

# Safeguarding Policy Care of Under 18s

<b>Version:</b>	13 <sup>th</sup> June 2019
<b>Reviewed by:</b>	Peter Dean & Kerill Kennedy (Designated Leads)
<b>Implementation Date:</b>	June 2019
<b>Next Review Date:</b>	September 2019
<b>Related Policies/Procedures:</b>	Safeguarding Vulnerable Adults, Prevent Duty, E-Safety, Equality & Diversity; Anti-Bullying & Harassment; Attendance, Admissions, Recruitment Policies, Teaching & Learning, SEN, Confidentiality
<b>Policy Owner:</b>	Designated Leads

## Statement of Intent

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that all staff are aware of methods to ensure a safe environment for colleagues and students alike; in particular children (referred to as **Under 18s**), and vulnerable adults (Please refer to the Safeguarding of Vulnerable Adults Policy).

**As such, NCG will ensure that the service they provide...**

- **is accessible, well publicised, ensures confidentiality and is available in an environment that is sensitive to the needs of adults at risk and children.**
- **takes account of the views of children, young people, and adult service users, in the decisions about and delivery of services.**
- **ensures that racial heritage, language, religious beliefs, sexuality, gender and disability is taken into account - for example by the use of interpreters or by making adjustments to enable access for disabled people.**
- **takes into account the service user's wishes and feelings and balances this against their rights and need to be safeguarded.**
- **considers if there are risks from any form of abuse; mental health problems; misusing drugs and alcohol; or a risk of homelessness.**

## Safeguarding at NCG: An Overview

This document provides detailed information regarding the college's responsibilities and procedures in relation to the welfare and safeguarding of students at the college who are under 18 years of age.

To ensure the policy is up to date with current legislation, it will be reviewed annually by the Designated Lead and the Director of Quality Assurance. The Designated Lead will also make any necessary amendments in-between official reviews. To ensure accurate and up to date records are maintained, all are monitored on a regular basis by the Designated Lead.

*For the purpose of this document and for rules and procedures in the school, there are two main classifications of non-adult students; under 18s (16-17) who are treated in some respects as adults and*

*allowed to attend adult classes, and under 16s who cannot join adult classes and for whom restrictions are more stringent. Within the under 16s group they are further sub-classified into 14-15 year olds and 12-13 year olds with additional safeguards/restrictions on 12-13 year olds.*

## **NCG Welfare & Safeguarding Teams**

NCG has two schools, one in Manchester and one in Liverpool. The following structure is applicable across the group and contact details of the key people can be found on the following page.

## NCG Welfare & Safeguarding Team Roles

### Designated Lead

Has overall responsibility for safeguarding at the college. Is the lead person in making decisions, writing policies and enforcing procedures. Provides advice and support to students and colleagues.

### Safeguarding Officer

Works with the Designated Lead in dealing with concerns and ensuring procedures are adhered to. Provides advice and support to students and colleagues.

### Welfare Officer

Provides front line support to students with welfare issues. Provides advice and support to colleagues.

## Key People:

NCG Manchester			
<b>Contact Details</b>	9 Portland St Manchester M1 3BE Tel: +44 (0)161 233 4290		
<b>Designated Lead</b>	Peter Dean Extension 214 <a href="mailto:pdean@newcollegegroup.com">pdean@newcollegegroup.com</a>		
<b>Failsafe</b>	Charlotte Kerns Extension 221 <a href="mailto:ckerns@newcollegegroup.com">ckerns@newcollegegroup.com</a>		
<b>Safeguarding &amp; Welfare Officers</b>	Anthony Greaves Extension 252 <a href="mailto:agreaves@newcollegegroup.com">agreaves@newcollegegroup.com</a>	Kristy Hoyle Extension 218 <a href="mailto:khoyle@newcollegegroup.com">khoyle@newcollegegroup.com</a>	Rich Marriott 209 <a href="mailto:rmarriott@newcollegegroup.com">rmarriott@newcollegegroup.com</a>
NCG Liverpool			
<b>Contact Details</b>	Graeme House Derby Square Liverpool L2 7ZH Tel: +44 (0)151 236 2749		
<b>Designated Lead</b>	Kerill Kennedy Extension 3005 <a href="mailto:kkennedy@newcollegegroup.com">kkennedy@newcollegegroup.com</a>		
<b>Failsafe</b>	Christine Flanagan Extension 3004 <a href="mailto:cflanagan@newcollegegroup.com">cflanagan@newcollegegroup.com</a>		
<b>Safeguarding Officer</b>	James Jenkins Extension 3004 <a href="mailto:jjenkins@newcollegegroup.com">jjenkins@newcollegegroup.com</a>		
<b>Welfare Officer</b>	Lucia Martin Extension 3006 <a href="mailto:lmartin@newcollegegroup.com">lmartin@newcollegegroup.com</a>		

## The Difference between Welfare & Safeguarding

The line between welfare and safeguarding is very fine, and what may appear to be a welfare issue could easily develop into, or be the signs of a safeguarding issue. As explained below, safeguarding specifically relates to a child who is or could potentially be suffering abuse at the hands of another person.

### Definitions

**Welfare** concerns supporting students with any social, financial or emotional problems they have, which are impacting on their lives inside and outside of college.

