



OAKLANDS COLLEGE

**Safeguarding Policy &
Procedure 2021.2022 – Child
and Vulnerable Adult
Protection**

DRAFT

SAFEGUARDING POLICY AND PROCEDURE

Policy 03

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1. Introduction

The College is committed to safeguarding, to creating a culture of vigilance and maintaining a safe and secure environment for all our students and will ensure that action is taken to support them if abuse is suspected. The College will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

In order to safeguard and promote the welfare of children, young people and vulnerable adults, the college will act in accordance with the following legislation and guidance. This policy applies to **all** staff, governors, and external organisations or individuals including contractors working within the college environment or on behalf of the College. The word "staff" is used for ease of description. The policy and procedures also apply to staff working at the College Nursery (Acorns).

- [Keeping Children safe in education 2021](#)
- [Working together to safeguard children](#)
- [Child abuse concerns: guide for practitioners](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [Education Act 2002 \(section 175\)](#)
- [The Children and Young Person Act 2008](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)
- [The Care Act 2014](#)
- [The Prevent duty \(June 2015\)](#)
- [Prevent Duty Guidance: for Further Education Institutes in England and Wales \(April 2019\)](#)
- [Counter Terrorism and Security Act 2015](#)
- [Serious Crime Act 2015](#)
- [Work based learners and the prevent Statutory Duty September 2018](#)
- [Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures](#)
- [Working Together to Safeguard Children \(July 2018\)](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Female Genital Mutilation Act 2003 \(Section 74, Serious Crime Act 2015\)](#)
- [Police Act 1997](#)
- [Homelessness Reduction Act \(2017\)](#)
- [Sexual Offences Act \(2003\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(May 2018\)](#)

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- [School attendance: guidance for schools \(Aug 2020\)](#)
- [Children missing education: Statutory guidance for local authorities \(September 2016\)](#)
- [Missing Children and Adults strategy \(2011\)](#)

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The College will keep its policy and procedures under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and vulnerable adults.

2. Designated Staff with Responsibility for Safeguarding

The ultimate responsibility for safeguarding students and staff rests with the Principal and Chief Executive. However, responsibilities are delegated throughout all levels of the organisation, identifying individuals with responsibilities for safeguarding.

It is important that everyone is aware of the legal responsibilities and works together to maintain high standards with regards to safeguarding. Everyone must know what lines of communication and levels of responsibility exist to ensure that all Safeguarding, safety, health and environment matters are dealt with efficiently and effectively.

This policy is supported by other policies, procedures and guidelines which have been identified as necessary to protect the safety and health of employees, students and other people who may attend the College campuses, including safeguarding all who learn or work or visit all facilities. It applies to all College employees and Students and covers all locations where they learn or work.

The Designated Senior Lead (DSL) with overall responsibility for safeguarding issues relating to child protection, vulnerable adults and Prevent Duty is Nicola Caiger, Director of Progression and Inclusion. The Deputy DSLs are Emily Slater, Safeguarding and Wellbeing Manager, and Roxanne Lowe, Head of Learning for Independence and Future Employment (L.I.F.E.).

These staff are senior members of the College management team and have a key duty to take lead responsibility for raising awareness of issues relating to the welfare of children and young or vulnerable people, and the promotion of a safe environment for students within the College campuses.

The DSLs have all received training in child and young or vulnerable Student safeguarding and welfare issues and multi-agency working, as required by the Hertfordshire Safeguarding Children Partnership (HSCP) and will receive appropriate refresher training and or updates every 2 years. The DSLs should keep up to date with developments in all relevant protection issues.

The designated senior lead role is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- Providing advice and support to other staff on issues relating to child and young or vulnerable people's protection
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)

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- Ensuring the college adheres to the Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015). Statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18
- [FGM Reporting](#)
- Ensuring that parents of children and young or vulnerable people within the College are aware of the College's Safeguarding policy
- Ensuring the Principal and Chief Executive is briefed of any relevant safeguarding incident or issues that arise.
- Liaising with local authorities, Children's and adult services, Hertfordshire Safeguarding Children's Partnership (HSCP), and other appropriate agencies
- Liaising with local schools DSLs if a Safeguarding concern is raised in relation to a student (14-16).
- Liaising with external safeguarding and specialist agencies over suspected cases of abuse and contributing to the inter-agency strategy discussions.
- Providing guidance to parents, students and staff about how to obtain suitable support relating to safeguarding issues and how to access the policy.
- Liaising with secondary schools which send students to the College to ensure that appropriate arrangements are in place for students before they start.
- Liaising with employers and training organisations that receive children or young or vulnerable people from the College on long term placements to ensure that appropriate safeguards are put in place.
- Ensuring that staff receive basic training in protection issues and are aware of the College's safeguarding procedures. An annual report will be taken to the governing body of the College setting out how the College has discharged its duties. The DSL is responsible for reporting deficiencies in procedure or policy identified by the HSCP (or other external agencies) to the governing body at the earliest opportunity.

