

Student Safeguarding Policy – 2022/2023

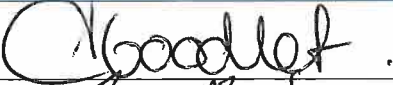
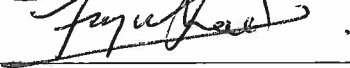
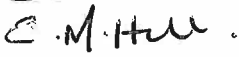
Approved by Safeguarding Committee

Date: 9 December 2022

Approved by Safeguarding Governor

Date: 9 December 2022

Formally Approved by:

Role	Name	Signature
Designated Safeguarding Lead (DSL):	Emma Goodlet	
Principal and Chief Executive:	Dr Fazal Dad	
Safeguarding Governor:	Catherine Hill OBE	



Key Contacts:

The Designated Safeguarding Lead (DSL) is: Emma Goodlet (Assistant Principal)

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The Safeguarding Governor: Catherine Hill

The Designated Officer for Blackburn with Darwen: (Professional Abuse Allegations)

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- # **Blackburn with Darwen Children's Advice and Duty Service (CADS): 01254 666400**
- # **Blackburn with Darwen Emergency Duty Team (EDT): 01254 587547 (out of office hours)**

Out of Hours Service – (evenings, weekends, holiday periods and college closure days)
– **Student Assistant Programme 0800 0283766**

The Policy

1. PURPOSE

At Blackburn College, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students and apprentices. We endeavour to provide a safe and welcoming environment where our students and apprentices are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure the provision of effective support.

The purpose of this Policy is to provide all employees, volunteers, partners and other stakeholders (incl. contractors) with a clear understanding of the issues around child protection and safeguarding vulnerable adults and to explain the college's processes and procedures if an allegation is made. The college is committed to creating a culture of vigilance where students' welfare is promoted and where timely and appropriate safeguarding action is taken for students who need extra help or who may be suffering or likely to suffer harm. Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

1.1 The purpose of this document is to:

- Promote a safe learning environment and challenge poor and unsafe practice
Ensure staff receive adequate training and supervision
- Identify instances in which there are grounds for concern about a student/apprentice and take action to keep them safe
- Take appropriate action to prevent unsuitable people entering the workforce

Definitions

- **Children** - anyone who has not yet reached their 18th birthday – referred to throughout this policy and procedure as ‘child’ or ‘children’
- **Adults** – anyone over the age of 18
- **Peer** - refers to any learner at the college including adults and children incorporating specifically child-on-child abuse (KCSIE, 2022)

Throughout this Policy and Procedure, the language used is students; the encompassing term including children, young people and vulnerable adults.

Safeguarding and promoting children and young people’s welfare is defined as:

- protecting children from maltreatment;
- preventing the impairment of children’s mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.
- Children includes everyone under the age of 18.

For adults the key reference points are the 2015 document ‘No Secrets’ (Adult Protection) which provides a definition of abuse of adults, the Equality Act 2010, and Protection of Freedoms Act 2012. Vulnerable adults are defined as students on foundation learning programmes and any other adult learners identified as being vulnerable through social, medical or mental health conditions impacting on their learning.

The Policy is informed by the following legal/statutory regulations:

- Revised Prevent duty guidance: for England and Wales: on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015
- Children and Social Work Act 2017
- GDPR 2018
- Data Protection Act 2018

- Modern Slavery Act 2015
- Safeguarding Children and Young People from Knife Crime (Ofsted) 2019
- Education and Training (Welfare of Children) Act 2021
- Equality Act 2010
- Public Sector Equality Duty
- Human Rights Act 1998 (HRA)

A separate Appropriateness to Study Procedure is designed to support students whose medical condition means that they may have difficulty completing their programme of study but contains within the guidelines of the procedure, the option to terminate a student's learning contract.

2. SCOPE

2.1 Our Safeguarding Principles:

- The welfare of all students and apprentices is paramount
- Safeguarding and promoting welfare is everyone's responsibility
- All students and apprentices, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to effective safeguarding arrangements
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a student or apprentice is at risk of harm
- Students, apprentices and staff involved in safeguarding and protection issues will receive appropriate support

This Policy deals with the protection of children and vulnerable adults and is supported by the Staff Code of Conduct, which sets out required standards and expectations. Children are young people (up to the age of 18) including customers, contractors, employees, students and visitors and will include those on school links courses although for these students the relevant school policy will take precedence.