**Safeguarding** means:

***“Protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect”.***

It is this definition which forms the basis of our policy and procedures. We do not use the term **Child Protection**, due to the majority of our students being over the age of 18, and as such, the term **Child Protection** has less meaning for our staff and students than does **Safeguarding**.

### Care Quality Council

For the purpose of this document the following definitions apply:

**Safeguarding** means the active prevention and protection against the abuse of any person or persons under 18, who work or study at New College Group.

**Abuse** means a violation of an individual’s human and civil rights by other person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a child is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Within this context abuse can take the form of:

- **Physical abuse:** including hitting, pushing, kicking, and misuse of restraint or inappropriate sanctions.
- **Sexual abuse:** including sexual assault, rape, inappropriate touching, the taking of sexual images/videos, or any other acts to which a child did not, or could not consent to.
- **Psychological abuse:** including emotional abuse, bullying, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse.

- **Financial or material abuse:** including theft, blackmail, fraud or damage to property.
- **Neglect or acts of omission:** including ignoring medical or physical care needs, inadequate nutrition and failure to provide appropriate health, social or educational services.
- **Discriminatory abuse:** including racism, sexism and other forms of harassment.
- **E-abuse:** any abuse conducted via the internet, or other e-technologies. (See E-Safety Policy)
- **Being radicalised:** being vulnerable to or at risk from indoctrination by radical or extremist groups. (See the Prevent Policy)

### Signs of Abuse:

Staff should be aware that the following could be signs that a child is at risk of, or is being abused and they should report these immediately to the Safeguarding Team. As the signs may apply to different forms of abuse, they have not been related to any particular type, but noticing any should be immediate cause for concern. The list is not exhaustive, and if any staff have concerns, they should follow the reporting procedures (See page 18).

### Physical Signs

- Frequent physical injuries such as, bruising, fractures, burns, cuts
- Weight loss or weight gain: changes in appetite
- Poor personal hygiene
- Changes in style of dress or appearance

### Psychological & Behavioural Signs

- Sudden changes in behaviour or personality: becoming withdrawn, anxious, depressed, extroverted, sexually inappropriate or aggressive
- Avoiding contact with others, especially members of the opposite sex
- Signs of alcohol or drug misuse
- Sudden poor attendance or participation in lessons
- Being unusually tired or frequently sick
- Not wanting to return home
- Expressing extreme views or opinions

## Preventative Measures

### Safety on the Premises

For admin staff and teaching staff to be aware and keep track of students who are under 18, the following measures are in place.

- **ID Badges:** All staff and students must wear their ID badge at all times. There are different coloured lanyards for staff (yellow), students over 18 (purple) and students under 18 (pink); so minors may be easily identified.
- **A Minors' List:** This is updated weekly following the intake of new students and is distributed to key people. It includes; name, age, address in the UK, contact details, classes & teachers & next of kin details.
- **Registers:** the age of each student is printed on the registers; if a teacher notes that a student who is under 18 is absent, they must leave the class and report it to the Attendance Officer as soon as is practically possible. The Attendance Officer will then follow the procedures outlined in the Attendance Policy to contact the student and ensure their safety.
- **Visitors:** all visitors must sign in and out of the college and wear a red visitor's pass.
- **External Speakers or Trainers:** The content of the speech or training is subject to a risk assessment. They are also given a copy of the staff code of conduct which they must sign prior to the event.

### Internet Safety

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that staff are all aware of methods to ensure a safe environment for colleagues and students alike, in particular children and vulnerable adults. As the use of technology is part of daily life, it is important that both staff and students have an awareness of using this safely, both inside and outside the college environment. (Please see the Online Safety Policy for further details.)

### Safer Staffing

NCG operates rigorous recruitment practices across all departments with the aim that all its employees are safe to work with under 18s: this includes host families, whose DBS status is kept on their personal



file. Our recruitment practices can be found in the Recruitment Policy, and information pertaining to all staff can be found on the Single Central Register; which is maintained by the Human Resources Officer. *In all cases of employment, we endeavour to only appoint staff once a DBS has been received. Where the candidate has an existing DBS this may be used while waiting for their new DBS to return as long as all other pre-appointment checks are satisfactory. In such cases, the application for a new DBS must take place prior to appointment. There are, however, occasional circumstances when waiting for the DBS would negatively impact on service delivery. Under these circumstances a DBS Risk Assessment form will be completed, the purpose of which is to allow a new employee to start whilst waiting for their DBS, under specific supervised conditions.*

## **Appropriate Staff & Student Relationships**

Staff should bear in mind that many students may form personal attachments to them, due to various reasons; for example, feeling lonely or homesick. These attachments are understandable, however, students may misinterpret attention outside of working hours or sharing personal contact details as being more than just a professional relationship and as such it is not allowed. Staff must adhere to the following in terms of their interaction with students.

- Staff should not socialise with students outside of working hours, unless they are leading a social activity organised by the college.
- No personal emails or telephone numbers of staff should be shared with students; if a student requests this, then work contact details must be given. During Social Activities/Trips the college's emergency telephone number is given to all students in case of an emergency.
- Requests from students for a member of staff to befriend them on Facebook, or any other social media site, should be politely refused and the student directed to the college's Facebook page. As we are a predominantly adult college, if an adult student requests this, then it should be discussed with the member of staff's Line Manager to deem if it is appropriate or not.

It may be difficult at times to refuse a student, but it should be clearly explained that this is college policy.

