Safeguarding and Prevent: The policy and procedures for the protection of children, young people and vulnerable adults

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This policy and procedure is subject to The Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual orientation, Disability.

Alternative Format

This policy is available in alternative formats, to request this, please email marketingcampaigns@mkcollege.ac.uk

This document includes the Child Protection Policy, the Vulnerable Adults policy and Safeguarding Strategy have now become part of this policy, to create an overarching Safeguarding policy, supporting staff to find all safeguarding information in one place

Version Control

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18	Group Director: Inclusion Quality and Student Experience	Board of Governors	10/12/25	Apr 26

Change log

Version Number	Summary of changes
18	

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1. Introduction

1.1 This policy states the responsibilities of the College in relation to safeguarding children and vulnerable adults, in line with current legislation and guidance. The College will keep its policy and procedures on child protection 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 accountabilities regarding the safety and wellbeing of students.

1.2 Safeguarding is a core element of all aspects of college activity. The term Safeguarding describes the broader preventative and precautionary approaches to planning and procedures that are necessary to be in place to protect all students, staff and visitors and minimise risk from any potential harm. Protection of children and vulnerable adults, 'Safer Recruitment' practice and health and safety are all aspects of Safeguarding.

1.3 As a college we actively promote the principles of safeguarding in terms of both staff and students. A College specific safeguarding induction is provided to all new staff irrespective of specific role and all staff are trained in the use of Child Protection Online Monitoring (CPOMS) Regular bulletins are provided to all staff via internal comms and the Safeguarding Strategy Group meets termly. Students undertake 6 weeks worth of tutorials as part of their Personal Development curriculum around the theme Safe which covers in depth a range of topics designed to empower and raise awareness.

2. Scope

2.1 The procedures apply to all staff, whether teaching, administrative, management or support, visiting lecturers, supply or agency staff as well as to volunteers. The word 'staff' is used for ease of description.

2.2 The term student herein refers to all enrolments including study programme, apprentices, work-based learners and higher education students. An additional section within this policy refers to vulnerable adults.

2.3 This policy applies to all campus sites; Chaffron Way, Bletchley, the Information Technology Centre (ITC) the Institute of Technology (IOT) Sports Central and Careys sites. Each site has access to a designated safeguarding team that responds to incidents and concerns. There is a rota of senior safeguarding staff across all sites. Contextual Safeguarding remains a key area of focus across all sites.

2.4 At Milton Keynes College any student (adult or child) in danger of radicalisation or demonstrating extremist tendencies (violent or non-violent) is deemed to be vulnerable

and appropriate support under the Prevent strategy or through CHANNEL will be sought. The College maintains active links with the Prevent board and Thames Valley Police Counter Terrorism officers.

2.5 Any and all subcontracted provision is subject to rigorous due diligence checks and regular safeguarding monitoring is undertaken to ensure the safety of all students engaging with this provision. Safeguarding features as part of the monthly Delivery Partnerships group meeting.

3. Policy Statement

3.1 The Milton Keynes College Group aims to maintain a safe and welcoming environment on all sites for staff, students and visitors. We promote a culture of safeguarding within the College, where the importance of keeping everyone safe is understood and that the way to seek help is clear. It is committed to meeting its duty to safeguard and promote the welfare of all students and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.

3.2 The College is committed to taking a preventative approach to safeguarding all students from potential harm, damage, radicalisation or being drawn into terrorism (violent and non-violent extremism.(See section 29 for further details)

3.3 The College reserves the right to refuse admission to any student who may pose a risk to other students or themselves and has appropriate student admissions procedures in place.

3.4 The College takes its obligation seriously to deliver the outcomes specified in the Ofsted Education and Skills Inspection Framework. In the context of this policy, inspectors will make a judgement on the effectiveness of leadership and management by evaluating the extent to which leaders, managers and governors protect all learners and keep them safe. Updates to the framework will move from a model of Effective/Ineffective to Met/Unmet with an accompanying narrative.

3.5 The College commits to take all appropriate actions to address concerns about the welfare of children, young people and vulnerable adults and to work to agreed local policies and procedures to ensure that the maximum is done to provide a safe environment for all students within the College. The College recognises that Safeguarding impacts on all areas of an individual's life. The College aims to build knowledge of Safeguarding and resilience in students within their College experience, personal lives and within the community. The Personal Development curriculum includes a 6 week programme of Safeguarding modules.

3.6 The College recognises the need to work with other agencies in performing its duties under the Education Act 2011 and Children Act 2004. These are, in summary:

- to have in place and follow procedures in keeping with local inter-agency (Local Safeguarding Partnership) guidelines
- to operate and adhere to safer recruitment procedures
- to have in place procedures to deal with low level and significant allegations against staff
- to designate a senior member of staff as having lead responsibility for safeguarding students and ensure that they receive appropriate training and supported by a safeguarding team.
- to ensure all staff working with students receive appropriate regular safeguarding training and are aware of their responsibilities
  to review policies and procedures annually or when there is a change in legislation or guidance.
- to represent the College on the MK:Together (an amalgamation of the Local Safeguarding Children Board, Adult Safeguarding Board and Health and Wellbeing Board.)

3.7   The College is committed to taking all reasonable measures to ensure that risks of harm to children, young people vulnerable adults are minimised by appropriate:

1. Risk assessment, management and audit
2. Health and safety procedures
3. Staff selection, recruitment, induction, probation, supervision and training
4. Adherence to the staff code of conduct and professional boundaries guidance
5. Creation and promotion of an open culture through a Public Interest Disclosure (Whistleblowing) policy.
6. Reacting to and reporting abuse
7. Checking and monitoring the safeguarding arrangements of sub-contractors contractors, supply staff and visitors
8. Risk assessing all trips.

3.8   The College has detailed procedures underpinning this policy to provide clear direction to staff; these can be found in Annexe 1 and 2, Application of these procedures is mandatory. Staff are required to sign to say that they have read and understood these policies and that they will adhere to them at all times.

3.9   Overall responsibility for compliance monitoring lies with the Safeguarding Strategy Group which is chaired by the Lead Safeguarding Officer. Designated and suitably trained members of staff are assigned responsibility for receiving referrals and taking appropriate action.

4. Legal Framework

4.1   DfES circular 10/95 set out the role of FE Colleges in helping to protect children from abuse, under the terms of the Children Act 1989. Guidance was updated in the Introduction of the

Education and Training (Welfare of Children) Act 2021 which brings FE Colleges and post 16 provision in line with all educational provision.

4.2 The Children Act 1989 placed a duty on Local Authorities to investigate situations where a child is at risk of significant harm. Schools and Colleges had a legal obligation to work with investigating agencies acting on behalf of children in need.

4.3 Section 175 of the Education Act 2002, which came into force in June 2004, a duty on local authorities, the governing bodies of maintained schools the governing bodies of Further Education institutions to have arrangements in place to ensure that they safeguard and promote the welfare of children. This duty is very general but acquires substance in guidance issued periodically by the Department for Education. S175 imposes a statutory duty to have regard to the guidance issued by the Secretary of State.

4.4 Responsibility for making sure appropriate arrangements are in place lies with the Governing Body. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by the Governing Body.

4.5 The Children Act 2004 resulted from Lord Laming's report into the death of Victoria Climbié. Section 11 of the Act, which came into force in October 2005, brought other key agencies into line with the duties already placed on schools and Colleges by s175 of the Education Act 2002. Section 13 (as amended) specifies membership of local safeguarding boards, including Further Education Colleges.

4.6 In April 2014, the Department for Education replaced this with new statutory guidance 'Keeping Children Safe in Education'. The guidance is updated annually and reflects changes to the vetting of staff, including the introduction of the Disclosure and 5 Barring Service (DBS) to replace CRB, and the notion of 'regulated activity' which prescribes which staff may and may not be subject to pre-appointment checks. The document sets out what schools and Colleges should do to safeguard and promote the welfare of children, as well as the legal duties with which they must comply. Although it is designed to be read in conjunction with 'Working Together to Safeguard Children', the intention of the guidance was to scale back to a minimal set of requirements which make clear where individuals should use their own practitioner judgement.

4.7 The current KCSIE guidance was updated for use from September 2024 which outlines what schools and Colleges must do legally, as well as what they should be doing to create a safe environment. It requires that all staff must understand and work to Part 1.

