



Adults at Risk Protection Policy 2022-23

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Monitoring and review

- This policy will be reviewed by the Corporation at least every year.

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1. Scope of the Policy

This policy provides guidance to all adults working within the College whether paid or voluntary or directly employed by the College or by a third party.

2. Adult at Risk Statement:

Our College is committed to safeguarding adults at risk and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect adults at risk by reporting anything that might suggest an adult at risk is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The College seeks to work in partnership with families and other agencies to improve the outcomes for adults at risk who are vulnerable or in need.

In preparing this guidance we have consulted with, referred to, and worked within the Liverpool Safeguarding Adults' Board Inter-agency Safeguarding Adults Procedures. This policy has been updated to include referrals to Channel in compliance with the Prevent Duty.

The College further reinforces their duty of care to all students, irrespective of age or vulnerability, within all relevant training, guidance, policies and procedures, deriving from:

- Common law duty of care/in loco parentis
- Statutory duty of care and sector specific guidance and legislation
- Duty arising from the contract of employment

3. Definitions:

' An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.' Care Act 2014

The Care Act 2014 sets a clear framework for how local authorities should protect adults at risk of abuse or neglect. The Act places a duty on local authorities to make enquiries, or cause others to do so, if it believes that an adult:

- has needs for care and support (whether or not the authority is meeting those needs) and
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or the neglect or the risk of it.

'Where an adult at risk is suffering significant harm, or is likely to do so, action should be taken to protect that adult at risk.'

4. Policy Aims:

- To ensure College takes appropriate action, in a timely manner, to safeguard and promote the welfare of all adults at risk

- To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.
- To ensure that the College's practice meets local and national guidance and all statutory requirements are in place.

5. Key Principles:

- The adult at risk's needs and welfare are paramount. All adults at risk have a right to be protected from abuse and neglect and have their welfare safeguarded.
- All staff should maintain an attitude of "it could happen here" where safeguarding is concerned.
- Adults at risk should be listened to and their views should inform any assessment and provision for them. Staff should always act to protect the interests of the adult at risk.
- The College recognises that scrutiny, challenge and supervision are key to safeguarding adults at risk.
- The College is committed to working with other agencies to provide early help for adults at risk before they become at risk of harm.
- All staff should be aware of the importance of identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment.
- All staff should be aware of the process for making referrals to Adult Services where an adult at risk is suffering, or likely to suffer, significant harm and understand the role they might be expected to play in such assessments that may follow a referral.
- All staff have responsibility to report their concerns about an adult at risk **without delay** to the College's Safeguarding Team. Whilst the Safeguarding Team will normally make referrals to Adult Services, **anyone** can refer their concerns to Adult Services directly in emergencies or if they feel they need to do so.
- Everyone has responsibility to escalate their concerns and 'press for reconsideration' if they believe an adult at risk's needs remain unmet or if the adult at risk is failing to thrive and in need or if the adult at risk is at risk of harm.
- The College will work in partnership with other agencies to promote the welfare of adults at risk and protect them from harm, including the need to share information about them in order to safeguard them.
- The College will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The College will follow the Local Safeguarding Adults Board procedures and provide them with information as required.
- Adults at risk have a right to learn ways to keep themselves safe from harm and exploitation.
- All staff will work to the 6 Principles of Safeguarding as defined by The Care Act 2014:
 - **Accountability**
 - **Empowerment**
 - **Partnership**
 - **Prevention**
 - **Proportionality**
 - **Protection**

6. Legislation and Guidance:

The Counter-Terrorism and Security Act 2015 places a duty upon local authorities and educational providers to 'have due regard to the need to prevent people from being drawn into terrorism' (CTSA 2015). 'The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are, "to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism." (**Work Based Learners and the Prevent Statutory Duty 2018**). The DfE has provided statutory guidance for colleges and childcare providers: '**Revised Prevent Duty Guidance: England and Wales**' (DfE 2019). The guidance summarises the requirements of colleges in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Our College will ensure that staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance. Staff will use their judgement in identifying adults who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. Equally, adults at risk will be made aware of the risks and support available to them. We will ensure that adults at risk are safe from terrorist and extremist material when accessing the internet in College. The Government has developed an 'educate against hate' website providing information and resources for colleges and parents to support them to recognise and address extremism and radicalisation in young and/or vulnerable people.