## Student Supervision on Social Activities & Trips

In order to balance the minimising of risk, while ensuring that students get the full benefit of being in the UK, some under 18s will be allowed unsupervised time on activities and trips depending on the results of the risk assessment and their age. The risk assessment will decide which category of risk the trip falls under:

**Class A-** The location is deemed very risky such as a visit to a major metropolitan area such as London.

**Class B-** The location is deemed of moderate risk such as a small town/city with little pedestrian traffic, low crime and/or with which students and staff are already familiar.

**Class C-** The location is deemed of low risk. For example, inside a museum where there is only one normal entrance/exit and CCTV throughout the building.

If a trip/activity includes a location that falls under a lower level of risk (for example they visit a museum in London) then they may be unsupervised for their time at this location for the requisite length of time. In any unsupervised time, students will be told to stay in pairs or small groups.

For class A all under 18s must be supervised throughout.

For class B, 16-17 year olds can be unsupervised for up to 45 minutes. Younger students must be supervised throughout.

For class C, 16-17 year olds can be unsupervised for up to 45 minutes and 14-15 year olds can be unsupervised for up to 30 minutes. Students of 12-13 years of age, (or younger if this ever becomes applicable), can never be left unsupervised.

## Staff Induction

All new staff are given the following policies and information to read and sign during their induction or in cases where this is not practical, within a week of them commencing employment.

- Safeguarding under 18s Policy
- Safeguarding Vulnerable Adults Policy
- Prevent Policy
- E-Safety Policy
- Staff Code of Conduct, which can be found in the Staff Handbook.
- Attendance Policy (Teachers only)

In addition to this they must also complete online In-House Training, which provides an introduction to Safeguarding and Prevent, nationally and within the college. This should ideally prior to commencement of employment, or within a week of starting.

## **Training**

In addition to the initial training described above, all staff receive Level 2 training following 2 years' service, or attend an in-house extended workshop which covers Level 2 materials. All members of the Safeguarding Team are trained to Level 3, as are the Managing Director, the Principal, the HR Officer and all Senior Managers. All senior managers are also trained in Safer Recruitment. Information regarding training is entered onto the Central Register by the Designated Lead and can be found on the N-Drive in Compliance. The college also provides additional training in the form of face to face safeguarding refreshers.

## **Maintaining Good Safeguarding Practice**

As part of maintaining good practice, the Safeguarding Team meets which meets on a regular basis or as required, to review the policies and procedures, discuss any improvements and update the Safeguarding Action Plan. In addition to this, there is a Safeguarding Improvement Board made up of staff from different departments, which meets bi-annually, to discuss cases or concerns, look at current documentation (see below), and share good practice and ideas.

## **Monitoring Procedures and Practice**

In order to ensure we can identify and address any issues immediately, the following monitoring procedures are employed:

- A weekly Minors' List, containing the students' names, IDs, home and UK contact details, is run and sent out following enrolment.
- Any under 18s who are absent from class are marked on the register and reported to the Attendance Officer no later than the break. These are followed up immediately and recorded by the Attendance Officer.

- A weekly report is sent to the Principal containing information on the number of under 18s in the college and any issues (with follow up details) that have occurred that week.

### **Maintaining Accurate & Safe Records**

All records pertaining to individuals are kept in the Safeguarding Folder on the N-Drive in Compliance; this is accessible to only the people responsible for Safeguarding, the Director of Compliance & the Principal.

These records include:

- The Single Central Register, which is added to on an AD Hoc basis in terms of new staff being employed, but is checked on a weekly basis by the HR Officer and Designated Lead to ensure DBS checks and other information is up to date.
- All completed forms, dealing with a safeguarding concern.
- Any minutes of meetings that pertain to a safeguarding concern.

The above documentation is checked on a monthly basis by the Designated Lead or Failsafe against quality assurance criteria to make sure it is being updated properly and is fit for purpose. If any issues arise they will be highlighted in the action section on the QA form and addressed within a specified time.

### **How we address issues that arise but are not covered by the current policy:**

As the policy and procedures are working documents there may be occasions when a situation will arise that is not dealt with by the current policy. In these cases, unless someone is at immediate risk, no actions will be taken by an individual until...

- The manager/s of the relevant departments and the Designated Lead have been informed of the issue, either by phone or email.
- A meeting has taken place between these persons, to decide upon a course of action to rectify the situation. If this is not possible, then communication via email will be used.

Once an action is decided it will be acted on straight away. Following this, the following will be actioned:

- The outcome of the above will be reflected upon to assess its efficacy, and the processes revised as necessary.
- Any resulting amendments to the Policy & Procedures will be written by the Designated Lead, forwarded and approved/amended by the relevant Manager/s, the Compliance Director & the Principal prior to the Policy being updated.
- These changes will then be communicated to other staff.

### **How we ensure the policy is up to date and the relevant documentation is fit for purpose**

- Any amendments from the actions outlined in the previous section will result in the policy being updated and the changes circulated to all staff.
- The Designated Lead will keep up to date with current legislation and good practice by monitoring the government's website, and those of other relevant bodies such as the NSPCC: making amendments as necessary.
- All staff are invited to make suggestions to the design of forms or to procedures, if they feel the current practice is not fit for purpose. Any suggestions will be discussed within the Welfare and Safeguarding team and changes implemented if deemed appropriate.