The College is committed to ensuring that it:

- Provides a safe environment for all its students to learn and taking action to enable all students to have the best outcomes
- Identifies children and young or vulnerable people who are suffering, or likely to suffer significant harm, and are protected from maltreatment. Preventing impairment of children's mental and physical health or development. Takes appropriate action to help ensure that such children and young or vulnerable people are kept safe, both at home, at the College and online.
- Will refer concerns that a child or young or vulnerable person might be at risk of significant harm to Social Services or an appropriate agency.

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- Raises awareness of issues relating to the welfare of children and young or vulnerable people and the promotion of a safe environment for the children and young or vulnerable people learning within the College campuses.
- The College is unequivocal in its position that **All** staff and students have a responsibility to provide a welcoming and safe environment, where respect is a core behaviour that is expected and where any form of bullying or harassment is not tolerated, differences are celebrated, and all students feel valued and treated with dignity and respect. The College will take all allegations seriously and provide support to any student who feels they are being bullied or harassed
- Ensures staff and managers understand the risks posed by adults or young people who use the internet to bully, groom or abuse children, young people and vulnerable adults and support them in learning how to keep themselves safe.
- Aids the identification of children and young or vulnerable people at risk of significant harm and provide procedures for reporting concerns.
- Establishes procedures for reporting and dealing with allegations of abuse against members of staff. Recruits staff and volunteers safely ensuring all necessary checks are made and reviews policies and procedures annually. All Staff and Governors will receive safeguarding awareness training and updates.
- Provides training for all staff working with children and young or vulnerable people adequately to familiarise them with protection issues and responsibilities and the College procedures and policies, attending appropriate refresher training at least every 3 years.
- The Safeguarding officers are responsible for the first response to operational safeguarding concerns. The Safeguarding and Wellbeing Manager will oversee the referral of cases of suspected abuse or other allegations to relevant agencies and regularly report to the Designated Safeguarding Lead

The Safeguarding Policy and Procedures should be read in conjunction with the College’s HR policies and procedures including Recruitment and Selection, DBS Policy and procedure, Professional Standards, Student Behaviour Procedure, Bullying and Harassment policy, IT Acceptable Use Policy.

Children are those students under 18 years or age who may be on a:

- 14-16 – Practical Learning Opportunities Programme
 - 16 - 18 study programme (including those in Residential provision), traineeship and apprenticeship
- This policy also covers children accessing Acorns nursery.

Vulnerable Adults are those students defined (under the Protection of Vulnerable Adults Regulations 2002) as:

- (1) ‘a person aged 18 or over who is receiving services of a type listed in paragraph (2) below and in consequence of a condition of a type listed in paragraph (3) below has a disability of a type listed in paragraph (4) below.

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- (2) The services are:
- (a) accommodation and nursing or personal care in a care home.
 - (b) personal care or nursing or support to live independently in his own home.
 - (c) any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body.
 - (d) social care services; or
 - (e) any services provided in an establishment catering for a person with learning difficulties.
- (3) The conditions are
- (a) a learning or physical disability.
 - (b) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
 - (c) a reduction in physical or mental capacity

The disabilities are

- (d) a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions.
- (e) severe impairment in the ability to communicate with others; or
- (f) Impairment in a person's ability to protect himself from assault, abuse or neglect.

3. Policy Statement

All College staff, including contactors, have a collective and individual duty of care to ensure that they fulfil their responsibilities to prevent the abuse of children and vulnerable adults, to refer any abuse discovered or suspected and to prevent students from being drawn into terrorism.

The College will ensure that the college operates safe recruitment procedures and ensures that all appropriate checks are carried out on new staff including volunteers who will work or come into contact with children ensuring compliance with the statutory requirements. The Recruitment and Selection policy specifies the criminal disclosure procedure, and this is monitored by the Human Resources department.

The college will comply with the Education (Restriction of Employment) Regulations 2000 and report to the

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appropriate authorities when a person is dismissed or resigns in circumstances which would have led to their dismissal, on grounds of misconduct.

The College will designate a member of the College Senior Leadership Team (SLT) to carry overall responsibility for the protection of students (i.e., the Designated Safeguarding Lead) who will report annually to the Corporation on Safeguarding. Any issues of immediate concern will be reported to the Principal of the College as and when they arise.

The College will work with appropriate agencies and will liaise with the Hertfordshire Safeguarding Children Partnership (or other Boards as appropriate) for the purposes of establishing and updating procedures, coordinating training and sharing information. The procedures are reviewed annually.

The College recognises that any child or vulnerable adult can be subject to abuse or radicalisation and all allegations of abuse or concerns about radicalisation will be taken seriously and treated in accordance with the College's procedures.

The Safeguarding Policy and Procedure will be made available via the college website.