The Teaching Standards (DfE 2013) also requires all tutors to 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside College, including:

- treating students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a tutor's professional position
- having regard for the need to safeguard students' wellbeing, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others

The College will also take account of additional guidance and legislation including:

The Equality Act 2010

Special educational needs and disability code of practice: 0 to 25 years Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities (DfE 2015)

Criminal Exploitation of children and vulnerable adults: County Lines Guidance (DFE, 2017)

Information sharing: Advice for practitioners providing safeguarding services (HMG, 2018)

Revised Prevent Duty Guidance: for England and Wales (DfE, 2019)

How social media is used to encourage travel to Syria and Iraq (DFE Briefing note for colleges)

7. Communicating with parents and visitors:

The College is committed to the principles of safeguarding where a person-centred approach is fundamental to safeguarding and promoting the welfare of every adult at risk. An adult at

risk centred approach means keeping them in focus when making decisions about their lives and working in partnership with them and their families.'

The following statement is made available to parents/carers through the College website so they are aware of the College's responsibilities:

'Our College is committed to safeguarding adults at risk and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect adults at risk by reporting anything that might suggest an adult at risk is being abused or neglected.'

The College also has a statutory responsibility to share any concerns it might have about a child or adult at risk in need of protection with other agencies and in particular police, health and social services. Colleges are not able to investigate child or adult at risk protection concerns but have a legal duty to refer them. In most instances the College will be able to inform the parents/carers of its need to make a referral; however, sometimes the College can in certain circumstances share information without the consent of the family and may be advised by adult services or the police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The College follows legislation that aims to act in the interests of the child or adult at risk.

The College will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child or adult at risk and family.'

The following notice is made available to all visitors in reception. In addition, all visitors are provided with additional safeguarding guidance.

'Our College is committed to safeguarding children and adults at risk and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children and adults at risk by reporting anything that might suggest they are being abused or neglected. We would expect you to also report to the Designated Safeguarding Lead or Principal any behaviours of any adults working in the College that may concern you. By signing our visitors' book, you are agreeing to follow the College's safeguarding advice to visitors and where appropriate the code of conduct for staff and volunteers.'

The names and photographs of the Designated Safeguarding Lead, Safeguarding Operational Lead, U16s Safeguarding Lead and Safeguarding Officers are displayed in each centre.

8. Roles and responsibilities:

The Principal is: **Elaine Bowker**

The Chair of Governors is: **Tony Cobain**

The Designated Safeguarding Lead is: **Aamir Butt**

The nominated Safeguarding Governor is: **Steve Sankson**

The nominated governor for dealing with allegations against the Principal is: **Tony Cobain**

Those trained to provide cover for the role of Designated Safeguarding Lead are:

Operation Safeguarding Lead

Members of the Safeguarding Team and Duty Managers

The Governing body should ensure that:

- The College meets the statutory responsibilities set out in relevant legislation and local guidance
- This policy is reviewed at least annually by the full governing body and available to parents/carers, normally via the College's website.
- There is a named Designated Safeguarding Lead who is a member of the College's Senior Leadership Team. There are colleagues trained to provide cover for the role.
- The College has procedures in keeping with the Merseyside Safeguarding Adults Board (MSAB) for dealing with any allegations made against any adult working within the College.
- There is a nominated governor, usually the chair, who is the case manager for managing any allegations against the Principal.
- There is an additional nominated safeguarding governor to liaise with the Designated Safeguarding Lead and champion safeguarding on behalf of the board.
- The College follows safer recruitment procedures, including the statutory pre-employment checks on all staff. The Chair of Governors and safeguarding governor together with the Principal review the College's single central record.
- The College itself is a safe environment where the views of adults at risk and families are listened to and where adults at risk are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.
- The College will ensure there are appropriate filters and monitoring systems in place in respect of internet use and encourage safe and responsible use of new technologies.
- The College scrutinises the impact of its training strategy so that all staff, including temporary staff and volunteers, are aware of the College's safeguarding policies and procedures. All staff must undertake safeguarding training which is regularly updated. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training requirements.
- The governors are given guidance to support them to ensure the College meets its statutory safeguarding requirements.

- All safeguarding practices are quality assured by the Designated Safeguarding Lead, including the auditing of safeguarding records and the supervision of the Deputy Safeguarding Lead, Safeguarding Officers and other members of the safeguarding team.
- The governing body will appoint an appropriately trained designated person to promote the educational achievement of adults at risk who are looked after.

Governing bodies are accountable for ensuring the College has effective policies and procedures in line with local and national guidance, and for monitoring the College's compliance with them. Neither the Governing Body nor individual governors have a role in dealing with individual cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Principal will ensure that:

- The Single Central Record is up to date and the safer recruitment practices are followed in line with the College's Recruitment and Selection Policy and Procedures. At least one member of every recruitment panel has attended safer recruitment training.
- Job descriptions and person specifications for all roles make specific reference to adult at risk protection and safeguarding.
- There is a listening culture within the College where both staff and adults at risk are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- The Designated Safeguarding Lead has a job description in keeping with safeguarding requirements and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead who have undertaken the same training.
- The curriculum provides opportunities to help students stay safe especially when online. Adults at risk should be aware of the support available to them.
- In keeping with the Prevent Duty reasonable checks are made on visiting speakers in line with the External Speakers Protocol, part of the Use of College Premises Policy.
- Principals should ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff

Designated Safeguarding Lead

The Designated Safeguarding Lead will quality assure the College's adult at risk practices including the auditing of safeguarding records and the supervision of the Safeguarding Operational Lead, Safeguarding Officer and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The latest safeguarding legislation set out the broad areas of responsibility for the Designated Safeguarding Lead:

Managing Referrals

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority Adult Services as required;
- Support staff who make referrals to Adult Services;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to an adult at risk to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required

Work with Others

- Liaise with the Principal to inform him or her of issues especially ongoing serious safeguarding concerns and police investigations;
- Liaise with staff (especially support staff, College nurses, IT technicians and the named person with oversight of SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Undertake training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:

- Understand the assessment process for providing support, including Adult Services' referral arrangements.
- Ensure each member of staff has access to and understands the College's Adult at risk policy and procedures, especially new and part time staff;
- Are alert to the specific needs of adults at risk in general and those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- Understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting adults at risk from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep adults at risk safe whilst they are online at College;
- Can recognise the additional risks that adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND adults to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to adults at risk and taking account of their wishes and feelings, among all staff, and any measures the College may put in place to protect them.

Raise Awareness

- The Designated Safeguarding Lead should ensure the College's adult at risk protection policies are known, understood and used appropriately;
- Ensure the College's adult at risk policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

- Ensure the adult at risk policy is available publicly and parents/ carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and
- Link with the local MSAB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Adult at risk file

- Where adults at risk leave the College ensure their adult at risk protection file is transferred to the new college upon request. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained. Receiving colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the adult at risk protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new college in advance of an adult at risk leaving. For example, information that would allow the new college to continue supporting victims of abuse and have that support in place for when the adult at risk arrives.

Availability

During term time the Designated Safeguarding Lead (or a deputy) will be available (during College hours) for staff in the College to discuss any safeguarding concerns.

The Designated Safeguarding Lead will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

The Principal will normally be informed of any allegations against staff and will ensure appropriate referrals to the Disclosure and Barring Service or Teaching Regulation Agency are made.

In addition to the above the Designated Safeguarding Lead is also expected to ensure that:

- A training log is kept of safeguarding training include the names of those attending. All staff must have regular training and updates.
- The College attends and contributes to multi-agency meetings, ensuring actions are completed in a timely manner.
- The College escalates its concerns with other agencies when an adult at risk's needs are not being met following the Local Safeguarding Board Escalation and Resolution Policy.
- All members of the Safeguarding Team have received appropriate training; that all referrals made are quality assured and the supervision is provided to the Safeguarding Team to monitor all decisions and action taken and the wellbeing of each team member.

All staff (and volunteers) should:

- Contribute to ensuring students learn in a safe environment.
- Recognise that any adult at risk will benefit from timely support, but should be particularly alert to the potential need for an adult at risk who:
 - is disabled and has specific additional needs
 - has special educational needs
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is misusing drugs or alcohol themselves
 - is at risk of modern slavery, trafficking or exploitation
 - is showing early signs of abuse and/or neglect
 - is at risk of being radicalised or exploited
- Report any concerns about an adult at risk's welfare without delay to:
 - the Safeguarding Team (or Duty Manager) in line with published procedures
 - the Safeguarding Officer or Safeguarding Manager
 - the Designated Safeguarding Lead, or in their absence a senior member of staff.
- Understand that any member of staff can make a referral to Adult Services should that be required, informing the Safeguarding Team of any action taken.
- Report any concerns without delay about the behaviour of staff towards an adult at risk to the Principal, Designated Safeguarding Lead or the Chair of Governors.
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if an adult at risk remains at risk or their needs are not met. This includes the understanding that any member of staff can make a referral to Adults Services if required to do so.
- Follow all College's policies including this policy and the College's Code of Conduct.
- Be aware safeguarding issues can manifest themselves via abuse among peers
- Understand that some adults at risk, including those with Special Educational Needs, may be more vulnerable to abuse.
- 'Adults at risk with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their disability without further exploration;
 - adults at risk with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
 - 'communication barriers and difficulties in overcoming these barriers.' (DfE 2016)
- Have access to the College's Code of Conduct and Whistleblowing policy.

9. Safeguarding Framework:

In addition to this policy the College has procedures or policies in relation to other areas for safeguarding adults at risk including as examples:

- Attendance
- Anti-bullying including cyber bullying
- Alternative and off-site provision
- Behaviour for learning
- Code of conduct for staff, governors and volunteers (guidance on safer working practices)
- Data protection
- Educational visits procedures
- Emergency Evacuation Procedures
- First Aid Procedure
- Managing allegations against staff and volunteers
- Online Safety
- Risk Assessment Guidelines
- Safe recruitment practices
- Safeguarding advice for visitors
- Sexual Abuse Policy (peer-on-peer)
- Single Equality Scheme and Action Plan
- Special educational needs and disabilities
- Whistleblowing

10. Procedures for reporting adult at risk protection or adult at risk welfare concerns:

- All concerns should be reported without delay following the College’s published Safeguarding Policies /Reporting Procedures. This should be followed by a written account of the concerns completed on the College’s Safeguarding reporting System CPOMS.
- Consideration will need to be given to immediately protecting the adult at risk and contacting the police and/or ringing for an ambulance if the adult at risk is injured or at risk of immediate harm.
- The Designated Safeguarding Lead or Deputy Designated Safeguarding Leads will take immediate action and will make a referral to Adult Services by telephone if an adult at risk is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing.

Area	Adult Services
Liverpool	233 3800
Halton	907 8306
Knowsley	443 2600
Sefton	Sefton North: 934 2683 Sefton South: 934 3920
St Helens	(01744) 676 600 0845 050 0148 (emergency duty team) or 0345 0500 148
Wirral	606 2006
Merseyside Police	709 6010 or 101 - 999 in emergencies

- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will follow the LSAB and Local Authority multi-agency procedures and consider the adult at risk's needs and consider whether a referral to Adult Services is needed.
- Concerns about an adult at risk should always lead to timely support. The College may need to escalate its concerns with Adult Services to ensure a referral is accepted.

Concerns that an adult at risk is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel referral being made to the Local Authority's Prevent and Channel team.

11. Managing allegations against staff and volunteers working at the College

All staff and volunteers must report any concerns about a member of staff's behaviour towards adults at risk to the Principal. Concerns can also be discussed with the Designated Safeguarding Lead. Concerns about the Principal should be raised with Chair of Governors or nominated governor. The College's policy and procedures will support everyone to take action.

College should ensure strict compliance of the Staff Code of Conduct. There may be times when the concern raised against a member of staff does not meet the reporting threshold (Low-level concern). College, through its safeguarding training and induction inform all staff (permanent, casual, volunteers and agency) about their responsibility to report even the small concerns they may have about another member of staff. HR should record all concerns and investigate them thoroughly to ensure that any of the reported concerns are addressed and dealt with appropriately. Designated Safeguarding Lead should be consulted when making these decisions. In most cases these concerns will be addressed through conversation with concerned staff, appropriate training and reminder of professional behaviour as per the Staff Code of conduct. However, in some cases there will be a need for formal action. The guiding principle should be the potential of harm to "adults at risk" in the College.

12. Allegations of abuse against another student

All concerns must be reported and discussed with the Safeguarding Team (or Designated Safeguarding Lead or Duty Manager). This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting (sexual imagery). Staff should recognise that adults at risk are capable of abusing other students. Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by adults at risk or others should never be passed off as 'banter'.

Adults at risk with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these adults at risk. Adults at risk who are LGBT or perceived to be, may also be targeted by their peers and harassed or assaulted.

Victims of sexual abuse will be supported by the College's student support system and referred to specialist agencies including, as examples, CAMHS, Brook and Barnardo's. A risk assessment may need to be in place. The College curriculum will support all students to become more resilient to inappropriate behaviours towards them.

13. On-line safety, data protection and the use of mobile phones and digital photographic equipment

Staff should also report any concerns about any inappropriate use of technology to the Safeguarding Team, Deputy Designated Safeguarding Lead or senior member of staff.

The College's on-line/E-safety/ Acceptable User policy clearly outlines the way in which the College uses technology and the measures in place to ensure safe and responsible use by all. There is a clear code of conduct for staff and volunteers which sets out the use of new technologies, mobile phones and personal photographic equipment around adults at risk. A protocol for video conferencing was produced at the start of lockdown to be included within the IT Acceptable User Policy.

Staff should bring immediately to the attention of the Safeguarding Team any behaviours by adults or adults at risk themselves that may be risky or harmful.

14. Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that an adult at risk has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained mental health professionals in college attempt to make a diagnosis of a mental health problem. College staff, however, are well placed to observe individual students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where the adults at risk have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff in college are aware of how these experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action is taken, and refer the individual at risk to the safeguarding team following established procedures.

15. Up skirting

All staff are made aware that 'up skirting' is now a criminal offence. A definition has been included which describes up skirting as, "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" (DfE, 2020)

16. Safer recruitment

The College will ensure that all appointments follow its recruitment policy and the guidance set out in its Safeguarding Policy. At least one member of the appointments panel will have undertaken safer recruitment training. The College will undertake all the required DFE pre-employment checks and where appropriate record these checks on the single central record and retain evidence in personnel files. The College will seek written confirmation that third-party organisations including contractors and alternative education providers have undertaken appropriate checks.

The College is required to make all relevant checks including the Disclosure and Barring Service (DBS) checks to ensure that staff recruited are appropriate for an educational environment. Appropriate action will be taken against staff (in service) who have committed a relevant offence. This includes reporting them to Disclosure and Barring Service.

17. The safeguarding curriculum

The College will ensure it has a curriculum map which sets out how its students keep themselves safe from harm. Adults at risk will be supported to develop their understanding, where appropriate, of risks when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. The College will ensure the curriculum promotes British Values as set out in the Counter Terrorism and Security Act 2015.

18. Confidentiality, information sharing, record keeping and retention

Staff will be told of concerns about an adult at risk on a 'need to know basis'. The College understands the need to keep its safeguarding records securely.

The College Safeguarding team will ensure that all safeguarding records are transferred to the educational provider where a student destination is known or where records are requested by a new provider. College will transfer records securely to the next setting and discuss the individual's needs

The College will retain records in keeping with legal guidelines.

Staff cannot promise adults at risk confidentiality but must always act in their best interest and share disclosures made by the adult at risk or others with the Safeguarding Team.

The College will aim to seek consent of individual or their carers before sharing information with other agencies, however legislation states that colleges and other agencies can share information without this consent in particular circumstances.

19. Reporting and Monitoring

The Designated Safeguarding Lead is responsible for reporting safeguarding data and analysis to the governing body each term. Governors are presented with 3 reports every year. The

reports will provide assurance to governors about the College's compliance status with regards to its legal obligations as well as safeguarding records for relevant terms along with an analysis. The reports also highlight any prevalent issues and trends that require College's attention.

The designated Safeguarding Lead, through termly meetings of "Safeguarding and Wellbeing Strategy Group" seek assurances from all stakeholders around compliance with the safeguarding requirements: The membership of the group include Deputy Principal, Designated Safeguarding Governor, Director of HR, Head of IT, Deputy Safeguarding Lead, Director of Progression, Head of Student Services and Director of Estates. Groups seeks assurance around DBS checks, Safeguarding training compliance, web and online filtering and monitoring, digital safety and digital education, site safety and security etc.

20. Complaints

Complaints about safeguarding should follow the College's complaints policy.

The College and Local Authority also have whistle blowing procedures.