### **Care of the Under 18's During Their Stay**

As an adult college we take the care of students under 18 very seriously and we do our utmost to minimise the risk to the growing number of students in this age group. As such we have dedicated procedures as outlined below in caring for students who are under 18.

#### **Pre-Arrival Information & Documentation**

The care of our younger students begins prior to their arrival in the UK and consists of providing them and their parents/guardians with a Pre-Arrival Pack containing the following.

- A named contact.
- Information about what to expect during their stay, both in and outside of college.
- Details of their accommodation and their host family.
- A summary of safeguarding at NCG & information about staying safe in the city.
- Comprehensive *Parental Agreement Forms*: which allow parents/guardians to stipulate what their child/children are allowed to do out of college hours; the type of accommodation, and an under 18s Student Handbook, which contains useful information, the code of conduct, rules for under 18s and disciplinary procedures.
- Arrival information (See below for procedures).
- Information we require, such as mobile number, medical problems or dietary requirements.
- Information about the college.

## **Arrival**

Unless it has been previously agreed and expressly confirmed between the student's guardian and New College Group, all under 18's will be met at the airport by a DBS checked driver at the Information Desk. The driver will have a sign with the student's name clearly stated on it. After being collected by the driver, the student is then driven to their accommodation to be met by their NCG DBS checked host, or own pre-arranged accommodation guardian. Once the students have arrived safely with their hosts, they are then left under the guardianship of said host.

## **First Day Procedures**

Our under 18s undergo an induction, which includes information about what they need to do when they are in the college, how to keep themselves safe both in and out of the college, and where then can get support during their stay; including the emergency phone number. The students will be given a Student Handbook which includes; the information provided in the induction, a section on staying safe and appropriate behaviour, and a support section with the names and contact details of who to speak to if they have a concern.

## **Out of Lesson Time**

The college does not provide supervision for under 18s out of lesson time and this is made very clear to their parents or guardians prior to arrival. That said, we do endeavour to ensure a safe and happy environment for them during their unsupervised time by implementing the following:

- Bathroom breaks: 16 – 18 year olds are allowed to take a bathroom break without supervision in the college. For students under 16 please see below.
- Safe accommodation, as detailed in the following section.
- If numbers permit; some social activities that only they can attend. If numbers are not high enough, then extra precautions are taken if they go on the general social programme: See social activities' Risk Assessment available on the N-Drive in Shared Documents/Forms, and in the Social Activities Folder in the Academic Office.
- Providing host families & all relevant staff with clear parental wishes regarding the freedom allowed their child/children from the guardianship letter provided in the pre-arrival documentation.

- Maintain regular contact with the parents/guardians of the child/children to allow for any issues or queries to be dealt with promptly: for example, if a child wants to stay away from the host family overnight, full details of where and with whom must be given to, the host family and the college, and the parents/guardian must email the college to endorse this.
- Ensure the young person is aware of who they can talk to regarding any aspect of their stay; this information is given at induction and is on posters around the college.

## **Accommodation**

Whilst the law does not specify where a student who is under 18 years be housed during their stay, minimising risk when housing children is outlined in the guides:

[http://www.englishuk.com/uploads/assets/members/publications/under18\\_guide.pdf](http://www.englishuk.com/uploads/assets/members/publications/under18_guide.pdf)

<http://webarchive.nationalarchives.gov.uk/+/www.dh.gov.uk/assetRoot/04/06/91/90/04069190.pdf>

The recommendations within the documents are something the college takes seriously and has formulated the following guidelines based upon them.

- The student will be given emergency contact information on arrival.
- We always prefer to house students under 18 with an enhanced DBS checked host family or a family appointed guardian. However, at times, parents want their children to stay in residential halls; we do not recommend this but will adhere to parent's wishes in these cases and have them complete the necessary Parental Agreement Form.
- Students under 18 years should not be housed with those over 18 wherever possible. However, in the rare cases where this happens, then the students will be of the same gender.
- Any health conditions or concerns will be shared with people who need to know and are involved in maintaining the student's wellbeing.
- It should be made clear to parents or guardians that their child will not be supervised by the college outside of class times or at weekends; however, they can ring the emergency number at any time if they need help.
- Host families will be given clear information as to the freedom students should have out of college time in accordance to their parents'/guardians' wishes outlined in the Parental Agreement Form.

- If a student feels unsafe in their accommodation or in the area around it, alternative arrangements will be made immediately.

## Care of the Under 16's During Their Stay

In addition to the measures detailed above, the following apply to under 16s at NCG.

### First Day Procedures

Under 16s may have a separate induction or induction with the rest of their closed group (some of whom may be older than 16) if this is deemed safer or more appropriate than using a common induction.

### Lesson Time

Students under 16 will not be placed in adult classes or have adult students in their class. Wherever possible, the class and break times of under 16 classes will differ from those of adult classes. First, this is to ensure that younger students have more regular breaks (2 rather than 1 in a three hour session) to ensure they get the most out of their learning. In addition, this greatly reduces the time that these students can mix with adult students unsupervised without overly restricting freedom.

