



DERBY COLLEGE GROUP POLICY

Safeguarding Policy

Policy Number:	STS-014
Executive Owner:	Deputy CEO Strategy & Corporate Services
Owning Strategy / Department:	Student Engagement / Services for Students Corporation
Approval Board / Committee / Group:	Corporation
User Group:	Employees, Students, Stakeholders, Contractors, Members of the Public
Relevant To:	As above
Implementation Date:	November 2021
Approval Date:	November 2021
Review Start date:	October 2022
Expiry Date:	November 2022

Date:	October 2021
Ref:	HJ V13
Originator:	Director of Services for Students
Area:	Services for Students

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POLICY - PROCEDURES - GUIDELINES - RELATED DOCUMENTS

Policy Accountability and Implementation

Policy Title:	Safeguarding Policy
Policy Author / Reviewers:	Director of Services for Students
Policy Implementation:	Safeguarding Board, Employees, Students, Stakeholders, Contractors Members of the Public
Policy Monitoring and Compliance:	Safeguarding Board/DSL Group
Policy Review Timeline:	Annual

Synopsis:

DCG places the highest importance on safeguarding, and the safety and well-being of students is paramount in all College activities. Furthermore, the College recognises that employees/volunteers and students have an important role to play in safeguarding, in particular the welfare of young people and vulnerable persons and preventing abuse and/or harm. DCG also acknowledges that at any time any person could be classed as 'vulnerable'.

The College has a statutory duty placed on it by Keeping children safe in education (September 2020) to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of young people and vulnerable persons. This is further supported by the Education Act 2011 and the Children Act 1989 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate)), in addition to Working together to safeguard children (2018). In order to comply with this duty of care, all employees/volunteers must be aware of the lines of communication and levels of responsibility which exist to ensure that matters of safeguarding can be dealt with adequately.

Policy Classification and Publication

Classification

- Essential Authority (EA)

Publication

- Intranet – Policy portal
- Student VLE (Moodle)
- Website

Empowering/related legislative and/or authoritative references:

Keeping children safe in education (September 2018), Working together to safeguard children (2018), Education Act 2011 and the Children Act 1989 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate)), Care Act 2014

Impact Assessment reference IA901 2016

Version	Reviewed / Modified by:	Change History	Advisory committee / groups or specialists	Review / Meeting Date/s
5	Environmental Compliance Manager (ECM)	<ul style="list-style-type: none"> • Senior Designated person job title changed to Designated Safeguarding Lead in line with Keeping Children Safe in Education guidance • Inclusion of Early Help Process and other forms of abuse 	QIG - Safeguarding	June 2016
6	ECM	<ul style="list-style-type: none"> • Job titles amended in line with recent management changes • Training element included within Team Manager – Student Engagement responsibilities • Self-Harm Policy added to Supporting Documents list • Data Protection Act amended to General Data Protection Regulations 	QIG - Safeguarding	July 2017
7	ECM	<ul style="list-style-type: none"> • Example of leading question inserted • Example of independent action inserted • Reporting to a member of the Safeguarding Team made more explicit 	QIG - Safeguarding	September 2017

		<ul style="list-style-type: none"> • Subcontract provision made more explicit who is responsible for monitoring and managing • Immediate referral made more explicit in relation to who is responsible for this • DSL (or nominated deputy) will inform the alleged offender • Made it more explicit which College policy an employee would follow if they wished to appeal against a decision following disciplinary action • Made it more explicit that HR will contact an employee following allegations without foundation • Self-referral support expanded to include Employee Assistance Programme • Attendance at Case Strategy Meetings will either be attended by the Director of HR or their nominated deputy • Obtaining a DBS for employees made more explicit, to include their role and responsibilities within the College and in line with Government guidance • Procedures section inserted information regarding new ESFA requirement to report safeguarding allegations against the organisation to the ESFA • 		
8	Director of Services for Students	<ul style="list-style-type: none"> • Guideline section re Female Genital Mutilation. More explicit reference regarding the requirements of teachers to report cases of FGM to the police. 	DSL Exec Group	23/11/17
9	ECM	<ul style="list-style-type: none"> • Inclusion of supervision timetables into the roles of Team Managers and Director of HR • Inclusion of key principles which underpin all adult safeguarding work 		23/02/18
10	ECM	<ul style="list-style-type: none"> • Job titles amended in line with recent management changes • Inclusion of the roles and responsibilities of the Residential & Welfare Manager 		21/03/2018
11	Director for Services for Students / ECM	<ul style="list-style-type: none"> • Added in section on peer-on-peer abuse • Within Designated Safeguarding Lead responsibilities included about Carer Leavers and transferring of safeguarding files • Added in section on Host Families • Within Executive Director of HR's responsibilities included the requirement <ul style="list-style-type: none"> ○ to seek written confirmation related to fee-funded ITT trainees ○ to have supervision timetables in place for new starters (as necessary) ○ for DBS information for contractors / volunteers working within the College to be obtained • Removal of the Disqualification by associated definition and updated the procedures to reflect the changes in legislation • Job titles amended in line with recent management changes 		24/07/2018 24/08/18
12	Director for Services for Students	<ul style="list-style-type: none"> • Reviewed and minor updates only required. References to Derby College replaced with DCG. Responsibility for Policy development as well as implementation sits within the Director of Services for Students role (policy development previously within Environmental compliance manager role) - see section 5 • Updated references to Keeping Children Safe in Education September 2019 (updated statutory guidance) 	DSL Exec Group Safeguarding Board Corporation	26/06/2019 28/06/2019 21/10/2019
13	Director for Services for Students	<ul style="list-style-type: none"> • Updated references and links to key guidance documents including Keeping Children Safe in Education September 2020 (updated statutory guidance) • Amended the DSL responsibilities in the policy by adding 'overseeing the implementation of the arrangements covered by this policy including accountability for ensuring that safeguarding records are retained, stored and destroyed in the appropriate manner.' • Updated safeguarding procedures Record Keeping section to reference the age by which a student record should be retained 'Copies of safeguarding files should be stored securely and kept until the child is 25 years old (this is seven years after they reach the school leaving age). (Information and Records Management Society (IRMS), 2016)' • Included an addition to the guidance document - Safeguarding guidance for remote teaching and learning in the Safeguarding Guidance document 	DSL, Exec Group Corporation	22/10/20 Dec 2020

14	Director of Services for Students, DSL	<ul style="list-style-type: none"> • Section 1 Policy Statement – amended to highlight zero tolerance to peer-on-peer abuse, and reference to Prevent Action Plan, Sexual Abuse Action Plan and SDAT • Section 5 Responsibilities – amended to include Multi agency working arrangements and responsibility of all for safeguarding • Section 11 Related Documents - Updated references and links to key guidance documents including Keeping Children Safe in Education September 2021 (updated statutory guidance), link to DDSCP Threshold Document. Added reference to DCG Sexual Abuse Action Plan. • Updated the Safeguarding Procedure to include procedure for reporting 'low level concerns' and included link to DDSCP Allegations against staff, carers and volunteers' guidance. (p8/9) • Updated Safeguarding Guidance document to include more detailed information re Child Sexual Exploitation, Child Criminal Exploitation and Peer on Peer Abuse. Also referenced key guidance document, KCSIE Part 1. 	SLT Safeguarding Board	03/11/2021
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1. Policy Statement

DCG places the highest importance on safeguarding, and the safety and well-being of students is paramount in all College activities. Furthermore, the College recognises that employees/volunteers and students have an important role to play in multi-agency safeguarding, in particular the welfare of children and vulnerable persons and preventing abuse and/or harm. DCG also acknowledges that at any time any person could be classed as 'vulnerable'.

The College has a statutory duty placed on it by Keeping Children Safe in Education (September 2021) to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of children and vulnerable persons. This is further supported by the Education Act 2011, the Children Act 1989 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate)) and Working Together to Safeguard children (July 2018). In order to comply with this duty of care, all employees/volunteers must be aware of the lines of communication and levels of responsibility which exist to ensure that matters of safeguarding can be dealt with adequately.

Everyone working in, or for our college, takes all welfare concerns seriously and encourages children to talk about anything that worries them. We share an objective to help keep children safe by contributing to:

- Providing a safe environment for children to learn in education settings
- Creating a zero-tolerance approach to peer-on-peer abuse and a culture of vigilance to abuse, neglect, exploitation and radicalisation where we always act in the best interest of the child
- Identifying children who may be at risk of radicalisation, in need of extra help, or are suffering or likely to suffer significant harm, and taking the appropriate action, working with other services as needed.

The College also has a responsibility to safeguard adults at risk in line with the requirements of the Care Act 2014.

The College's Safeguarding Procedure sets out the framework for those arrangements.