4.8 The Protection of Freedoms Act 2012 changed the definitions of regulated activity and amended the provisions of the Safeguarding Vulnerable Groups Act 2006, which altered the definition of a vulnerable adult.

4.9 The Milton Keynes College Group is not an investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers (MASH etc).

4.10 There is a mandatory duty to report known cases of Female Genital Mutilation to the Police. This must be carried out by the person that received the disclosure (supported by our DSL/Head of Safeguarding.)

4.11 The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability. It is also acknowledged that additional barriers may exist when recognising the signs of abuse and neglect in children who have special educational needs and/or disabilities.

4.12 In February 2015 the Counter-Terrorism and Security Act placed on Colleges identifies the duty to have due regard to the need to prevent people from being drawn into terrorist activity. The mandatory duty to report radicalisation under the Prevent Duty is in place. See section 29 for further detail.

5. Local and National Safeguarding Priorities

5.1 The College participates in MK Together (previously known as the Milton Keynes Safeguarding Children Board) and as such the College is mindful of the current local and national agenda, including drug and alcohol misuse, missing education, sharing self-generated indecent images, Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM), Child on Child Abuse and Sexual Violence. Current Milton Keynes priorities include Mental Health, Neglect, Poverty and County Lines and Domestic Abuse.

5.2 The College also recognises its role in promoting the wellbeing of its students, and, through its tutorial framework, cross-College events and national campaigns, seeks to raise student awareness of safeguarding issues and develop resilience and protective behaviours. As the College enrols students from neighbouring counties and beyond, we need to be aware of issues linked to gang activity and county lines. To enable us to mitigate risk as far as possible we are part of local crime prevention and Contextual Safeguarding groups. We also use screening arches weekly as a deterrent and to raise awareness of the risks posed by carrying bladed articles.

6. Equality and Diversity Statement

6.1 The Milton Keynes College Group is committed to the promotion and development of equality and diversity. We aim to provide a working and learning environment which values individuals equally and does not discriminate on any grounds including age, disability, race, sex (gender), sexual orientation, gender reassignment, religion or belief, marriage or civil partnership and pregnancy and maternity.

6.2   This policy and procedure will be implemented in accordance with our policy on equality and diversity, and decisions/actions taken in relation to a potential safeguarding or child protection incident will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.

6.3.   This policy is subject to equality impact analysis.

7. Monitoring and Review

7.1   Implementation of this policy will be monitored through termly Strategy meetings and an annual report to the Board of Governors with interim reports delivered termly.

7.2   The policy is reviewed annually by the Safeguarding Strategy Group

8. Child Protection & Safeguarding Procedures

These guidelines also apply to all adults, including volunteers, working in or on behalf of the College.

*"Schools and Colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working together to safeguard children 2018. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. We implement a culture of safeguarding within the College, ensuring that staff, students, contractors, parents, volunteers are all aware of our ethos and play a part in keeping young people safe.*

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action."

Keeping Children Safe in Education DfE September 2024

It is commonly accepted that College staff spend so much time in contact with young people and vulnerable adults that they are in a good position to discern whether they may be a victim of abuse or not. However, it is important to know what this abuse is and how it can be picked up on.

The four principal categories of harm suffered by children are set out in national guidance. These are used to assist those responsible for the welfare and protection of children to understand and recognise the symptoms of abuse. These definitions are available in Annexe 3.

The identification of abuse is difficult, even for experts. It is NOT the role of College staff to define or attempt to diagnose whether a child or vulnerable adult has suffered abuse within certain categories. An understanding of the categories is, however, important to enable staff to recognise symptoms of abuse.

All concerns are discussed with the Designated Safeguarding Lead and where appropriate the MASH team or Adult Safeguarding team to consider appropriate support or referrals being made.

9. Safeguarding Vulnerable Adults

9.1   "Adult" in this context means a person aged 18 years or over.

9.2   Vulnerable Adults

In accordance with the Law Commission Report 'No Secrets' Department of Health 2000, vulnerable adult is a person: "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."

Adult At Risk: Any person over the age of 18 years who is unable to look after their own wellbeing, property, rights or other interests; and is at risk of harm (either from another person's behaviour or from their own behaviour); and because they have a disability, mental disorder, illness or, are more vulnerable to being harmed than other adults.

Milton Keynes College has a legal and moral duty to safeguard and promote the welfare of adults at risk receiving education and training at the College.

The aim of this policy is to establish a 'whole College' approach to safeguarding vulnerable adults and adults at risk, by:

- providing a safe environment.
- identifying vulnerable adults who are suffering or likely to suffer significant harm
- Supporting the adult to look at the options and consider a referral
- providing appropriate action to ensure the safety of vulnerable adults both in the community and at College.

Overall responsibility for compliance monitoring lies with the Governor for Safeguarding and with the Designated Safeguarding Lead. Regular safeguarding concerns are raised at the weekly Safeguarding Panel, which is chaired by a senior member of the Head of Safeguarding. Designated members of staff are assigned responsibility for receiving referrals and taking appropriate action. The Group Director of Inclusion is Lead DSL with the Head of Safeguarding as Deputy Designated Safeguarding Lead and three campus DSLs in post.

9.3   Responsibilities for vulnerable adults are:

- to safeguard adults whose circumstances may make them vulnerable to abuse, by developing and maintaining an inclusive culture within the College, developing the staff's knowledge and awareness of safeguarding issues, and by applying best practice at all levels of the organisation.

- to ensure that all vulnerable adult matters are dealt with according to national guidelines and legal requirements.

- to ensure that all interventions are based on the concept of empowerment and participation of individuals, and that the right to self-determination may involve risk.

- to aid the identification of vulnerable adults at risk of significant harm, and provide procedures for reporting concerns.

- to act promptly in response to any incident reported; and work in partnership with other agencies such as Thames Valley Police and Milton Keynes Adult Social Care Assessment Team 'ASCAT' to promote and uphold the rights of adults whose circumstances make them vulnerable.

- to establish procedures for reporting and dealing with allegations of abuse against members of staff.

- to ensure students are provided with appropriate information relating to safeguarding and where appropriate to support the vulnerable adult to build their own resilience against harm.

- to improve continuously the effectiveness of response to situations of alleged abuse through monitoring and evaluation.

- to keep a database of available services, that may support adults at risk. For example:

- to maintain a confidential centralised record of all reported vulnerable adult protection issues.

- to provide an annual report to the Board of Governors which reviews how the College has fulfilled its responsibilities to protect vulnerable adults. This report will go, in the first instance, to the College's Safeguarding Group.

10. Specific Safeguarding Issues

10.1 All staff should have an awareness of safeguarding issues that can put students at risk of harm. Behaviours linked to issues such as substance misuse, deliberately missing education, social media and harmful sexual behaviours that put children in danger are key focusses.

10.2 All staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm· sexual violence and sexual harassment.
- sexting (also known as Youth Produced Sexual Imagery) and sexploitation (the practice of illegally persuading people to perform sexual acts and/or threatening to distribute images)
- initiation/hazing type violence and rituals
- upskirting

The types of abuse that staff should be clear on

- Physical abuse
- Domestic violence and abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or Institutional abuse.

10.3 All staff are clear as to the College's policy and procedures with regards to Child-on-Child Abuse and aware that all concerns must be logged and followed up.

10.4 Expert and practitioner organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

10.5 Specific forms of abuse and safeguarding issues can include:

- Children missing from education
- Children with family members in prison
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- County lines
- Domestic abuse
- Abuse, neglect and exploitation
- Female Genital Mutilation (FGM)
- Forced marriage
- Honour-based violence
- Preventing radicalisation
- Child on child abuse
- Serious violence

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- Problematic and Harmful Sexual Behaviours
- Upskirting
- Homelessness
- Mental Health

10.6   The Female Genital Mutilation mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on them.

- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present.

11. Designated Staff

11.1   A list of designated persons with responsibility for safeguarding and child protection is given at Annexe 1.

11.2   There is a designated governor with delegated responsibility for safeguarding. The designated governor meets half termly with the Group Director of Inclusion and Head of Safeguarding. The Safeguarding governor is responsible for ensuring the College has policies and procedures in place which are considered annually by the Board of Governors and to seek assurance on all activity pertaining to safeguarding.

12. Safeguarding Information for Students

12.1   The College is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students are aware that there is a

discrete Safeguarding Team and how to contact them. The College informs students about who they can talk to, both in and out of College, their right to be taken seriously, listened to and heard and what steps can be taken to protect them from harm. This information is delivered to students at the start of their course and reinforced throughout their programme of study via the Personal Development curriculum. This information is also available on the my MKC App and the College website.