Under 16s who need to visit the bathroom or similar facilities, where such facilities are onsite but open to members of the public, will need to be accompanied by either a member of NCG staff and/or by a vetted group leader. Additional measures may be implemented where possible to further increase their safety including, but not limited to:

- Getting the agreement from building management to restrict access to these areas to NCG students for the duration of the stay of the under 16s in the school
- Ensuring there are deterrents in these areas such as CCTV cameras
- Preventing the access card of under 16s allowing them to enter or leave the premises or building from any unsupervised exits.
- During break times, under 16s need to be supervised by an NCG member of staff or a vetted group leader.
- Students of the same gender go in pairs.

### Accommodation

Under 16s will be subject to an 8pm curfew rather than the 10pm curfew of 16-17 year olds.



## **Procedures to Follow for Safeguarding & Welfare Concerns**

### **Raising a Concern**

Should any person within the organisation suspect that a welfare or safeguarding issue has arisen, they must inform one of the Safeguarding Team as close to the event as possible, and no later than 24 hours after they first become concerned.

In the event of there being a concern out of hours, an email should be sent and a call made to the Out of Hours Officer on the emergency number: +44 (0)7535816060 (Manchester), +44 (0)7774707622 (Liverpool), +353 85 1739 991 (Dublin) to inform them of the concern. If it is felt that immediate action needs to be taken, the Out of Hours Officer will act in accordance with the policy and hand over to one of the safeguarding officers as soon as the college is next open.

Following any reported concern, the officer informed should immediately pass on these concerns to their counterparts so that a decision can be made as to what action should be taken. In the case of a serious concern being raised, immediate risk of harm, or an allegation of abuse by a staff member or a fellow student, the LADO (Local Authority Designated Lead) and/or Police must be informed immediately. Only the Designated Lead, (or nominated person in their absence), will make an external referral.

### **Handling a Disclosure of Abuse & Ensuring Confidentiality**

If you are approached by a student wanting to talk you should:

- Always listen positively and reassure them. If you can, try and ensure a degree of privacy, but this may not always be possible.
- Do not show revulsion or distress, however distasteful the events are.
- Stay calm and controlled.
- Let the student know at once that it was not his/her fault and keep restating this.
- Reassure the student that you still care for them and that what they have said does not make you care less.

- Do not make false promises, i.e. that you will keep the abuse a secret or that the police will not be involved. Do not promise confidentiality.
- Make them aware that disclosure will be reported to only those that need to know and can help.
- Do not question the student; try to limit your involvement to listening. A child can be interviewed only once.

It is imperative that what is said, is documented as accurately as possible, and that leading questions are not used as these may render the documentation inadmissible should legal action be taken. By leading questions, we mean direct questions that are asking if someone did something specific.

For example:

*Did X touch you here?*

*Did you feel upset?*

Instead, ask open questions like:

*Can you tell me what happened?*

*How did this make you feel?*

This allows the person to tell things in their own words, without being led by another person's assumptions about what happened or might have happened. This should be documented using, as closely as possible, the words of the young person or vulnerable adult. This must be documented on a *Welfare/Safeguarding Record of Concern Form*; available on the N-Drive in Shared Documents, Forms/Compliance/Safeguarding. The completed form should be emailed to the Designated Lead and will be stored on the N-Drive in the Safeguarding Folder and filed in a separate folder named with the student ID: this is only accessible to the Safeguarding Team, The Principal and the HR Officer.

## **Investigating a Concern**

Once it has been established that there is a safeguarding or welfare issue, the following actions should be taken. The persons involved should be contacted, and if necessary removed from an unsafe situation immediately. A meeting between the student whom the concern is about and one of the Safeguarding & Welfare Team should take place within 24 hours of it being reported. If this is not physically possible, for example it is the weekend, contact should be made by phone or email. In this case, a *Welfare/Safeguarding Follow-Up Form*, available on the N-Drive in Shared Documents,

Forms/Compliance/Safeguarding, should be completed by the welfare or Designated Lead, and stored on the N-Drive, Compliance in the Safeguarding Folder. The student's parents will be contacted by a member of the team to inform them of the situation.

### **Support Following a Concern**

Once it has been established that there is a safeguarding or welfare issue, the following actions should be taken. The student and their family should be offered immediate and then regular support by a member of the team. If the support required is outside the college's remit, support from external agencies will be sought. The officer involved will act as a point of contact for the student, their family and any outside support agencies that the student has been referred to.

### **Handling Allegations Against Staff & Students**

Any staff who have concerns about a colleague, or a student, being a perpetrator of abuse must report them to the Designated Lead. The reporting member of staff will be protected by the Whistleblowing Policy (See the Staff Handbook), and should not feel concerned about making an allegation. Confidentiality must be maintained at all times, any breach of this, could result in disciplinary action.

### **Initial Response**

In cases where a member of staff or another student has been accused of some form of abuse, the utmost should be done to keep this allegation confidential until it has been fully investigated. Upon the receipt of a *Record of Concern Form*, naming a staff member or a student as a possible abuser, the Designated Lead will contact the LADO immediately. Two possible courses of action may be taken following consultation with the LADO, and in line with their recommendations.

1. The member of staff, or student, will be asked to remain at home until an investigation has been completed. In the case of staff, this will be done in accordance with the College's Disciplinary Procedures (See Staff Handbook).
2. The member of staff, or student, will be allowed to remain in the college, but restrictions will be put in place. For example, a student will be placed in another class, where possible at a different time of day. They will have no contact with the alleged victim and must be supervised during all breaks. The staff member will not engage in any duties that could put them in contact with the alleged

victim, their working hours arranged so as to minimise any casual encounter, and possibly work under supervision.

