WirralMet

Wirral Met College

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Safeguarding, Protection and Promoting the Welfare of Children and Adults at Risk Policy and Procedure

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Policy
Introduction

- This policy states the responsibilities of Wirral Met College in relation to the safeguarding, protection and promoting the welfare of students, specifically children, adults at risk and students who are vulnerable due to circumstances.

- Wirral Met College is committed to safeguarding, protection and promoting the welfare of children and adults at risk, recognises that it is everyone's responsibility and therefore expects all staff and volunteers to share this commitment.

- Informed by statutory guidance and recommendations, this document incorporates:
  Intent: creating a safe environment for students to aspire to and achieve their goals.

  Implementation: raise awareness of issues with staff through ongoing training and reporting; responding to need and ensuring appropriate intervention is in place by working with local support and statutory agencies; learning through experience and supervision.

  Impact: student retain their place in education, achieve their qualification and return to continue their education or progress to new opportunities. Section 6 outlines some impact measures.

- Safeguarding and promoting the welfare of children is defined by Working Together to Safeguard Children (2018) as:

  - protecting children from maltreatment
  - preventing impairment of children's health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes

- The 6 Principles of Adult Safeguarding set out in the Care Act 2014 that underpin safeguarding adults are:
  - Empowerment: People are supported and encouraged to make their own decisions and informed consent
  - Prevention: It is better to take action before harm occurs.
  - Proportionality: The least intrusive response appropriate to the risk presented.
  - Protection: Support and representation for those in greatest need.
  - Partnership: Services offer local solutions through working closely with their communities have a part to play in preventing, detecting and reporting neglect and abuse.
  - Accountability: Accountability and transparency in delivering safeguarding.

Definitions

- Children are students who have not yet reached their 18th birthday but in the case of Special Educational Needs it is up to 25 years of age.

- An adult at risk of abuse or neglect is defined as someone over 18 who has needs for care and support, who is experiencing, or is at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves. (Care Act 2014).

- A vulnerable student is a student who, due to their circumstances, may require safeguarding arrangements to be implemented i.e. domestic/relationship abuse, under 18 and have caring responsibilities, child in care/care leaver, under 18 and estranged from family, young parent or young mum to be, student involved in offending behaviour.

  The term student will be used, for ease, throughout this policy and procedure to cover the definitions outlined above.

- This policy applies to all students and staff in the College.

Policy Statement

- The Board of Governors is committed to and will approve and annually review policies and procedures with the aim of ensuring that Wirral Met College:

  - provides a safe environment for students in which to learn.
  - identifies students who are suffering, or likely to suffer, significant harm and provides child/ adult at risk procedures for reporting concerns.
  - identifies students under 18 who are in need of early help/support from other agencies to ensure their welfare and takes appropriate action.
  - takes appropriate action to promote and support the safety and welfare of students, at home, at College, in the community, online and in the work place.
  - has established procedures for reporting and dealing with allegations of abuse against members of staff
  - ensures the safe recruitment of staff in compliance with appropriate legislation.

- In developing its policies and procedures, the College, will take account of guidance issued by the Department for Education (DfE), Wirral Safeguarding Children Partnership, Merseyside Adults Safeguarding Board and other relevant agencies, bodies and groups.

- All staff, including agency and substantial contractors (such as Aramark) will receive training to familiarise themselves with safeguarding and protection issues, their responsibilities and Wirral Met College policies and procedures which will be regularly updated. In addition, to provide staff with knowledge and skills to ensure

effective safeguarding of children and adults at risk, safeguarding e-bulletins will be disseminated through email and staff meetings.   The Be Safe Information Portal on the staff intranet is also in place and maintained.

- Aa member of the Senior Leadership Team nominated as the Designated Safeguarding Lead (DSL) with lead responsibility for safeguarding and protection issues. They will be assisted by the College Safeguarding Manager (CSM) and other managers, who have also received the appropriate training and are authorised to act on behalf of Wirral Met College.

- DSL, CSM and other Designated Managers will undertake higher level training to enable them to give advice and guidance, make decisions about safeguarding and protection issues and take appropriate action. Refresher training will take place at least every 2 years.

- The Board of Governors will receive an annual report which will review how safeguarding and protection duties have been discharged in line with statutory guidance: Keeping Children Safe in Education (September 2021).

- Referrals to the Integrated Front Door will, as far as is practicable, be made by the College Safeguarding Manager or another Designated Manager.

- College staff will not have a direct role in investigating safeguarding or protection issues personally, but will work with other agencies as appropriate.

Supporting Students

- The College recognises that students who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. The College may be the only stable, secure and predictable element in their lives.

- The College accepts that the behaviour of a student in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

- The College will support all students by:

  - ensuring the content of the curriculum includes social and emotional aspects of learning; through tutorials and other curriculum contexts, students are encouraged to talk about feelings and deal assertively with pressures, are listened to and know to whom they can turn for help and advice;

  - providing students with a range of appropriate adults to approach if they are in difficulties; and ensuring that students are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it,' supporting students' development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying;

- ensuring a comprehensive curriculum response to online safety, enabling students to learn about the risks of new technologies and social media and to use these responsibly;

- liaising and working together with other support services and those agencies involved in safeguarding and promoting the welfare of students;

- ensuring that the curriculum will help students stay safe, recognise when they do not feel safe and identify who they might or can talk to. Support students to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that they may be coerced into including grooming, sexting and harmful sexualised behaviour';

- having a behaviour policy that is aimed at supporting vulnerable students in the College, which enables students to know that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;

- ensuring repeated hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under Safeguarding procedures and monitoring students who have been identified as having welfare or protection concerns and providing appropriate support;

- acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a student's life that may be a threat to their safety and/or welfare (Working Together to Safeguard Children, 2018 and KCSIE 2021)

- ensuring sexual harassment and sexual violence is not tolerated and students are enabled to raise concerns and feel they will be listened to, taken seriously, supported accordingly and the incident investigated.

- liaising with a range of agencies that support the student such as Health Services, Wirral Social Care (both children and adults), Community Matters, Family Matters, Child and Adolescent Mental Health Services, Special Educational Support Services, Youth Offending Service, Prevent Merseyside & Channel Panel and the Educational Psychology Service.

- ensuring that when a student who is the subject of a Child Protection/Child in Need Plan leaves, their information is transferred to the new provider within 2 weeks and that the child's Social Worker is informed that the child has moved;

- acknowledging that a child that is looked after (CLA) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep the CLA and previously looked after children safe. It is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group;

- applying the Fitness to Study Policy as an alternative to the standard Student Discipline and Progress Policy where a student's poor behaviour is directly linked to their disability or learning difficulty;

- applying the Use of Reasonable Force Policy to ensure that if a student's behaviour is putting themselves or others at risk of physical harm, physical intervention is used only as a last resort and with minimal risk of causing harm to the individual.

Inter-Agency Working

- The College will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police, and the integrated front door.   Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

- The College will ensure that relevant staff members, mainly the College Safeguarding Manager, will participate in multi-agency meetings and forums, including initial child protection conferences/reviews, associated core groups, child in need meetings to consider individual children and contribute to associated plans.

- The College will participate in safeguarding practice reviews, other reviews and file audits as and when required to do so by the Wirral Safeguarding Children Partnership. It will ensure that there is a clear process for gathering the evidence required for reviews and audits, and embed recommendations into practice and compile required actions within agreed timescales.

Legal Framework

This policy and procedure is driven by the following legislation and guidance:

- The Children Act 2004
- The Education Act 2002
- The Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (September 2021)
- The Counter Terrorism & Security Act 2015
- The revised Prevent Duty 2015
- The Care Act 2014
- Domestic Abuse Act 2021

Monitoring and Review

- The implementation of this policy will be reviewed on a termly basis through the safeguarding steering group and an annual basis in the form of a report to the Board of Governors.

- The policy and procedure will be approved on an annual basis by the Board of Governors.
- Safeguarding, Protection and Promoting the welfare of children and adults at risk, particularly the number of cases, types of issues presented and training compliance will be monitored regularly by the Board of Governors.

Additional Policies and Procedures

      a. Policy on Recruitment of Ex-Offenders
      b. Whistleblowing Policy and Procedure
      c. Storage and handling of Disclosures Policy
      d. Staff Development Policy
      e. Recruitment and Selection of Staff Policy and Procedure
      f. Policy and Procedure for Placing Students on Work Placement
      g. Data Protection Policy
      h. Health, Safety and Welfare Policy
      i. Student Anti Bullying Policy
      j. ICT Usage Policy – Staff
      k. ICT Usage Policy – Students
      l. Equality & Diversity Policy
      m. Guidance for Working with Young People and Adults at risk
      n. Students Social Media Guidance
      o. Staff Social Media Guidance
      p. Student Discipline and Progress Policy and Procedure
      q. Tutorial Policy
      r. Disciplinary Procedure (Staff)
      s. Fitness to Study Policy
      t. Use of Reasonable Force Policy
      u. Drugs Policy
      v. Safeguarding code of practice for Live-Streaming
      w. Taking part in live-streamed lessons a guide for students, parents & carers.

This Policy and Procedure has been ratified by Wirral Safeguarding Partnership Board, October 2021.

Child/Adult at Risk Protection Procedure

All staff should recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These additional barriers and challenges can include:

- o assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- o the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- o communication barriers and difficulties in overcoming these barriers.

Staff also need to be aware that children can abuse other children. This is generally referred to as peer on peer abuse.   Peer on peer abuse can take many forms. This can include, but is not limited to:

- o bullying (including cyberbullying);
- o sexual violence and sexual harassment;
- o physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- o sexting
- o initiating/hazing type violence and rituals.

More information is provided under Appendix 1.

The College has a Student Anti-Bullying Policy in place to respond to initial peer on peer abuse.   If an incident of peer on peer abuse has caused or is likely to cause significant harm, this includes physical assault, sexual harassment, sexual assault/violence, the following procedure needs to be instigated.

In all circumstances of student being at risk of or is likely to be at risk of signification harm the following procedures should also be instigated immediately.

For **ALL** types of suspected abuse/allegation this procedure must be instigated.

How to deal with suspected/allegation of abuse

- You must take the information seriously and deal with it quickly, with sensitivity and with respect for the student. Appendix 1 provides guidance about categories of abuse we are protecting against and other specific safeguarding issues such as radicalisation & extremism, criminal and sexual exploitation, peer on peer abuse, domestic abuse, sexual violence/harassment etc.

    Receive:

- Listen carefully to what is being said and remain calm.
- Do not interview the student. Just let the student talk normally and without interruption.
- Keep questions to a minimum; just clarify what is being said, without pressure, to be sure you understand what the student is telling you.

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- Avoid leading questions or comments, do not put words in the student's mouth or finish off sentences. Do not jump to conclusions. Remember the student may have learning difficulties.
- When the student is telling you things, clarify terms that may be open to interpretation such as frequently, sometimes, often, always, never, possibly, probably etc.
- Do not comfort the person physically or ask to see any physical signs, especially if this means moving or removing clothing.
- Don't be judgemental – remember that you are **NOT** investigating the matter

Reassure:

- Reassure the student that by telling you, they have done the right thing and you hear what they are saying
- **DO NOT** promise confidentiality. Students who have sufficient maturity or capacity to consider matters concerning themselves have the same rights to professional confidence and confidentiality as adults, irrespective of their age. This includes the rights to have certain confidences kept from parents/carers. ***The exception to this principle is the issue of safeguarding and protection of children and adults at risk.*** You should make it clear to the student that you cannot guarantee confidentiality.

Respond:

- Inform the student that you must pass the information on, but only those that need to know about it will be told.
- Reassure them that they will be kept informed of all developments.

Record:

- Record the details using the students own words, verbatim if possible, even if this means using unsavoury language or swear words do not sanitise the words.
- Read the information back to them. This will help clarify the situation. This is particularly important to students who find reading difficult.
- You don't have to provide a copy of this record to the student; they can access this through other means at a later time.
- In addition, it is perfectly acceptable for you to include a separate statement of your professional judgement, any changes in behaviour you have witnessed and/or your opinion so long as you make sure these are clearly identified as such.
- You must contact the Safeguarding Manager/Designated Manager immediately, by phone.
- Once you have spoken to the Safeguarding Manager/Designated Manager you must record the information on Safeguard. Do not put any safeguarding information on ProMonitor, other than a brief comment indicating that a safeguarding referral has been made but omitting any further detail. -
- Appendix 3 provides further guidance about Do's and Don'ts when dealing with a safeguarding issue.

Designated Managers

The following Managers are Designated Managers and can advise and decide on matters of safeguarding and protection.

Designated Manager	Safeguarding Role	Contact
Lorraine Jones Safeguarding Manager	Matters relating to students, staff and processes.	0151 551 7032 0790 401 6154
Jess Raybould Deputy Safeguarding Manager	Matters relating to students	0151 551 7032 07852 000 983
Ste Bailey Executive Assistant Principal, Student Support	Designated Safeguarding Lead (DSL) with lead responsibility for safeguarding and protection.	0151 7012 07827 983 488
Jayne Bayley Campus Manager	General advice and guidance concerning protection incidents	0151 551 7952 07854696818
Paul Crawford Campus Manager	General advice and guidance concerning protection incidents	0151 551 7694 07762 134 709
Karen Christian Assistant Principal: Visitor Economy, Health, Care and Public/Professional Services	General advice and guidance concerning protection incidents	0151 551 7613 07852 000 990
Jade Gibson Assistant Principal: Quality	General advice and guidance concerning protection incidents	0151 551 7036 07583 067 798
Ella Tsui-Lau Assistant Principal: STEAM & Apprenticeship	General advice and guidance concerning protection incidents	0151 551 7417
Pooja Furniss Director of HR	General advice and guidance concerning protection incidents	0151 7411 07852 000 923
Phil Jones Vice Principal	General advice and guidance concerning protection incidents	0151 551 7417 07848147403
Chris Carter Vice Principal	General advice and guidance concerning protection incidents	0151 551 7611
To ensure that advice is available at all times (eg during holiday periods), **in the event that the Designated Managers are not available** then the following managers can be contacted.		
Michael Norton Deputy Principal	General advice and guidance concern protection incidents	0151 551 7411 07711 079 445

Sue Higginson Principal & CEO	General advice and guidance concern protection incidents	0151 551 7411
		07904 017 592
If staff have safeguarding concerns about one of the above managers then the Principal should be contacted immediately.		
Is staff have safeguarding concerns about the Principal then the matter should be referred to the College's Chair of Governors through the Clerk of the Corporation		
Tim Kelly Chair of Governors	Safeguarding and protection concerns relating to the Principal ***ONLY***. Contact through Lesley Venables, Clerk to the Corporation.	07759660745
		07895177666

- The Board of Governors have decided that there should be no nominated Governor with specific responsibility for safeguarding issues. The Chair will assume this accountability on behalf of the Board as necessary.

- In the unlikely event that a Designated Manager is not contactable (i.e. evening time) the Duty Manager is empowered to exercise discretion and judgement in the prevailing circumstances and may make a referral to the Emergency Duty Team (EDT) or Police depending on the circumstances. (Follow guidance on the Staff Intranet (Safeguarding, Designated Managers section). You must inform the Safeguarding Manager or a Designated Manager, as soon as possible, on the following day in accordance with this policy and procedure.

Duties of Safeguarding Manager/Designated Managers receiving Record of Suspected/Allegations of abuse

- Where possible, formal referrals will be done through the College Safeguarding Manager or another Designated Manager. In this section the term Designated Manager (DM) is used.

- The designated manager (DM) should request the information is recorded on Safeguard as a concern, from the referrer as soon as possible after the initial contact and check that enough detail has been provided for a formal referral if needs be.

- The DM should ascertain whether or not the *student* has sufficient 'capacity' to be able to understand and make decisions about the next steps on their own behalf.

- A link to the Electronic Multi Agency Referral form (E-MARF) (for under 18's), is provided under Designated Managers section on the Safeguarding webpage on the staff intranet.

- In general, the DM should always discuss any concerns the college may have with the student's parents; they need to know why we are concerned about their child.

They also need to be aware that the referral is being made and comment as appropriate. **However, if the DM believes that speaking to the student's parents would place them at greater risk or lead to loss of evidence for a police investigation, concerns will not be discussed with parents.**

- If the student does not have the capacity to make decisions the DM may seek further advice from Integrated Front Door. Contact details are provided in Designated Managers section on the Safeguarding webpage on the staff intranet.

- If the DM decides that they must refer the disclosure, they should contact either the Integrated Front Door (if out of hours the Evening Duty Team) or the Police. The date and time of the contact, the duty officer's name and any case no./reference should be recorded. The E-MARF should then be completed and submitted. The DM should either act as the communication channel to the student or nominate the manager of the referring member of staff to arrange so. Where any communications with external agencies follow the initial referral, prompt feedback should be provided to the *student*.

- The DM should ensure that all actions taken in relation to the incident are recorded on Safeguard.

- In the case where the disclosure or concern is made by a *student* against a member of staff, the DM should follow the procedure outlined in Managing allegations against staff members.

- In the case where the disclosure or concern is made by a *student* against another student (peer on peer abuse) the DM will need to consider if the Student Anti Bullying Policy and Procedure would be more appropriate in the first instance and perhaps the Student Discipline & Progress Policy or Fitness to Study Policy need to also be instigated and liaise with the appropriate College Manager. If the incident involves physical assault, sexual harassment, sexual abuse/violence, hate crime or places a student at risk of significant harm, advice will be sought from Integrated Front Door and/or the Police if appropriate and will take appropriate action to ensure the safety and welfare of all students involved, making associated referrals as required.

- Attendance at Strategy Meetings, Initial Child Protection Conference/review, Core Group Meetings or Child In Need Meetings will be the responsibility of the College Safeguarding Manager or another Designated Manager, who have received training, and are authorised to act on behalf of Wirral Met College.

Record Keeping

- Staff must not retain safeguarding information or record it on pro-monitor. It is very important that all information is secure. The college uses the software platform Safeguard to manage its safeguarding records.
- Child Protection records will be kept until the 25th birthday. Adult protection records will be retained for 10 years or up to 65th birthday. Records relating to students with a looked after/care leaver status will be retained for 100 years.

- Under no circumstance should any safeguarding or protection related information be recorded on Pro-Monitor.

Support for Staff

- This policy and procedure is available to all staff via the staff intranet.
- Training is provided at induction, within probationary period and refreshed every three years, with regular e-bulletins and updates on a monthly basis.
- Dealing with an allegation of abuse can be particularly distressing. Staff who are affected as such can request support through their Line Manager, Safeguarding Manager or HR.
- Specific roles within the college i.e. Pastoral Support Mentors, Counsellors, Safeguarding Manager and Deputy Safeguarding Manager receive regular supervision sessions

Accessing Early Help Intervention (Under 18's) Procedure

Introduction

Sometimes a student may give us cause for concern in matters relating to their welfare that is not a child protection issue. In these instances, your concerns should be discussed with the student and documented using the Safeguard software and discussed with the Safeguarding Manager. You must inform the student you are doing this.

Team Around the Family (Multi Agency Support/Level 3)

- On receipt of the concern the Safeguarding Manager will make a decision and take appropriate action and if thresholds are met the College Safeguarding Manager will contact the student/parents to discuss further.
- Completion of the Early Help Assessment Tool and associated assessment tools will be undertaken by the Safeguarding Manager or another appropriate member of staff. The Safeguarding Manager will assume the role of Lead Professional if/where appropriate.
- Attendance at Team Around the Family meetings will be the responsibility of the College Safeguarding Manager as much as is possible or another appropriate member of staff identified.

Team Around the Student (Single Agency/Level 2)

- In cases where the student's needs can be met through internal support mechanisms the Safeguarding Manager will instigate the Team Around the Student processes if appropriate.

Record Keeping

- Staff must not retain safeguarding information or record it on pro-monitor. It is very important that all information is secure. The college uses the software platform Safeguard to manage its safeguarding records.
- Safeguarding records will be kept until 25th birthday of the student and will then be destroyed.

Support for Staff

- This policy and procedure is available to all staff via the staff intranet.
- Training is provided at induction, within probationary period and refreshed every three years with regular e-bulletins and updates on a monthly basis.
- Recognising a concern with a student and the impact this could have could be upsetting to staff. Staff who are affected as such can request support through their Line Manager, Safeguarding Manager or HR.
- Specific roles within the college i.e. Pastoral Support Mentors, Counsellors, Safeguarding Manager and Deputy Safeguarding Manager receive regular supervision sessions

Managing Allegations/Concerns against members of staff Procedure

These procedures apply to all staff (other than senior post holders); as well as to volunteers. The word "staff" is used for ease of description. Where the allegation/concern relates to the Principal or a senior post holder, then references to the "Principal" in this section should be replaced by the "Chair of Governors" and the disciplinary procedures for senior post holders used.

Introduction
- Because of their frequent contact with children and adults at risk, staff may have allegations of abuse or impropriety made against them. Wirral Met College recognises that such an allegation could be for a variety of reasons and that the allegation may or may not be true. Section 11 offers guidance on how staff can protect themselves against such allegations.

- Wirral Met College recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within Wirral Met College will do so with sensitivity; act in a careful, measured way; maintain an open mind and ensure that any investigation is thorough and not subject to delay.

Receiving an allegation or concern
- A member of staff who receives an allegation or has a concern about another member of staff should record their concerns Safeguard.

- The allegation should be reported immediately to a Senior Manager or the Safeguarding Manager. The receiving manager will inform the Director of HR immediately who will make an initial assessment of the allegation/concern. Where appropriate the Director of HR will delegate subsequent actions to another Executive/Assistant Principal or Designated Manager who should record information about the allegation/concern, the names of potential witnesses and actions taken. It is important that the Director of HR does not investigate the allegation.

Initial Assessment

- The Director of HR should make an initial assessment of the allegation/concern on the basis of the information received, consulting with the (internal) Designated Safeguarding Lead, and if deemed necessary with the Local Authority Designated Officer (LADO). Notwithstanding, the LADO should be informed if the member of staff is alleged to have:

  - behaved in a way that has harmed, or may have harmed, a student;
  - possibly committed a criminal offence against, or related to, a student; or
  - behaved towards a student in a way that indicates they are unsuitable to work with children and/or adults at risk

- The initial assessment will need to consider whether:
  - an investigation should take place;
  - the member of staff should be suspended pending an investigation.
  - If so then Wirral Met College Disciplinary Procedure should be followed
  - the matter should be referred to the police;
  - the matter should be referred to the Integrated Front Door
  - a combination of these should be instigated;
  - a referral is made to DBS

Enquiries and Investigations

- Enquiries by the LADO or the police are not to be confused with internal, disciplinary enquiries by the College. Wirral Met College may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct Wirral Met College to act in a particular way; however, Wirral Met College should assist the agencies with their enquiries.
- Wirral Met College shall consider holding in abeyance its own internal enquiries while the formal police or LADO investigations proceed; to do otherwise may prejudice the investigation. Wirral Met College would only suspend if it intended to conduct an internal investigation in accordance with the disciplinary procedure.
- If there is an investigation by an external agency, for example the police, Wirral Met College should normally be involved in, and contribute to, the inter-agency strategy

discussions. Appropriate confidentiality will be maintained in the interests of the member of staff about whom the allegation is made.

- Subject to considerations of confidentiality and/or objections from the police or other investigating agency, Wirral Met College will:

  - inform the *student* and/or parent/carer that the investigation is taking place and what the likely process will involve.
  - inform the member of staff against whom the allegation/concern was made of the fact that the investigation is taking place and what the likely process will involve.

- If the allegation is against a member of staff who is employed by an external agency, the employing agency will be notified immediately and be involved in any subsequent processes.

Suspension of Staff

- Suspension should not be automatic. In respect of staff other than the Principal, suspension can only be carried out by the Principal, or delegated senior post holder. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in her/his absence, the Vice Chair). In all cases the Director of HR should be informed.
- Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

- Suspension should only occur for a good reason. For example, where:

  - a *student* is at risk;
  - the allegation/concern is potentially sufficiently serious to justify dismissal on the grounds of gross misconduct;
  - it is necessary for the good and efficient conduct of the investigation.

- If suspension is being considered, processes under the College's Disciplinary Procedure will be followed and the member of staff should be encouraged to seek advice from a trade union or work colleague.

- Where a member of staff is suspended the Chair of Governors and the Clerk to the Corporation should be informed of the suspension in writing.

- Only senior staff that need to know of the reason for the suspension should be informed.

- The Principal should give consideration to what information should be made available to the general population of Wirral Met College or the public, taking due regard of the need to avoid unwelcome publicity and to protect the reputation of Wirral Met College.

- The suspended member of staff should be given appropriate support during the period of suspension. S/he should also be provided with information on progress and developments in the case at regular intervals.

- The suspension should remain under review in accordance with Wirral Met College disciplinary procedures. A member of staff who has been suspended may appeal for the suspension to be lifted. The appeal shall be in writing to the Clerk to the Corporation.

The Disciplinary Investigation

- The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures, using the Guidelines for Investigating Officers. That the member of staff resigns or offers to resign shall not prevent the procedure from reaching a conclusion.

- A disciplinary hearing will be held in accordance with college procedures and where the allegations are substantiated, disciplinary action will be taken and the member of staff informed of their right of appeal.

- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

- The party raising the allegation/concern should be informed of the outcome of the investigation and proceedings if/where appropriate. This should occur prior to the return to College of the member of staff (if suspended).

Referrals to Disclosure & Barring Service (DBS)

- If it is determined that the staff member poses a risk to children and or adults at risk a referral to the DBS will be required.

- This referral will be made by the Deputy Principal.

- Consideration will also be given as to whether the Teaching Regulation Agency should also be informed.

Allegations without foundation

- Obviously false allegations may be indicative of problems of abuse elsewhere. The LADO and other agencies may act upon the information.

- Where a false allegation/concern has been identified:

- the member of staff against whom the allegation was made will be informed orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.

- the persons involved in the allegation/concern will be informed of the outcome and the reasons
- a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken will be filed.

Record Keeping

- It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

- All records relating to members of staff will be held in the HR department.

- If a member of staff is dismissed or resigns before the disciplinary process is completed, s/he should be informed about Wirral Met College's statutory duty to inform the Disclosure & Barring Service.

Monitoring Effectiveness

- Where an allegation has been made against a member of staff, the Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of Wirral Met College's procedures and/or policies and/or which should be drawn to the attention of the WSCB. Consideration should also be given to the training needs of staff.

Protecting yourself from allegations

- All staff should maintain strict professional boundaries with students. The forming of a personal relationship with a *student* is strongly discouraged and in certain circumstances could lead to disciplinary action.

- It is recognised that some roles are designated to work with close contact with *students* including working alone with them. However, you should seek to keep your personal contact with *students* under review and seek to minimise the risk of any situation arising in which misunderstandings can occur.

- Consider taking the following sensible precautions, where possible and appropriate, when working alone with a *student*:

  - work in a room where there is a glass panel in the door, leave the door open or make sure that other adults visit the room occasionally

  - always observe personal boundaries and physical personal space

  - avoid working in isolation with a *student* unless thought has been given to safeguards and other colleagues or a manager is made aware

  - avoid being alone with a *student* where it is not an expected part of your normal job role

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- do not use personal mobile phone numbers or private e-mail addresses for contacting *students* for non-College purposes and that are not associated with your role

- do not give *students* lifts in your cars

- do not arrange to meet *students* alone outside of timetabled hours

- log out of MS Teams when not in use

- do not 'chat' to *students* on social websites or accept them as 'friends'

- avoid regular contact with *students* in their "free" time that could be construed as attempting to form a relationship with them

- Where necessary, if you have to meet or transport a *student* alone, then inform your College Manager or the parent/carer of the *student* in advance of doing so.

- Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a *student* even when the *student* is over the age of consent.

- Any use of physical force or restraint against a *student* must be documented and drawn to the attention of the relevant College Manager immediately.

- All staff should follow the Guidance for Working with Young People and Adults at risk, which has been written to help ensure the college is a safe environment for all students and staff.

- All staff should follow the Safeguarding code of practice for live streaming and ensure that the taking part in live-streamed lessons: a guide for students, parents and carers is shared with appropriate parties.

Risk Management Procedures

Introduction

Where a *student* or potential *student* discloses information which suggests that a potential safeguarding risk needs to be considered or when staff become aware that a *student* may pose a potential safeguarding risk to other *students*, then the Safeguarding Manager, the College Manager of the appropriate area or other manager identified in this policy, should be informed. The information should also be recorded on Safeguard.

Risk Assessment and Risk Management Plan

- The circumstances of the potential risk will be investigated normally by the Safeguarding Manager or a person nominated by the Safeguarding Manager. If

the *student* is deemed to pose a risk then a risk assessment will be undertaken and a risk management plan will be devised and implemented where appropriate.

   a. All Risk Management plans will be discussed with and authorised by the Designated Safeguarding Lead. In the case of criminal convictions the College Manager for the curriculum area will also be involved.

   b. Where possible the risk assessment and risk management plan will be agreed between the College and the *student*, if appropriate the parent/carer of the student and any relevant agencies or support services e.g. Social Care, CAMHS, Youth Offenders Service (YOS), Probation Service, Sexual Offenders Registration Unit.

   c. The risk management plan may contain conditions which the student must adhere to as a condition of enrolment or continuation of study. Refusal to enrol or a decision to exclude a *student* on the basis of a safeguarding matter should only be on the basis of failure to observe conditions applied, or because the risk assessment process has been unable to establish control measures which can adequately reduce the level of risk. Any decision to refuse enrolment or to exclude must be done within the appropriate College procedures

   d. Risk Management Plans will be in place for an academic year and will be reviewed on a termly basis or as required/updates.

- That a *student* or potential *student* may declare or disclose circumstances that indicate a potential risk should not prejudice the normal enrolment process on the basis of academic suitability and selection, or continuation on a course if already undergoing study.

Confidentiality

As for all students, conditions of privacy, confidentiality and data protection should be observed at all times. Involvement of staff should be on a "need to know" basis sufficient to assess and manage the risk(s). All information will be stored securely with the Safeguarding Manager. Under no circumstances should information be recorded on Pro Monitor.

Record Keeping

- The risk assessment and management plan will usually be for no longer than an academic year. It will be recorded and be subject to review when specified in the plan, if/when other information becomes available or termly.
- Staff must not retain safeguarding information or record it on pro-monitor. It is very important that all information is secure. The college uses the software platform Safeguard to manage its safeguarding records.
- Safeguarding records will be kept up to the 25th birthday for children and for 10 years or up to 65th birthday for adults and will then be destroyed.

Support for Staff

- This policy and procedure is available to all staff via the staff intranet.
- Training is provided at induction, within probationary period and refreshed every three years with regular e-bulletins and updates on a monthly basis.
- Being exposed to information related to offending behaviour can be particularly distressing. Staff who are affected as such can request support through their Line Manager, Safeguarding Manager or HR.

Procedure for Dealing with the Death of a Student

Introduction

These procedures aim to ensure that support is provided to the immediate family, where appropriate, and to staff and students of the College, where affected. It also aims to provide a set of procedures for staff to follow when dealing with any death of a student. Individuals using this policy should see it as a minimum guide to help them deal with the situation; it should not restrict their actions as each event will be different. Nevertheless, there is a need to observe legalities, and a need to protect the interests of the College in cases where negligence might be alleged.

The Death of a Student on Site or in the Care of College Staff

- On the first discovery or notification of a death on College premises or while a student is in the care of College staff:

- If a body is discovered by any college employee or the discovery is reported to any college employee, the following action must be taken:
  a) Secure the area and ensure that no one is allowed to enter the area.
  b) Inform the Principal's office which will inform the Police
  c) Summon support from the Facilities team to maintain a secure environment
  d) On no account should the body be touched or moved and no action other than that outlined above should be taken without direction from the Police.
  e) Record details of who found the body, at what time, details of who was at the scene at time of discovery, and when the deceased was last seen alive (if known).
  f) A College manager or the member of staff in charge of an off-site group should take charge of the immediate incident until the Police arrive.

- The Principal's office will also inform the Designated Safeguarding Lead, who will take the lead in ensuring all necessary actions in Appendix 4 are taken.

The Death of a Student Outside of College

- Information about a student death may enter the College from a variety of possible sources and arrive on the desk of any member of the academic or support staff. The report of death may come from someone who says they are a relative or friend, or via a telephone call. Obviously, it is important to be confident that the report is true before taking any action. Whether or not the report is true, it would be insensitive to contact the student's home to verify. However, discrete enquiries will need to be made to try and corroborate the story from a reliable source.

- Once the death is confirmed, the Designated Safeguarding Lead will take the lead in ensuring all necessary actions in Appendix 4 are taken.

The Death of an ex-student

Procedure for a student not enrolled but who may have attended in the last three years:

- Verification of death.
- The Assistant Principal - MIS should be informed, they will ensure all records relating to the learner are archived appropriately and no further correspondence sent to the deceased. Also to include Finance,
- Learning Resource Centre, Additional Learning Support, Pastoral Support Mentors etc.
- The relevant Curriculum Manager should be informed who will inform relevant staff and if appropriate, learners who may have known the learner. Curriculum also to ensure that any locally held records/letters etc are sent to the Assistant Principal - MIS for appropriate archiving
- The Director of Marketing should be informed who will deal with any press requests.

The Death of a Prospective Wirral Met College Student

Procedure for a prospective student who has applied for a Wirral Metropolitan College course.

- Verification of death.
- The Director of Student Services will ensure all admissions records relating to the learner are archived appropriately and no further correspondence sent to the deceased.
- The Assistant Principal - MIS should be informed, they will also ensure all records relating to the learner are archived appropriately and no further correspondence sent to the deceased. Also to include Finance, Additional Learner Support, Pastoral Support Mentors etc.
- The relevant course staff should be informed who will ensure any local records/letters are sent to the Assistant Principal -MIS for appropriate archiving.

Appendix 1 – Abuse, Specific & Other Specific Safeguarding Issues

(Taken from Keeping Children Safe in Education: Statutory Guidance September 2021)

Indicators of abuse and neglect (under 18's)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.   Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

- **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.   Sexual abuse can take place online, and technology can be used to facilitate offline abuse. (Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (refer to peer on peer abuse) and all

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staff should be aware of it and of the college's policy and procedures for dealing with it.

- **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following forms and patterns of abuse against adults are taken from Wirral Adult Safeguarding Policy and Procedures: (adults at risk)

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic abuse** – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence and FGM (female genital mutilation), forced marriage as well as coercive and controlling behaviour in intimate or familial relationships.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery**– encompasses slavery, human trafficking, forced labour and domestic servitude. 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.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, hate crime or religion
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

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- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health and surroundings and includes behaviour such as hoarding. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this without external support.
- **Radicalisation is** comparable to other forms of exploitation, such as grooming and child sexual exploitation. Radicalisation's aim is to attract people to another way of reasoning, inspire new recruits and embed extreme views and persuade vulnerable people of another cause's legitimacy. This may be through face-to face encounters or through social media. There are a number of factors that may make a person susceptible to exploitation by violent extremists. None of these factors should be considered in isolation but in conjunction with the individual circumstances.

Key Specific Safeguarding Issues *(Taken from Keeping Children Safe in Education: Statutory Guidance September 2021)*

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. **Child Criminal Exploitation (CCE**)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and

professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship

Peer on Peer Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy)

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
• sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
• up-skirting, 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;
• • initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the college's policy and procedures with regard to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it

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 and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Female Genital Mutilation

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of

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FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.   (The College Safeguarding Manager will support you with this)

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff however, are well placed to observe children 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 children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the designated safeguarding lead or a deputy.

Please contact the Mental Health and Wellbeing Team, via the Additional Learning Support department, for further guidance and support.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The college's designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral

Other Additional Safeguarding Concerns:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Relationship & Domestic Abuse
- Homelessness
- Honour Based Abuse
- FGM
- Forced Marriage

Any concerns need to be documented using the Safeguard Software and the Safeguarding Manager or other Designated Manager contacted immediately.

For further information:

www.wirralsafeguarding.co.uk

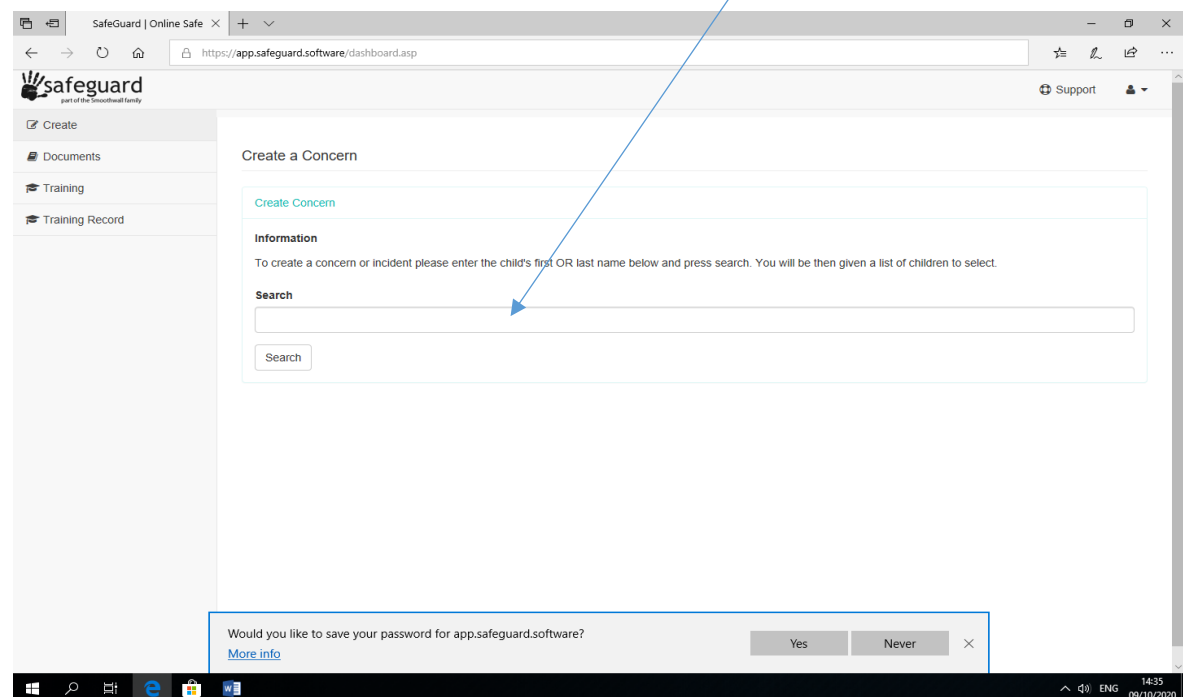If you have concerns about a child or young person contact: 0151 606 2008

Appendix 2

Accessing Safeguard

Access Staff Intranet and click on Safeguard
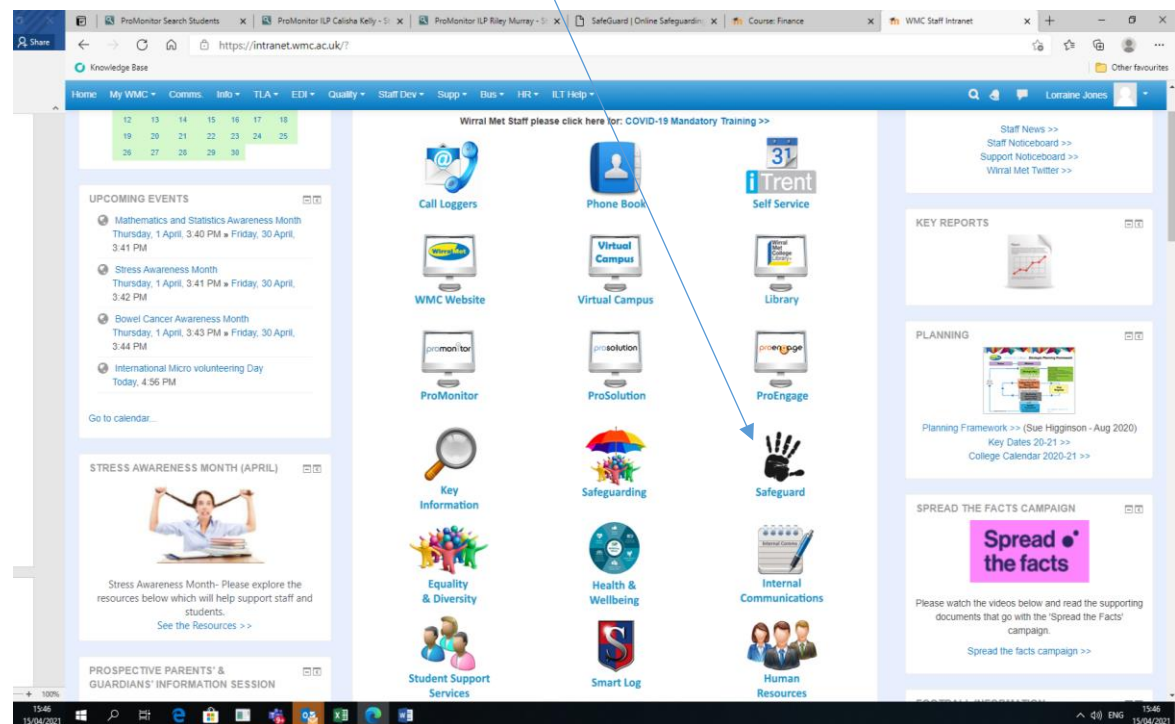
Log in using your college email account and your password. Search for your student by first or surname, alternatively use the student number

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When you have identified your student from the list of names you will be presented with click on create concern

Identify the concern you have about the student by ticking the appropriate box in the list of categories

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Record the information, including all details in the text box and when complete click on create concern

You MUST still contact the Safeguarding Manager or another Designated Manager by telephone if you believe that a student is at immediate risk of significant harm.

Appendix 3 - Do's & Don'ts Staff Guidance

If you have concerns regarding a student, or a student discloses their concerns to you, try to remember the following Do's and Don'ts

DO

- Listen to the student carefully and take what is said seriously
- Watch and notice any changes in behaviour
- Re-assure the student: let them know what has happened is not their fault
- Reach agreement with the student about what happens next, they should be in control
- Tell the student what YOU are going to do next
- Watch your reactions & body language
- ASAP AFTER talking, record what the student has said, using their words, on the Safeguard software.
- Try not to touch or cuddle the student who is talking to you it may trigger unwanted reactions or emotions
- Refer this to your Safeguarding Manager or another Designated Manager immediately.

DON'T

- Don't interrogate. Evidence could be lost if you prompt the student or put words into the student's mouth.

- Don't show anger towards the accused person. The student may have mixed emotions about this person and a sense of loyalty. They may want the abuse to stop but may not want to be separated from the person who could be their prime carer.

- Don't promise confidentiality. The Safeguarding, Protection of Children and Adults at Risk Policy & Procedures do not allow us to keep disclosures confidential.

- Don't make false promises that you may not be able to keep. Reassure the student that they have done the right thing but don't assume that the 'abuser' will be punished or imprisoned, as this may not happen.

- Don't forget that there may be other children involved that we may not know about and could be affected by this disclosure; we have a duty towards them too.

- Don't assume that someone else knows and will help – you must act.

  Don't let the matter go without reporting it, or discussing it with the Safeguarding Manager or another Designated Manager.

Appendix 4(a):   Action Checklist for death of any current student

Student name: **Student number:**

Action to be Taken	Responsibility	Timescale	Initials when complete	Date
Inform Chair of Governors	Principal	As soon as death is confirmed		
Inform relevant Curriculum Manager, Maths and English Managers	Executive Assistant Principal: Student Support	As soon as death is confirmed and (if relevant) Police agree information can be shared. This would normally be after the next of kin has been informed.		
Inform relevant staff and fellow students (to include relevant ALS, Maths and English Tutors, Pastoral Support Mentors, etc. who may have worked with the student, also consider student finance if the student received vulnerable bursary payments)	Curriculum Manager; Maths and English Managers, EAP: Student Support	As above (Accept that some students may talk to the press so ensure that they receive only factual information not speculation.)		

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Send letter of condolence to the family/next of kin	Principal	As soon as is deemed appropriate.		
Ascertain funeral arrangements and decide who/if the College will be represented formally.	Curriculum Manager	Once funeral date and details are released		
Ensure all records relating to the student are amended appropriately and no further correspondence sent to the deceased. To include: • Registers • Pro-Solution • ProMonitor • Automated texts/letters	Assistant Principal: MIS	As soon as death is confirmed.		
Ensure any outstanding financial issues between the student and the college are dealt with appropriately	Head of Finance	As soon as death is confirmed		
Ensure any outstanding library loans are dealt with appropriately	LRC Manager	As soon as death is confirmed		
Inform any relevant work placement provider/employer/sub-contract provider.	College Manager	As soon as death is confirmed and (if relevant) Police agree information can be shared.		
Agree appropriate bereavement counselling or informal emotional support for students from Counsellors/Pastoral Support Mentors	ALS Manager; Safeguarding Manager	As soon as death is confirmed		

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Ensure any belongings such as contents of locker are returned to student's family	Director of Estates	After funeral has taken place.		
Offer emotional support to affected staff	Relevant Managers; Director of HR	As soon as death is confirmed		
Be aware of press interest, if applicable	Director of Marketing in liaison with Principal	As necessary		
Delete any marketing/promotional materials featuring the student, to ensure they are not used in the future	Director of Marketing	As soon as death is confirmed		

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Appendix 4(b):   Additional Action Checklist for death of a student on-site or in the care of College staff.

Action to be Taken	Responsibility	Timescale	Initials when complete	Date
Liaise with police and coroner's office (if required)	Principal	Immediately		
Liaise with the Police to ensure the relevant access / security is provided if necessary Arrange for any remedial action e.g. cleaning needed once the Police provide permission for such action	Director of Facilities	As instructed by Police		
Arrange for any reports under RIDDOR to be sent to the HSE if necessary, and lead any Health and Safety investigation deemed appropriate by the Principal	Director of Facilities	As appropriate to circumstances		
Decide what, if any, form of internal investigation needs to be implemented and who will lead this.	Principal / Health and Safety Manager	As appropriate to circumstances		
Approve press releases if appropriate (in collaboration with Police press officer where necessary)	Principal (with Director of Marketing)	As appropriate to circumstances		

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Appendix 5

Guidance for teaching staff addressing a class about a death

Note: *This is not intended to be a script for talking with students. An address will need to be adapted depending on who is talking with the class and the particular circumstances of the death. Ideally the class tutor will address the class if able to contain personal emotions, as the tutor usually knows the deceased student and peers as well. Counsellors can be present for additional support or to address the class if the tutor feels unable to do this.*

I would like to extend my sympathy to all of you – both to '*John's*' classmates and the staff who taught him. I realise that you are all very shocked by this tragic news. I am sure many of you still cannot believe it has happened. It will take time to come to terms with '*John's*' death.

I appreciate that we cannot take away your pain, but I want you to know that your department and the college services will do all we can to help you through this difficult time. Some of you may feel overwhelmed, others may feel less affected, and others may re-experience past losses. Unfortunately, there are no shortcuts, and these feelings will have to be lived through. There are many ways in which people react to the death of a friend. You might experience a range of emotions including shock, numbness, anger, fear, regret etc. Physically you may be tearful, shaky, lose your concentration and motivation, feel like not eating or sleeping etc.

(Additional note if the death was by suicide) Any death is tragic, but a death by suicide is particularly difficult for us all. Many of you may feel confused, angry or guilty. You may have lots of questions – why, what could have been done, etc. Give these questions time and then talk them through with your friends, family and staff members here in college.

Department staff may attend the funeral with you and notify the Principal who will send a letter of condolence to the family.

In dealing with your loss you may wish to:

1. Talk with your classmates/tutors and your families about your feelings
2. Meet individually with a Counsellor in college.
3. Meet individually with a Learning Mentor who can provide a listening ear.
4. Have a group appointment with a counsellor if there is a group of you who were particularly close to '*John*'. I am happy to facilitate this.
5. Make a memorial card/poem to your deceased friend and/or family of the deceased.
6. Seek help from outside agencies such as CRUISE, Papyrus or www.uk-sobs.org.uk (Survivors of Bereavement by Suicide)

Further information, guidance and support regarding student suicide can also be found in 'Building suicide-safer schools and Colleges' on the college intranet here

Appendix 6 Advice for staff following a death by suicide

After the death of a student, staff members can help classmates process the information and cope with their emotions. Although you may feel inadequate and worry that you may say something wrong, by trying to understand what a student is feeling, a valuable genuineness is evoked and usually appreciated. It is helpful to draw on your own experiences of death and loss. If you have concerns about a student or group of students, please contact the Student Counselling Service or Safeguarding Manager.

Respect the family wishes regarding the death. One family may refuse to label the death as a suicide, while another family will find it acceptable to refer to their child's struggles with depression. If you are unsure about the wishes of the family, please try to clarify these e.g. with the curriculum manager.

Listen, care and do not be alarmed by tears. Students, like most people, will benefit from discussing their thoughts and concerns. This dialogue is a healthy beginning for grieving.

Minimise hysteria by maintaining a stable college environment. In addition to being professional and calm, do not use dramatic exaggerated or sensational language that will inflame a situation.

Ensure that all information given to students is honest, factual and clear. This honesty works to build up trust. It is hoped that if students need support they will be more likely to feel they can ask for it.

Use the word 'suicide' when discussing the death. It is best to acknowledge the death honestly for what it is, rather than using euphemisms. You cannot put the idea of suicide in someone's head just using the word.

Avoid providing simple explanations or glorifying the deceased student.

Suicide is a complex event with many motivating factors, usually including mental illness. When possible, it is more useful to acknowledge the deceased's achievements and problems (without divulging confidential information).

Emphasise that suicide is not a good choice for dealing with problems. Unfortunately, suicide will always be an option, but staff members can help students see other ways out of their problems.

Reinforce the reality that death is a permanent solution to temporary problems. A romantic image of suicide may blur the realisation that death is forever, while problems can be dealt with and solved.

Remind students that support and help are available in the college and in the wider community. Although their problems may be perceived as overwhelming, students need to be reassured that people who love them and professionals are available to help them tackle serious issues.

Watch for students who seem to be affected beyond the 'normal' grieving intensity and duration. The suicide of a classmate may be a trigger event for students who are experiencing mental illness or who have a history of distress themselves. Seeing how the

bereaved student is missed and eulogised may create dangerous allure for a potential copycat suicide.

Do not respond to media enquiries and direct journalists to the Principal's office. Out of respect for the grieving family, and as a form of self-protection, encourage students not to speak to the media about the death. (In previous crisis situations elsewhere, upset students made comments to the press that they later regretted. This made their grieving process more complicated and traumatic).

Take care of yourself

The death of a student can be upsetting for everyone involved. Please look after yourself, talk with colleagues and seek support as needed.

Version: 16
Status: Open

Appendix 7 – Additional measures and considerations in the event of campus closures (e.g. due to further COVID-19 outbreaks).

There have been significant changes within our setting in response to the outbreak and enforced lock downs. All college campuses are now fully open, in line with Government guidance. This annex sets out some of the adjustments that must be put back into place in the event of any future campus closure.

Despite any necessary changes to operating practices, Wirral Met's Safeguarding, Protection & Promoting the Welfare of Children and Adults at Risk Policy is fundamentally the same: students always come first, staff should respond robustly to safeguarding concerns and contact the Safeguarding Manager in line with our established safeguarding procedure.

In the event of a campus closure, arrangements are in place for students to access remote and on-line learning, similarly for staff to be able to work from home. All support services to students remain in place, albeit remotely, and incorporates pastoral mentor support, mental health, safeguarding, counselling and specialist learning support through specialist support tutors. Closure of the campuses will be reviewed regularly and in line with Government guidance. All students who fall into a recognised vulnerable group, have an EHCP or are under statutory process with children's social care must be identified and appropriate support mechanisms put in place, inclusive of regular communication with allocated social workers and virtual schools where appropriate, plus access to on-site learning by exception and in line with government and public health guidance.

Reporting arrangements

The college arrangements continue in line with our Safeguarding, Protection & Promoting the Welfare of Children and Adults at Risk Policy.

The Safeguarding Manager is: Lorraine Jones; 07904016154; lorraine.jones@wmc.ac.uk

The Designated Safeguarding Lead is: Ste Bailey; 07827983488; ste.bailey@wmc.ac.uk

The Deputy Designated Managers are:

Jess Raybould: 07852000983; jess.raybould@wmc.ac.uk
Karen Christian; 07852000990; Karen.christian@wmc.ac.uk
Jayne Bayley: 07854696818; Jayne.bayley@wmc.ac.uk
Paul Crawford: 07762134709; paul.crawford@wmc.ac.uk
Pooja Furniss: 07929233322; Pooja.furniss@wmc.ac.uk
Jade Gibson: 07583067798; jade.gibson@wmc.ac.uk
Phil Jones: 07848147403: phillip.jones@wmc.ac.uk
Chris Carter: 07983347274; Christine.carter@wmc.ac.uk
Michael Norton: 07711079445; Michael.norton@wmc.ac.uk
Sue Higginson: 07904017592; sue.higginson@wmc.ac.uk

The college's approach ensures the Safeguarding Manager, Deputy Safeguarding Manager, DSL, or a deputy safeguarding lead is always available during the college's hours of operation.

Staff will continue to follow the Safeguarding, Protection and Promoting the Welfare of Children and Adults at Risk procedure and advise the safeguarding manager or deputy immediately about concerns they have about any student, whether in college or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a student is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority.

The arrangements for contacting children's services are: contact Integrated Front Door (IFD) 0151 606 2008 for under 18's

For 18+ adults at risk contact Wirral Community NHS Trust: Single Point of Access 514 2222

Should a student in the college's view be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure.

Identifying vulnerability

The most vulnerable students must be identified, and contact made with appropriate social workers, lead professionals and key workers to notify them of the move to remote and on line learning.

This includes our students who have child looked after status, care leavers, students who are subject of child protection or child in need plan, under Team Around the Family, early help/targeted support, students estranged from parents and living in alternative accommodation, young carers and students who have an EHCP in place.

Students will receive regular contact through their allocated pastoral support mentor, mental health worker, specialist support tutor and/or their personal tutors as appropriate and in line with their individual needs. The Safeguarding Manager and Deputy Safeguarding Manager will maintain contact with allocated social workers, Independent Reviewing Officers, Virtual School and other key professionals as required.

NB Contact will be made remotely through telephone calls, text messages or emails by default, and in-person onsite by exception and in line with Government and Public Health advice.

Staff will continue to log contacts via Pro-Monitor and raise any safeguarding concerns by instigating the safeguarding procedures and contacting the safeguarding manager or another designated manager in her absence.

Staff will be aware of increased risk

The pressures on students and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work for students to undertake at home.

Staff will be aware of the mental health of both students and their parents and carers and make referrals to the College Mental Health Workers (for students) accordingly. If staff feel that a student is at risk of significant harm they should inform the Safeguarding Manager about any concerns.

The Department for Education have produced guidance to support parents: https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between students who are not currently attending our provision

Risk online

Student will be using the internet more during this period. The college may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the college.

The college continues to ensure appropriate filters and monitors are in place. Our governing body will review arrangements to ensure they remain appropriate. Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the college's code of conduct and importance of using college systems to communicate with children and their families.

Students accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the college, Childline, the UK Safer Internet Centre and CEOP.

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for online working have been issued to staff involved in live-streaming of lessons.

Allegations or concerns about staff

With such different arrangements in place students could be at greater risk of abuse from staff or online abuse. We remind all staff to maintain the view that 'it could happen here' and

to immediately report any concern, no matter how small, to either the Safeguarding Manager (Lorraine Jones), Designated Safeguarding Lead (Ste Bailey) or HR. Any allegations will be dealt with in line with our usual policy.

New staff or volunteers

All new starters must have an online induction. They must complete the online Safeguarding, Protection and Promoting the Welfare of Children and Adults At Risk training, read the Guidance for Safer Working Practice with Children and Adults at Risk, and complete the on line KCSiE Quiz.

The Safeguarding Manager will ensure new starters know who to contact if worried about a student and ensure they are familiar with the Safeguarding Procedures