12.2   College's arrangements for consulting with and listening to students are through Student Forums (Student Voice) and Personal Development feedback.

12.3   Students are made aware of these arrangements via presentations, poster campaigns, information screens, the induction programme and College documents including programme handbooks. There are also links on the MyMKC app and via the Personal Development Teams channel.

13. Responding to a Disclosure or Suspicion of Abuse

13.1   It is not the responsibility of the College's staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns, maintain an open mind and ensure that the DSL is notified. Accordingly, all concerns regarding the welfare of students will be recorded and discussed with a member of the Safeguarding Team prior to any discussion with parents.

   All referrals should go through the Designated Safeguarding Lead unless the following circumstances are present:

   - The concern involves the DSL
   - The concern involves a family member of the DSL
   - The DSL does not believe it meet thresholds for a referral, but the person identifying the concern believes it needs to be picked up by MASH
   - There is an imminent risk and the child needs safeguarding immediately

13.2   If, at any point, there is imminent risk of serious harm to a child or adult a referral should be made to children's or adult social care and/or the police immediately. Anybody can make a referral, however, the DSL must be made aware of all referrals and these should be completed with guidance from a member of the Safeguarding Team. If the child/vulnerable adult's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child or vulnerable adult at some point.

13.3   Any member of staff who has knowledge of, or a suspicion that, a child / vulnerable adult is, or has been suffering significant harm, must refer their concern to a member of the Safeguarding Team immediately.

13.4   All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the Safeguarding Team in the first instance.

13.5   Staff training recognises the many possible perpetrators of abuse, including adults inside or outside College, Child on Child abuse and online abuse.

13.6   Staff who receive a disclosure of abuse should make an immediate written record of the conversation via CPOMS. The following information should be included:

- date and time of report
- date, time and place of alleged abuse
- your name and name of complainant
- name of student alleged to have been abused, if different from above · nature of alleged abuse including perpetrator, if known
- description of any injuries observed, if any (body map)
- any other information given, including siblings, if relevant
- distinguish between observation, fact and opinion (opinions should be backed up describing why we have this opinion).
- confirmation that the student has been advised of the next steps (and parent if appropriate)

13.7   Questions should be kept to the minimum required for clarity, and leading questions must be avoided. Where, when, who and what happened is usually sufficient to gain enough for a referral. Do not stop the disclosure, it may be the one opportunity for them to speak Ensure they are aware that you must pass this information onto the DSL.

13.8   It may also be appropriate to remind the student about the availability of the College Counselling Service, Arthur Ellis, Togetherall or external helplines.

13.9   Staff should be aware that when making a safeguarding referral, they may be asked to contribute towards assessments, plans or monitoring by external agencies. This may include MASH referrals (MARF form).

14. Safeguarding Students Aged 16 and 17 (including under 16s)

14.1   These students are covered in law by the Children Act. This means that allegations or suspicions of abuse must be taken seriously by the College and acted upon according to the procedure.

14.2   Concerns or suspicions must be referred to the Safeguarding Team even if the student's stated wishes are to the contrary. They will seek advice from the appropriate investigating agency and

agree any further action which may be necessary. This may include a formal referral using the agency's referral paperwork.

14.3 Students aged 16 and 17 are encouraged to report the abuse, or give consent for a report to be made, to an investigating agency. This will usually be the Children's Services department in the area where the student lives, via the relevant Multiagency Support Hub (MASH). The student should be made aware that it may be necessary to report the abuse even without their consent.

14.4 The following issues are relevant:

- · what are the wishes of the student?
- · are younger siblings involved?
- · is a criminal act being committed?
- · is there immediate risk of significant harm?
- · Is there a public interest (others at risk)
- · Is it historic or current abuse

15. Safeguarding Students with Special Educational Needs & Disabilities

15.1 Students with special educational needs (SEN) and disabilities can face additional safeguarding challenges and these students can have additional barriers when staff are recognising abuse and neglect.

15.2. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
- Being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.
- Lack of understanding of what constitutes abuse

15.3. To address these additional challenges, the Head of Additional Learning Support and SENCO is part of the Safeguarding Strategy Group and weekly Safeguarding Panel. Additionally, all staff working with students with SEND can access additional support from specialist teams to ensure that they are confident and comfortable in addressing emerging concerns.

16. Work Placements

16.1   Staff responsible for co-ordinating work placements/work experience must have received the relevant training. They must take the safeguarding of students, whether children or vulnerable adults, into account at the planning stage when assessing the suitability of the placement and as part of the College's health and safety procedures. All placements must be assessed for safeguarding risks irrespective of the duration of the placement.

16.2   It is recognised that the employer has primary responsibility for the health and safety of the student, and the College must be assured that the employer understands and is managing the risks, including safeguarding, associated with young people in the workplace.

16.3   All students on work placement should have a regular point of contact within College and be made aware that they can discuss with that person or with a Work Placement Coordinator should they have any concerns about their placement. Any concerns raised about their work placement, or any suspicions of abuse must be reported to the Safeguarding Team immediately and procedures followed.

16.4   Students should be appropriately prepared for their work placement to ensure they understand how to keep themselves safe (protective behaviours) as well as their own responsibilities to others in the workplace. There must be made aware of the CP policy, whistleblowing policy, behaviour policy and sign to say they understand and will work to the College Code of conduct.

16.5   Where a student's placement is classed as 'regulated activity', the student is required to have an enhanced DBS check.

17. Working with Employers (Apprenticeship Provision)

17.1   Employers have a responsibility to safeguard their students and the procedure they should follow if they have concerns for a student can be found on the College's website. Employers will be provided with the web link to the Safeguarding policy within their Apprenticeship Training Agreement

17.2   A number of safeguards will be in place to support the apprenticeship provision including:

·   Risk Assessment process of employers linked to Health and Safety and Equality and Diversity
·   Sharing the College's safeguarding procedures and guidelines with employers and ensuring they have read it

18. Partnerships with Others

18.1 The College recognises that it is essential to establish positive and effective working relationships with other agencies e.g. Local Authority, Multi-Agency Safeguarding Hub (MASH), Police, Health, National Youth Advocacy Service, Youth Agencies, Local counselling agencies, CAMHS, MK Together, The Safeguarding Children Partnerships, and the Prevent Teams. This includes local education, childcare provides, services offering support around Domestic Abuse, Drug and alcohol services, sexual health services and voluntary groups.

19. Supporting the Student and Partnership with Parents & Carers

19.1 The College recognises that the student's welfare is paramount, however good child protection practice and outcomes rely on a positive, open and honest working partnership with parents/carers.

19.2 Whilst we may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any student. This is the exception and will only be enacted if informing parents/carers is believed to increase risk.

19.3 Students will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why. We will ensure that their views and concerns are reflected in any referral that is made.

19.4 We will endeavour always to preserve the privacy, dignity and right to confidentiality of the student and parents/carers. The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child/young person, whilst maintaining a network of support around vulnerable children or adults at risk. Staff may be given sufficient information to support them to recognise, identify and alert the DSL of any subtle changes in behaviour or low level comments that may be made.

20. Information Sharing

20.1 Information sharing is vital in identifying and tackling all forms of abuse

20.2 The Data Protection Act 2018 places duties on organisations to process personal information fairly and lawfully and to keep the information they hold safely and securely. The College ensures that it is General Data Protection Regulation (GDPR) compliant in all its processing of information whilst also ensuring this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information

cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The safeguarding team liaise with the College Data Protection Officer in relation to complex cases.

20.3   Where children leave the school or College, the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or College within 5 days in term or within 5 days from the start of term, ensuring secure transit, and confirmation of receipt should be obtained.

20.4   In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or College in advance of a child leaving. For example, information that would allow the new school or College to continue supporting victims of abuse and have that support in place for when the child arrives.

21. Confidentiality

21.1   A good working relationship between staff and students depends, to a large extent, on the establishment of trust. This may be described as a 'confidential relationship'. However, guarantees of absolute confidentiality will not be given as it may prove necessary to make a referral to an appropriate agency.

21.2   If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break confidence.

21.3   The College counsellor works to the British Association for Counselling and Psychotherapy ethical framework. This allows the counsellor to break confidentiality in exceptional circumstances, with or without the student's consent if necessary, where, in her/his practitioner judgement:

· there is a serious risk of the student harming themselves or being harmed
· there is a serious risk of another person being harmed
· there is a risk of a serious crime being committed.