The above actions will be discussed in a meeting by Senior Management and documented on an *Initial Consideration Meeting Form*, available on the N-Drive, Compliance – Safeguarding – Forms.

### **During an Investigation**

Whilst an investigation is being carried out, support will be offered to any person against whom an allegation has been made. If the allegation is against a student, they will be supported internally by a member of the Safeguarding Team, and external support will be signposted. Where a staff member has been accused, they will be referred to the HR manager, who will arrange for them to receive support and advice from an independent agency.

### **Following an Investigation**

If the allegation is proved to be true, the member of staff or student will be removed permanently from the college. In the case of a student their embassy and UKVI will be informed of the offence immediately. In the case of a staff member, the DBS will be informed, as per the law.

If the allegations are proved to be unfounded, this will be clearly documented on the records. All records will be kept, as per Government recommendations, in a password protected folder within the limited access Safeguarding Folder on the N-drive.

Summaries of the Safeguarding procedures can be seen on the following pages. All procedures are in line with those recommended by Manchester Children's Safeguarding Board, information regarding these can be found at <http://www.manchesterscb.org.uk/prof-procedures.asp>.

## Procedures for Reporting a Concern

All staff must follow the steps below if they have any concerns about a student.



## **Procedures for Responding to a Safeguarding Concern**

These procedures must be followed by the Safeguarding Officer involved

### Risk is identified

- If a risk of possible abuse has been identified, then the SG Officer must consult with the Designated Officer to decide on the level of risk involved.
- The team must then decide what action to take and document this on the *Safeguarding Record of Concern form*. (Available on the M-Drive: Shared Documents: Compliance: Safeguarding: Forms)

### Action to take in an immediate risk

- If the student involved is deemed to be at immediate risk the Designated Officer must contact the LADO (Local Authority Designated Officer) immediately for advice.
- The police will immediately be called if the concern is of an obvious criminal nature.
- The Designated Officer will act as the point of contact for all subsequent actions taken by the Local Authority.
- Everything must be documented on the *Safeguarding Record of Concern form*. (Available on the M-Drive: Shared Documents: Compliance: Safeguarding: Forms)

### Action to be taken in any risk

- If any risk of a safeguarding nature is identified, the Designated Officer must phone the LADO for advice.
- The Safeguarding Team must follow the advice given by the LADO and review/risk assess the situation on a weekly basis, or more frequently if required.
- Contact with the LADO will be maintained throughout by the Designated Officer.
- Everything must be documented on the *Safeguarding Record of Concern form*. (Available on the M-Drive: Shared Documents: Compliance: Safeguarding: Forms)

## **Procedures in the Event of an Allegation against a Staff Member or Student.**

These procedures must be followed by the Safeguarding Officer involved





# **Appendices**

## **Forms & Useful Information**

## Safeguarding Record of Concern Form

<b>Student Details</b>		
Name:		I.D:
Date of Birth:	Age:	Gender:
<b>Reason for Referral:</b> <i>Please be as factual and detailed as possible.</i>		
<b>Level of Risk:</b>		
<p>The risk is <b>LOW</b> - if it is unlikely that harm will result from the concern but support may be needed.</p> <p>The risk is <b>MEDIUM</b> - if it is more likely that harm might actually occur and support should be given.</p> <p>The risk is <b>HIGH</b> - if there is a high likelihood that harm will occur or is occurring. <b>In high risk situations, the LADO or/and Police must be contacted and the student made safe immediately.</b></p>		
<b>Details of the meeting with student:</b> <i>Please Record as accurately as possible what is discussed.</i>		
<b>Present:</b>		
<b>What will happen next?</b> <i>Please identify how the concern will be followed up below:</i> <b>If no follow up is required please explain why here:</b>		
<b>Action (If you have called someone for advice, then please write their name and contact details here.)</b>	<b>Who is responsible?</b>	<b>By when?</b>
Signature and name of Designated Lead/Safeguarding Officer:		Date:



**Final Outcome:** *Please detail why the case is being closed:*

Signature and name of Designated Lead/Safeguarding Officer:

Date:

## Parental Agreement Form for Under 18s in Residential Halls

E: admissions@newcollegigroup.com

T: +44 (0) 161 233 4290

Address: New College Group, 9 Portland Street, Manchester, M1 3BE

**Student Name:** \_\_\_\_\_

### Emergency contact 1 – Parental contact details

<b>Father's / Mother's Name:</b> <b>Address:</b>	<b>Home telephone number: (Including country code)</b>  <b>Mobile telephone number: (Including country code)</b>  <b>Work telephone number: (Including country code)</b>  <b>Email:</b>
---	---

### Emergency contact 2 – Person's contact details

<b>Name:</b> <b>Relationship to child (brother, aunt, friend...)</b> <b>Address:</b>	<b>Home telephone number: (Including country code)</b>  <b>Mobile telephone number: (Including country code)</b>  <b>Work telephone number: (Including country code)</b>  <b>Email:</b>
--	---

Adult General English courses are for students aged 16 years and over. However, many students on our Adult General English courses are 18 years and above. For students between 16 and 18 years, there are rules that help us and make sure your child is happy and safe.