DCG is not an investigating agency. This function will normally be carried out by Social Care and Health, or other agencies with statutory powers, i.e. the Police, as set out in the Derby and Derbyshire Safeguarding Children Procedures or Derby & Derbyshire Safeguarding Adults Policy & Procedure.

The college assesses the risks and issues in the wider community when considering the well-being and safety of its students and apprentices. In order to protect our college community, we have a Prevent Risk Register and Action Plan, Sexual Abuse Action Plan and are part of the Stopping Domestic Abuse Together initiative.

2. Definitions

Safeguarding – the action we take to promote the welfare of young and vulnerable people and protect them from harm by:

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

(Working together to safeguard children, July 2018)

Regulated activity of children is any unsupervised activity (i.e. teach, train, instruct, care for or supervise, or advise on well-being, drive (only for children) which takes place in specified places (i.e. schools, childcare premises, and FE Colleges mainly educating children full-time). Regular means by the same person frequently (once a week or more often) or on more than three days in a 30-day period (or in some cases, overnight).

Regulated activity for vulnerable groups is anyone undertaking personal care (i.e. assistance with washing and dressing, eating, drinking and toileting, or teaching someone to do one of these tasks). There is no requirement to do an activity a number of times before a person is in regulated activity.

3. Principles

Everyone who comes into contact with young people and their families has a role to play in safeguarding them. All persons have a responsibility and role to identify concerns, share information appropriately and take prompt action. Employees will maintain an attitude of “it could happen here” where safeguarding is concerned.

When concerned about the welfare of a young person, employees will always act in the best interests of the young person. DCG operates a child centred approach, taking into account the young person’s views and voice. The young person’s wishes and feelings will be taken into account when determining what action to take and services to provide to protect them through ensuring there are systems in place for them to express their views and give feedback.

The six key principles which underpin all adult safeguarding work are:-

- Empowerment – people being supported and encouraged to make their own decisions and informed consent.
- Prevention – it is better to take action before harm occurs.
- Proportionality – the least intrusive response appropriate to the risk presented.
- Protection - support and representation for those in greatest need.
- Partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability – accountability and transparency in delivering safeguarding.

4. Scope and Limitations

Young people under the age of 18.

[The Care Act 2014](#) defines an adult at risk as:

- Someone over the age of 18 who has a need for care and support
- Someone who is experiencing or is at risk of neglect or abuse

As a result of the above needs, the adult is unable to protect himself or herself against the abuse or neglect, or the risk of it. The term ‘Adult at Risk’ is now more commonly used in place of ‘Vulnerable Adult’, as ‘Vulnerable Adult’ may wrongly imply that some of the fault for the abuse lies with the victim.

5. Responsibilities

Safeguarding is Everyone's Business

There is a whole college approach and ethos to safeguarding and protecting children and adults at risk. All adults working in, or on behalf of the college have a responsibility to safeguard and promote the welfare of children and prevent radicalisation and extremism. This includes.

- Responsibility to provide a safe environment in which children and adults at risk can learn.
- Creating a culture of vigilance where we always act in the best interests of the child and adults at risk.
- Taking all welfare concerns seriously and encouraging children and young people to talk to us about anything that worries them.
- Identifying children who may be in need of extra/early help, have complex or serious needs or who are suffering, or are likely to suffer significant harm. All staff then have a responsibility to take appropriate action, working with services as needed.

The Director of Services for Students is the College's Designated Safeguarding Lead (DSL) and is responsible for the development of the policy and overseeing the implementation of the arrangements covered by this policy including accountability for ensuring that safeguarding records are retained, stored and destroyed in the appropriate manner. See [Keeping Children Safe in Education](#) Annex C for further detail regarding the role of the DSL.

The Governing Body have a strategic leadership responsibility for the college safeguarding arrangements and the responsibility to ensure that the college complies with safeguarding duties under the legislation, Keeping Children Safe in Education (DFE Sept 2021). The Link Governor for Safeguarding will liaise with the Designated Safeguarding Lead in relation to implementation of the College's Safeguarding Policy and arrangements.

The Senior Leadership Team, College Management Team, Deputy Designated Safeguarding Leads and Safeguarding Officers are responsible for the delivery of the safeguarding procedures.

The roles and responsibilities of employees are clearly identified within the Procedures document.

Multi-agency working - The safeguarding partners in Derby and Derbyshire have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children and adults at risk in a local area. The local area safeguarding partners are Derby City Council, Derbyshire County Council, Derbyshire Constabulary and Derby and Derbyshire Clinical Commissioning group. The partners will agree on ways to co-ordinate their safeguarding services, acting as a strategic leadership group in supporting and engaging others and implementing local and national learning including from serious child safeguarding incidents. The college will work in partnership with the Derby and Derbyshire Safeguarding Children Partnership (DDSCP) and follow relevant local arrangements as published. See Derby and Derbyshire Safeguarding Children Partnership [webpage](#). Local schools and colleges are named as relevant agencies by the DDSCP and as such we will be under a statutory duty to co-operate with the published arrangements.

6. Implementation Arrangements

All new employees are made aware of the policy and procedures during the formal employee induction process.

Updated and amended procedures are disseminated and reinforced in training sessions, team meetings, newsletters and via email communications. The College's policy is available to all, being accessible on both the College's intranet and internet.

7. Monitoring and Review

The DCG Executive DSL Group and Safeguarding Board will monitor the effectiveness of safeguarding policies and procedures implemented within the College, in order to ensure legal compliance. To facilitate this, managers at all levels are responsible for the on-going monitoring in their department/faculty.

The Safeguarding Policy and Procedures are subject to an annual review, unless there are changes in legislation or management arrangements. This review will take into account the views of employees and students and relevant local and national documents. The College reserves the right to make whatever changes it deems appropriate. An updated copy of the policy and procedures is available on the College intranet/internet or from the Designated Safeguarding Lead.

7. Procedure

The Safeguarding Procedures document sets out the framework for DCG's approach to safeguarding all.

8. Guidelines

The Safeguarding Guidelines document provides additional information to support the College's Safeguarding Policy and supporting Procedures.

9. Templates and Forms

External events and visiting speakers risk assessment form.

10. Related Documents

This policy does not stand alone and should be used in conjunction with other College policies and procedures. (The following list is not exhaustive.)

- DCG Safeguarding Strategic Policy Framework
- DCG Health and Wellbeing Strategic Policy Framework
- Little Explorers Day Nursery Safeguarding Policy
- Health, Safety & Welfare at Work Policy
- Health & Safety Risk Assessment Policy
- Health & Safety Vetting for WBL & Work Experience (including Projects) Policy
- Employee Disciplinary Policy
- Recruitment & Selection Policy
- Employee Harassment Policy
- Retention of Records Policy
- Employee Code of Conduct
- Public Interest Disclosure Policy (Whistleblowing)
- E-Safety Policy
- Disclosure to Parents/Carers (16 to 18 and vulnerable adult students) Procedure
- Positive Behaviour (including Student Discipline) Policy
- Personal Assessment Plan Policy
- Educational Visits Policy

- Self-Harm Policy
- Fitness to Study Policy
- DCG Prevent Risk Register and Action Plan
- DCG Sexual Abuse and Harassment Action Plan
- DDSCP DCG Education Safeguarding Audit tool and action plan

Local and National Policy Guidance

The policy is consistent with [Derby and Derbyshire Safeguarding Children Partnership web-based procedures, including the local criteria for action \(thresholds document\) and local protocol for assessment.](#)

[These](#) can be found on the [Policy and Procedures](#) page of www.ddscp.org.uk. DCG will adhere to the Derby and Derbyshire Safeguarding Children Partnership procedures.

This policy will also adhere to local and national statutory requirements and guidance

- [Working Together to Safeguard Children](#) (2018)
- [The Children Act](#) (1989) and [Children Act](#) (2004)
- [Keeping Children Safe in Education](#) (2021)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (2018)
- [Protection of Freedoms Act](#) (2012)
- [Data Protection Act](#) (2018)
- [The Prevent Duty Guidance for England and Wales](#) (2015)
- [Prevent Duty Guidance: for further education institutions in England and Wales](#) (2015)
- [Mandatory reporting of Female Genital Mutilation – procedural information](#) (2015)
- [Sexual Offences Act \(2003\)](#) and [Serious Crime Act \(2015\)](#)
- [SEND code of practice: 0 to 25 years](#) (2014)
- [Sexual violence and sexual harassment between children in schools and colleges](#) (2021)
- [Children Missing Education: statutory guidance for local authorities](#) (2016)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (2019)
- [Serious Violence Strategy](#) (2018)
- [Promoting the education of looked-after children and previously-looked after children: Statutory guidance for local authorities](#) (2018)
- [Managing coronavirus \(COVID-19\) in education and childcare settings](#)
- [Promoting and supporting mental health and wellbeing in schools and colleges](#)
- [Elective home education](#) (2019)