21.4   There may be occasions where information is not shared as it places the child or young person at additional risk In the event of this happening, the College will record fully the justification for not sharing information.

22. Record Keeping

22.1   All wellbeing concerns and safeguarding referrals will be confidentially recorded on CPOMS. These will be detailed, accurate and include a full audit trail.

22.2   All written records must be passed to the Safeguarding Team, these will be scanned and added to CPOMs.

22.3   CP and adult safeguarding Records will be kept securely for 25 years (child - DOB plus 25 years)

22.4   Records are confidential. They may be accessed by the subject of the record but not by any third party other than a Designated Safeguarding Lead and/or the originator.

22.5   Staff must not retain any records relating to a safeguarding issue.

23. Safer Recruitment of Staff (please refer to standalone Safer Recruitment policy)

23.1   The College undertakes best endeavours to ensure that its employees are fit to work with children and vulnerable adults.

23.2   The College has safer recruitment procedures in place to deter unsuitable people from applying to and working with children and vulnerable adults and promote safe practice.

23.3   Changes to the Protection of Freedoms Act which came into force in September 2012 have resulted in a new definition of regulated activity which determines when disclosure and barred list checks may be undertaken.

23.4   'Keeping Children Safe in Education' (2024) describes the checks that are, or may be, required for any individual working in college.

23.5   In accordance with the regulations, a single central record (SCR) is kept of all checks and disclosures carried out. The SCR is audited regularly, and the Group Director for Inclusion has access to enable "spot checks" to take place.

24. Training of Staff

24.1   Designated staff in addition to their basic safeguarding training every three years and annual update, receive DSL safeguarding training every 2 years, Multi agency Working Together training every 3 years and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up to date with developing local and national priorities. We have a training plan in place to look at upcoming training and training requirements.

24.2   Alongside Working Together Training and update training, Designated Safeguarding Leads are also required to undertake specialist training to ensure expertise in each priority area.

- Child on child abuse
- Abuse, neglect and exploitation
- Domestic Abuse
- Female Genital Mutilation
- Prevent
- Child Sexual Exploitation
- Harmful Sexual Behaviours

24.3   All other staff and governors receive mandatory training as part of their induction and refreshed every year, to ensure they are aware of their safeguarding responsibilities and of the College's policies and procedures. The training includes recognising signs of abuse, and recording and reporting suspected abuse. They receive updates on safeguarding and child protection at least annually.

24.4   All staff are required to read and understand Part 1 of Keeping Children Safe in Education (2024), Government guidance on Sexual Harm and Violence and the Practitioner Boundaries document.

25. Safe Practice

25.1. The College ensures that all staff are safe and aware of unacceptable behaviours through the College's Professional Boundaries document.

25.2. Safe working practice ensures that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent way
- discuss and/or take advice from the Designated Safeguarding Lead or Deputy over any incident which may give rise to concern
- record any incidents or decisions made
- apply the same practitioner standards regardless of gender, sexuality or ethnicity
- are aware that breaches of the law and other practitioner guidelines could result in criminal or disciplinary action being taken against them
- undertake appropriate risk assessments for their work area
- are vigilant of each other, holding each other to the highest standard

26. Allegations of Abuse against Staff

26.1   The College has in place Professional Boundaries document which clearly sets out expectations in terms of staff behaviours and provides guidance to staff on keeping themselves safe. Nevertheless, allegations against staff may occur.

26.2   All allegations and concerns will be taken seriously and dealt with according to the relevant statutory guidance. The Whistleblowing policy covers allegations that staff may not feel comfortable reporting internally.

26.3   Where an allegation of abuse is made against a member of staff, the relevant disciplinary procedures may be invoked as well as reporting the case to the appropriate authorities, normally the Local Authority Designated Officer (LADO). There are now two strands to allegations those that meet the harm criteria for a referral to LADO and those that don't are considered low level concerns (please see Annexe 7)

26.4   There are four criteria for referral to the LADO where an allegation that any person who works with children, in either a paid or unpaid capacity, or voluntary activity and would therefore be in a position of trust has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

26.5   There are five possible outcomes from a referral to LADO

- Substantiated
- Unsubstantiated
- Unfounded
- False
- Malicious

26.6   Following this referral, any investigation undertaken by the LADO must take precedence over internal College procedures.

26.7   If an allegation of abuse is made against a designated member of staff, the allegation must be referred directly to the HR Department and Designated Lead who will report the matter to the appropriate authorities. In serious cases this will be taken straight to the CEO/Group Principal. An allegation against the Group Principal and CEO must be dealt with by a member of the Board of Governors.

26.8   Where an allegation is made by a student aged 18+, it will be investigated through internal College procedures, unless the student is deemed to be a vulnerable adult in which case Persons in Position of Trust (Pipot) will be contacted.

26.8   If it is subsequently found that the student has made a false allegation, or that the allegation was prompted by the student inappropriate behaviour, the matter will be investigated through the Student Behaviour and Disciplinary Procedures. If a false or malicious allegation is made by a staff member, staff disciplinary procedures will be followed.

27. Support for Staff

27.1.   This policy document is available to all staff via SharePoint and the College websites. An up-to-date list of the Safeguarding team is available on SharePoint and is displayed within key areas of each site.

27.2   Where a member of staff finds a disclosure particularly distressing, they may wish to seek support through the Employee Assistance Programme (EAP) provided through Health Assured. Details of the EAP are available on or from Human Resources. Alternatively, they may talk through their concerns with a Designated Safeguarding Lead or with Human Resources. The independent charity Education Support Partnership also gives confidential advice and support - 08000 562 561. All DSLs and Wellbeing staff are required to undertake supervision and this is routinely offered to all DSOs and staff dealing with safeguarding incidents

27.3.   A Professional Boundaries document is in place and was developed in consultation with staff. It outlines expected standards of conduct for staff when working with children and vulnerable adults, and provides support and guidance on practitioner boundaries and keeping themselves safe. All staff must sign to say they have read, understood and agree to work to it.

28. Safeguarding Groups

28.1.   A cross-College safeguarding committee and strategy group meets three times per year. It includes representation from across the College including the Designated Safeguarding Leads, Group Director of Estates, Group Director of People Services, the College Nursery DSL and representatives from teaching and support areas.

28.2   The group reports to the College Executive and its terms of reference include monitoring the effectiveness of the College's safeguarding arrangements, advising on the development and review of related policies, and developing a safeguarding plan.

28.3   The safeguarding group concerns itself with the wider safeguarding agenda which includes matters such as bullying, internet safety, safe learning environments, drug and alcohol misuse, and student awareness of personal safety.

28.4   The Head of Safeguarding attends monthly local DSL meetings and the Thames Valley Police Independent Advisory Group

29. Preventing Violent Extremism – The 'Prevent' Agenda

29.1   The Counter-Terrorism and Security Act (2015) places duties on the College to take best endeavours to prevent students from being drawn into terrorist and extremist activity, and statutory guidance is in place. In College, Prevent is embedded within our safeguarding procedures, and this document should therefore be read in conjunction with the Prevent Strategy.

29.2   Staff should be aware of the signs of extremism and report any such concerns through the safeguarding process. The College will review such concerns and take action as is necessary, including referring to our local Police contacts, the Channel panel, the multi-agency support hub (children@milton-keynes.gov.uk) and/or providing support through our own internal structures.

29.3   The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. Through its classroom practice, theme weeks and induction activities, it will encourage equality of opportunity and celebrate diversity. Prevent is a key part of the Personal Development induction and Safe units.

29.4   The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature. Promotion of any organisations linked to violent extremism is contrary to the values of the College and would constitute misconduct.

Visiting lecturers will be checked and risk assessments undertaken to ensure they are not spreading any radical messages. An online guest speaker form is used to record and review all guest speakers that are planning on presenting information to any of our students.

29.5   Computer searches are monitored via Smoothwall with daily reports provided to the DSLs. Calls are made to the Head of Safeguarding by Smoothwall if there are high level immediate

concerns. Weekly security meetings take place with our Executive Head of IT and our Data Protection Officer, where trends and blocked websites are investigated.

29.6   Radicalisation can include Far right extremism, Islamic extremism, Pro-life, animal rights organisations, vegan or vegetarian rights groups, eco- rights groups, anti-vaxxers or any group that promotes violent actions.

29.7   Early intervention is at the heart of "Prevent" in diverting people away from being drawn into terrorist or extreme activity. "Prevent" happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to extremist views and radicalisation.

Overview of specific responsibilities

ALL College Staff are responsible for:
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College.
- **Recognise, Respond, Refer, when** becoming aware of any safeguarding concern (including Prevent concerns)
- Ensure student safety and that the college addresses any form of bullying and harassment
- Safeguarding is EVERYBODYS business.

Safeguarding Lead, Head of Safeguarding, Head of Student Development:
- Respond appropriately to events in local, national or international news that may impact on students and communities.
- Promote Milton Keynes College values through induction, tutorials and the curriculum by encouraging active citizenship and the student voice. (as mentioned above)
- Build staff and student understanding of the issues and confidence to deal with them through appropriate training.
- Attend local Channel Pannel
- Ensure plans are in place to respond appropriately to a threat or incident within the College.
- Manage potential risks within the College and from external influences and ensure measures are in place to minimise the potential for acts of violent extremist within the College.
- Ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation. This can be done with annual safeguarding refresher training for all staff.
- Report to governors to ensure monitoring takes place to ensure the college is meeting its statutory duties in relation to Prevent.
- Ensure or work aligns with that of the Regional Prevent Coordinator, Local Authority Prevent Coordinator, Police Prevent Leads and local Prevent Board priorities and other agencies at both a strategic and operational level.
- Develop and maintain MK College Prevent Action Plan (Annex 8)

Responsibilities for Head of Safeguarding and DSL's
- Provide support for students who may be at risk and signpost to appropriate sources of advice and guidance. (This can relate to all staff withing MK College)
- Work collaboratively with the Wellbeing and Behaviour Teams making referrals when necessary.
- Developing effective ICT and e-safety policies (as above)
- Refer and communicate with the local Prevent Team when necessary, using the Prevent National Referral form: Prevent National Referral Form V3_TVP.docx
  Local Thames Valley Prevent team or the Prevent Gateway Team by email: PreventGateway@thamesvalley.police.uk or calling 01865 555618.

Specific Responsibilities – Head of Curriculum:
- Embed Learning and teaching strategies, which explore controversial issues in a way which promotes critical analysis and pro social values.

30. Child on child abuse

30.1   Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals and upskirting.

30.2   There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by the College's behavioural and disciplinary systems. If one student causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard child on child behaviour as abusive if harm is caused because:

- There is a significant power imbalance between the young people concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of child-on-child abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth, social marginalisation and so on. It is important to note that the perpetrator and/or victim may well be subject to power imbalances with other individuals in an incident of abuse and so it is important to investigate any incident as fully as possible.

- The perpetrator has repeatedly tried to harm one or more other children.

- There are concerns about the intention of the alleged perpetrator. If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not.

31. Students with Social Worker Involvement

31.1   The Safeguarding Team will hold information on students where there has been social worker involvement to ensure that any decisions can be made in the best interests of the child's safety, welfare and educational outcomes. Children's Social Care are required to inform the DSL when children have been allocated a social worker and involve the DSL in any discussion about plans in place for the child. This should be a routine process.

31.2   This information will be used to inform decisions about safeguarding and promoting welfare.

31.3   The Colleges safeguarding team work proactively with social care and will escalate concerns as appropriate with the relevant local safeguarding agency.

32. Students Requiring Mental Health Support

32.1 The College recognises that challenges around the mental health of an individual can, in some cases, be an indicator that an individual has suffered or is at risk of suffering abuse, neglect or exploitation. Milton Keynes College has a Wellbeing Team which staff can refer to if they are concerned about a student's wellbeing.

32.2 The College has a Readiness to Learn Policy to ensure that these students are not disadvantaged in any way and that reasonable adjustments can be made to their programme of study as far as practicable.

32.3 The College has a team of Mental Health First Aiders to support the health and wellbeing of this cohort of students. A full list can be found on the College Intranet. The College is continuously building a range of resources for staff and students to support good mental health.

32.4 A pyramid of need is utilised to determine the level and frequency of support required. There are pathways in place to ensure that students can access appropriate services, including external referrals. Support also includes access to Togetherall, an online peer to peer support platform monitored and supervised by clinicians.

32.5 The College works closely with a range of external agencies to promote positive mental wellbeing, and students are provided with opportunities for self-referral as part of the Personal Development curriculum.

32.6 In the event that a student takes up a Tier 4 bed, a member of the Wellbeing Team will attend education reviews to explore the viability of maintaining the enrolment and working with the setting to continue study as appropriate.

33. Looked After Children / Children in Care / Previously Looked After / Leaving Care

33.1 Local Authorities work closely with the Colleges to promote the educational achievement of Looked after Children / Children in Care / Previously Looked After and those Leaving Care.

33.2 Looked After Children are regularly supported by a team of external agencies and have a Personal Education Plan (PEP). The PEP is used to support the personalised learning of the child – both academically and otherwise. Staff will be asked to contribute to the PEP and where possible, attend meetings regarding that student.

33.3 Looked After Children / Children in Care / Previously Looked After / Leaving Care must be regularly monitored and supported whilst they are at college. Staff will be required to provide updates to the Designated Teacher for Looked after Children.

33.4 Attendance for Looked After Children / Children in Care will be monitored weekly via attendance updates from MIS.

33.5 The Designated Teacher for Looked after Children will meet on a regular basis with the Virtual School Head to promote the educational achievement of this group of vulnerable students.

33.6 The virtual Heads are a source of support, advice and guidance to the Designated Teacher and there should be regular contact between them in addition to the PEP meetings.

34. Complaints about the handling of a Safeguarding Issue

34.1 Any complaint about the handling of a safeguarding issue can be made directly to the Group Principal & Chief Executive, Governor Champion for Safeguarding, or to the Local Authority through the Multi Agency Safeguarding Hub (children@milton-keynes.gov.uk).   The College's Complaints Policy and Procedures can be used when making a complaint.

34.2 Minimum Expectations:

- Any complaints will be acknowledged within one working day of receipt.

- Wherever possible the College will aim to resolve any complaints to the satisfaction of all parties within 10 working days.

- Complainants have the right of appeal up to 5 working days of the outcome of the complaint

- If the complainant is not satisfied with the outcome of the appeal, then the Safeguarding governor can be contacted within a further working days of the appeal outcome being notified.

Links to other policies

Behaviour and Disciplinary Policy

Admissions Policy

Readiness to Learn Policy

Ensuring the Safety of Students in the Workplace Policy

Subcontracting strategy, fees and charges Policy

SEND and Additional Learning Support Policy

Public Interest and Disclosure Policy and Procedures (Whistleblowing)

Events with external speakers and fundraising Policy (including freedom of speech)

Lockdown Procedure

Digital Learning Policy

Ensuring the Safety of Students on Visits Policy

Drugs Policy and Procedure for Students

De-escalation and restraint Policy

Harmful Sexual Behaviours

LQBTQIA+ Policy

Social Media and E-safety Policy

Safeguarding: Procedures for the Protection of Children, Young People and Vulnerable Adults

Contents

ANNEXE 1 - DESIGNATED STAFF WITH RESPONSIBILITY FOR SAFEGUARDING

Senior Member of Staff with Lead Responsibility

The designated senior member of staff with lead responsibility for safeguarding is the Lead Safeguarding Officer; they will be deputised for by other designated members of staff drawn from senior management and suitably experienced staff. A team of suitably trained designated safeguarding officers will be drawn from across the College curriculum and business partner areas. The wider designated safeguarding team have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and young people, and the promotion of a safe environment within the College.

The DSL is the main contact for any issues around the welfare and safeguarding of children within the College. All staff must know who the DSL is, what their role is and how to contact them.

An open-door culture exists for access to DSL.

Designated members of staff receive additional training in safeguarding and inter-agency working, as required by the MK Together and will receive refresher training at least in between the two-year requirement for DSL training. DSLs also have access to monthly supervision which is a requirement of the role. The Team is required to keep up to date with developments in safeguarding children and young people as required.

Designated staff are responsible for:

- overseeing the referral of cases of suspected abuse or allegations to the Milton Keynes Multiagency Safeguarding Hub (MASH) using the appropriate document Multi Agency Referral Form (MARF) and Early Help Assessment (EHA)

- maintaining a proper record of any safeguarding referrals, complaint or concern (even where that concern does not lead to a referral) using the CPOMS recording and reporting system.

- ensuring that parents/carers of children, young people and vulnerable adults within the College are aware of the College's Policy for the Protection of Children and Young People.

- liaising with the MASH, Milton Keynes Children and Young People's Service and other appropriate agencies.

- liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for those pupils.

- ensuring that the College works with employers and training organisations that provide apprenticeships and/or work placements for children or young people from the College to ensure that appropriate safeguards are in place.

- ensuring that all staff undertake training and that refresher training takes place every two years and that they receive updating annually.

- the designated senior member of staff will provide information on an annual basis to the Board of Governors setting out how the College has discharged its duties. He/she is also responsible for reporting deficiencies in procedure or policy identified by MK:Together (previously known as Local Safeguarding Children Board) to the Board of Governors at the earliest opportunity.

Safeguarding Team

Safeguarding Lead

Amy Langford: Group Director Inclusion
01908 684437
07930 110710
email: amy.langford@mkCollege.ac.uk

Deputy Leads

Jenny Worby, Head of Safeguarding
01908 684210
Email- jenny.worby@mkCollege.ac.uk

Charlie Lancaster-Papp, Positive Behaviour Lead
Emal: Charlie.lancaster-papp@mkCollege.ac.uk

Tim Gallagher
Head of Student Development and Support
01908 637415
Email: tim.gallagher@mkCollege.ac.uk

Louise James
Executive Head of School Skills Academy
01908 684471
Email; louise.james@mkCollege.ac.uk

Vicky Golder
Wellbeing and Resilience Team Lead
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Email; vicky.golder@mkCollege.ac.uk

Natalie Charman
Chaffron Way Designated Safeguarding Lead
01908 687378
Email: natalie.charman@mkCollege.ac.uk

Carly Lancaster
Bletchley Designated Safeguarding Lead
01908 687377
Email: Carly.lancaster@mkCollege.ac.uk

Lucy Twilley
Safeguarding Administrator
Email: lucy.twilley@mkcollege.ac.uk

Wider Safeguarding Team

Saffron Butler
Designated Safeguarding Officer
Email: saffron.butler@mkCollege.ac.uk

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Email: caroline.underwood@mkCollege.ac.uk

Camilla Milner
Designated Teacher and Corporate Parenting Co-ordinator
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Email: Camilla.milner@mkCollege.ac.uk

Rocksana Begum
Wellbeing and Resilience Advisor
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CTL Performing Arts
01908 684313
Email: Colin.bloxham@mkCollege.ac.uk

Karen Allford
Nursery Manager
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Email: karen.allford@mkCollege.ac.uk

Claire Selleck
Deputy Nursery Manager
01908 684462
Email: Claire.selleck@mkCollege.ac.uk

Jaye Thompson
Commercial Salon Receptionist
01908 684102
Email: Jaye.thompson@mkCollege.ac.uk

Dolores Ovens
Exam Access Arrangements Specialist Assessor
01908 687451
Email: dolores.ovens@mkCollege.ac.uk

Caroline Godden
Student Counsellor
Email: Caroline.godden@mkCollege.ac.uk
Campus Managers

We have two Campus Managers, one based on each site (Bletchley and Chaffron Way). Their focus will be improving the student and staff experience and elevating behaviours and attitudes across the campuses. The Campus Managers will work closely with the Safeguarding Team, Behaviour Team and Wellbeing Team.

Jack Maude – Campus Manager for Chaffron Way
Jack.maude@mkCollege.ac.uk

Louise Frizelle – Campus Manager for Bletchley
Louise.frizelle@mkCollege.ac.uk

The wider safeguarding team consists of approx. 40 members of staff based across the campus sites. These staff have undertaken designated training - contact details are available on the staff intranet.

These designated staff will:

- know how to make an appropriate referral to the Multi-Agency Safeguarding Hub (MASH) using the appropriate documentation, Multi Agency Referral Form (MARF).

- be available for consultation and be able to provide advice and support to other staff on issues relating to safeguarding students.

- have skills of listening to students studying at the College.

- will deal with individual cases, including attending strategy meetings, case conferences and review
  meetings as appropriate.

- have received training in safeguarding children and young people and inter-agency working, as required by MK:Together (previously known as the Local Safeguarding Children's Board), and will receive relevant refresher training at least every 2 years or as required.

- will have the ability to record appropriately using CPOMS.

- will ensure that the young person and the member involved in the procedure are aware of the support provided by the College or relevant external services.

- make relevant referrals to the Mental Health and Wellbeing Team

Governor Champion for Safeguarding Children and Young People

The Governor Champion is responsible for liaising with the Group Principal and CEO and the Lead safeguarding officer over matters regarding safeguarding children and young people, including:

- ensuring that the College has procedures and policies which are consistent with MK:Together
- (previously known as the Local Safeguarding Children's Board) procedures.

- ensuring that the Board of Governors annually reviews the College's Policy for the Protection of Children and Young People.

- ensuring that the Prevent policy is consistent with Government legislation and is complied with by all staff.

- ensuring that all staff have read and understood part 1 and annexe 1 of Keeping Children Safe in Education 2023.

  - ensuring that the Board of Governors is informed annually of how the College and its staff have complied with the Policies, including but not limited to, a report on the training that the staff have undertaken.

The Governor Champion is the contact person for liaison between agencies such as the police and the Children's Services in connection with allegations against the Group Principal and CEO or the designated senior member of staff with lead responsibility. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the Governor Champion shall receive appropriate interagency training as directed by MK:Together (previously known as the Local Safeguarding Children's Board.)

ANNEXE 2 - GUIDANCE FOR HANDLING DISCLOSURE OF ABUSE AND PROCEDURE FOR REPORTING CONCERNS

Staff should **NOT** investigate concerns or allegations themselves but should report them immediately to a designated member of staff. In the event of any emergency staff should contact the Milton Keynes, Multi-Agency Safeguarding Hub directly (01908 253169) or contact the police (999)

When a young person makes an allegation of abuse, the member of staff who receives it should:

Reassure them that they have done the right thing listen and not interrupt.

- **not** promise the young person that they will keep the matter **confidential.** Explain to him/her that you must report the matter to a member of the College's designated safeguarding team as this is your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members.

- let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding children and young people issue.

- note, this is not an investigation; simply establish the key facts, remember Listen, Recognise, Respond, Refer

- only ask simple, open, non-leading questions. For example, if a young person tells you they have been hurt, ask, 'Can you describe how that happened?' rather than

'Did someone hit you?'
What When Who Where

- accept what the young person is saying and do not offer an alternative interpretation of the alleged events.

- once concerned enough to raise the matter with a designated member of staff, do not ask any more questions.

- write down what has been said immediately afterwards, to the best of your memory, in the words used by the young person and you.

- **not** ask the person to sign anything at this stage.

- note anything about the young person which may be connected, for example, any visible injuries including the position and description; Use a body map

- verbally report the matter to a designated member of staff as soon as possible and within 24 hours (if you are unable to contact a member of the Designated Team, please contact any member of the Senior Leadership Team.

- if in doubt, seek advice from one of the designated members of staff.

- complete documentation and submit to a designated member of staff.

Once you suspect any abuse or extremism/radicalisation you should immediately contact a member of the wider designated safeguarding team or the lead(s) safeguarding officer initially by telephone outlining what has been disclosed or what you have overheard or what your suspicion is. You should also contact them if you know or suspect that a member of staff or student has a previous history of abuse of children, young people or vulnerable adults.
A joint referral is made by DSL and the person spotting the concern

This referral form must be completed and sent to the email address below

https:_www.milton-keynes.gov.uk/assets/attach/70333/Prevent-National-Referral-Form_TVP.docx

preventreferralsmiltonkeynes@thamesvalley.pnn.police.uk

ANNEXE 3 – DEFINITION OF VULNERABLE STUDENTS

Vulnerable children and young people include those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a Child in Need plan (CIN), a child protection plan (CP) or who are a looked after child (CLA).
- have an education, health and care (EHC) plan.
- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued fulltime attendance, this might include:
- children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services - adopted children or children on a special guardianship order
- those at risk of becoming NEET ('not in employment, education or training') those living in temporary accommodation
- those who are young carers those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
- care leavers
- others at the provider and local authority's discretion including pupils and students who need to attend to receive support or manage risks to their mental health.

Eligibility for free school meals in and of itself is not a determining factor in assessing vulnerability. Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable students are. They have the flexibility to offer a place to those on the edge of receiving social care support as needed.

The Designated Corporate Parent has contacted all looked after/vulnerable students, including Asylum seekers, young carers and under 16. Regular check in's will be made where possible.

A list of Vulnerable students has been identified, and those students have been contacted regarding keeping in touch (wellbeing support) and Bursary support. £15 will be paid weekly into student accounts that are currently on Bursary. Access to food has been made available.

Each student, including those who are vulnerable, have been addressed according to individual need and made aware of all support available. Online support is accessible and has been tailored to meet the needs of our diverse student population.

Students that are vulnerable have been identified and contacted; this will continue as the academic year progresses. They have been advised of how to make contact if they have a concern or feel at risk. The

Wellbeing Team are in close contact with students that are struggling, they are also working closely with Tutors.

Staff responsibilities:

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the College will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2023) (KCSIE). The continued importance of all staff and volunteers acting immediately on any safeguarding concerns remains.

If staff have concerns about other members of staff or volunteers a direct phone call is to be made to the Safeguarding Lead/Deputy Lead and LADO will be informed within 24 hours for those allegations that meet the harm criteria.
Low level concerns will be followed up and investigated by lead within the College (see Annexe 7) If there is any doubt to the level of concern, the LADO will be contacted for advice and guidance.

Any Safeguarding concerns must be recorded using CPOMS and anything urgent will also require a phone call to the Designated Safeguarding Leads. CPOMS FAQs have gone out to all staff. Staff have open lines of communication with the Wellbeing Team and the Lead Safeguarding Team.
The 3 R's still apply – **Recognise, Respond, Refer** – using the safeguarding flowchart (when working at home) for reference.

Monitoring and tracking:

Monitoring students, identifying safeguarding concerns and recording them appropriately remains a priority for Milton Keynes College. All forms of reporting and contacting are in line with the rest of the College systems:

- CPOMS for safeguarding concerns
- Contacts for Lead and Deputy Lead Safeguarding Team
- Use of Pro Monitor
- Use of Teams for contacting students and online lessons (During College times)
  College emails are used as another form of communication
- MASH must be notified of DSL contact details

<u>Concerns about a child/student</u>

Pupils may be experiencing a variety of emotions in response to, any major incident which leads to the closure or reduced timetable within College. Such as anxiety, stress or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. It is important to contextualise these feelings as normal responses to an abnormal situation. Some may need support to re-adjust to school, others may have enjoyed being at home and be reluctant to return, a few may be showing signs of more severe anxiety or depression. Others will not be experiencing any challenges and will be keen and ready to return to school.

If a staff member has any concerns about a child/student, then they need to follow the flow chart that is now in place and that has been circulated to all staff in various formats. Please see a copy of this flow chart in Annexe 6

The chart clearly states the name and contacts of the Safeguarding Lead and Deputy Leads. Any Safeguarding concerns must be recorded using CPOMS and anything urgent will also require a phone call to the Designated Safeguarding Leads.

There are two members of the safeguarding team based at each site; they will be on hand for any safeguarding events that occur on campus. A list of DSLs can be found on the intranet that staff can use when working from home.

Child on child abuse - given the very different circumstances schools and Colleges are operating in a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach)

All Child-on-child abuse to be monitored. Any reports to be recorded on CPOMS and anything urgent will require a phone call or advice to be given to call 999. We are using Smoothwall to monitor students 'on line' conversations that cause concern or certain words that are deemed as negative will be highlighted. This will only be picked up with students using the College Wi-Fi or a College laptop. Where we know serious child on child abuse has been happening regular check in's will be made with students and reported as necessary.

Communication between students and staff

Students can email staff using their College email.
Staff are to only use their College email to contact students
Staff are to only use CISCO or the Jabber application to make phone calls to students or outside organisations.
WhatsApp groups or any other forms of social media are not to be used at any time to communicate with students.
Microsoft Teams has been set up for all staff to use when delivering online learning and communication with students. Teams should only be used during the working hours of 9.am - 5pm (or later if related to evening classes)
Staff that feel any student is at risk are advised to follow the 3 R's
(**Recognise, Respond, Refer** – using the safeguarding flow chart that has been put in place for home learning.
There is advice and websites about keeping safe online on the student Moodle page and staff intranet.

ANNEXE 4 - DEFINITIONS OF ABUSE AND NEGLECT

Abuse and neglect are forms of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person 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 a stranger. They may be abused by an adult or adults, or another child or children.

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

Emotional Abuse
Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.
These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve witnessing domestic violence. It may involve serious bullying, 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, though it may occur alone.

Sexual Abuse
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
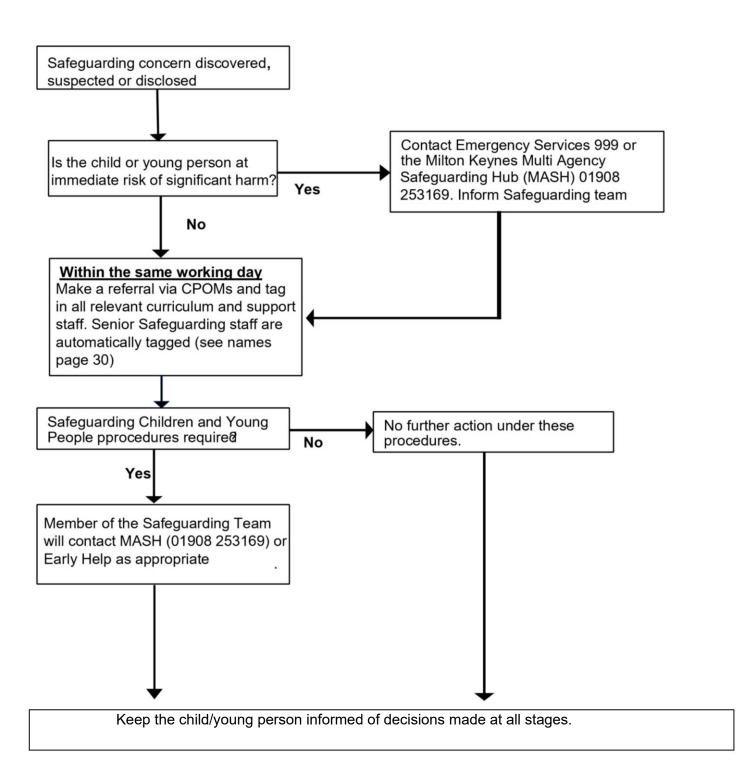
Neglect
Neglect is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

*   provide adequate food, clothing and shelter (including exclusion from home or abandonment).
*   protect a child/young person from physical and emotional harm or danger.
*   ensure adequate supervision (including the use of inadequate caregivers).
*   ensure access to appropriate medical care or treatment.
*   It may also include neglect of, or unresponsiveness to, a child/young person's basic emotional needs.

ANNEXE 5 – FLOW CHART FOR REPORTING CONCERNS ABOUT SAFEGUARDING CHILDREN AND YOUNG PEOPLE

FLOWCHART FOR REPORTING CONCERNS ABOUT SAFEGUARDING CHILDREN AND YOUNG PEOPLE

Safeguarding concern discovered, suspected or disclosed

Is the child or young person at immediate risk of significant harm? **Yes** → Contact Emergency Services 999 or the Milton Keynes Multi Agency Safeguarding Hub (MASH) 01908 253169. Inform Safeguarding team

No

Within the same working day
Make a referral via CPOMs and tag in all relevant curriculum and support staff. Senior Safeguarding staff are automatically tagged (see names page 30)

Safeguarding Children and Young People pprocedures required? **No** → No further action under these procedures.

Yes

Member of the Safeguarding Team will contact MASH (01908 253169) or Early Help as appropriate

Keep the child/young person informed of decisions made at all stages.

ANNEXE 6 - RECOGNISING AND RESPONDING TO LOW LEVEL CONCERNS

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or College to refer to the Local Authority Designated Officer (LADO)

Low-level concerns are part of a spectrum of behaviour. This includes:

- thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with students
- having favourites
- adults taking photographs of students on their mobile phone
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Such behaviours must be reported to the Designated Safeguarding Lead for follow up and investigation as appropriate.

Responding to a report of a Low-Level Concern

All low-level concerns will be responded to in a sensitive and proportionate way. The Designated Safeguarding Lead should consult with the Group Principal and CEO on all such cases as appropriate. If there is any ambiguity as to whether the concern raised reaches the threshold for harm the LADO should be consulted.