### General rules/procedures:

- Students must arrive on time and attend all morning and/or afternoon classes. If students are ill, they must telephone and/or email New College Manchester (admin@newcollegemanchester.com) to notify the reason for absence.
- Students under 18 years on Adult General English courses are not supervised during break-times, lunch times or after lessons have finished.
- Students that choose to live in residential accommodation will not be supervised during their stay. They may be living with students that do not study at New College Group Manchester and their flat mates may be over the age of 18.
- New College Manchester reserves the right to ask a student to leave because of misconduct (unacceptable behaviour), non-payment of fees or non-attendance and will be subject to disciplinary procedures.
- All students and staff at the New College Manchester are expected to show respect to each other at all times. The following behaviour is not acceptable: harassment, bullying, actual or threats of violence, damage to personal property and verbal abuse based on racial, sexual or religious differences.

### General Rules and Behaviour Guidelines for students

- Do not break the law in the UK:

- Students must be over 18 years to buy and consume alcohol and cigarettes in the UK. UK pubs do not usually welcome under 18's and smoking is not permitted inside any establishment.
- Do not buy or take any illegal drugs.
- Do not be tempted to take anything without paying, even students under 18 may be arrested and prosecuted if caught shoplifting.

#### Discipline procedures

- Verbal warning (by teacher and/or group leader).
- Verbal warning by Director of Studies / Director
- Written warning by Director of Studies / Director to students and copy to parents
- Final written warning Director of Studies / Director to students and copy to parents
- Expulsion at the cost of parents (to send student back to their country of origin).

#### Parents please read and sign below to indicate your agreement:



- I give permission for my child to participate in all lessons and excursions / activities organised by Manchester.
- I am aware that my child will be studying with older students on the Adult General English course and will not be supervised during break-times, lunch-time or after school.
- I agree that my child should abide by the recommended rules and curfew time of 10PM.
- I understand internet access is provided by New College Manchester for students and may be available in their homestay. I am aware my child may have unsupervised access to the internet.
- I give permission for my child to travel unaccompanied by public transport in Manchester to and from all lessons, activities and excursions organised by New College Manchester.
- I give permission for my child to receive emergency medical treatment in the UK.\* Please indicate on the application form any special medical requirements, behaviour issues, dietary requirements or allergies.
- I am aware of New College Manchester's Discipline Procedures and that if my child is subject to these and expelled, then I am liable for the cost of sending my child home early (travel to the airport and flight expenses).
- I give my permission for my child to live, unsupervised during their stay in residential halls and am aware that they may be living with students that do not study at New College Group Manchester and students over the age of 18.

#### Overnight or Weekend Visits

Sometimes students under 18 years want to stay overnight with friends or stay overnight at the weekend to visit another city.

**Are you happy for your child to stay overnight with a friend or in another city?**

**YES:**

**NO:**

If you are happy for your child to stay overnight, then they must tell the college and you where they are going. Tell you and us who they are going with, where they are staying, and give contact details for both. You must then email the college to say this is okay.

#### Publicity:

There may be occasions when photographs are taken. Do you give permission for NCM to use any photograph of your child in our publicity material? A copy of the photograph will be send to you.

**YES:**

**NO:**

**Parents please read and sign below to indicate your agreement: By typing your name in the box below you are signing that you agree to the arrangements and rules within this form.**

- I give permission for my child to participate in all lessons and excursions / activities organised by New College Manchester.
- I agree that my child should abide by the rules and behaviour guidelines.
- I agree that my child should abide by the recommended rules and curfew time of 10PM.
- I understand internet access is provided by New College Manchester for students and may be available in their accommodation. I am aware my child may have unsupervised access to the internet. We do have a policy for safe internet use and sites which are unsuitable for young people are blocked by our server.
- I give permission for my child to travel by public transport in Manchester to and from all lessons, activities and excursions organised by New College Manchester.
- I give permission for my child to receive emergency medical treatment in the UK.\* Please indicate on the application form any special medical requirements, behaviour issues, dietary requirements or allergies.
- I am aware of New College Manchester's Discipline Procedures and that if my child is subject to these and expelled, then I am liable for the cost of sending my child home early (travel to the airport and flight expenses).

I understand, and accept, that New College Manchester will offer as much support as possible to my child, and provide them with an emergency telephone number for out of hours help. However, I appreciate that they are not able to offer supervision outside of the hours my child is in college; and are therefore not liable for any incidents that could occur during this time.

I understand that allowing my child into residential halls is against New College Manchester's recommendation. However, I sign in the knowledge that my child is mature enough to live independently without supervision, during their stay in residential halls. I can ensure that my child knows, and will use one, of the contact numbers below should they need any help

Parent/Guardian's Signature:	
Student's Signature:	Date:



## DBS CHECK RISK ASSESSMENT

**This form can be used to assist in assessing and recording the risks of allowing someone to start paid or volunteer work. It should only be used in circumstances where to not employ the person would result in a severe disruption of service provision.**

The completion of this risk assessment form is the responsibility of the appointing manager and must be authorised by the Principal **before** the person can start. This completed risk assessment form must be placed on the individual's personnel file.

### **Circumstances in which the form may be used:**

- The appointment is necessary to allow the service provision to continue.
- An enhanced, DBS check has been applied for.
- The person has no unsupervised contact with children or vulnerable adults.
- They have no access to sensitive records, particularly information about individual children or vulnerable adults.
- This risk assessment and risk management plan has been completed and signed off by the appointing manager and the Principal.

