an individual's human and civil rights by any other person or persons which may result in significant harm. It may be a single act, repeated acts, an act of neglect, a failure to act, or multiple acts (Care Act 2014). Types of Abuse are variable and may be described as:

#### Physical abuse

This includes injuries which are not explained satisfactorily or where there is concern that the injury was inflicted intentionally. Pushing, shaking, pinching, slapping, punching and forcefeeding could come into this category depending on the circumstances in which they occurred.

Physical abuse can also include situations where people are caused unreasonable physical discomfort through the withholding of care or the application of inappropriate techniques or treatment. Deprivation and forcing of food and water and involuntary isolation and confinement (e.g. inappropriate methods of restraint) can be physical abuse. Physical abuse can include forcing of prescribed or non-prescribed medication against the person's will or covertly medicating without a DOLS authorisation and best interest plan.

#### Sexual abuse

The involvement of a person in sexual activities or relationships that either they do not want, have not consented to or they cannot understand. May include inappropriate looking / touching, sexual harassment, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual teasing, innuendo, sexual assault and rape.



## **Psychological abuse**

Psychological abuse includes the use of verbal and physical threats, fears of bribes to:

- Negate an adult an individual's choices and independent wishes
- Cause isolation or over-dependence
- Prevent an individual from using services which would otherwise aid and extend them.

Psychological abuse includes intimidation, humiliation, shouting, swearing, emotional blackmail, bullying and the denial of basic human and civil rights (including choice and opinion, privacy and dignity and allowing people to follow their own spiritual or cultural beliefs or choice about their own sexuality)

## **Financial abuse**

This involves an individual's resources being inappropriately used to the advantage of another person. It includes the withholding of money or inappropriate or unsanctioned use of a person's money or property, usually to the disadvantage of the adult to whom it belongs.

## **Neglect or Acts of Omission**

Ignoring or withholding physical or medical care needs. The deprivation of help to perform activities of daily living and failure to intervene in behaviour which is dangerous to the individual concerned or to others. Allowing a person judged to lack capacity to make decisions to take unwarranted and unreasonable risks.

When a manager, or other care provider in a position of responsibility, does not ensure that appropriate care, environment or services are provided to maintain the health and safety of vulnerable people in their care then they may be open to a charge of 'wilful neglect'.

Neglect may be regarded not only as the commission or omission of an act, but also the threat of risk of such.

Neglect may also occur as a result of unintentional actions by carers in not responding adequately to the needs of the vulnerable person. This can occur where the carer lacks the physical, financial and / or mental resources to provide sufficient care or lacks knowledge about their dependant's illness or disability and have not received guidance or support on how to care.

## **Discriminatory**

A violation of human and civil rights by any other person or persons. This is abuse which is racist or sexist in nature or about a person's disability or sexuality. Any form of harassment or bullying. There is some cross-over with other forms of abuse.



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## **Organisational**

When the lifestyles of individuals are sacrificed in favour of the rituals, routines and / or restrictive practices of the home or care setting. Care may not be individualised; rules may be used inappropriately and there may be a lack of stimulation.

## **Self-neglect**

A wide range of behaviour such as neglecting to care for personal hygiene, health or surroundings. This could include hoarding, failure to complete personal care or attend to own health needs.

## **Domestic abuse**

Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. This could include psychological, physical, sexual, financial, emotional, 'honour based' violence, female genital mutilation or forced marriage.

## **Modern slavery**

Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Including human trafficking, forced labour, domestic servitude and sexual exploitation.

**“ABUSE IS ABOUT THE IMPACT ON THE PERSON, NOT THE INTENT!”**

## **Prevent Duty**

The Prevent Duty is the UK's counter-terrorism strategy that aims to prevent terrorist attacks before they occur.

## **What make someone vulnerable to radicalisation?**

- Low self-esteem
- Victimisation
- Guilt
- Loss
- Lack of trust
- Isolation
- Family breakdown
- Charismatic leader
- Lack of theological understanding

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- Fear
- Lack of purpose
- Unemployment
- Mental health problems
- Political grievance
- Sense of worth
- Social exclusion
- Peer pressure
- Anger

## **How our learners are vulnerable:**

- Easily manipulated
- Trusting of others
- Easily led or befriended
- Unsupervised at times/independent use of internet.
- Limited understanding of consequences

## **Assessing the risk**

Consider:

- Engagement – a person's susceptibilities, motivations and influences
- Intent – is the individual ready to use violence to promote their views?
- Capability – do they have the skills, resources and networks to commit acts of terrorism?

## **How does radicalisation happen?**

- Usually develops from a friendship
- Attention may make them feel special
- Threat of exclusion
- Desire for belonging/self-worth

## **Signs of Abuse**

What to look for:

### **Physical signs**

- Multiple bruising, including bruising in well protected areas e.g. the inside of the thighs or upper arms or bruising at different stages of healing.
- Finger marks
- Burns, especially if in unusual places
- An injury similar in shape to an objects
- Unexplained fractures
- Under or overuse of medication
- Unexplained weight loss

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- Unkempt appearance
- Being left in a wet or soiled bed

## **Psychological/behavioural signs**

- The person being cared for appears depressed, frightened, withdrawn, agitated, anxious or aggressive.
- Sudden withdrawal from previously enjoyed activities
- Self-isolating
- Unexpected or unexplained change in behaviour
- Depression, loss of appetite
- Sleeplessness or nightmares
- Increase in inappropriate or seductive behaviour
- Mimicking of explicit sexual activity
- Self-injury
- Aggression to one particular person

## **Signs of radicalization**

- Overly secretive about internet use
- Isolation/withdrawal
- 'Them and Us' mentality
- Argumentative
- Strong viewpoints expressed aggressively
- Questioning faith/identity
- Altered appearance
- Unusual behaviour/abnormal routines
- Silence
- Anger

## **Whistleblowing**

An integral part of safeguarding and protecting adults in need of safeguarding.

A whistle blower is someone who discovers something that is wrong and alerts their employer or the relevant authorities to what is going on. If a member of staff sees abuse (or what appears to be abuse), they should report to a Safeguarding Officer and explain the concerns. If the member of staff is not satisfied with their response, or if the Officer is seen to be colluding with inadequate care, the member of staff is expected to report the concern to the Principal. The first concern must be the protection and safety of the individual, who is vulnerable and may need the staff to voice concern on their behalf.

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The law protects whistle blowers from their employer subjecting them to detriment or dismissal by reason of their having “blown the whistle” and from detrimental treatment by their colleagues. To be protected by the law, the act of whistleblowing must fall within the legal rules and the whistle blower must reasonably believe that their disclosure of wrongdoing is made in the public interest.

Any person who criticises or victimises a bona fide whistle blower will be liable to disciplinary action.

## **Summary of safeguarding whistle-blowing action to be taken by staff:**

If staff suspect or come across a case of abuse they should:

1. Ensure the victim is safe and removed from danger. If a crime is suspected, you must call 999 emergency / 101 non-emergency immediately.
2. Do not contaminate evidence particularly if you suspect sexual abuse i.e. Do not change clothes, bedding or encourage bathing
3. Inform the relevant Safeguarding Officer immediately and ask for guidance on how to proceed
4. Unless an individual wishes it, never discuss the matter with them if others are present, as they may be too afraid or ashamed to talk
5. Never discuss concerns with possible abuser at any stage. This might put the individual at risk and could lead to further problems
6. Always respect the needs and wishes of the individual who might be the victim of abuse.
7. Be sensitive to religious and cultural background.
8. Never ‘cover up’ for a colleague suspected of being abusive.
9. Always report incidents or concerns to the appropriate safeguarding officer or DSL.
10. Seek advice or support from a professional body or union if you feel in need of advice and/or support when whistleblowing.
11. Always check that action has been taken.

After you have raised a concern, we will decide how to respond which will usually involve making internal enquiries, but it may become necessary to carry out a full investigation which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time. We will keep you informed of progress and let you know when the investigation is completed. We will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.

If a member of staff feels the concerns are not being satisfactorily addressed, they can report their concerns to Ofsted. The inspector has a responsibility to ensure that the Senior Leadership Team are informed of the situation and the inspector will check what action has been taken.

You can also get free, independent and confidential advice on whistleblowing on 08000 724725.

You can also call the independent whistleblowing charity Public Concern at Work for free and confidential advice on 02074046609.



## **Procedure in the event of abuse or suspected abuse of adults in need of safeguarding**

There are three important functions in the procedure:

1. Alerting
2. Reporting
3. Investigating

### **Alerting**

This is when abuse is suspected because of an individual's behaviour or the comments of members of staff or other students.

Frontline staff are best placed to identify signs of abuse and have a duty to pass on suspicions. Abuse by other students may have been witnessed by staff or by other students.

All staff witnesses should complete an information report.

The Safeguarding Officer may go on to ask further questions to ensure the fullest possible account. If a student approaches a member of staff to confide in them and asks them to keep it a secret, staff must tell them they cannot keep secrets and they will have to pass on what they are told.

Staff witnessing, hearing about or suspecting abuse should alert a Safeguarding Officer immediately.

If there is a serious physical or sexual assault the police must be called, and evidence should be preserved.

### **How to respond when a person says they have been abused – guidance for staff**

Responding to an individual making an allegation of abuse:

Do:

- Stay calm and listen carefully to what is being said
- Find an appropriate early opportunity to explain that it is likely the information will need to be shared
- Allow the person to continue at their own pace
- Ask questions for clarification only; always avoid asking questions that suggest a particular answer
- Reassure the person that they have done the right thing in telling
- Tell them what you will do next and with who the information will be shared
- Record in writing what was said using the individuals own words as soon as possible – note date, time, any names mentioned. Ensure that the record is signed and dated. This information should then be passed immediately to the appropriate safeguarding officer.



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- RESPOND PROMPTLY by alerting the relevant Safeguarding Officer.

Do not:

- Discuss the disclosure with colleagues apart from the safeguarding officer

Alerting for the College sites:

The **Designated Safeguarding Lead** for Future Horizons Leeds is:

- **Thomas Sadler**

The Safeguarding Officers are

- Tracey Barwell
- Julia Mallett

Safeguarding officers will refer as necessary directly to Designated Safeguarding Lead before action is taken. If you have difficulty contacting the Designated Safeguarding Lead, then come directly to the Senior Leadership Team:

- Thomas Sadler – Principal

## **On call**

In the unlikely event that you need to contact somebody outside of working hours about a safeguarding concern the Principal is contactable between 16:00 – 09:00 every weekday and between 08.00 Saturday – 08.00 Monday every weekend and on bank holidays.

In the unlikely event that you are unable to contact the Principal then report the incident to:

## **Leeds Safeguarding Adults Board**

- Social care – 0113 222 4401
- Out of hours – 0113 378 0644

## **Reporting**

The Safeguarding Team will decide whether the concern constitutes abuse and may pass on the allegations to the Leeds Safeguarding Adults Board.

They must keep detailed records of all telephone conversations and actions logged on CPOMS which may include informing the Safeguarding Adults Board or Ofsted of reported incidents that have been classed by the investigatory team as 'safeguarding' and informing social workers and funding agencies of all individuals concerned in the incident. They should inform parents of students who are over 18 but lack mental capacity to make their own decisions regarding this. For those individuals aged 18 and over who do have mental capacity to make their own decisions, they should be asked whether they want their parents to be informed or not and that decision should be respected.

If the Safeguarding Team decides not to refer the concern then an alert should be raised on CPOMS stating the reasons why no referral has been made and any actions taken.

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## **Investigating**

This will be carried out by a member of staff from the Social Care teams detailed above or by a Safeguarding Officer following their instruction. All records should be sent by secure post on request.

## **Other circumstances where an alert should be made**

If a staff member becomes aware of any member of staff or their family, or a learner's family, becoming involved in a police investigation, this should be reported to a safeguarding officer immediately so that appropriate risk assessments and actions can be undertaken to safeguard learners.

The Safeguarding Team must report these to the respective agencies and inform the Principal.

## **Useful links and contacts**

Citizen-Led Multi-Agency Safeguarding Adults Policy and Procedure

[Leeds Multi-Agency Safeguarding Adults Policy and Procedures \(19th July 2021\).pdf](#)  
([leedssafeguardingadults.org.uk](http://leedssafeguardingadults.org.uk))

## **Appendices**

### **Appendix A: Guidance specific to safeguarding children**

#### **Children potentially at greater risk of harm**

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Our College recognises that children who experience adverse childhood experiences may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children college may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We recognise that there are some children who are at a greater risk of harm due to adverse childhood experiences or trauma. Our College seeks to remove any barriers that may exist in being able to recognise abuse or neglect in students experiencing special educational needs or disability.

Additional barriers can include:

- Assumptions that the indicators of abuse such as behaviour and mood relate to the disability
- Students being more prone to peer group isolation
- Students being impacted by behaviours such as bullying without outwardly showing any signs
- Communication barriers and difficulties overcoming these.

We will seek to identify children who may be more vulnerable to further harm and seek to provide such children with the necessary support and to build their self-esteem and confidence.

There is a designated lead member of staff who is responsible for children who are looked after or who are care leavers.

## **Mental Wellbeing**

The College recognises the role that we can play in supporting the mental health and wellbeing of our students. We recognise the importance of ensuring that staff can recognise the indicators of poor mental health and can raise their concerns to ensure that extra and appropriate support is put into place where it is needed.

## **Peer on Peer abuse**

This College recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as “banter” or “part of growing up”. This abuse could for example include sexual violence, harassment and assaults, initiation / hazing type violence, all forms of bullying, sexting and physical violence experienced by both boys and girls. There are separate College and Local Authority safeguarding guidance and policies to address these concerns including the Anti-bullying policy, the E-safety Policy. In addition, there is the DfE guidance “Sexual violence and sexual harassment between children in schools and colleges” and Part 5 of “Keeping children safe in education”.

Where an incident has occurred or specific risks are identified, a risk assessment will be undertaken in order to ensure the safety of all staff and students and minimise the risk of further harm.

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The following steps will be taken to minimise the risk of peer-on-peer abuse:

- Staff training to ensure an understanding of what it is and how to recognise signs
- Promotion of a supportive environment by teaching about acceptable and unacceptable behaviours (including online) throughout the curriculum.
- Clear procedures put in place to govern the use of mobile phones in college
- Appropriate staff supervision of students and identifying locations around the sites that are less visible and may present more risk to others

## **Sexual violence and sexual harassment**

Sexual violence refers to offences under the Sexual Offences Act 2003 including rape, assault by penetration and sexual assault.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a child's dignity, make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment - may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and sexual exploitation, coercion and threats
- 'Upskirting' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Sexual violence and harassment exist on a continuum and may overlap, they can be both physical and verbal, and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh".
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.



All cases of sexual violence and harassment should be reported to a Safeguarding Officer immediately.

## **Sharing nudes or semi-nudes**

College will always respond if informed that children have been involved in 'sexting' (youth produced sexual imagery or the sharing of sexual imagery by children). Sexual violence and sexual harassment between children in schools and colleges, May 2018 will be used to guide the college's response on a case-by-case basis.

The key points being for staff being:-

- Inform the Principal / DSL as soon as possible
- Support the victim as appropriate and in accordance with their best interests
- You must not view, download or share imagery or ask a student to do so. If you have viewed imagery, you must inform the DSL.
- Do not delete the imagery or ask the student to delete it.
- Do not share information with other staff, students, parents or carers.

The key points for the DSL being:

- Refer to social care if:
  - The victim is a child and perpetrator an adult
  - The young person has been coerced or there are concerns about the capacity to consent
  - There are indications that the content depicts sexual acts or violence
  - There is immediate risk of harm including suicide/self-harming
- Inform all parents of involved children unless by doing so you put a child at risk

## **Children missing from education**

Our College recognises the entitlement that all children have to education and will work closely with the local authority to share information about students who may be missing out on full time education or who go missing from education. A child missing from education, particularly repeatedly, can be a warning of safeguarding issues including neglect, criminal or sexual exploitation, FGM, radicalisation or forced marriage, or issues such as mental health problems and substance abuse.

The Local Authority will also be informed where children are to be removed from the College:

- a. to be educated outside the college system
- b. for medical reasons
- c. because they have ceased to attend
- d. because they are in custody
- e. because they have been permanently excluded



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**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Staff training includes raising awareness of this issue and any concerns are passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children's Duty if appropriate.

**So-called 'honour-based' violence (HBV)** encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation (FGM) (see Appendix D), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation), and concerns will be passed to the Designated Safeguarding Lead for onward referral as required. Complaints or concerns raised by parents or students will be taken seriously and followed up in accordance with the College's complaints process.

## **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

## **Online safety**

We recognise that technology is a significant component in many safeguarding and wellbeing issues and that young people are at risk of abuse online as well as face to face. Some may use mobile and smart technology, whilst at college and outside of college, to sexually harass their peers, share indecent images (consensually and non-consensually) and view and share pornography and other harmful content. Many have unrestricted access to the internet via their mobile phones and our online safety policy describes the rules governing their use in college. It also sets out the college's response to incidents which may involve one or more of the four areas of risk – content, contact, conduct and commerce. Online safety is a consideration running through the planning and implementation of all relevant policies and procedures. Staff will always respond if informed that young people have been involved in sharing indecent images.

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The DfE guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (Dec 2020) will be used to guide the College’s response on a case-by-case basis. The key points for staff being:

- Report immediately to the DSL
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

CSE and CCE can affect both males and females and can include children who have been moved (trafficked) for the purpose of exploitation. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted - exploitation, as well as being physical, can be facilitated and/or take place online. CSE can include 16- and 17-year-olds who can legally consent to sex, but they may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines) and serious violent crime. ‘County Lines’ involves drug networks or individuals exploiting children and young people into carrying drugs and money between cities, towns and villages.

Serious violent crime can be associated with this form of criminal activity together with child sexual exploitation. Children may also be exploited into committing cybercrime or money laundering offences and organised criminal groups or individuals may exploit children and young people with enhanced computer skills to access digital networks and/or data for criminal and financial gain.

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Children with bank accounts may be persuaded to allow criminals to use their banking facilities to launder money.

CCE can also involve working in cannabis factories, shoplifting or pickpocketing and may involve coercing children to commit vehicle crime or serious violence towards others. It is important to note that the experience of girls can be very different to that of boys but girls are also at risk. Criminal exploitation of children is a form of harm that can affect children in both a physical environment and online. Staff training includes raising awareness of these issues and any concerns are passed to the Designated Safeguarding Lead.

## **Appendix B: Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a learner**

### **General**

1. The Local Safeguarding Adults Board Procedures contain the inter-agency processes, protocols and expectations for safeguarding adults. The Designated Safeguarding Lead is expected to be familiar with these, particularly the referral processes.
2. It is important that all parties act swiftly and avoid delays.
3. Any person may seek advice and guidance from the Safeguarding Adults Duty Team, particularly if there is doubt about how to proceed. Any adult, whatever their role, can take action in their own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
4. Written records, dated and signed, must be made about what has been alleged, noticed and reported, and kept securely and confidentially.
5. In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the learner. This is appropriate where it is thought a learner may be in need in some way and require assessment to see whether additional support and services are required. An example might be where it is suspected a learner may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent / carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

### **Individual Staff / Volunteers / Other Adults – main procedural steps**

1. If a learner is suffering or likely to suffer from harm or is in immediate danger inform a safeguarding officer as soon as possible.
2. When a learner makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine the learner, or promise confidentiality. Learners making

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disclosures should be reassured and if possible at this stage should be informed what action will be taken next.

3. As soon as possible write a dated, timed and signed information report of what has been disclosed or noticed, said or done and contact a Safeguarding Officer.
4. If the concern involves the conduct of a member of staff or volunteer, a visitor, a trustee, a trainee or another young person, the Safeguarding Officer will ensure that the Principal is informed.
5. If the allegation is about the Principal, the information should normally be passed to the Chair of Trustees or the Local Authority Designated Officer (LADO).
6. If this has not already been done, inform the learner (or other party who has raised the concern) what action you have taken.

## **Designated Safeguarding Lead / Deputy DSL – main procedural steps**

1. Begin a case file which will hold a record of communications and actions to be stored securely (see Section on Records, Monitoring and Transfer).
2. Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult, complete a Cause for Concern form, take action and monitor the situation. If in doubt, seek advice from the Leeds Safeguarding Adults Duty Line.
3. Share information confidentially with those who need to know.
4. Where there is an adult safeguarding concern requiring immediate, same day, intervention from Adult Social Care, the Leeds Safeguarding Adults Board should be contacted by phone.
5. If the concern is about children using sexually abusive behaviour, refer to the separate guidance.
6. If it appears that urgent medical attention is required arrange for the learner to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
7. Exceptional circumstances: If it is feared that the learner might be at immediate risk on leaving the College, take advice from the Leeds Adult Safeguarding Board Duty Team. Remain with the learner until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the learner, the member of staff has no right to withhold the learner, unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, Leeds Safeguarding Adults Board should be updated and the Police should be contacted immediately.

## **Appendix C: Process for dealing with allegations against staff (including the Principal) and volunteers**

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These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with vulnerable adults has:

- behaved in a way that has harmed a vulnerable adult, or may have harmed a vulnerable adult
- possibly committed a criminal offence against or related to a vulnerable adult, or
- behaved towards a vulnerable adult in a way that indicates they would pose a risk of harm to other vulnerable adults.

Relevant documents: **DfE “Keeping children safe in education: Statutory guidance for schools and colleges” September 2020 (part 4: Allegations of abuse made against teachers and other staff)**

### **Individual Staff / Volunteers / Other Adults who receive the allegation:**

- Write a dated and timed information report of what has been disclosed or noticed, said or done.
- Report immediately to a safeguarding officer. The Principal will be informed.
- Pass on the written record.
- If the allegation concerns the conduct of the Principal, report immediately to the Chair of Trustees. Pass on the written record. (If there is difficulty reporting to the Chair of Trustees, contact the Allegations Manager, Safeguarding and Improvement Unit as soon as possible.)

### **Principal (or Chair of Trustees)**

- If there is no written record, write a dated and timed information report of what has been disclosed or noticed, said or done.
- Before taking further action notify and seek advice from the Allegations Manager, Safeguarding and Improvement Unit on the same day.
- You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Report to Leeds Adult Safeguarding Board if the Allegations Manager so advises or if circumstances require a referral concerning a child.
- Ongoing involvement in cases:
  - Liaison with the Allegations Manager
  - Co-operation with the investigating agency’s enquiries as appropriate.
  - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

Possible referral to the Disclosure and Barring Service (DBS) or the National College for Teaching and Leadership (NCTL), depending on the outcome. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

<https://www.gov.uk/government/collections/dbs-referrals-guidance--2>

## **Appendix D: Safeguarding learners who are vulnerable to extremism and radicalisation**



Our college recognizes the duties placed on us by the Counter Terrorism Bill (July 2015) to prevent our pupils from being drawn into terrorism.

These include:

- Working in partnership with relevant agencies under Leeds Safeguarding Adults Board
- Appropriate staff training
- Appropriate online filtering

Our College is committed to actively promoting 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 students are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Our College seeks to protect children and young people against the messages of all violent extremism including but not restricted to those linked to Islamic Ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to a safeguarding officer who will inform the DSL. Prevent and Channel referrals will be made as necessary. They will also consider whether circumstances require Police to be contacted.

## **Appendix E: Female Genital Mutilation**

Starting in October 2015, section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 placed a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM.

The College's response to FGM will consider the government guidance, "Multi-agency statutory guidance on female genital mutilation" April 2016. Staff will also follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report must also be made to the Police.

There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (e.g. there is a known history of practising FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and / or making a referral to Children's Social Care.

If the risk of harm is imminent there are several emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

## **Appendix F: Low-level concerns policy**

### **1.0 Purpose**

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1.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in college. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

1.2 The policy should be read in conjunction with the current statutory guidance – “Keeping Children Safe in Education” Part 4, Section 2.

## 2.0 Who does the policy apply to?

2.1 This policy applies to all staff and other individuals who work or volunteer in college.

## 3.0 Definition of a low-level concern

3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of the college may have acted in a way that:

- is inconsistent with the “Guidance for safer working practice” (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of a low-level concern may be:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in one-to-one activities where they can’t be easily seen
- Using inappropriate language
- Low level concerns can include behaviour both inside and outside of work

## 4.0 Reporting low-level concerns

4.1 Where a low-level concern has been identified this will be reported as soon as possible to the principal. However, it is never too late to share a low-level concern if this has not already happened.

4.2 Where the principal is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (i.e. the most senior member of SLT acting in this role).

4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the principal and those about the principal will be reported to the Chair of Trustees /

4.4 Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the principal of the details as soon as possible.

## 5.0 Recording concerns

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5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

5.2 Where concerns are reported verbally to the principal a record of the conversation will be made by the principal which will be signed, timed, and dated.

## 6.0 Responding to low-level concerns

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The principal will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,
  - i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019): no further action will be required,
  - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.
  - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the college’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
  - iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the college’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
- Records will be made of:
  - i) all internal conversations including any relevant witnesses
  - ii) all external conversations e.g. with the LADO
  - iii) the decision and the rationale for it
  - iv) any action taken

## 7.0 Can the reporting person remain anonymous?

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be

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circumstances where this is not possible e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

## **8.0 Should staff report concerns about themselves (i.e. self-report)?**

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

## **9.0 Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)**

9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

## **10.0 Should the low-level concerns file be reviewed?**

10.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

## **11.0 References**

11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

## **12.0 What is the role of the Board of Trustees?**

12.1 The Principal will regularly inform the Trustees about the implementation of the low-level concerns policy including any evidence of its effectiveness e.g. with relevant data. The Safeguarding Trustee may also review an anonymised sample to ensure that these concerns have been handled appropriately.