The DSL will make records of any internal and external conversations. They will then determine whether the concern sits in relation to the below criteria and provide a rationale for this decision:

    (i)   the behaviour is in fact appropriate – i.e. entirely consistent with their staff code of conduct and the law,

    (ii)   the behaviour constitutes a low-level concern (see above)

(iii)　there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact may meet the harm threshold, in which case they should consult with their LADO,

(iv)　in and of itself the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies, or

(v)　when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies

Records of low-level concerns will be held centrally by People Services at least until the individual leaves employment with the College.

ANNEXE 7 – PREVENT ACTION PLAN

PREVENT Action Plan 24-25

This action plan is to be monitored by the Safeguarding Strategy Group (SSG) and the Equalities Strategic Review Group (ESRG)

Prevent features as part of Strategic Risk C (C3) in the Strategic Risk register and as such is actively monitored by this group on a monthly basis. All ongoing risks are monitored in this group. This Action Plan exists alongside the Prevent DfE risk assessment which is updated annually.

Leadership and Values - *to develop and maintain a culture which upholds our core values of Respect, Integrity, Innovation, Inspiration, Excellence and Belonging*

Objectives	Current Activity	Actions required	By whom	By when	Progress
Promoting core values of respect, integrity, innovation, inspiration, excellence and belonging	Induction Project completed by all study programme learners and apprentices. Cross College Events Schedule 2024/2025 (all online) See SharePoint	Continued development of cross college student development programme - Students can answer "How do you keep yourself safe in this world we live in"	Student Development Team with Manager	Ongoing Check points at all SSG meetings	On going Prevent built into inductions and cross college events and PD Refresh of content 24/25
Building staff and student understanding of the issues and confidence to deal with them		All staff complete on line training Identify further training	Safeguarding Lead and CPO	Ongoing Check points at all SSG meetings	All staff complete prevent training when they join and update annually

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		Offer bespoke sessions to individual school areas in response to individual concerns/incidents Dissemination of Educate Against Hate website with access to updates via PD curriculum			Head of Safeguarding now trained to deliver DSL training and Prevent A prevent awareness session is being delivered annually to all staff
Deepening engagement with local communities	Inter-faith groups Islamic Arts PCSO Thames Vallet Police Independent Advisory Group (TVPIAG) – attendance 6 weekly	Engage with Anti-terrorism Police	Safeguarding Lead	Ongoing	Regular contact with Prevent policing team Attend Channel Panel as required Membership of Prevent Board – attended once a quarter
Actively working with local schools, local authorities, police and other agencies	As above	Attendance of Channel Panel (monthly) and Prevent Board (termly)	All		As above MKC member of MK Prevent Board Attending 6 weekly TVPIAG meetings Meet with the Chief Inspector for TVP and Neighbourhood Inspector Dec 2024 to refresh Trigger Plan Relationship built with DfE Regional Prevent

| | | | | | Coordinator for South-East,

Meeting with DfE Social Justice and Disadvantage Division Oct 2024 re Roundtable event Members of 'The Key' allowing access to any updates/new guidance/terminology |

Teaching and Learning – *to provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students by undermining extremist ideology and supporting mainstream voices.*

Objectives	Current Activity	Actions required	By whom	By when	Progress
Embedding equality, diversity and inclusion, wellbeing and community cohesion	Inclusive college Mandatory staff training E & D online Staff training on E&D re embedding into the curriculum – part of observation process. Staff actively challenge discrimination and record concerns on CPOMS	Cross College E & D Best Practice to be reactivated See SSE actions	All E & D Lead Arv Kaushal E & D report to Board PD Lead and Team	Ongoing	All staff to completed mandatory E & D training on joining college and update annually Cross College events – WOW Calendar

Promoting wider skill development such as social and emotional aspects of learning	Sessions for all students preparing for life and work Work experience Sessions use naturally occurring opportunities to promote E & D Personal Development sessions		Heads of School CTLs PD Lead and Team Progress Mentors	Ongoing	Sessions delivered throughout the academic year
A curriculum adapted to recognise local needs, challenge narratives and promote universal rights	PD sessions pre planned for the year and disseminated to Progress Mentors		PD Lead/team Progress Mentors	Ongoing	Use of restorative approaches E & D embedded in sessions and naturally occurring opportunities to develop learners understanding of E & D, promote diversity, tackle discrimination.
Teaching and learning strategies which explore controversial issues in a way which promotes critical	As above	As above	As above	Ongoing	Ongoing

analysis and pro social values					
Encouraging active citizenship and learner voice	Strong learner voice Learner Voice/Class Reps		Student Engagement Team	Ongoing	Embedded Students participating in election preparation Students participating in restorative approaches

Safeguaridng Team – *to ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities.*

Objectives	Current Activity	Actions required	By whom	By when	Progress
Establishing robust multi-disciplinary Safeguarding Team	Restructured Summer 2023 with additional posts approved September 2024	Continuous Review	Group Director of Inclusion Head of Safeguarding	Ongoing	Ongoing New DSOs recruited and Positive Behaviour team created Campus Managers introduce September 2024 to provide another layer of security and vigilance
Listening and responding to what is happening in the College and the community	Staff listen to what learners say – Safeguarding training Extra vigilance during sensitive times	Further training in areas of high risk	All	Ongoing	Additional safeguarding training to include contemporary issues Staff training video circulated in

					September 24 and March 2025 Updated training September 2024
Implementing anti-bullying strategies and challenging discriminatory behaviour	Anti-bullying policy Zero tolerance Staff challenge discriminatory behaviour	Classroom management of bullying consistent across the college	All	Ongoing	Bullying incidence monitored and reported at Safeguarding Strategy Group Restorative and mediation techniques used to reduce tensions and resolve situations. Recent, updated training completed by DSL's Recent mediation training for DSL and PD Lead Safeguarding Panel Behaviour and safety plans – implemented and supported by Positive Behaviour Teams and DSLs
Helping students and staff know how to access support in College and or through community partners	Safeguarding Team Positive Behaviour Team Student Engagement Mentors Wellbeing Team Induction	Ongoing promotion	All	Continuous	Ongoing

	Fresher's Fairs Cross College Events				
Supporting problem solving and repair of harm	Security Student Development Team PCSO Student Behaviour Policy Level 4 Disciplinary Meetings Restorative approach/Mediation	Mediation Training (completed Dec 24)	People Services Lead Safeguarding Positive Behaviour Team and Lead		All issues monitored and recorded CPOMS Incident forms Safeguarding Panel (weekly) Mediation training completed Dec 24
Supporting at risk students through safeguarding and crime prevention processes	Safeguarding policy/procedures Staff training At risk student identification Safeguarding team PCSO	Ongoing promotion	Safeguarding Team	Ongoing	All issues monitored Safeguarding Panel Safeguarding Strategy Meetings Prevent referrals Prevent Panel Screening Arches

Focussing on narrowing the attainment gap for all students	ESRG Leaders in Diversity			Ongoing	ESRG group Data analysis and sharing SAR/QIP

Managing Risks and Responding to Events - *to ensure that the College monitors risks and is ready to deal appropriately with issues which arise.*

Objectives	Current Activity	Actions required	By whom	By when	Progress
Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College	None Development of Resilience Meetings	ELT/SLT scheduling	ELT Safeguarding Lead Head of Safeguarding	Ongoing	Safeguarding/Prevent standing agenda item Screening Arches implemented September 23 Regular meetings/contact with TVP (Thames Valley Police)
Understanding and managing potential risks within the College and from external influences	Risk assessments Criminal risk assessments	Risk Assessment review –	Lead Safeguarding Team Health and Safety Teams Head of Facilities	Continuous	No changes to current practice - no further risk assessments required to date Screening Arches
Responding appropriately to events in local, national or	Representation on MK Together Children's committee	Continuous Training	Group Director Inclusion	Continuous	Representation in place Attending regular meetings TVPIAG

international news that may impact on students and communities	Links with local police through TVPIAG and anti-terrorism officer Risk Management Meeting				meetings and DSL forums
Developing effective e-safety and ICT user policies	Policies in place	Review policy Ensure students and staff have e-safety training	Executive Head of IT Services CEOP Ambassador Safeguarding Lead Head of Safeguarding		Smoothwall Monitor all use of systems both students and staff ICT user policy updated Data Privacy Notices Updated ISO270001