*Please note that candidates may be able to carry out induction, training and supervised tasks whilst waiting for the DBS certificate to be returned.*

If you require any assistance with completing this Risk Assessment please contact one of the following:

- Fareeda Haq (Whole group): [fhaq@newcollegegroup.com](mailto:fhaq@newcollegegroup.com)
- Charlotte Kerns (Manchester): [ckerns@newcollegegroup.com](mailto:ckerns@newcollegegroup.com)
- Kerill Kennedy (Liverpool): [kkennedy@newcollegegroup.com](mailto:kkennedy@newcollegegroup.com)

## **PART 1 – FOR THE APPLICANT TO COMPLETE**

Please read and sign the following declaration. Please be aware that to withhold information or to give false information will be regarded as an attempt to falsify records which constitutes gross misconduct and will, if proved, lead to dismissal and reporting to the relevant authorities.

<b>Name:</b>	<b>Date of Birth:</b>
<b>Job/ Position Applied for:</b>	<b>Work Base:</b>

### **Have you ever been cautioned or convicted of any offences?**

We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed. It is also necessary to explain how you, the applicant, now feel about the incident or offence. Please give details below.

### **Declaration by Applicant**

I, \_\_\_\_\_, confirm that I am eligible to work with students under 18 years of age. I am not on a Sex Offenders' Register nor have I committed a crime which prevents me from working with students under 18 years of age.

I certify that the information I have provided on this document is true and complete. I understand that to knowingly make a false statement or omit information will result in my job or volunteering application being unsuccessful or, if employed, in my facing possible dismissal or other disciplinary action.

Sign & Print name:

Date:

## **PART 2 – FOR THE APPOINTING LINE MANAGER TO COMPLETE**

<b>Name of Candidate:</b>	<b>Date of Birth:</b>
<b>Job Title:</b>	<b>Work Base:</b>

<b>Has the Recruitment Checklist been completed, including all of the following?</b>	<b>Confirmation/Details</b>
Employment gaps, discrepancies or anomalies	
Appropriate and satisfactory references	
Give details where you have obtained clarification or missing information on the applicant or verification of the referee's position in the organisation.	
Have you checked and verified that the candidate's qualifications fulfil the requirements in the selection criteria?	
Has the candidate completed the self-declaration? Confirm that you have actively asked the person if they have any convictions, cautions, reprimands, warnings, bind-overs, pending prosecutions or disqualifications.	
Have you seen and verified asylum and immigration checks?	
Has the candidate completed a new DBS certificate Application form?	
Has the candidate been a resident outside of the United Kingdom? If yes, is a Police Check or DBS equivalent from that country being sought?	
<b>Risk Assessment:</b> Please give details of any risks involved in appointing/employing the individual.	

**Outline protective measures to be used to reduce the risk:**

Is this person suitable to start work before the DBS is returned under the conditions proposed above? Yes/No  
**Comments: (Reasons for decision)**

Risk Assessment completed by:

Sign & Print name (Manager)

Date:

Risk Assessment Authorised by;

Sign & Print Name (Principal)

Date

## Useful Information

### Local Authority Designated Leads (LADO)

All Local Authorities have a Local Authority Designated Lead (LADO) who works within Children's Services and must be alerted to all cases (from within any agency) in which it is alleged that a person who works with children has: behaved in a way that has harmed, or may have harmed, a child possibly committed a criminal offence against children, or related to a child behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO will provide advice, guidance and help to determine what procedures to follow. They also help co-ordinate information-sharing with the right people and will monitor and track any investigation.

### LADO for Manchester

Majella O'Hagan

Ground Floor- R&D Block, Wenlock Way Offices, Wenlock Way, West Gorton. M12 5DH

**E:** [majella.ohagan@manchester.gov.uk](mailto:majella.ohagan@manchester.gov.uk) **T:** 0161 274 6211

### LADO for Liverpool

Ray Said

Safeguarding Unit, The Ray Hurst Centre, Pendine Close Liverpool, L6 3BH

E: [ray.said@liverpool.gov.uk](mailto:ray.said@liverpool.gov.uk) T: 0151 2330853

### **Channel Manchester**

**Regional Channel Manager:** Gaynor Egerton – 0161 856 6325 or [gaynor.egerton@gmp.police.uk](mailto:gaynor.egerton@gmp.police.uk)

**GMP Channel Lead:** DS Julie Haworth - 0161 856 636 or [julix.haworth@gmp.pnn.police.uk](mailto:julix.haworth@gmp.pnn.police.uk)

**DC Paul Meadows:** [paul.meadows@gmp.pnn.police.uk](mailto:paul.meadows@gmp.pnn.police.uk) 66373 Metropolitan South Manchester Trafford

### **Websites:**

**Manchester Safeguarding Children Board:** <http://www.manchesterscb.org.uk/index.asp>

**Liverpool Safeguarding Children Board:**

<http://www.liverpoolscb.org/>

**NSPCC:** <http://www.nspcc.org.uk/preventing-abuse/>

**The Safe Network:** [http://www.safenetwork.org.uk/about\\_us/Pages/default.aspx](http://www.safenetwork.org.uk/about_us/Pages/default.aspx)

### **Government Sites:**

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97976/prevent-strategy-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf)