

Safeguarding Policy

Young People and Vulnerable Adults

The C&M College Network
where people flourish, and achieve
extraordinary things

Process

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Introduction

The Cheadle and Marple College Network Corporation and Senior Management Team recognise that it has statutory obligations under the Children's Act 2014 and Education Act 2011 to safeguard and promote the welfare of individuals. In relation to vulnerable adults the Government set out key principles (No Secrets 2000) which state that "the protection of vulnerable adults should always receive a high priority and that all agencies should be able to clearly demonstrate the ability to respond to abuse with prompt, timely, and appropriate action".

In addition, The C&M College Network recognise the duties relating to the prevention of vulnerable people being drawn into terrorism as defined in Section 21 The Counter Terrorism and Security Act 2015.

Informed by our mission statement:

"The C&M College Network – a place where people flourish and achieve extraordinary things"

We aim to:

- Ensure employees are carefully selected, trained to understand types of abuse and are aware of their responsibilities in relation to safeguarding and protection.
- Take reasonable steps to ensure the health, safety and welfare of The C&M College Network community
- Understand and act where there is cause for concern and collaborate with external agencies

Compliance: Legal, Statutory and Internal Regulations

The Safeguarding Young People and Vulnerable Adults Policy is underpinned by the following legal / statutory regulations:

- Keeping Children Safe in Education
- Children's Act 2014
- Common Assessment Framework 2016
- Counter Terrorism and Security Act 2015
- GDPR 2018
- Guidance: Advice for Schools & Colleges: How to Prevent and Respond to Reports of Sexual Violence and Harassment Between Children
- Working Together to Safeguard Children (2018 Update)
- Safeguarding Children & Young People from Knife Crime (Ofsted) 2019
- Teacher Standards 2016
- Every Child Matters 2017
- Care Act 2014
- Modern Slavery Act 2015
- Data Protection Act 2018

Procedures and Protocols Supporting This Policy

- Equality Policy & Procedures
- Whistleblowing Policy & Procedures
- Safeguarding Young People and Vulnerable Adults Procedures (including guidance in relation to Forced Marriages)
- Online Safety Policy & Protocol and Acceptable Use Agreements
- Data Protection Policy & Procedures
- Employee Handbook
- Health and Safety Policy & Procedures

Scope

The Safeguarding Young People and Vulnerable Adults Policy applies to all "children" i.e. a young person up to the age of 18 including customers, contractors, employees, students and visitors and vulnerable adults and repeals all previous policies in relation to Child and Vulnerable Adult Protection.

Note: Vulnerable adults are defined as people who are or may be in need of community care services because of mental disability, other disability, age or illness and who are, or who may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

Specific accountabilities of parties are:

- The Corporation is accountable for ensuring effective policies and procedures are in place, are monitored and comply with the statutory guidance
- The Principal holds ultimate accountability to ensure a safe environment
- Designated Safeguarding Leads, one of whom must be a senior manager, have responsibility for monitoring procedures, incident recording, liaison with external agencies and ensuring colleagues are advised and supported in relation to safeguarding
- All employees have a responsibility to take seriously, understand and act without personal judgment where there is cause for concern and liaise with the Designated Safeguarding Leads

The Role of The C&M College Network

Within The C&M College Network's duty of care it has responsibility to act if there is a cause for concern and to notify the appropriate agencies to enable investigation and action to be taken, if appropriate. However, it is not The C&M College Network's responsibility to investigate allegations or suspicions of abuse.

The C&M College Network has a responsibility to provide information to Social Services about an individual or family, if required to do so for a protection assessment under the Common Assessment Framework. The Working Together to Safeguard Children 2018 update places new duties on key agencies in a local area to work together and with other local partners to safeguard and promote welfare of all children and young people in their area.

In addition, The C&M College Network may provide help or a specific service to an individual as part of a protection plan agreed at a Child in Need Meeting and could also contribute to reviewing and individual's progress in this regard.

