

EASTLEIGH COLLEGE

SAFEGUARDING POLICY

Policy Statement

Statement of Principles

All College policies, procedures and strategies are underpinned by the College **strategy**, our values (ambition, professionalism, resilience and respect) and FREDIE (fairness, respect, equality, diversity, inclusion and engagement). The four 'pillars' of the College strategy are; sustainability and direct delivery growth, high standards and an expectation of excellence, reputation and brand, and forward scanning.

Every policy, procedure and strategy is also considered against the College's sustainability and digital commitments. The College will champion an environmentally sustainable approach across all activities and will share this knowledge with learners, businesses and regional stakeholders. This includes our human behaviour, approach to planning, how the future College will seek to operate, and how we engage with our community and region.

The College is digitally ambitious. As such a 'digital by design' approach informs decision making, delivery, planning and operations. This commitment extends to ensure that all future implementations to existing policies are also considered in a digital context, therefore supporting the sustainability first agenda with regards to College strategy.

Eastleigh College is committed to safeguarding and promoting the welfare of young people and vulnerable adults and expects all staff, volunteers and partners to endorse and practise this commitment at all times. This policy has due regard to relevant legislation including Keeping Children Safe in Education 2022, Working Together to Safeguard Children 2018 and The Hampshire Safeguarding Childrens Partnership inter-agency safeguarding procedures.

Aim:

- To safeguard all College learners, (particularly children, young people and vulnerable adults).
- To safeguard College governors, staff, volunteers and members of the subcontractor network in carrying out their duties in teaching, supervising and supporting learners at all College centres, other external facilities, in the workplace or by distance learning.

Scope:

The duty applies to:

- All learners, particularly children, young people and vulnerable adults who may need support. This includes Eastleigh College learners who study online or at any provider in our sub-contracting network.
- All governors, staff, volunteers, sub-contractors and visitors at all College centres, other external facilities, in the workplace or by distance learning, and sub-contractors.

In order to demonstrate our commitment to safeguarding and child protection we will:

- Appoint a Designated Safeguarding Lead (DSL) who will perform the duties set out in Annex C of Keeping Children Safe in Education 2022 with the support of identified deputies.
- Provide a safe environment for young people and vulnerable adults to learn in.
- Identify young people and vulnerable adults who are suffering, or likely to suffer, significant harm.
- Take appropriate action including referrals to see that such young people and vulnerable adults are kept safe, both at home and at the College.
- Ensure that appropriate and secure records are kept and maintained of all safeguarding incidents.
- Ensure that learners, staff (including lone workers), visitors, Governors, volunteers, employers, delivery sub-contractors and contractors feel safe.

- Implement safeguarding measures that exceed minimum DBS (Disclosure & Barring Service) compliance including the safe recruitment of staff.
- Ensure that safeguarding is prioritised and that safe working practices are in place in all settings (including off site venues).
- Ensure that all staff are trained in and kept updated on Safeguarding and Child Protection and have read and understood Part One of Keeping Children Safe in Education 2022 and that all staff who work closely with learners have also read Annex B of KCSIE .
- Ensure that all learners and staff, regardless of age are aware of the risks of radicalisation and extremism and how to report concerns and that British Values are promoted in lessons and in the work place.
- Maintain a safe environment for all College stakeholders.
- Maintain a completed PREVENT action plan to be shared with the sub-contractor network.
- Work proactively with external agencies and professionals on information sharing to safeguard College learners and stakeholders.
- Work proactively with external agencies and professionals to ensure we are aware of local risks and react appropriately.
- Ensure that safeguarding principles extend fully to virtual or remote delivery as may be required.
- Ensure risk assessments are in place and action as appropriate.
- Have procedures in place to safeguard all stakeholders including being able to respond effectively to incidents.
- Ensure that Governors are informed of safeguarding activity and incidents and are fully aware of their responsibility with regard to safeguarding.
- Ensure a high quality of safeguarding principles and practices in our sub-contractor network where Eastleigh College learners are taught.
- Maintain a line management framework through which staff are able to raise issue in relation to safeguarding and child protection in an appropriate, accessible and receptive environment.

Monitoring and Review

The Board, through the Standards Committee, will receive an annual report on safeguarding and child protection to an agreed schedule. The report will contain a review of the progress in implementing the policy and include progress against College targets and recommendations of the policy where appropriate.

This Policy will be reviewed annually by SMT and the Standards Committee.

The Safeguarding Procedures will be reviewed annually by SMT.

Reviewed by Head of Learner Support and Safeguarding (DSL), September 2022
 Reviewed and Approved by SMT, 16 September 2022
 Approved by Standards Committee, 30 November 2022

Employers Working with Eastleigh College Apprentices

All Eastleigh College policies refer to 'learners'. A 'learner' being defined as either an apprentice, 16-18 year old, adult, full cost or trainee. Thereby wherever a policy or procedure states 'learners' this includes apprentices.

This appendix however sets out how the Safeguarding Policy specifically supports apprentices, and the employers of apprentices by the specific examples below. These examples are not exhaustive but set out how the College's overarching Safeguarding Policy will be sought to be applied to apprenticeship provision and delivery.

- Apprentices and employers are signposted to anonymously report Safeguarding concerns via a link on the College website.
- All Trainers have had contextualised safeguarding or workplace training.
- Apprentices have half termly tutorials delivered digitally via Hubspot. these include topics such as safeguarding, Prevent and British Values.
- All College devices provided to apprentices have 'Smoothwall' installed to monitor and action concerns on internet search history and usage.
- Ensure all employers understand what their role in safeguarding apprentices is:
 - Familiarise themselves with relevant government legislation.
 - Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibility they have for the people they employ.
 - Ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present danger or threat.
 - Ensure that any people working with young or vulnerable people have had an appropriate check completed with the Disclosure and Barring Service.
 - If possible, identify a person to coordinate safeguarding across the organisation.

Employers who have employed an apprentice studying with Eastleigh College are required to undergo health and safety checks of their premises as part of the induction and enrolment process. They are also required to confirm they have a Health & Safety Policy and are also asked if they have a Staff Behaviour Policy or equivalent.

The college is able to provide support and guidance to employers, working with Eastleigh College apprentices, in understanding their role and responsibilities in Safeguarding.

Where Eastleigh College policies refer to 'learners', a 'learner' is defined as either an apprentice, 16-18 year old, adult, full cost or trainee.

Low Level Safeguarding Concerns Policy**Introduction**

This is an appendix to the College Safeguarding Policy and Procedure and should be read in conjunction with the College's Staff Code of Conduct, Disciplinary and Whistleblowing Policies, to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the College's Code of Conduct are constantly lived, monitored and reinforced by all staff.

The college deals with all concerns about adults working in or behalf of the college appropriately and promptly. The college seeks to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

This policy seeks to:

- ensure that staff are clear, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns with the Designated Safeguarding Lead/Head of HR
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour (including any patterns) that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the organisation's safeguarding system.

This policy applies to all staff at the college

Allegations that may meet the harm threshold

When anyone working in an Education Environment (including volunteers, supply staff and contractors) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside College posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the College's Safeguarding Procedures.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is one that does not meet the harm threshold as stated in the college's Safeguarding Procedures.

Defining a Low-Level Concern

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ (i.e. they believe it could be a concern) – that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Examples of such behaviour could include, but are not limited to:
 - being over friendly with Learners;
 - showing favouritism;
 - taking photographs of learners on their mobile phone;
 - engaging with a learner on a one-to-one basis in a secluded area or behind a closed door; or,
 - using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Responsibilities of staff

It is important that all staff are clear of the expectations the college stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead and as part of the college’s induction for new staff.

It is crucial that any concerns in relation to a staff member’s behaviour, including those which do not meet the harm threshold, are shared responsibly. This should be done without delay.

Where there are concerns/allegations about the Principal, this should be referred to the Chair of Governors (whose contact details can be found in the College’s Safeguarding Procedures document).

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the College’s code of conduct and expectations, they self-refer to the Designated Safeguarding Lead (DSL)/ Head of HR

Dealing with Low-Level Concerns

All low-level concerns may be shared verbally with the DSL and or the Head of HR in the first instance, but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Where the low-level concern is provided verbally, the Head of HR & Talent Development / DSL should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated. Records will remain confidential in accordance with the college’s Data Protection policies and GDPR.

Responding to a Low-Level Concern

The Head of HR & Talent Development / DSL will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher-level concern/allegation. The circumstances in which a low-level concern might be reclassified are:

- A. the threshold is met for a higher-level concern/allegation
- B. there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- C. there is other information which when taken into account leads to a higher-level concern/allegation.

Where the Head of HR & Talent Development / DSL is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Head of HR & Talent Development / DSL will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Head of HR & Talent Development / DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken. Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear that if they fail to reach the required standard or repeat the behaviour in question the College disciplinary procedure may be invoked. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the college's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate.

Monitoring of Low-Level Concerns

The Head of HR & Talent Development will securely retain confidential files on low-level concerns. A central log will be shared by Head of HR & Talent Development and monitored by the college's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either: (a) the concern (or group of concerns) has been reclassified as a higher-level concern, or (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the college's grievance, capability or disciplinary procedure.