The College will nominate a team of Safeguarding Officers who will act as a first point of contact for other staff on safeguarding issues and will be responsible for coordinating action within the college and liaising with other agencies; contributing to a coordinated approach to safeguarding by developing effective liaison with other agencies and support services. The names and contact details are listed in Annex 2.

The College will specify the role and responsibilities of the Safeguarding team members and will ensure that they are trained to carry out the role.

The College will ensure that all staff are aware of this policy and provide them with procedures for responding to situations in which they believe a student has been abused or is at risk of abuse. The College recognises that it is the responsibility of all staff to act upon any concern, no matter how small or trivial it may seem. This will include procedures to be followed if a member of staff is accused of abuse.

The College will ensure that all members of staff undergo appropriate training and development.

Members of the Corporation, the Senior Leadership team and all other staff who work with students will undertake training to equip them to carry out their responsibilities for safeguarding children and vulnerable adults effectively including the PREVENT strategy.

All new employees undertake training as part of the induction process, including completion of an online safeguarding module.

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All staff will be kept up to date by refresher training every 3 years. There will be regular updates provided as required, but at least annually.

The Safeguarding team will undertake refresher training every two years to keep their knowledge and skills up to date, this will include providing appropriate supervision.

The designated member of the Corporation responsible for safeguarding is Peter Thompson. It is a policy requirement that all corporation members undergo an enhanced DBS check.

The Residential team will have specific training in line with the requirements of the national minimum standards (NMS) for the accommodation of students under 18 by further education colleges. The Nursery staff will also undertake specific training.

The College will ensure that accurate records of safeguarding concerns and incidents are kept and maintained in a secure place. All referred cases will be recorded on the secure safeguarding site for monitoring purposes. The records will include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome.

The College will inform students about relevant sources of information, advice and support and play a part in the prevention of abuse through personal and social education. Information and sources of support are made available to students through leaflets, posters and a variety of media throughout the College.

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4. Prevent Duty (See Annex 3)

Protecting students from the risk of radicalisation is seen as part of College's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- Ensure Prevent awareness training is delivered as an essential part of safeguarding training to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas.
- Ensure that students are safe from terrorist and extremist material when accessing the internet in College.
- Safeguarding team must understand when it is appropriate to make a referral to the Channel programme.
- Have policies and procedures in place for the management of events held on College premises. The policies should apply to all staff, students and visitors and clearly set out what is required for any event to proceed.
- Consider carefully external speakers and whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups.
- In partnership with local Prevent team carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism. [Prevent Duty Guidance \(2015\)](#)

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5. Designated Staff Members

If the DSL is unavailable there are other designated Deputy Leads with responsibility for safeguarding issues and the wider safeguarding team will provide support as necessary.

Name s	Role	Telephone extension
Nicola Caiger – Designated Safeguarding Lead (DSL)	Director of Inclusion and Progression (including responsibility for Residential provision)	Ext 7355 or 07912 519172
Emily Slater - Deputy Safeguarding Lead	Safeguarding and Wellbeing Manager	Ext 7048 or 07743809515
Roxanne Lowe-Deputy Safeguarding Lead	Head of Learning for Independence and Future Employment (L.I.F.E.)	Ext 7148 or 07912519192
Dulcie Hiscott	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Telsa Gillborn	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Eve Shuckard	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Bethan Garrity	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Paul Musgrave	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Karolina Borawska	Student Advice and Safeguarding Officer	safe@oaklands.ac.uk 01727 735717
Sara Davison	14-16 Coordinator and Designated Teacher	safe@oaklands.ac.uk

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Safeguarding team staff members:

- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to safeguarding
- Have particular responsibility to be available to listen to children and young or vulnerable people studying at the College
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection issues, prevent duty and multi -agency working, as required by the HSCP, and will receive relevant refresher training at least every 2 years

6. The Governing Body

The Governing Body is responsible for ensuring there are sufficient measures in place to safeguard children and vulnerable adults within the College. A Designated Safeguarding Governor is responsible for liaising with the Principal and Senior Staff Members with lead responsibility over matters regarding protection, including:

- Governing body must ensure that they comply with their duties under legislation.
- Ensuring that the College has procedures and policies which are consistent with the national and local Safeguarding Partnership guidance and that they comply with all their duties under current legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in the college are effective and comply with the law at all times.
- Governing bodies should ensure that the college contributes to multi -agency working in line with statutory guidance Working Together to Safeguard Children 2019. Ensuring that the Governing Body considers the College policy on protection each year
- Ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, and the training that the staff have undertaken.
- To assist in these duties, the Designated Governor shall receive appropriate training.
- To monitor the college's performance against this policy and relevant legislation
- Governing bodies should consider how students may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

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7. Procedures for dealing with a Disclosure of Abuse and Reporting Concerns:

(Responsibility of ALL College staff)

If any member of staff has a concern of a safeguarding or child protection nature about a student, they have a responsibility to share this information and inform a member of the safeguarding team.

Information should be reported on the same day through ProMonitor. The account must be clear, precise and a factual account of observations made.

The staff member should reassure the student that they are being taken seriously and that they will be supported and kept safe. They should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should the student ever be made to feel ashamed for making a report.

The DSL and the safeguarding team will then decide whether the concerns require referral to any external services/ agencies.

Dealing with a disclosure

If a child or young person tells a member of staff about possible abuse the following guidance should be followed:

- Listen carefully to what is being said without displaying shock. Do not interview the child or person concerned; listen only asking questions when necessary to clarify in order to be sure that you understand what they are telling you.
- Allow the person to speak freely ensuring you do not put words into the child or person's mouth.
- Reassure them that by telling you, they have done the right thing. Do not promise to keep what they tell you confidential.
- Explain to them that you may have to pass the information on to a member of the safeguarding team, but that only those that need to know about it will be told.
- Make a detailed note of the date, time, place, what the child or person said, give a full account of your conversation, including anything else that concerns you. Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Senior Lead or, a member of the Safeguarding team.
- Add your notes onto confidential comments in ProMonitor
- When appropriate the Safeguarding team will undertake any required discussions and communication with parents and carers
- When a concern is made regarding a 14-16 student a member of the Safeguarding team will liaise with the relevant school DSL.

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8. 14-16 Students

In the event that a 14-16 School student discloses abuse, or a college staff member has concern for the student's wellbeing or a suspicion that they are being abused, the staff member must follow the same procedures as outline above. This must be reported to the Director of Inclusion and Progression who oversees the 14-16 provision who will contact the Designated Safeguarding staff member at the relevant school. The referral must be logged on the Safeguarding App, including the action the School intends to take.

9. Support

If you wish to discuss concerns or issues that might arise from having a student disclose a safeguarding concern to you support and advice is available to you from the Safeguarding team and Human Resources.

10. Indicators of abuse and neglect (taken from Keeping Children Safe in Education Statutory guidance for schools and colleges (September 2021):

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.

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Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

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 and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos⁹ can be signs that children are at risk. Other safeguarding issues 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.

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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) is a form of child sexual abuse.

Sexual abuse may involve physical contact, assault by penetration (for example, rape or oral sex) or nonpenetrative 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

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime).
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.
- owe a 'debt bond' to their exploiters.
- have their bank accounts used to facilitate drug dealing.

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Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Domestic abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Anyone who is a witness can be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact. In some cases, the individual may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

If there are concerns about a student's safety or welfare, the College's safeguarding procedures should be followed, and both the victim and the perpetrator (if also a student) should be offered support.

behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage) So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and

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individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹²⁸ that requires a different approach (see following section).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Under keeping children Safe in Education (2021) the staff member must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Forced marriage is a criminal offense in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The safeguarding team are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#).

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The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

Most College staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: [here](#).

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and this can happen both inside and outside of college or online.

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, 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 standalone 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 nudes and semi-nude images and or videos¹³ (also known as sexting or youth produced sexual imagery).
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- 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).

Even if there are no reports it does not mean it is not happening, it may be the case that it is just not

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being reported. If any staff member has any concerns regarding peer on peer abuse they should immediately speak to a member of the Safeguarding Team. All staff **must** challenge inappropriate behaviours between students and not downplay certain behaviours, e.g. dismissing sexual harassment as “just banter”, “just having a laugh” . All staff should reassure students that they are being taken seriously and that they will be supported and kept safe. A student should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should the student ever be made to feel ashamed for making a report.

The College will take all allegations seriously and use the Student Behaviour Policy to respond to any students who reports that they are being bullied, abused or harassed.

The college response to peer-on-peer abuse:

Allegations of a student abusing another student, including online abuse.

If a student has reported being abused by another learner, a member of the College Safeguarding team should be contacted immediately. The student reporting the abuse may be advised to report the matter to the police. In some circumstances the Safeguarding Team will contact the Police especially if the student reporting the abuse is vulnerable. If the student is under 18 years their parents may be contacted (the student’s wishes will be taken into account when deciding this). A serious consideration of immediate suspension of the alleged abuser will be taken whilst an investigation is undertaken. If the decision is taken not to suspend the student who is the subject of the allegation, a risk assessment will be undertaken, and a risk management plan put into place (coordinated by the Safeguarding Team). If the decision is taken to suspend the student then work will be put online for the student to complete at home. If the police or Children’s Social Care or the Adult Protection Unit are undertaking an investigation it is likely that the College will need to wait for the outcome of this before undertaking a College internal investigation (in some cases this takes several months). The safety of other students must be considered in any disciplinary process. Support should be offered to both the student reporting the abuse and the student who is the subject of the allegation in such situations and judgements should not be formed until the outcome of any investigation

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware of the importance of:

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

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual

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violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media.
- sexual exploitation; coercion and threats

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The Colleges and all staff can access broad government guidance on the issues listed via the www.gov.uk website, Keeping Children safe in Education guidance

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. 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, following this policy and speaking to the designated safeguarding lead or a deputy.

11. Online Safety

The use of technology has become a significant component of many safeguarding issues.

It is essential that children and vulnerable adults are safeguarded from potentially harmful and inappropriate online material. The College's responsibility is to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images(e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College is doing all that it reasonably can to limit student’s exposures to the above risks and has the appropriate filters and monitoring systems in place. Students and staff have been given training how to keep themselves on safe online.

12. Receiving an allegation about a member of staff

A safeguarding allegation is any information which indicates that a member of staff (including supply staff and volunteers) may have:

- Behaved in a way that has or may have harmed a child or vulnerable adult
- Possibly committed a criminal offence against/related to a child/ vulnerable adult
- Behaved towards a child or children in a way which indicates she/he would pose a risk of harm if they work regularly or closely with children and vulnerable adults.

Any member of staff who receives an allegation of a safeguarding nature about another member of staff should follow the procedures for dealing with a concern and then report the concern immediately to the Designated Senior Lead for safeguarding or in their absence the Director of Human Resources

Responsibilities of Human Resources and Designated Senior Lead with regards to Allegations of Abuse against Members of Staff.

The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind, and that investigations are thorough and dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The College has a duty of care to their employees and will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

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In the event an allegation of a safeguarding nature is made against a member of staff it must be reported immediately to the Designated Senior Lead for Safeguarding who will notify the Principal and Director of Human Resources. If the Principal is the person against whom the allegation is made the senior staff member with Lead Responsibility for safeguarding will take appropriate advice and inform the Chair of Corporation

Any necessary disciplinary action or investigation will be conducted in accordance with the existing staff disciplinary procedures.

Initial Assessment to be carried out by the Designated Senior Lead

The Designated Senior Person should make an initial assessment of the allegation, consulting with the Principal and the Director of Human Resources. Where the allegation is considered to be either a potential criminal act or indicates that the child or person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported within 24 hours to the HSCP, Local Authority Designated Officer (LADO) or other appropriate supporting agencies where appropriate.

Obtain written details of the allegation from the person who received it, ensuring they are signed and dated where possible. Record information about times, dates, locations and names of potential witnesses.

It is important that the designated senior person does not investigate the allegation. The initial assessment should be on the basis of the information received and is to be used to support the decision whether or not the allegation warrants further investigation.

13. Enquiries and Investigations with regards to staff

Child or young or vulnerable adult protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College should assist the agencies with their enquiries.

The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform with the existing staff disciplinary procedures.

Where an allegation of a safeguarding nature has been made against a member of staff, the Director of Human Resources and Designated Senior Lead will oversee the investigation jointly and at the conclusion of the investigation or any disciplinary action, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures/ policies and if there are any matters arising which should be drawn to the attention of the HSCP.

If there is an investigation by an external agency, for example the police, the Designated Senior Lead should

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normally be involved in, and contribute to, the inter-agency strategy discussions. The Designated Senior Lead is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Designated Senior Lead or Director of Human Resources shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to any conditions set by the police or other investigating agency, the designated person will:

- Inform the child/person or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of a child/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Where appropriate inform the Corporation and/or a designated member of the Corporation of the outcome of the investigation.
- Keep a written record of the action taken in connection with the allegation. Follow latest advice/Guidance from the Department of Education regarding managing allegations of abuse against teachers and other staff.

14. Record Keeping

The staff member may also be requested to complete a Record of Concern form (these can be located on the Safeguarding SharePoint site). The report should contain as much information as possible including observations (including physical signs of apparent abuse). It should not include opinions, personal interpretations and assumptions.

- name and position of the person who reported the matter the date / time
- the place where the alleged abuse happened his/her name and the names of others present
- the name of the complainant and, where different, the name of the person who has allegedly been abused
- the nature of the alleged abuse
- a description of any injuries observed – indicate on a diagram to indicate the position of any injuries
- the account, which has been given of the allegation

Some students with additional support needs may need different treatment to others e.g., in the way their physical/mental condition might mask possible abuse.

The completed form should be delivered immediately either by hand, in a sealed envelope or via college

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email marked confidential to the member of the safeguarding team. No copies of notes taken should be retained by the member of staff or volunteer.

Details of the suspicions or allegations of abuse should be reported to the Designated Safeguarding Lead or the Deputy Safeguarding Leads without delay. The Safeguarding Lead will decide whether to make a referral to Children's Services: Safeguarding and Specialist Services, Adult Services or the Police. The student or parents may wish to separately refer their concern to the police.

If it is decided to make a referral to Children's Services: Safeguarding and Specialist Services, this will be discussed with the parents, unless it is considered to do so might place the child, young person or vulnerable adult at increased risk of significant harm by:

- The behavioural response it prompts e.g., a child, young person or vulnerable adult being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed
- Leading to an unreasonable delay
- Leading to the risk of loss of evidential material.

(The College may also consider not informing parent(s)/carer(s) where this would place a member of staff at risk).

If the allegations raised are against other children, the college will follow section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. If a child is in immediate danger or is at risk of harm a referral should be made to Children's Services and/or the police immediately. Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead, they should be informed as soon as possible that a referral has been made.

Children's Services (including out of hours) 0300 123 4043

15. Concerns or disclosures in relation to a Student over 18 years

A student over 18 may wish to involve the police. In this case, the College's role is to support the student through the process and direct the student, if appropriate, to other supporting agencies e.g. counselling, well woman/man clinic etc. If there is a risk to students, the College will initiate the appropriate action.

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16. Concerns or disclosures in relation to a student in relation to a student with learning difficulties and/or physical or mental impairments, aged 18 or over.

The College understands that children with special needs and disabilities can face additional safeguarding challenges. These may include:

- Recognising that behaviour presented may be indicators of abuse and all avenues should be explored
- Being more prone to be isolated
- Having difficulty in communicating concerns of harm and / or abuse

The College has a duty of care towards students with learning difficulties and or physical or mental impairments. The decision to report abuse should not be made by a single person. If abuse is suspected or reported to a member of staff, he/she should discuss the matter with the DSL or a member of the Safeguarding Team before contact with external agencies. The course of action will be a matter of professional judgement.

The member of staff to whom the abuse is revealed should explain the above to the student so that the student is aware that it may not be possible to maintain confidentiality.

17. Children Looked After (CLA) and Carers

Within the college there are some groups of students who are deemed vulnerable, this includes students in care, leaving care or those caring for relatives. The college lead for Looked After Children is the Safeguarding and Wellbeing Manager. All looked after children are supported by the Student Advice and Safeguarding and Wellbeing Manager and the Designated Teacher s who work closely with the curriculum and the Virtual Schools Personal Advisors to ensure these students are fully supported.

18. Private fostering

Private Fostering is an arrangement made between the parent and the private foster carer, who then becomes responsible for caring for the young person in such a way as to safeguard and promote his/her welfare.

A privately fostered child means a child under the age of 16 (under 18 if they're disabled) who is cared for and provided with accommodation by someone other than; a parent, a close person who is not a parent but has parental responsibility, a close relative, for more than 28 days and where the care is intended to continue and without the involvement of a local authority.

It is a statutory duty for us at the College to inform the Local Authority – Children's Services where we are made aware of a young person who may be subject to a private fostering arrangement.

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19. Reporting to the DSL

Any suspicions or allegations should be formally reported to the DSL, Nicola Caiger as soon as possible with a view to contacting the local Children's Services or Adult Care Services of Hertfordshire County Council (or the appropriate local authority) within 24 hours, Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.

The DSL will keep an electronic record of the date and time the report is made. The report must include the name and position of the person to whom the matter is reported.

If, for whatever reason, the Designated Senior Lead is unavailable, there are 2 Deputy Designated Senior Leads: Emily Slater and Roxanne Lowe.

ProMonitor and safe@oaklands.ac.uk are monitored by the Safeguarding officers from 8.30am – 5pm (Monday – Thursday) and 8.30am – 4.30pm (Friday).

If the report needs to be made outside of working hours and either the Duty Manager, the DSL or Deputy DSL cannot be contacted, the individual staff member must take personal responsibility to ensure that suspicions of abuse are reported to Children's Services or Adult Care Services at Hertfordshire County Council or to the relevant local authority. They should be contacted on 0300 123 4043. This call centre is open 8am to 8pm Monday to Friday and 9am to 4pm on Saturday. At all other times calls will be automatically diverted to the emergency duty team.

If there are immediate concerns regarding risk to life, including to self and others, please contact emergency services on 999.

You should also email the DSL with the relevant information

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20. Use of External Contractors

Where Contractors are employed by the College, it is the responsibility of the Director of Human Resources to ensure that the companies have undertaken appropriate checks on their employees. For those providing a service (e.g., for catering, car park management, cleaning) all employees should be DBS checked.

For contractors engaged to undertake work on a short-term basis (e.g., builders), risk assessments are carried out. Entry and exit routes of contractors are agreed, and they are not allowed to leave their workplace except at agreed times.

21. The College's Response to (UKAD) UK Anti-Doping in Sport

Testing Procedures

There are modifications to the test procedures for athletes who are minors (defined as a young person under the age of 18)

Minors will be tested in the same way as other athletes, except for a few modifications to the sample collection process.

The College's Compliance with Anti-Doping in Sport

The World Anti-Doping Code International Standard for Testing and Investigations (ISTI) is mandatory international standard developed as part of the World Anti-Doping Programme.

There are modifications to the testing procedures for athletes who are minors (defined as those under the age of 18) and these are outlined below.

Sample Collection Process

Modifications for Athletes who are Minors (taken from The ISTI Document, WADA, January 2021).

C.1 Objective

To ensure that the particular needs of *Athletes* who are *Minors* are met in relation to the provision of a *Sample*, where possible, without compromising the integrity of the Sample Collection Session.

C.2 Scope

Determining whether modifications are necessary starts with identification of situations where *Sample* collection involves *Athletes* who are *Minors* and ends with modifications to *Sample* collection procedures where necessary and where possible.

C.3 Responsibility

The Testing Authority has responsibility for ensuring, when possible, that the DCO has any information necessary to conduct a Sample Collection Session with an *Athlete* who is a *Minor*. This includes confirming wherever necessary that the parental consent for *Testing* any participating *Athlete* who is a *Minor*.

C.4 Requirements

C.4.1 All aspects of notification and *Sample* collection for *Athletes* who are *Minors* shall be carried out in accordance with the standard notification and *Sample* collection procedures unless modifications are necessary due to the *Athlete* being a *Minor*.

C.4.2 In planning or arranging *Sample* collection, the Sample Collection Authority and DCO shall consider whether there will be any *Sample* collection for *Athletes* who are *Minors* that may require modifications to the standard procedures for notification or *Sample* collection.

C.4.3 The DCO and the Sample Collection Authority shall have the authority to make modifications as the situation requires when possible and as long as such modifications will not compromise the identity, security or integrity of the *Sample*. All such modifications shall be documented.

C.4.4 *Athletes* who are *Minors* should be notified in the presence of an *Athlete* representative (who is not a *Minor*) in addition to the DCO/Chaperone and may choose to be accompanied by a representative throughout the entire *Sample Collection Session*. Even if the *Minor* declines a representative, the Sample Collection Authority or DCO, as applicable, shall consider whether another third-party ought to be present during notification of the *Athlete*

C.4.5 Should an *Athlete* who is a *Minor* decline to have a representative present during the collection of a *Sample*, this shall be clearly documented by the DCO. This does not invalidate the *Test* but shall be recorded.

C.4.6 The DCO shall determine who may be present during the collection of a *Sample* from an *Athlete* who is a *Minor*, in addition to a representative of the DCO/Chaperone who shall be present. A representative of the *Minor* may be present during *Sample* provision (including observing the DCO when the *Minor* is passing the urine *Sample*, but not directly observing the passing of the urine *Sample* unless requested to do so by the *Minor*). The DCO's/Chaperone's representative shall only observe the DCO/Chaperone and shall not directly observe the passing of the *Sample*.

C.4.7 The preferred venue for all Out-of-Competition Testing of a *Minor* is a location where the presence of an *Athlete* representative (who is not a *Minor*) is most likely to be available for the duration of the *Sample Collection Session*, e.g., a training venue.

The Sample Collection Authority shall consider the appropriate course of action when no adult is present at the *Testing* of an *Athlete* who is a *Minor* and shall accommodate the *Athlete* in locating a representative in order to proceed with *Testing*.

C.4.8 The *Testing* Authority or *Sample* Collection Authority (as applicable) shall consider the appropriate course of action when no *Athlete* representative³⁰(who is not a *Minor*) is present at the *Testing* of an *Athlete* who is a *Minor* (for example by ensuring that more than one *Sample* Collection Personnel is present during a *Sample* Collection Session of such *Minor Athlete*) and shall accommodate the *Minor* in locating a representative if requested to do so by the *Minor*

What this means for College Staff

There is always the chance that the ISTI team could come into the College to test one or more of our sports academy students. If they visit outside of normal College hours, Residential staff will act as the chaperone. If they come into College during the day, the student athlete needs to contact either the Residential Team, the Student Advice Team or their Tutors – one of whom will chaperone the student during the testing process.

If a student declines to have a chaperone, this will be clearly documented. Parents/carers/guardians will also be informed if testing is taking place.

ANNEX 1: 14-16 Students Participating on a Practical Learning Opportunities Programme (PLO)

4. Purpose

4.1 The College recognises the vulnerability of its 14–16-year-old students who come to study for a 3-hour vocational programme and therefore implements additional measures to review and monitor their safety.

5. Additional Safeguarding Measures

5.1 14–16-year-old students wear a specific lanyard to identify them within the College premises and in class / workshops.

5.2 Staff will ensure that registers are marked within the first 15 minutes of each lesson. The teacher will inform the 14-16 Co-ordinator of any absence who will contact the school to confirm this. All correspondence will be logged on Promonitor.

5.3 Students are not allowed off site or left unattended at break times or allowed to leave early. If a student feels unwell, they are to speak to their tutor who will then inform the 14-16 Coordinator who will liaise with the school to gain permission for them to be collected or sent home.

5.4 Students will be onsite with other students that will be over 16 and will include adults over the age of 18. A risk assessment will be completed by the 14-16Coordinator and a copy will be sent to the relevant Head of Department before the student starts their programme.

5.5 If a student goes off site or is missing from lessons the tutors will contact the 14-16 Coordinator, who will alert the school and their Designated Safeguarding Lead as well as the College's Safeguarding Manager. . Under no circumstances will a student be sent off campus without the school being informed. If a student needs to be removed from the class, the tutor will contact the Head of Department and the 14-16 Coordinator. The school will be contacted, and the student will remain within the student advice hub.

5.6 It is the responsibility of the Parent/Carer and school to ensure that safe travel arrangements to and from Oaklands College are in place and are shared and agreed with the College.

5.7 Any safeguarding concerns will be reported to the Designated Safeguarding Lead (DSL) or deputy DSL as per the Safeguarding Policy. The DSL will liaise closely with the DSL from the young person's school. If any emerging safeguarding concerns are raised, the DSL at the student's school will take the lead liaising with external agencies and continue to work closely with the DSL at Oaklands College. The referral must be logged on confidential comments in ProMonitor including the action the School intends to take.

5.8 The conduct of students towards each other is covered in the College's Student Behaviour and Policy Procedure and any behaviour or disciplinary issues are dealt with accordingly.

Meet the SAFEGUARDING TEAM...



We're here to help!

If you are worried about your or someone else's safety, please contact one of the safeguarding team below



Nicola Caiger

01727 737555
or 07912 519172



Emily Slater

01727 737048
or 07743 809515



Roxanne Lowe

01727 737148 or 07912 519192



Paul Musgrave

01727 735717



Karolina Borawska

01727 735717



Bethan Garrity

01727 735717



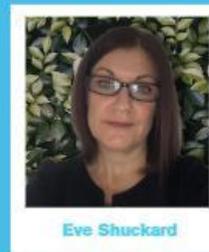
Telsa Gillbom

01727 735717



Dulcie Hiscott

01727 735717



Eve Shuckard

01727 735717

We're here to help!

If you need to get in touch with someone from the Safeguarding team, please contact us on: safe@oaklands.ac.uk or 01727 735717

Annex 3 – Prevent Strategy

Purpose

The purpose of this strategy is to outline our approach to supporting the national 'Prevent' Agenda linked to the safeguarding of our students and staff. This Strategy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism."

Context

The aim of this strategy is to:

1. Develop an awareness of Prevent in the College
2. Recognise current practice which contributes to the Prevent agenda
3. Identify areas for improvement
4. Develop a coordinated action plan

1. Awareness of Prevent Agenda

- 1.1 Prevent is 1 of the 4 elements of 'CONTEST', the government's counter-terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming terrorists or supporting terrorism.
- 1.2 The Prevent strategy responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- 1.3 It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 1.4 It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- 1.5 It covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

Source: <https://www.gov.uk/government/publications/prevent-duty-guidance>

2 College practice which contributes to Prevent

- 2.1 The College Safeguarding Policy features reference to the Prevent agenda and all current and future Safeguarding officers will have participated in Prevent training.
- 2.2 The College has strong links with our regional Prevent Coordinator and local Police. The Safeguarding and Wellbeing Manager and College Designated Senior Lead for Safeguarding have the details for contacting 'CHANNEL' a process which supports people at risk of being drawn into terrorism). The College also employs two 0.5 Police Community Support Officers who attend the College on a regular basis to normalise police presence and help maintain trust between students and the police service.
- 2.3 All members of the Student Advice team have completed Prevent training.
- 2.4 All staff have Prevent training, this is covered in the induction session and staff are required to complete an on-line module.
- 2.5 Posters have been provided to College staffrooms to inform and remind staff of the Prevent agenda.

- 2.6 Corporation members undertake Prevent training. Subcontractors are also required to undertake Prevent training and this is facilitated by the College.
- 2.7 Our work to promote Equality and Diversity within College, including the annual Diversity Week celebration, incorporates British Values, contributes to good community relations and reduces the risk of radicalisation.
- 2.8 Mainstream political parties are regularly invited into College to support democracy related events. The College will not allow representation at such events, from parties with extreme views which promote violence or intolerance.
- 2.9 Policy for the use of visiting speakers within the curriculum, for cross college events and as part of any external lettings/commercial hire.
- 2.10 The College's ICT policies incorporate the Prevent Duty.

3. Areas for improvement

- 3.1 Further integration of the Prevent agenda including Fundamental British Values into teaching and learning.
- 3.2 Ensure all students are aware of and understand PREVENT and that the Student Union representatives undertake more detailed training.
- 3.3 Further training and awareness on Right Wing Extremism.

DRAFT