
Safeguarding Policy

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Introduction

It is the duty of Queen Alexandra College governors, staff and volunteers to provide a safe and secure environment in which vulnerable young people and adults can thrive and develop and where all aspects of their welfare will be protected. It is recognised by QAC that its service users may be more likely to be vulnerable to abuse as a result of their disabilities. The term 'student' is used throughout this policy and refers to all service users of QAC provision.

QAC's Board of Governors, through the Principal & Chief Executive, aims to provide effective safeguarding procedures for children and adults that provide clear direction to staff and volunteers about expected codes of behaviour in dealing with safeguarding issues. This policy also makes explicit the College's commitment to the development of good practice and sound procedures. It ensures that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of students who attend QAC.

The College follows key statutory guidance including:

- Disclosure and Barring Service requirements for employment recruitment in relation to the Safeguarding Vulnerable Groups Act 2006.
- The Care Act (2014)
- The Mental Capacity Act (2005)
- The Human Rights Act (1998)
- The Modern Slavery Act (2015)
- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2023)
- Home Office Prevent guidance, under the Counter-Terrorism and Security Act 2023.

Other advice of relevance:

- Sexual Violence and Sexual Harassment between Children in Schools and Colleges Advice (2018)
- 'Sexting in Schools and Colleges, responding to incidents and safeguarding young people (UKCCIS, 2017)
- 'Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (July 2018), with relation to data protection and GDPR considerations.

The policy is further informed by Birmingham Safeguarding Children Partnership and Adult Board.

The College is committed to working with families, carers and agencies to ensure the welfare of its students by minimising or eliminating the risk of abuse.

In the rare circumstances that a student may be requested to be interviewed by external agencies then QAC will ensure that an appropriate adult is available during this process to determine the continuing appropriateness of the external intervention. QAC values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. All students and staff have the right to speak freely and voice their opinions. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. QAC seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, to Far Right/Neo Nazi/ White Supremacist ideology, or other extreme groups. See also QAC's Statement of Conduct on Freedom of Speech and Expression (Appendix 7).

QAC utilises 'MyConcern' for safeguarding referrals. Online activity within QAC is monitored to ensure inappropriate sites are not accessed by students or staff. The specialist online software used for this purpose is 'E Safe' and the filtering system is 'Smoothwall'. There are good links between the Designated Safeguarding Lead (DSL) and the IT/Resources Team to ensure effective reporting and monitoring of safeguarding concerns. It is recognised many students will access the internet while at College using their own data plan. We aim to ensure online safety is embedded in our curricula at appropriate levels and PSHE support. We are clear about our expectations of acceptable use through policies including the Student Code of Conduct.

Definitions

An updated definition of safeguarding (2024)

This is now in line with the Working Together to Safeguard children 2023 guidance. Safeguarding and promoting the welfare of children is now defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care.

We should also be alert to any young person/child who:

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending.
- Is frequently missing/goes missing from education, home or care.
- Taking action to enable all children to have the best outcomes.

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Child Protection:

Part of safeguarding and promoting welfare. The activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm (impairment of health or development).

Safeguarding Adults:

Protecting an adult's right to live in safety, free from abuse and neglect.

Statutory safeguarding responsibilities apply where an adult:

- Has needs for care and support (whether or not these needs are being met)
- Is experiencing or at risk of abuse or neglect
- As a result of those and support needs is unable to protect themselves from
- Either the risk of, or the experience of abuse or neglect.

'Care and support needs' means the mixture of practical, financial and emotional support needs for adults who need extra help to manage their lives and be independent. This includes those with a disability or cognitive impairment, learning disability or mental health needs, long term illness/condition.

Strategy

Responsibilities of QAC's Trustees

The Board of Trustees is responsible for strategic development of the policy and for monitoring its effectiveness.

The Board of Trustees is responsible for monitoring QAC's compliance with statutory duties by receiving an annual Safeguarding Report from the College Management Team. This report will outline safeguarding training, induction and review of policies and details of referrals/allegations of abuse.

All Trustees are required to remain updated about student welfare concerns and be satisfied that issues raised by students at the Student Services Forum are dealt with appropriately (see Student Involvement Policy).

All Trustees will receive regular safeguarding training to ensure that the college is focussing on a whole setting approach to safeguarding in line with policies and procedures.

The Board monitors student satisfaction at the Curriculum & Quality Committee through reports of student surveys which promote involvement and seek to address concerns about the quality of service they receive (see Student Involvement Policy).

The Trustees receive regular Health and Safety reports at the Finance & General Purposes Committee (see Terms of Reference for Finance & General Purpose Committee).

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The Trustees will appoint a Trustees as the Designated Trustees with responsibility for Safeguarding.

Responsibility of QAC's Designated Trustees

QAC has a Designated Trustees responsible for Safeguarding and a Designated Person who is a member of staff. The Designated Governor will:

- Liaise regularly with the DSL about policy and practice at the College
- Promote effective governance of this policy
- Ensure he or she undertakes 2 yearly training and keeps up to date with developments in legislation, policy and best practice

Responsibility of the Designated Safeguarding Lead

QAC's DSL who is a member of the College Management Team will on behalf of the Designated Governor:

- Ensure appropriate safeguarding induction and training is delivered to all staff

Staff on the safeguarding team are offered external supervision where needed as well as regular 1:1 discussion with their line manager and or DSL as well as wider safeguarding team discussion at least on a weekly basis.

The safeguarding team have access to additional training on specialist subjects that are particularly relevant to our college cohort such as Prevent, guidance on dealing with Mental Health.

- Champion safeguarding issues in the College by acting as a source of support, advice and expertise
- Co-ordinate any action on safeguarding concerns, except those involving any allegation against a member of staff which should be reported directly to the Principal
- Ensure they access safeguarding training on a minimum of a 2 yearly basis and ensure they keep up to date with developments in policy and practice
- Keep written records of all concerns even if there appears to be no need to make an immediate referral to external agencies
- Liaise and work jointly with Social Services and other agencies
- Maintain regular contact to inform and update the Designated Governor
- Ensure the presence of an appropriate adult where investigations are taking place for a child such as police interviews.

Procedure

The policy framework complements the Code of Practice at Appendix 1 which provides guidance to individuals for dealing with allegations of abuse.

Any indications that a student may be suffering from abuse will immediately trigger the College's Safeguarding procedures. These procedures are consistent with the good practice guidelines of Birmingham Safeguarding Children's Partnership and Adults Board. The College will work closely with parents and carers and support all external agencies involved in the protection and welfare of its students. QAC recognises contextual safeguarding in practice which means we assess wider environmental factors that are present in a student's life that may be a threat to their welfare or safety. The Care Quality Commission, Local Authorities or other funding/stakeholder bodies will be advised as appropriate.

Where possible the College holds more than one emergency contact number for each student which is identified as good practice and gives QAC additional options to make contact with a responsible adult relating to safeguarding concerns for a student.

Any person using the services of QAC or anyone acting on their behalf, may complain to the management team about any aspect of the service they receive. There is a simple process for this and complainants have the right of appeal to an independent person/agency if they are dissatisfied with the way a complaint is handled.

Any person using the services of QAC may disclose to a staff member or volunteer any abuse they may be suffering elsewhere in their lives. Staff and volunteers will be vigilant for the signs of abuse as often, by virtue of their day to day contact and knowledge and trust of the students, they will be well placed to identify abuse and offer support.

Any allegations of abuse or concerns expressed by our students, or made on their behalf, will be taken seriously and investigated. This will be done in a timely and thorough process.

Staff will be aware of the particular needs of LGBTQ students who make disclosures and ensure that they have an appropriate environment to speak about their experiences.

Promoting Student & Client Welfare

A number of other policies and procedures are in place to ensure the welfare of students is safeguarded. These are:

- Anti-Harassment and Bullying
- Positive Behaviour Support Policy
- Equality, Diversity and Inclusion
- Health and Safety Policy
- Risk Assessment Policy
- Managing Challenging Behaviour (including the use of reasonable force only when it is appropriate, in conjunction with MAPA principles)
- Complaint Procedure
- Residential Basic Rights and Values
- Counselling Provision
- Student/ Client Involvement
- Student Code of Conduct

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- Staff Code of Conduct
- Student Charter
- Confidentiality Policy
- Intimate Personal Care Policy
- Whistleblowing Policy

Students are made aware of the above policies at induction. A copy of all these policies will be available to families on request. The Safeguarding Policy is available on the College's website. The curriculum and wider College support mechanisms such as the Positive Behaviour Team which includes mentoring/counselling facilities and PSHE (personal, social, health education) will be used to raise awareness and build students' confidence and skills. Teaching themes can include building self-esteem, emotional literacy, assertiveness, healthy relationships, online safety, sexting and bullying (including cyber bullying). The College has a strong culture of promoting student welfare and wellbeing through the above mechanisms and QAC values of excellence, collaboration, enabling, respect, integrity and inclusion. QAC aspires to leadership in diversity and incorporates FREDIE principles (fairness, respect, equality, diversity, inclusion, engagement), into its culture. These ensure the whole college community is treated with respect and dignity, people feel safe, have a voice and are listened to.

In the context of the College environment outlined above, staff will raise students' awareness of safeguarding in the curriculum as appropriate to the level of students' understanding, including online safety guidance. The residential 24-hour curriculum also includes aspects of the above as appropriate in the context of students' needs and promotion of welfare and wellbeing.

Owing to the complexity of QAC students' disabilities and vulnerability, the possibility of mental health concerns is also greater, but they may not necessarily be safeguarding concerns. QAC staff, through the processes outlined at 5.2 and their day to day contact with students, are able to identify mental health problems. Staff will, therefore, ensure concerns are recorded, reported and acted on – as appropriate – via mentoring, counselling, behaviour support plan, external agencies or otherwise directed by the Assistant Principal Student Support/other relevant manager. If a mental health concern is also a safeguarding concern, it will be reported and actioned on MyConcern. Actions taken will be in line with the student's Education, Health & Care Plan (EHCP).

All staff will have an awareness of child on child/ peer on peer abuse, i.e. bullying, gender-based violence, sexual assaults and sexting. Students who abuse others will be responded to in a way that meets their needs as well as protecting others in the College community. We will ensure the needs of students who abuse others are considered separately from the needs of their victims. It will be determined on a case by case basis whether risk/needs assessments relating to allegations of sexual assaults on campus will be completed as a result of allegations including ensuring the physical environment is safe.

Staff will have due reference to KCSIE Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' as well as

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guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020).

Staff need to be aware of the potential impact on siblings where sexual abuse is reported by a student in the home environment.

Our staff will understand child on child/ peer on peer abuse is not tolerated and will not pass it off as “banter”, “just having a laugh” or “part of growing up”. Our staff are aware of sexual violence indicators and understand that students can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 and which are defined as rape, assault by penetration and sexual assault; where A commits an offence where B does not consent to any of these acts and A does not reasonably believe that B consents. Sexual harassment is unwanted conduct of a sexual nature which can occur offline or online. Sexual harassment can violate a person’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Likewise, the effect of ‘upskirting’ – taking a voyeuristic photograph under a person’s clothing without them knowing is a criminal offence.

Staff will be aware that safeguarding allegations could be made by a student against student which could be of a serious nature, including a criminal offence. Consideration will be given to risk factors for other students as well as young people outside the College community.

QAC’s support mechanisms will ensure the risk of peer on peer abuse is minimised with immediate action and individual support reviewed for those involved. The DSP and other relevant staff, including the Student Support Team will provide individual and holistic guidance as appropriate.

See also QAC’s Anti Bullying and Harassment Policy (for students).

All staff and volunteers at QAC have a duty to safeguard students by:

- promoting a caring, safe and positive ethos at all times
- adhering to the College’s Safeguarding policy
- ensuring they are trained and aware of potential indicators of abuse (identified at Appendix 3) and vigilant in their role.
- being open and non-judgemental to hearing concerns from students and involving the DSL or a deputy about referral advice. If the DSL or a deputy are not available, then the Deputy Principal or the Principal should be contacted.

QAC will ensure it is kept up to date on the latest advice and guidance to address specific vulnerabilities and forms of exploitation including County Lines criminal exploitation of young people, serious violence, forced marriage, trafficking, modern slavery, forced labour and domestic servitude. QAC staff will be supported to recognise warning signs and indicators in relation to such issues in an appropriate way. Staff should refer to KCSIE for further guidance around indicators of potential abuse. Staff will be aware of private fostering and ensure the College verifies

relationship to adults and complies with the mandatory duty to report to the Local Authority if they are aware of or suspect a young person under the age of 18 is in a private fostering arrangement. Our DSL will seek further advice from other agencies as necessary. Honour-based abuse encompasses crimes to protect or defend a family and/or a community and includes female genital mutilation (FGM). If it appears an act of FGM has been carried out, QAC staff have a statutory duty to report it. Failure to do so can result in disciplinary actions. If a member of staff suspects a student is at risk of such, they should discuss it with the DSL who will consult social care before a decision is made as to whether the mandatory reporting duty applies.

While all QAC students may be more vulnerable to abuse due to their disability, it is recognised that young people who have a social worker have a potentially greater risk of harm, as well as facing barriers to attendance, learning, behaviour and poor mental health. The welfare of Looked After Children and young people who are care leavers is managed proactively and QAC staff work with social workers (for example, inviting them to attend reviews and liaising with them for safeguarding and wider welfare concerns).

The College monitors attendance to address poor or irregular attendance, recognising that young people missing education can be an indicator of abuse and neglect.

What We Do When We Are Concerned

When QAC staff raise safeguarding concerns, the incident will be investigated by the DSL or a deputy member of the Safeguarding Team. Where there are risk factors but no evidence of a significant risk, the Team member will work with colleagues on early help and preventative work to support students. The DSL or Deputy may well talk to the students/family and work together to reduce the risk. The DSL or Deputy may:

- Monitor the situation after taking appropriate internal action to address the concerns
- Undertake an Early Help assessment through a multi-agency approach
- Seek advice from Children's Advice and Support Service (for children) or ACAP (for adult) safeguarding – see Code of Practice Section 3 below
- Notify Children's Social Care via request for support form to the CASS
- Notify Adults Social Care (see Section 3 below)

Recruitment of Staff

In recruiting staff and volunteers QAC follows a systematic selection process designed to assess the applicant's suitability for the post and to work with vulnerable students. Checks will be made to ensure that all the information provided by any potential member of staff or volunteer is accurate and, within the limits of the procedures available, staff and volunteers will be checked for any offences they may have committed against vulnerable people. DBS and KCSIE 2020 guidance is followed.

No member of staff will be appointed to any position without two suitable references being provided. All referees must be persons who can comment on relevant and recent aspects of the applicant's work.

All paid staff and volunteers will have clear roles detailed for them. All staff and volunteer appointments will be subject to a probationary period during which they will be closely supervised.

Prevent Duty

QAC has a duty under the Counter Terrorism and Security Act (2015) to have due regard to the need to prevent people from becoming terrorists or supporting terrorism' ('The Prevent Duty'). Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix four.

Risk Reduction

Senior Managers and the DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include consideration of the College's curriculum, Safeguarding Policy, the use of college premises by external agencies, regular contact with families and other external agencies, anti-bullying policy and other welfare-related issues specific to the college's profile, community and philosophy.

Response

QAC, like other educational and public bodies, is required to identify a Prevent Single point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

This is the DSL at QAC. The SPOC reports to the Deputy Principal for safeguarding duties. The responsibilities of the SPOC are described in Appendix 5.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC/ DSL. Any concerns about a member of staff should be referred to the Line Manager and the Director of HR. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

Training

Induction programmes for all new staff and volunteers will include e-learning or face to face training within the first few weeks of employment and prior to start of employment if appropriate (see also Staff Recruitment and Selection Policy). All staff will receive appropriate annual refresher training. In addition, staff will receive updates (e.g. via email, e-bulletins and staff meetings) as required. Governors undertake training every two years. Appendix 6 outlines the procedure in respect of allegations of abuse against staff.

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QAC will ensure that safeguarding issues receive continuous attention and will regularly review the way that the organisation operates to support this principle.

Appendix 1

Code of Practice

Contents

- Introduction
- Procedure for Staff Receiving and Recording Allegations of Abuse
- Procedure for the Designated Safeguarding Lead
- Safeguarding Case Management Guidelines

Introduction

These procedures must be followed if a student alleges abuse which has occurred whilst at QAC or elsewhere.

In all cases where an allegation of abuse or a sustainable allegation is made, the Designated Safeguarding Lead (DSL) must be informed immediately. The DSLs appointed by the College are:-

Designated Safeguarding Lead, Liz Egginton, Assistant Principal, Safeguarding & Student Services

Deputy Designated Persons:

- Kim Tierney, Residential Services Manager
- Steve Hirst, Informed Practice Lead
- Naomi Leon Redmond, Support Services Manager, Mentoring & Counselling
- Tom Nelson, Positive Engagement Support Officer
- Naresh Kumar, Student Support Officer
- Gill Leno, Community Services Manager
- Sam Wilkinson, Safeguarding & Care Leaver Co-ordinator
- Giles Logan – Independence Plus
- Designated Governor, Rosemary Adams

Indicators of abuse/exploitation may include but are not limited to:

- Disclosure
- Injuries that appear non - accidental
- A change in behaviour

Neglect and exploitation of a person's emotional or physical needs

QAC will use Preventative education as most effective in the context a whole college approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/ misandry, homophobia, biphobic and sexual violence and harassment. This will be underpinned by the school/college's behaviour policy and

pastoral support system as well as by a planned programme of evidence based RSE delivered regularly timetabled lessons and reinforced through the whole curriculum.

Procedure for Staff Receiving and Reporting an Allegation of Suspected Abuse and Exploitation

Record and report minor incidents that in themselves do not constitute abuse or suspected abuse but, if repeated over a period of time, would give rise to concern.

When abuse is suspected or disclosed, explain to the vulnerable person that you have a duty to share the information with the DSL. Ensure they know that the issue will be dealt with and taken seriously, by appropriate professional people.

Offer the person support at all times and ensure either you or a colleague are available to meet with them. Ease their anxieties as best you can.

The staff member should ask the student open questions to establish an outline of the incident(s) and use the 'MyConcern' referral system. If appropriate, use other forms of recording e.g. tape recorder. Be aware that, at this stage, the facts need to be established as accurately as possible as the information may be needed for the full investigation.

Clearly record any injuries and all details the student gives to you. Situations of abuse may lead to criminal investigation and you may be required to make a statement and any records you make may be subject to disclosure as evidence. Photographic evidence must not be taken e.g. of bruising but recorded on a body map on MyConcern.

Record the student and /or the referrer's details as required on 'MyConcern', including:

- the referrer's own status or involvement.
- the nature of abuse, including specific incidents.
- the alleged abuser's personal details, including their relationship to the vulnerable person.
- the need for a signer, an interpreter / intervener.
- details of any other agencies involved if known by the referrer.
- whether the student or the alleged abuser is aware of the referral.
- the current whereabouts of the student and alleged abuser and their likely movements for the next 24 hours.

If another person is involved in the allegation, ensure they remain in separate areas of the College or House. When necessary students can be moved to other houses.

Ensure confidentiality is maintained by only informing those who need to know. The incident is not to be discussed with other students, families, other QAC staff, professionals or the media. If you require assistance from another member of staff give minimal information only.

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All other necessary action required will be taken by the DSL, including, involving other agencies (police, social services, CQC) informing parents and carers and supporting students and staff.

If you believe that it would not be appropriate for the College's DSL to be involved, you should inform another member of the College's Safeguarding Team. You are able to contact social services or the police. This should only occur if you believe none of the College's Management Team will also be appropriate.

If you need urgent support and none of the Designated Persons are contactable, get in touch with the senior manager on call. Whatever the circumstances, if the individual insists on going to the police, then that must be facilitated and, where practical, the student should be accompanied by an appropriate member of staff.

In general, we will discuss safeguarding concerns with parents/carers (for students under the age of 18) before approaching other agencies, and will seek their consent to making a referral to another agency. We will seek the consent of students over the age of 18 and will ask them if we can tell their parents. However, there may be occasions we will contact another agency before informing parents/carers because we consider that contacting.

Procedure for the DSL When Dealing with Suspected Abuse

Review the referral/incident and whether the student or client needs medical attention. Ensure any medical attention needed is provided immediately. Establish that the student or client is not in immediate danger.

Inform staff making the referral that there is a Whistleblowing Policy in place to protect them if they have any concerns about reporting incidents.

Remember that the report and records you make may be required as evidence in any subsequent criminal proceedings.

Check the College records for previous information relating to the student and their alleged abuser.

Having gathered and recorded as much information as possible, contact other Designated Safeguarding Leads or a member of the senior management team about internal actions or external referral and Early Help guidance. See also 2.10 above. Having discussed the seriousness and severity of the allegations.

Contact if required:

- CASS (Children's Advice and Support Service) 0121 303 1888
- Or: Emergency Duty Team (outside normal hours): 0121 675 4806
- West Midlands Police: **0845 113 5000 or 101 and ask for the Police Child and Vulnerable Adult Protection Officer. Make it clear you are making a**

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referral and request are feral/incident reference number. See also NSPCC
– When to Call the Police for further guidance

State that this is a child protection referral which will be followed by a written report.

Birmingham Social Services – Adults & Communities /Emergency Duty Team (outside normal office hours): 0121 675 4806.

If it is not an emergency and you want to report adult abuse please call the “Adults & Communities Access Point” (ACAP) on 0121 303 1234.

Follow advice from those listed above, also clarify the position of parental involvement and other agencies. Where the student already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence, to their team manager. QAC will co-operate with any multi agency meetings or discussions.

If the police are involved, arrange for the student(s) to be escorted to and from the police station and ensure they receive support and advocacy from the College. Only inform those staff who need to know of the incident, giving the briefest details possible.

Record all actions undertaken on MyConcern

If contacted by the media refer them to the Principal

If the incident involves someone living in registered accommodation (i.e. Thornton/Woodville or Oakwood House), inform the Care Quality Commission within 24 hours and discuss the nature and severity of the allegations.

Contact CQC: 03000616161

Complete a Regulation 18 notification form and email to the CQC Office:
HSCA_notifications@cqc.org.uk

Hand written or printed forms should be sent to:

Care Quality Commission
Citygate,
Gallowgate,
Newcastle upon Tyne NE1 4PA

Ofsted can be contacted on <https://contact.ofsted.gov.uk/online-complaints> . They will refer complaints about colleges to complaints.ESFA@education.gov.uk

Report details of the incident/complaint to the Disclosure and Barring Service if the investigation finds allegations to be substantiated as per the DBS guidance (held by the DSL).

Addresses of relevant organisations and local offices which deal with Child and Adult Protection:

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- **Birmingham Safeguarding Children Partnership**
P O Box 17340
Birmingham, B2 2DR
Tel: 0121 464 2612.
- **Birmingham Safeguarding Adults Team**
P.O Box 16466
Birmingham, B2 2DP
- ACAP@birmingham.gov.uk
Phone: 0121 303 1234
- **Children's Advice and Support Service (CASS)**
Disabled Children's Social Care Service
PO Box 15887
Birmingham, B2 2RZ
secure.cass@birmingham.gcsx.gov.uk
Tel: 0121 303 1888 / emergency out of hours: 0121 675 4806

Safeguarding case management guidelines

QAC staff will have due regard to data protection principles which allow them to process (and withhold) personal and special category data as part of the processing condition to safeguard young people and individuals at risk. This condition also allows professionals to share information without consent where there is good reason to do so. KCSIE (2020) states "The DPA 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children". See also document 'Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2018)'.

There is now a definitive timeframe for transfer of files when children/Young People move schools Colleges. QAC will ensure that we make prompt data transfers within a 5-day period when we know which setting a student is transferring to.

These guidelines have been developed to ensure the effective management of Safeguarding Referrals at QAC. They are to be followed by the Safeguarding Team in following up Safeguarding Referrals.

On receipt of a MyConcern referral a member of the Safeguarding Team will be allocated to take any action necessary with regard to the Referral in discussion with the DSL and in line with QAC's Safeguarding policy and Appendix 1 Code of Practice. During weekly Safeguarding Team Meetings open referrals will be discussed and monitored referenced by their case number. Once all action necessary has been taken with regard to a referral this will be recorded as a closed case in the minutes of the Safeguarding Team Meeting and will be marked as filed on the 'MyConcern system'. The person who opens the case will take a lead on checking / monitoring that the case is now closed as outlined.

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The Safeguarding Governor will review the minutes of the Safeguarding Team Meetings and will raise any concerns regarding any unclosed cases direct to the DSL. Any printed safeguarding records will be kept securely and separately from general College records. Termly audits of MyConcern cases will be undertaken by a member of the Safeguarding Team and the Safeguarding Governor invited to attend those audits.

Appendix 2

Online Safety

Young people will be using the internet more during home learning or any college closure periods. We take seriously our responsibilities for safeguarding young people and vulnerable adults in our care and their safety online. Links have been listed on the college website (see below) providing helpful information for young people and parents/carers:

- **Children's guide to staying safe online**
- **Parents' digital safety and wellbeing kit**
- **Online safety for young people at home**

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

1. Content: being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
2. Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
3. Conduct: personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
4. Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Protocols for Staff in relation to Home Learning:

- Staff should not communicate with parents/carers outside college channels (such as through personal Facebook accounts, or contact young people using their personal email addresses or mobile phone numbers).
- Do not arrange to meet students or ask them to deliver work to your home

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- Remain professional and objective in all email and other forms of correspondence
- Staff and students should only use college approved platforms (Google Suite, Drive, Meet, Classroom or Microsoft Teams); do not use social media in communicating with young people
- Staff will reinforce online safety messages regularly in their teaching
- Staff will bear in mind the current circumstances and how they are affecting young people and families when setting expectations of young people
- Staff will consider online safety when sharing resources – vet websites and videos/apps/software carefully and bear in mind that the home environment will not have the same content filtering systems as at college. If introducing new apps and resources, ensure these meet GDPR requirements. Contact Head of Resources/IT Support for further guidance.
- Ensure that passwords and secure information – such as log-ins are kept confidential
- Adhere to copyright, GDPR guidelines and QAC's Staff Code of Conduct
- Continue to look out for signs that a young person may be at risk – which may differ from typical triggers in a college environment. Report any safeguarding concerns to the DSL without delay in the usual way.

Filtering and Monitoring Systems:

There is a further and continued emphasis on filtering and monitoring of IT systems.

We all have a responsibility to ensure that students are not viewing inappropriate content at college and this will be done via in class monitoring by tutors and support staff to an extent. However, we also have firewalls in place to ensure that students cannot access certain websites, social media while accessing college IT systems. We also have an application called Smoothwall which captures every key stroke that is typed on any of our college computers even if the text is deleted afterwards. This is in place for both staff and students. The system will flag to designated senior staff to manage including the DSL.

Systems are in place which are administered by our Resources team and monitored by senior managers. However, all staff are responsible for monitoring concerns as with any safeguarding issue.

In relation to 'Live' Online Teaching or Support:

- Staff must log home learning via set up trackers and Databridge/MIS – including date and time, what was covered and any incidents. Any serious incidents should be reported in the usual manner depending on the nature of the issue
- Staff must maintain professional conduct during live streaming – dress appropriately, consider your surroundings (background, other household members who may come into view etc.) and blur if necessary, and remember that your microphone may be on.

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- Staff maintain the same boundaries and insist on the same standard of behaviour as in a college setting. Make specific protocols clear at the outset, e.g. muting of microphones at appropriate times.
- 1:1 teaching and support subjects are an important part of college provision for some young people and this should be maintained as far as possible during guided home learning. 1:1 session that would have been in place in college in normal circumstances (e.g. pastoral/counselling meetings, mentoring) may continue online. All 1:1 session must be recorded and logged via Databridge/MIS system.

Protocols for young people in relation to Home Learning:

- Young people always log on through the Google platform
- Young people do not make recordings, take screenshots/screengrabs or photographs, or store footage of tutors or peers
- Young people to be aware that some live online sessions may be recorded by the tutor
- Young people dress appropriately for online live sessions
- Young people/parents/carers ensure that there is a safe and appropriate place to participate from. Blur your background if necessary
- Young people follow their QAC Code of Conduct during online sessions as if they were in college
- If a young person has any concerns about online safety, or if they feel they are being bullied, they should talk to someone they trust and report it to the college

Appendix 3

Definitions of Abuse

(Birmingham Safeguarding Children and Adult Boards)

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children Working Together to Safeguard Children (2018)

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. (Keeping Children Safe I Education 2022)

Physical Abuse

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

Emotional Abuse

Emotional exploitation and is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying causing the person frequently to feel frightened or in danger, or involve their exploitation or corruption. 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 person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape 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, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways or grooming in preparation for abuse (including via the internet).

Sexual Exploitation

Sexual exploitation occurs when a person receives 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities or another person performing sexual activities on the person. Significant indicators can include having a relationship of concern with a controlling adult or young person; entering and/or leaving vehicles driven by unknown adults, possessing unexplained amounts of money, expensive clothes or other items, frequenting areas known for risky activities; being groomed or abused via the internet or mobile technology; having unexplained contact with hotels, taxi companies or fast food outlets.

Child Sexual Exploitation (DfE 2017) is a form of child sexual abuse and occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity a) in exchange for something the victim wants or needs, and/or b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. The exploitation does not always involve physical contact, it can also occur through the use of technology.

Child Criminal Exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact, it can also occur through the use of technology (DfE, 2020). Staff should be aware of indicators of CCE as outlined in Part 1 of KCSIE.

Child on Child / Peer on Peer abuse:

Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual

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- harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Neglect or Acts of Omission

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the severe impairment of their health or development. It is another form of exploitation. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing or shelter, including exclusion from home or abandonment, failing to protect a vulnerable person from physical and emotional harm or danger, failing to ensure adequate supervision including the use of inadequate carers, or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

Financial Abuse

This may include theft, fraud, exploitation, (and for vulnerable adults: pressure in connection with wills, property or inheritance or financial transactions), or the misuse or misappropriation of property, possessions or benefits. Some of the recognised signs of financial or material abuse are: loss of jewellery and personal property, lack of money to purchase basic items, a bill not being paid when money is entrusted to a third party, inadequate clothing, unexplained withdrawal of cash, and loss of money from a wallet or purse.

Discriminatory Abuse

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.

Institutional Abuse

"Institutional abuse" is sometimes used to describe abuse which pervades a particular establishment. Institutional abuse may take the form of repeated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to widespread and persistent ill treatment or gross misconduct at the other. There may be a variety of underlying factors in relation to poor care standards which could include, for example, inadequate staffing, an insufficient knowledge base within the service, lack of essential equipment, rigid routines or a controlling management regime. Any

of the types of abuse outlined above may be raised as allegations in the context of abuse within an institution.

Domestic abuse

Controlling and coercive behaviour, forced marriage, 'honour'-based abuse including female genital mutilation.

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition:

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

The definition of abuse now also has 'including where children see, hear or experience its effects in relation to domestic abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

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

Operation Encompass enhances communication between the police and schools where a child is at risk from domestic abuse.

It is a process used to inform schools when the police have attended an incident of domestic violence or abuse in the homes of their pupils. This ensures sensitive and child-focused in-school support to mitigate the impact of domestic abuse on the affected child's learning, wellbeing and development.

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The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Self-neglect

Neglecting to care for oneself or environment

Modern Slavery

Trafficking; forced labour and domestic servitude

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk). School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood,

adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

More information can be found in the mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children

It is important that staff at QAC are aware of the links between mental health and a lack of attendance and progress and those who are missing from education.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Incel

Incel is a shortened version of involuntary celibate. With the growth of the internet and the ability to use it as a forum to develop and promote extremist viewpoints, a strand of incel was seen to develop into a "rigid three-tier, immutable, social hierarchy exclusively based on physical appearance. At its most basic, the incel world view appears to be based in our deep-rooted survival of the fittest ideals, namely that there are alpha males and females (known as Chads and Staceys) representing the top tier, with a majority of men in the middle tier (known as Normies) and then an exclusive minority group of males in the bottom tier who are the incels. This world view suggests that women are not only genetically inferior to men but are solely driven by an inherent sexual desire to mate with males who they see as genetically superior to them. This

naturally then leads to the view that those in the bottom tier (the incels) will automatically be excluded by any woman.

Information regarding Incel needs to be taught within general safeguarding training and linked to Prevent, Online safety, Domestic Violence and Peer on Peer abuse and delivered within a PSHE curriculum.

Homelessness

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

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Appendix 4

Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition of extremism are calls for the death of members of the UK armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Individuals may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – an individual is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the individual may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the individual’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism, discrimination or aspects of Government policy;

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- Unmet Aspirations – the individual may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special Educational Need – individuals may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others. There could be a level of vulnerability due to exploitation by others due to a learning disability.

However, this list is not exhaustive, nor does it mean that anyone experiencing the above is at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix 5

Preventing Violent Extremism - Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC for QAC is The Designated Safeguarding Lead who is responsible for:

- Ensuring that staff are aware that they are the SPOC in relation to protecting students from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of QAC in relation to protecting students from radicalisation and involvement in terrorism;
- Ensuring relevant training for staff is organised and student awareness is raised through relevant forums;
- Monitoring the effect of the college's work around equality, beliefs and community involvement activity to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the college about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the college for case discussions relating to students who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of vulnerable students into the Channel* process; attending Channel* meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel* Co-ordinator; and
- Sharing any relevant additional information in a timely manner.

*Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;

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- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Appendix 6

Allegations of Abuse Against Staff

QAC has robust recruitment processes which includes mandatory safer recruitment training for HR staff which is refreshed every 3 years.

Due to their close professional relationship with service users, some staff at QAC may be particularly open to allegations of misconduct or abuse. Staff can harm students accidentally, deliberately or as a result of failure to follow procedures, policies or good practice. All staff are required to read and sign agreement to the College's Staff Code of Conduct.

LOW LEVEL CONCERNS ABOUT STAFF BEHAVIOUR

Allegations or concerns about an adult working at QAC including agency staff, volunteers or contractors

At QAC we recognise the possibility that adults working in the college may harm young people and children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the college should be taken to the Principal/CEO or Deputy Principal without delay; any concerns about the Principal should go to the Chair of Governors. Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Principal. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations:

It is an allegation if the person* has:

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

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

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

If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

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

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

Advice around staff conduct relating to safeguarding can be sought from the DSL and/or HR. Any allegation about a member of staff will be reported to the Principal. If an allegation is made about a member of staff (including supply staff) or volunteer, or for any other reason suspicion falls on a member of staff or volunteer, QAC will follow the advice of the Local Authority Designated Officer (LADO) 0121 675 1669 or Police Child and Vulnerable Adult Protection Officer until the enquiries are complete. A child or Vulnerable Adult protection investigation will take precedence over an internal disciplinary investigation.

The Principal will determine whether the member of staff should be suspended, or some other action taken. This assessment will take into account the context of the allegation, background information regarding the member of staff and information regarding the student. A decision to suspend will be considered if information received alleges that:

- the member of staff may have committed an act of gross misconduct and/or
- his/her continued presence at work would impede an investigation and/or
- he/she could pose a risk to the student or other students.

The member of staff may also be suspended if their remaining at College leaves him or her vulnerable. The suspension in no way indicates or implies guilt. The College recognises the person's need for support and will be able to help identify suitable sources of support.

If the investigation identifies fault by the member of staff any subsequent action will be linked to the College's disciplinary procedure. If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision recorded on the young person's safeguarding file.

Allegations of Abuse Against the Principal & Chief Executive

Staff or governors who identify a potential vulnerable person concern/ allegation about the Principal & Chief Executive must act on those concerns and immediately contact Paul Walker, Director of Governance on 0121 803 5403, email: pwalker@gac.ac.uk. In out of hours please contact 0121 428 5050 where the Duty Manager can give details of the Senior Manager On Call (who can provide personal contact details of Paul Walker).

Appendix 7

Statement of Conduct on Freedom of Speech and Expression

Introduction

QAC recognises and endorses that freedom of speech and expression within the law is important for colleges as places of education and learning. Colleges are required to take measures to protect freedom of lawful speech and expression. This principle is also enshrined in Article 10 of the Human Rights Act 1998.

The obligations of this Statement shall apply to:

- All students and clients of QAC, including all those studying at QAC under an agreement with a partner organisation.
- All staff, volunteers and governors
- All persons invited to speak or otherwise take part in events to be held on College premises (to students/staff)
- All organisations and individuals using College hospitality room booking facilities for business and social events.
- All contractors to the College

QAC obligations

The College has the responsibility to maintain good order on its premises. It has the right and the power to regulate and, if necessary, to impose conditions or restrictions upon events such as meetings and demonstrations held or proposed to be held on its premises.

Where it is foreseeable that an event may raise issues of controversy in some way, a request should be made in writing to the Principal & Chief Executive for permission to hold such an event. For student/staff focussed events a Visitors Log must be completed. For Hospitality bookings, all hirers must comply with this Statement, QAC's Hospitality Terms and Conditions and QAC Values Statement. Contractors will also be sent the Statement as part of their obligations and terms.

Expression of views

QAC will not suppress freedom of thought and expression, provided such thoughts and expressions do not go beyond the articulation of views and do not constitute incitement to riot, insurrection, racial hatred, religious hatred, sexual harassment or other activities which are likely to cause a breach of the peace or public disorder or otherwise to be unlawful and provided that, by allowing such views to be expressed,

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the College would not be failing in its wider legal duties (for example, the Equality Act 2010 and the Prevent Duty within the Counter-Terrorism and Security Act 2015).

Reasonable grounds for action would include, but are not limited to, the fact that the event or expression of views by individuals may, within the premises of the College:

- Incite those present to commit a criminal act
- Lead to the unlawful expression of views
- Be in direct support of an organisation whose aims and objectives are illegal
- Give rise to a breach of the peace.

Holding of events

In determining whether the holding of an event on College premises might reasonably be refused, consideration will be given to:

- The health and safety of people attending the event and all staff, students or other visitors on College premises who might foreseeably be put at risk.
- The security of the College's property and premises
- The good name and reputation of the College

Staffing

Retention of documents – At QAC we have to clarify a successful candidate's identity etc. however copies of DBS certificates or criminal information should not be kept for longer than six months as long as there is evidence that the information has been sought.

QAC has a duty to manage any concerns or allegations relating to outside agencies using our sites through the same processes as our own staff.

Sanctions and Penalties

Where those responsible for the breach are students, staff or volunteers of the College, action may be taken against them under the relevant disciplinary procedure. The College will work with external agencies and families in accordance with its Safeguarding Policy to ensure the safety and wellbeing of students is maintained.

Where those responsible for the breach are students or staff of a partner organisation of the college, the Principal or Deputy Principal shall inform the partner organisation with a view that the partner organisation takes action under its relevant procedures.

Where a breach of this Statement takes place at an event, the College may take steps to assist the police to secure identification of the persons committing offences with a view to appropriate action being taken against them.

Communication

Communication of this Statement will be undertaken by:

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- HR (for new staff)
- All staff circulation
- Easy read version for students; linked to Students Code of Conduct
- Circulation to all contractors to the College alongside their Terms and Conditions
- Sent to all hirers of QAC facilities alongside Hospitality Terms and Conditions

Version:	5	Department/Area of Operations:	Health and Safety
Reviewer:	Assistant Principal Student Services	Approver:	Board of Trustees
Date of Review:	26/09/2024	Next Review Date:	26/09/2026
Policy Standard Owner:	Assistant Principal Student Services		