The C&M College Network response to a role in safeguarding the welfare of individuals in relation to abuse is:

- To establish safeguarding / child protection protocols and effective communication with schools, when pupils on their rolls are attending either The Cheadle College or Marple Sixth Form College
- To ensure the person who discloses abuse is offered all possible support
- To appoint Designated Safeguarding Leads with responsibility for safeguarding and child protection and to collaborate with external agencies and the local area Common Assessment Team and the Local Safeguarding Children Board (LSCB)
- To refer the individual to The Common Processes Team or other appropriate agency e.g. the Police or NSPCC, when the individual requests it or a situation necessitates such action
- To provide appropriate continual professional development to ensure up to date employee awareness of safeguarding and protection from abuse and the related procedures to follow
- To seek opportunities to promote student safety and welfare throughout the curriculum
- To ensure lower level safeguarding concerns are identified and monitored

The C&M College Network recognises its duties in relation to CONTEST, the Government's Counter Terrorism Strategy and in particular **Prevent** and will liaise with external multi agencies in order to safeguard vulnerable people who may be at risk of being radicalised or drawn into extremism or terrorist behaviour.

Policy Statement

The Cheadle and Marple College Network recognises that it has a statutory obligation to safeguard and promote welfare to the C&M College Network community and enabling all young people and vulnerable adults the opportunity to achieve their full potential by maximising their opportunities within a safe environment free from harm and abuse.

It is the responsibility of all employees to take reasonable steps to promote well – being, recognise potential harm, protect individuals from harm and share information whilst also respecting individual choice to disclose (unless withholding information would increase risk to the individual).

The Corporation will follow the statutory guidance, Keeping Children Safe in Education, the Care Act 2014 (Adult Protection), The Counter Terrorism and Security Act 2015, Modern Slavery Act 2015 and GDPR 2018 to ensure they meet their responsibilities to ensure effective policies and procedures are in place and regularly monitored. The Safeguarding (Young People and Vulnerable Adults) Procedure will be reviewed annually.

The C&M College Network will ensure there are Designated Safeguarding Leads of appropriate seniority, who are expert in the use of safeguarding assessments and procedures, maintain accurate incident records, support and offer advice and guidance to colleagues, liaise effectively with external agencies and, where appropriate, apply the Common Assessment Framework.

Safe Recruitment will take place including Disclosure and Barring Service check and professional boundaries applied to establish expectations and set parameters to maintain a safe environment. At induction new employees will receive information relating to safeguarding and Employee Code of Conduct.

In order to ensure appropriate up to date understanding of safeguarding including extremism and awareness of potential indicators, promote protection awareness and best practice mandatory training for governors, employees and sub-contractors will be provided to support policies, procedures and statutory obligations.

It is the intention that good safeguarding practice is integrated into all activities and services provided by The C&M College Network including services provided by sub-contractors. Our Anti-Slavery and Trafficking (Modern Slavery) Statement and Privacy Statements are published on our website.

Safety and welfare will be included in all student inductions and opportunities embraced to promote awareness will be embedded across the curriculum.

The C&M College Network intends to ensure that individuals are treated with respect and will not be harmed by employees, sub-contractors or visitors. Where it is suspected that a young person or vulnerable adult has been or is likely to be harmed, The C&M College Network will act efficiently and effectively to contribute to actions required to safeguard the individual person's welfare.

Signed:



Title:

Principal

Date:

08/07/2020



Chair of Corporation

08/07/2020

Addendum: Safeguarding Arrangements in Response to COVID-19

The Cheadle and Marple College Network has an effective Safeguarding Policy and Procedure in place reflecting business as usual. These, however do not accurately reflect new arrangements in response to COVID-19. The procedure has been reviewed and will remain under review as circumstances continue to evolve.

The way that the College is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however a number of important safeguarding principles remain the same:

- With regard to safeguarding, the best interests of young people and vulnerable adults must always continue to come first
- If anyone member of the College has a safeguarding concern regarding any young person or vulnerable adult they should continue to act and act immediately
- A Designated Safeguarding Lead (DSL) or Deputy DSL will be available
- Young people and vulnerable adults should continue to be protected when they are online

‘Colleges should, as far as is reasonably possible, take a whole institution approach to safeguarding. This will allow them to satisfy themselves that any new policies and processes in response to COVID-19 are not weakening their approach to safeguarding or undermining their child protection policy.’ (DFE updated safeguarding guidance 27TH March 2020).

Designated Safeguarding Leads:

During the period of remote learning the DSL and Deputy DSL will not be available on site, therefore the following arrangements are in place:

- The DSL or DDSL will be available to be contacted via phone, email, ProMonitor or through TEAMS when working from home
- If they are not available due to staff sickness, then arrangements will be made to contact additional members of the Safeguarding Team (who will be available to be contacted via phone or online video) and they will liaise with the Local Authority Safeguarding Leads at the Multi Agency Safeguarding Hub
- If one of the College sites reopens and a trained DSL or Deputy is not on site, in addition to one of the above options, a Senior Leader will take responsibility for co-ordinating safeguarding on site. This may include updating and managing access to the Central Safeguarding Log, liaising with the offsite DSL (or Deputy) and as required liaising with children’s social workers where they require access to children in need and/or to carry out statutory assessments of need.

Whatever the scenario, it is important that all College employees and volunteers have access to a trained DSL or Deputy, know on any given day who that person is and how to speak to them. Members of the Safeguarding and Wellbeing Teams will continue to be available during the holiday periods and students will be contacted by House Monitors to inform them who to contact during the holiday period.

The Cheadle and Marple College Network will face unique challenges at this time. Where reasonably possible, the DSL (or Deputy) should consider these in a child protection context and reflect them in the Safeguarding (child protection) Procedure as appropriate.

Reporting Safeguarding Concerns:

There is continued importance for all employees and volunteers to act immediately regarding any safeguarding concerns. The process for dealing with disclosures and safeguarding concerns remains the same (see p.6-10 Safeguarding Procedure).

Any concerns should be logged on ProMonitor as a confidential Level 2 safeguarding comment or emailed directly to a member of the Safeguarding Team. If necessary, the Safeguarding Team should also be contacted on their College mobile phones.

Training for Employees and Safeguarding Induction:

All existing College employees have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (KCSIE). The important criteria for these colleagues will be awareness of new local arrangements to ensure they know what to do if they are worried about a student.

Where new employees are recruited during the current arrangements of remote working, or new volunteers enter the College, they will continue to be provided with a safeguarding induction. An up to date, published Safeguarding (child protection) policy and procedure will support this process as will part 1 of KCSIE.

Updated advice received from local authorities regarding children with education, health and care (EHC) plans, the Local Authority Designated Officer and children's social care, reporting mechanisms, referral thresholds and children in need

All students with Educational Health Care Plans (EHCP's) will be contacted to check they are safe and to provide details of the DSL who will be monitoring the situation regarding the need for on-site care facilities. Parents / carers of those more vulnerable students of specialist provision will be contacted weekly to provide ongoing support and to check on ongoing issues arising. Risk assessments will be carried out for those whose circumstances change on a case by case basis and the relevant support / provision implemented.

Looked after students will be contacted weekly and the DSL will upload weekly reports to the Welfare Call system for Social Workers to access and review any issues arising. Those Local Authorities that do not use this online platform will be communicated with directly and remote Personal Educational Plan (PEPS) will be carried out with all professionals as required.

The Designated Teacher (Head of Inclusion) and DSL will liaise weekly with Stockport Local Authority Lead in relation to vulnerable students across the Borough and for those in the 3 designated Post 16 Providers – Aquinas College, Stockport College and The Cheadle and Marple College Network.

Arrangements to Support Students That The College Are Concerned About Who Do Not Meet The 'Vulnerable' Definition:

The Wellbeing Team will support low level well-being and mental health issues for all students and will remain in regular contact with House Monitors who monitor progress of their students. Liaison will take place with external agencies if required and signposting information will be provided. The intranet will be regularly updated with relevant information. All student concerns will be communicated to teams using ProMonitor.

Safe Online Working Practices:

Refer to the Online Safety (Acceptable Use) Policy and Procedure. Guidelines for keeping colleagues and students safe online have been issued to all colleagues. When using online conferencing tools to maintain direct contact with students, colleagues should:

Teachers / Employees: Safeguarding Yourself and Your Students

To be read in conjunction with all other criteria held within the Online Safety Policy, Protocols and Acceptable Use Agreements. The following applies to using video images and / or voice conferencing

- ✓ DO make sure that you only download the conferencing software from trusted sources.
- ✓ DO make sure that you check your privacy settings to make sure that you understand what (if any) data the service will access during operation. You may have the option to opt out of sharing data.
- ✓ DO try to use channels which are provided by the college e.g. Microsoft Teams, VLE where students are identified and secured by their College email or login.
- ✓ DO make sure your video/voice conferencing account (or the device or app you are using for video conferencing) is protected with a strong password.
- ✓ DO make sure that you test the service before making (or joining) your first call, so that you are familiar with all of the features and you know how to mute your microphone and turn on/off the camera. This will give you more control over what you share with others if needed. Make sure you also know how to turn on and turn off students' cameras and microphones if needed.
- ✓ DO tell students when you are available **and stick to working hours**. Do not contact students out of these hours.
- ✓ DO let participants know **in advance** if you are recording the live video/voice conference and reasons for this – it will allow you to share the recording with anyone who missed the live event. All lessons using video should be recorded as this can act as a safeguarding check.
- ✓ DO make sure students are aware if the conference call will be using video and voice prior to the call being made. Students should turn off the video cameras on their devices if voice calls are being used only in the conference.
- ✓ DO encourage students to use the text chat function to ask/answer questions. Students may have a microphone, but they may not. It can also become quite chaotic with multiple voice participants!
- ✓ DO make sure that all your devices and applications (not just the video/voice conferencing software) are kept up to date for added security.
- ✗ DONOT ask students to join conferences where they have to use their private email or contact details.
- ✗ DONOT have any contact with students via any social media.
- ✗ DONOT contact parents/carers using personal mobiles and email. Numbers should be withheld.

Hosting and Joining Calls

It is important that the teacher / employee can control who can join your video/voice conferencing call. For specific instructions, refer to the support website of the service you are using. However, the following general rules apply:

- Ensure you know who is joining your call. If you are organising the call for your students, consider using the lobby feature to ensure you know who has arrived. This is especially useful if individuals are joining the call via an unrecognised phone number. Make sure people are who they say they are before they join the call (the password function described above can help with this).
- Make students are aware at the start of any interaction if the call will be using video and/or voice conferencing. Students should turn off their video camera before joining the conference if the conference is just using voice.
- If using video conferencing calls, then surroundings must be considered. Take a moment to think about what your camera shows when you are on a call. Would you want to share that information with students? Consider blurring or changing your background - you will find instructions on how to do this on the support website for your video conferencing service. All teachers / employees to:
 - Sit against a neutral background
 - Avoid recording in busy, distracting environments if they can (if that's not possible, use a neutral background)
 - Dress appropriately
 - Double check that any other tabs they have open in their browser would be appropriate for a child to see, if they're sharing their screen
 - Use professional language (follow the 'Employee Code of Conduct')
- Students should be respectful of other users in the language that they use and in their onscreen behaviour (i.e. not take control of the screen!). They should also follow live video guidelines above and teachers must disable their video camera and microphone if inappropriate behaviour is identified.
- If conference calls are to be recorded, then you should notify the students **before the conference call** that you will record the interaction. It's important to know how long any recordings are retained and how to access them. Any recordings should only be shared with participants and all made aware of the expectations/restrictions regarding onward sharing.
- Do not make the calls public. Connect directly to the people you want to call using your contacts/address book or provide private links to the individual contacts. For some video/voice conferencing services, you can set up the call so that a password is required in order to join. This adds another layer of protection. Do not post the link (or the password) publicly.
- **Any safeguarding concerns identified during conference calls should be forwarded to the Safeguarding Team using the usual procedure in place.**

Accessibility Considerations

- Remote learning should be available to all students on platforms they are familiar in using. Bear in mind that not all students will have a device that will support live conferencing therefore it should not provide the sole mode of delivery.
- Also bear in mind that students may be sharing devices with other family members and so may not be available at a specific time to take part. The limitations of bandwidth of home WIFI will also mean that multiple simultaneous users could make live streaming difficult.
- Accessibility should be considered for those students with SEND needs and appropriate methods used. Please seek advice from the Learning Support Team, if required.
- Participants are entitled to refuse to use live video conferencing calls and opt for voice only if they do not feel comfortable. This could be due to a mental health need or other wellbeing/SEND need.

Holding Remote Meetings with Colleagues

The above information is relevant when arranging conference video/voice calls with colleagues. Additional considerations to follow are:

- Notify attendees **at invitation** that it is the intention to record the video/voice conference and the reason for recording. (Please note that unless there a legal reason for doing so, recording video meetings should not be permitted).
- Participants can refuse to use live video conferencing calls and opt for voice only if they do not feel comfortable.
- Sit against a neutral background and/or consider blurring or changing your background.
- Make sure that other members in your household are not in the vicinity of the meeting and can view/hear any content being discussed.
- Double check that any other tabs you have open in your browser would be appropriate for others to see, if you are sharing your screen e.g. personal emails, contacts, confidential information.
- Always adhere to the 'Employee Code of Conduct' during the meeting.
- If meetings are recorded, then they should be held securely within the video/voice conferencing platform and where possible password protected for added security. This is particularly important if any confidential information has been discussed during the meeting.
- Only retain recordings of any meetings for an agreed period of time and delete old recordings as appropriate.
- Recordings of meetings should not be shared with anyone who was not invited to the meeting. If this is required, then participants should be contacted, and provide consent.

17. The Student Acceptable Use Agreement holds comprehensive details of the code of conduct expected of students using The Cheadle and Marple College Network IT equipment and facilities. The following provides additional online safety advice for students.

Specific Advice for Students – Keeping Safe Online

To be read in conjunction with all other criteria held within the Online Safety Policy, Protocols and Acceptable Use Agreements. <https://www.getsafeonline.org/> “Get Safe Online” offers the following guidelines to avoid these risks:

- Do not let peer pressure or what other people are doing on these sites convince you to do something you are not comfortable with.
- Be wary of publishing any identifying information about yourself – either in your profile or in your posts – such as phone numbers, pictures of your home, workplace or school, your address or birthday.
- Pick a username that does not include any personal information. For example, “joe glasgow” or “jane_liverpool” would be bad choices.
- Set up a separate email account to register and receive mail from the site. That way if you want to close down your account/page, you can simply stop using that mail account.
- Use strong passwords.
- Keep your profile closed and allow only your friends to view your profile.
- What goes online stays online. Do not say anything or publish pictures that might later cause you or someone else embarrassment.
- Never post comments that are abusive or may cause offence to either individuals or groups of society.
- Be aware of what friends post about you, or reply to your posts, particularly about your personal details and activities.

- Always check your account privacy settings to ensure content is accessible to the correct audience.
- Remember that many companies routinely view current or prospective employees' social networking pages, so be careful about what you say, what pictures you post and your profile.
- Do not post your holiday dates - or family photos while you are away - as social networking sites are a favourite research tool for the modern burglar.
- Learn how to use the site properly. Use the privacy features to restrict strangers' access to your profile. Be guarded about who you let join your network.
- Be on your guard against phishing scams, including fake friend requests and posts from individuals or companies inviting you to visit other pages or sites.
- If you do get caught up in a scam, make sure you remove any corresponding likes and app permissions from your account.
- Ensure you have effective and updated antivirus/antispyware software and firewall running before you go online.

Instant messaging programmes such as texts, i-message, skype, facetime etc, are free, fast, real-time and powerful. However instant messaging also carries inherent risks: lack of encryption (allowing the possibility of eavesdropping) logging of chat conversations without a user's knowledge and virus risks. Care must be taken when using such programmes.

Note: Refer to additional guidance from AACOSS – (The Association of Adult and Child Online Safety Specialists).

The principles as set out in Part 5 of KCSIE will continue to inform any revised approach. Students and parents/ carers have been emailed information regarding staying safe online.

Concerns About a Colleague or Volunteer Who May Pose a Safeguarding Risk to Students:

The principles in Part 4 of KCSIE will continue to support how The Cheadle and Marple College Network responds to any such concerns. Usual procedures will be followed.

Safer Recruitment/Volunteers and Movement of Employees:

It remains essential that people who are unsuitable are not permitted to enter the College's workforce or gain access to young people and vulnerable adults. The College will continue to follow the relevant safer recruitment processes if recruiting new employees including, as appropriate, relevant sections in Part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Regarding members of the college workforce that already are engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school or college to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier.

The Cheadle and Marple College Network will continue to follow its legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at Paragraph 163 of KCSIE.

The Cheadle and Marple College Network will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per Paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral'. During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk. All referrals received by the TRA will continue to be considered. Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that the College is aware, on any given day, which employees/volunteers will be in College, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the Cheadle and Marple College Network will continue to maintain a Single Central Record (SCR) up to date as outlined in Paragraphs 148 to 156 in KCSIE. The SCR will provide the means to record everyone that will be working or volunteering at the College on any given day, including any individuals who may be on loan from other institutions.