In respect of children, the policy is informed by the statutory guidance outlined in the Department for Education publication, 'Keeping Children Safe in Education' statutory guidance 'Working Together to Safeguard Children'. The departmental advice What to do if you are worried a child is being abused Advice for practitioners and the departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

2.2 The College recognises that effective safeguarding systems are those which:

- Put the student/apprentice needs first.
- Provide students and apprentices with a voice.
- Promote identification of early help and prevention.
- Encourage multi-agency working and sharing of information.
- To provide all staff with the necessary information to enable them to meet their safeguarding responsibilities.
- To ensure consistent good practice.

- To demonstrate the College's commitment to safeguarding.

Blackburn College is committed to providing a safe, caring and welcoming environment where every student and apprentice can reach their full potential free from harm, abuse and discrimination.

The College will therefore:

- Establish and maintain an ethos where students and apprentices feel secure and are encouraged to talk, and are listened to.
- Ensure that students and apprentices know that there are adults in college who they can approach if they are worried or are in difficulty.
- Include in the curriculum material which will help students and apprentices develop realistic attitudes to the responsibilities of adult life and learn how to keep themselves safe.
- Ensure that every effort will be made to establish effective working relationships with parents and colleagues from other agencies.

The College recognises that all staff share the responsibility for safeguarding – focused on the following:

2.3 **Prevention:** Blackburn College is committed to early help and identification of unmet needs and vulnerabilities. The College works in partnership with other agencies to promote the welfare of students and apprentices and keep them safe.

2.4 **Protection:** All staff and volunteers are trained to recognise and respond to abuse and neglect. All staff and volunteers are expected to be vigilant and must act quickly when they suspect a student or apprentice is suffering, or is likely to suffer, harm.

2.5 **Support:** The College acknowledges the sensitivity and complex nature of effective safeguarding arrangements and therefore ensures that students, apprentices, staff and families are supported appropriately.

2.6 In pursuit of these aims, the Strategic Safeguarding Committee will approve and annually review this Policy and Procedure with the aim of:

- Raising awareness of issues relating to the welfare of students and apprentices and the promotion of a safe environment for learning within the College.
- Aiding the identification risks of significant harm and providing procedures for reporting concerns.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.

2.7 Particular Vulnerabilities

Any student or apprentice may benefit from early help and support, but college staff must be particularly alert to the potential need for early help for students and apprentices with the following additional vulnerabilities:

- Have a disability and/or specific additional needs.
- Have Special Education Needs (whether or not they have a statutory Education, Health and Care Plan).
- Is a young carer.
- Are showing signs of being drawn in to anti-social or criminal behaviour.
- Frequent missing episodes/goes missing from home/education.
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- Where family circumstances present challenges for the student or apprentice, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is a privately fostered young person.

2.8 Legislative Requirements

Blackburn College has a statutory and moral duty to ensure that the functions with a view to protecting, safeguarding and promoting the welfare of students receiving education and training at the College. The colleges statutory responsibilities include the requirement to have due regard to the need to prevent people from being drawn into terrorism (Prevent Duty). The College recognises that for students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help prevention.

The College will therefore:

- Establish and maintain an ethos where students feel secure, are encouraged to talk, and are
- listened to.
- Ensure the students know that there are adults in the Group who they can approach if they
- are worried or are in difficulty. Curriculum and pastoral staff will ensure that students are aware
- of their role in this area.
- Include within the curriculum discussions which will help students develop realistic attitudes
- to the responsibilities of adult life.
- Ensure that wherever possible every effort will be made to establish effective working
- relationships both with parents/carers and with colleagues from other relevant agencies.
- Follow safer recruitment practices when hiring staff, which includes a check of the List of
- those Barred from Working with children and vulnerable adults.

3. **ROLES AND RESPONSIBILITIES**

All staff (including Governors):

3.1 All staff and volunteers must read part one of ‘Keeping Children Safe in Education’,

- Will have safeguarding training appropriate to their role and responsibility that is regularly updated. In addition, all staff members should receive regular updates which can be in the form of emails, bulletins, staff meetings/discussion.
- Should be aware of the signs of abuse and neglect.
- Should be aware of how to respond to specific safeguarding concerns as outlined in this Policy.
- Have a responsibility to identify those who may require early intervention support and what action to take to ensure they are supported appropriately.
- Have a responsibility to identify and respond to a student or apprentice who is or likely to suffer significant harm and what action they must take, appropriate to their role.
- Must be aware of the importance of multi-agency partnership working and information sharing processes.
- Who work directly with students and/or apprentices and can contribute to early support and safeguarding assessments must be aware of the risk sensible approach to safeguarding.
- Have a responsibility to provide a safe environment in which students and apprentices can learn.

3.2 The Corporation Board will ensure that:

- The College complies with their duties under relevant legislation.
- All staff and volunteers undergo safeguarding training (including online safety) at induction and updated every two years with any legislative and regulatory updates on an annual basis where necessary.
- All senior leaders and staff working directly with students and apprentices read Part One of ‘Keeping Children Safe in Education’
- This Safeguarding Policy is consistent with local requirements, reviewed and updated annually and made available publicly (available on the College website).
- Safeguarding training commissioned and/or delivered internally is in line with advice from the Department for Education.
- There are procedures for dealing with allegations of abuse made against members of staff including allegations made against members of the Leadership Team and a nominated person identified to liaise with the appropriate Local Area Designated Officer (LADO).
- Policies adopted are disseminated, followed and understood by all staff.
- They appoint a member of the Senior Leadership Team to the statutory role of Designated Safeguarding Lead (DSL).

- Students and apprentices are taught about safeguarding (including online safety) through teaching and learning opportunities, as part of providing a broad and balanced curriculum and preparation for independence and employment.
- There are written recruitment and selection procedures that include the requirement for appropriate pre-employment checks and at least one person on any appointment panel has undertaken safer recruitment training.
- Procedures are in place to handle allegations of peer on peer abuse (child on child abuse KCSIE 2022).
- There are appropriate safeguarding responses to students and apprentices who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in the future.
- The student's wishes and feelings are considered when determining what action to take and what services to provide to protect individuals through ensuring there are systems in place for students and apprentices to express their views and give feedback.
- They recognise the importance of information sharing between professionals and the local authority.
- They appoint a Designated Teacher to promote the educational achievement of students and apprentices who are looked after and this person has appropriate training.
- Ensure the Student Computer Usage Policy addresses the safety of students and apprentices in accessing inappropriate material when accessing the internet and that appropriate filtering and monitoring systems are in place.

3.3 The College Principal:

- Ensures this Policy and associated Procedures are implemented and followed by all staff.
- Allocates enough time and resources to enable the DSL and any deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary professional meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- Ensures that the safety and welfare of students and apprentices is addressed through the curriculum and Personal Development offer.
- Provides a signed copy of the College’s Safeguarding Annual report to the Corporation Board.

3.4 The Designated Safeguarding Lead (DSL): (As set out in Annex C: Keeping Children Safe in Education

The Designated Safeguarding Lead (DSL) and/or nominated Deputy is expected to Refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and
- support staff who make referrals to local authority children’s social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police

3.5 Working with others

The designated safeguarding (or deputy) lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” (as per Part four) and the local authority

- designated officer(s) (LADO) for child protection concerns in cases which
- concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement college.

This includes:

- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

3.6 Designated Safeguarding Officers:

- Will report to the senior member of staff with lead responsibility. Will know how to make an appropriate referral.
- Will be available to provide advice and support to other staff on issues relating to child protection and protection of adults at risk.
- Will have particular responsibility to be available to listen to students studying at the Group or community courses.
- Will deal with individual cases, including attending case conferences and review meetings as and when appropriate.
- Will be trained to an appropriate level (Level 3 Safeguarding) and undertake mandatory updating as required

3.7 Training:

The DSL (and any **nominated deputies**) should undergo training that provides them with the knowledge and skills required to carry out the role. This training should be updated at least bi-annually. They must also undertake Prevent awareness training as and when updated training is made available

DSLs skills and knowledge should be refreshed at regular intervals but at least annually and this can involve e-bulletins, meeting other DSLs or simply taking the time to read and digest safeguarding materials.

3.8 Availability

During term time the Designated Safeguarding Lead (or a deputy) will always be available (during College hours) for staff in the College to discuss any safeguarding concerns.

4. SAFEGUARDING ARRANGEMENTS FOR SUBCONTRACTED PROVISION

The College has sub-contracted / partnership provision for 16-18 students and vulnerable adults with the following providers:

Blackburn Rovers Football Club

These organisations have their own safeguarding policies but within these they must refer to Blackburn Colleges practices and a requirement to pass details of any referrals to one of the designated officers.

All employees delivering courses at a subcontractor / partner must attend the providers own safeguarding training.

5. SAFEGUARDING ARRANGEMENTS FOR APPRENTICESHIP PROVISION AND WORK EXPERIENCE

For students undertaking Apprenticeships and work experience placements the same safeguarding requirements apply. Where a safeguarding concern arises in the workplace notification must be given to a Designated Safeguarding Officer. A summary of the Student Safeguarding Policy is included in the Work Placement Guide. The Guide includes details of how to make a safeguarding referral and links to the full Policy document.

6. SAFEGUARDING ARRANGEMENTS FOR TRIPS AND VISITS

For students participating in off-site trips and visits, where a safeguarding concern arises, the same safeguarding requirements apply. A copy of the Student Safeguarding Policy. Policy should be forwarded to any trip/visit destination and details of how to make a safeguarding referral outlined in the risk assessment document.

7. SAFEGUARDING ARRANGEMENTS FOR LOOKED AFTER CHILD (LAC) AND PREVIOUSLY LOOKED-AFTER CHILDREN

The most common reason for becoming looked after is as a result of abuse and/or neglect. A student or apprentice who is looked after by a local authority (referred to as a looked-after-child) as defined in section 22 Children Act 1989, means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority.

In particular, they should ensure that the Designated Safeguarding Lead has the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the young person's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the social worker and the name of the head of the 'virtual school' in the authority that looks after the young person.

8. SAFER RECRUITMENT

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student is paramount.

All staff working with children, young people and vulnerable adults are in a position of trust and authority. The Employee Code of Conduct and Employee Disciplinary Policy and Procedure will be used to manage any allegations or potential misconduct of staff. This will include where a member of staff is involved in an incident outside of college which did not involve children but could have an impact on their suitability to work with children. In such instances the matter must be referred to the Head of HR and the Designated Safeguarding Lead. (KCSiE 2022).

Any allegations against staff should be reported to the DSL in the first instance, who will liaise with the Head of Human Resources. The DSL will determine whether the matter should be referred to the LADO prior to any formal investigation.

The college endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education. Full guidance on safer recruitment can be found in the College Recruitment and Selection Policy and Procedure.

9. PREVENT PROTOCOL

Blackburn College is committed to supporting the Government's Prevent Strategy and to that end has engaged in employee training with regard to the Prevent Strategy as a whole and the Channel process in particular. The College's Safeguarding Team have an awareness of the Government Strategy and are able to make a referral via Channel, as appropriate.

Any extremism or radicalisation concern will be considered as a safeguarding issue and treated accordingly. If we (Blackburn College) believe that someone is vulnerable to being exploited or radicalised, we will use the established Safeguarding Procedures to escalate our concerns to the appropriate Designated Safeguarding Officers, who will raise concern via the Channel Coordinator.

The Channel Co-ordinator and Local Authority will initially screen referrals for suitability through a preliminary assessment.

If suitable, the case will then be discussed at a Channel Panel of relevant partners to decide if support is necessary. Blackburn College will engage with multi-agency panels to develop the most appropriate support package to safeguard the individual at risk.

10. MODERN SLAVERY

Blackburn College is committed to meeting obligations under section 54 of The Modern Slavery Act 2015 and to ensuring all its operations, collaborations and business relationships

are carried out with integrity and ethically. The College will implement systems and controls to ensure any form of exploitation of an individuals' liberty and freedoms by another person for commercial gain is not taking place within any business operations.

The Modern Slavery Act Statement is published on the website.

11. TYPES OF ABUSE

11.1 Peer on Peer Abuse (child on child abuse KCSIE 2022)

This includes all types of bullying (including cyber bullying); but is not limited to sexual violence and sexual harassment; physical abuse such as hitting, kicking, hair pulling or otherwise causing physical harm; sharing of nudes or semi nudes and initiating/hazing type violence and rituals; CSE; gang activity and youth violence. Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/ or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse. Sexual violence and sexual harassment can occur between two children of any sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

11.2 Child Criminal Exploitation (CCE)

Children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support. 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.

11.3 Serious Violence

All employees should be aware of the indicators, which may signal that students are at risk from, or are involved with serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

11.4 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

11.5 Further Information Further details on specific forms of abuse and safeguarding issues are outlined in Annex A of Keeping Children Safe in Education Part 1.

This detail includes:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines.
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation.
- Sexual violence and sexual harassment between children in schools and colleges (incl. 'up skirting').

12. **PROCEDURES FOR DEALING WITH A DISCLOSURE OF ABUSE**

Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child.

When dealing with a disclosure the welfare of the individual is paramount. Do remember that they have chosen you, the place and the time at which to tell you.

The following principles must therefore be followed:

If a student tells you that abuse is taking place, acknowledged this, take it seriously and listen to the student.

It is important not to ask too many or leading questions, but if you do, ask open questions.

- Write down the details in the student's own words including dates.
- Try to reassure the student.
- Explain to the student that you may have a legal obligation to pass this information on, to protect both them and possibly other members of the family and public.
- Get help and pass on the details and your record to the relevant Safeguarding Officer who will treat the information with the utmost confidence – the "need to know" principle will be employed. It is their responsibility to decide what further action should take place.
- Keep the student informed of what you have done and what will happen next.
- Get help for yourself if you feel upset by any disclosure. Remember that in any group

or class there may be a victim of abuse so sensitivity at all times is important.

Do Not:

- Make promises you cannot keep.
- Promise confidentiality.
- Take the matter further yourself (ensure that you know your boundaries).
- Contact the student's parents.
- Contact any other agencies. In terms of Children and Vulnerable Adults with Special Educational Needs and disabilities, do not assume that changes to behaviour, demeanour or signs of distress are due to their SEN or disability. These could be signs of abuse and you should consider these changes as cause for concern.

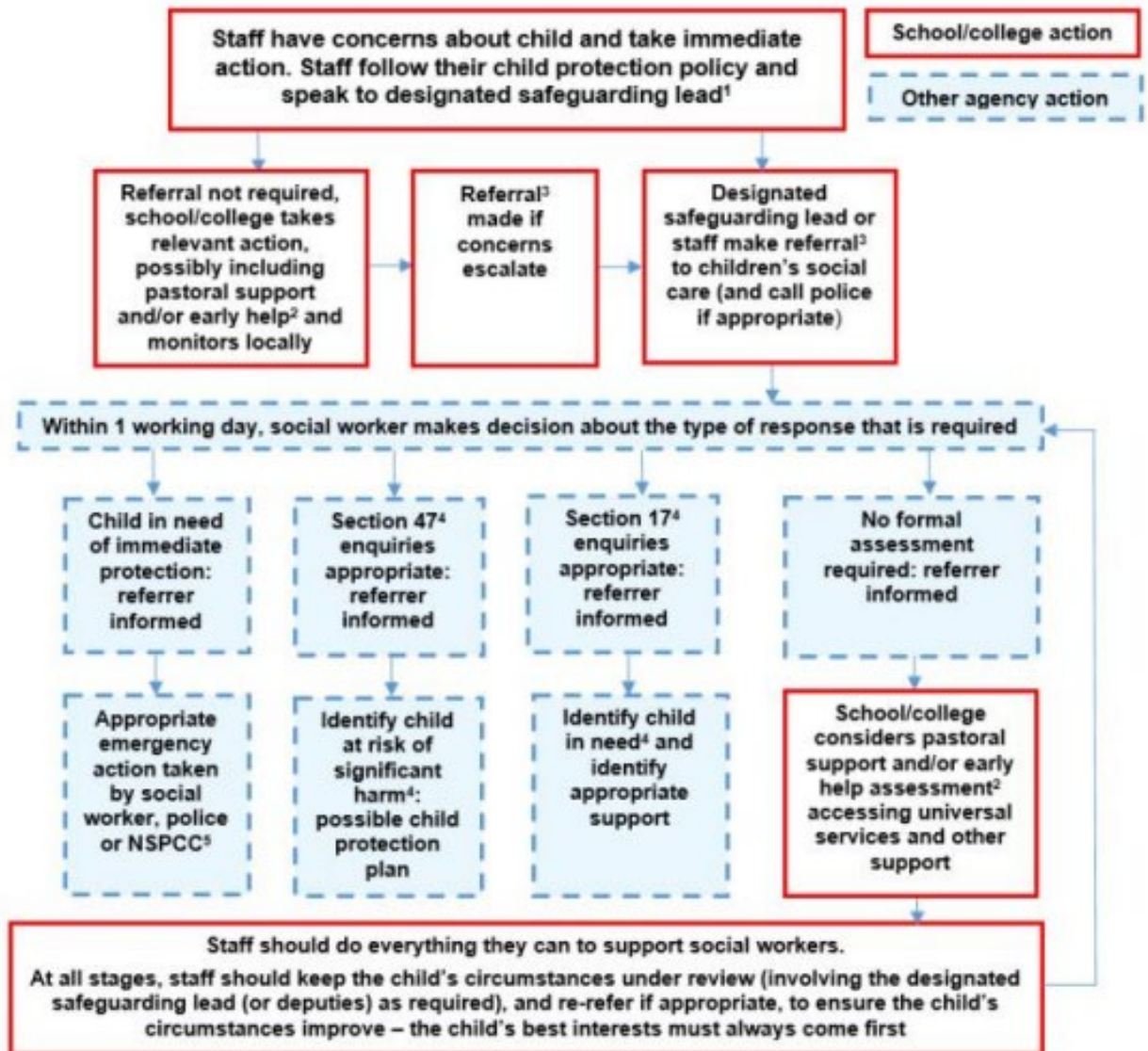
The designated safeguarding officer will establish the main area of concern and contact as appropriate:

- Relevant local authority multi agency team
- The Students current case/support worker
- The Student's GP
- The Accident and Emergency dept. of the nearest local hospital and the police as appropriate.
- Channel.

The safeguarding officer will note all actions undertaken, including any information shared and the record should be emailed to the safeguarding team safeguarding@blackburn.ac.uk.

13. Dealing with a Disclosure of Abuse in Respect of a Child or Vulnerable Adult

Actions where there are concerns about a child



14. ONLINE SAFETY

The College has in place appropriate filters and monitoring systems to protect students from harmful online materials. It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

If students or staff are at risk, this will be reported it to the Anti-Phishing Working Group (<https://apwg.org/>). The arrangements for online safety are in accordance with “Keeping Children Safe in Education, Annex D Online Safety”. In addition, the Student Code of Conduct highlights detail in respect of acceptable use of computers and access to on-line materials.

15. RECORD KEEPING, CONFIDENTIALITY AND SHARING INFORMATION

Well-kept records are essential to good Child Protection practice. The College is clear about the need to record any concerns held about a student within the college, the status of such records and when these records, or parts thereof, should be shared with other agencies. There is also a need to share important education and any Child Protection information at the point of a child’s transition to another education establishment.

Blackburn College recognises that all matters relating to Safeguarding and Child Protection are confidential and all information will be stored and handled in line with Data Protection Act 2018 and the GDPR principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive; accurate;
- kept no longer than necessary;
- processed in accordance with the data subject’s rights; and secure.

Safeguarding referral information and safeguarding concerns and any other related sensitive information will be stored electronically on the students ILP ProMonitor and on CPOMs – the colleges system for recording and reporting on safeguarding and child protection concerns.

Level of access to ProMonitor and CPOMs will be set according to the staff members role and remit. Information about a young person to others will be shared on a need to know basis only.

Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act and GDPR, which means that students and parents / legal guardians do not have an automatic right to see them. If any member of staff receives a request from a student or parent/ legal guardian to see safeguarding records, they will refer the request to the Data Protection Officer.

The Data Protection Act and GDPR does not prevent the sharing of safeguarding information with relevant agencies, where that information may help to protect or keep a young person safe.

Full guidance can be found in the Colleges Data Protection Policy and Freedom of Information Policy. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child or young person to keep secrets which might compromise the safety or wellbeing of a child or young person.

16. MONITORING AND REVIEWING

Quarterly monitoring will be undertaken by the Assistant Principal – Student Support and Experience (College DSL) and formally reported to the Strategic Safeguarding Committee and Corporation Board. The Policy will be reviewed annually.

17. RELATED POLICIES/PROCEDURES

- Sexual Violence, Abuse and Harassment Policy
- Single Equality Policy
- Recruitment and Selection Policy
- Student Behaviour Policy and Procedure
- The Pledge
- Whistleblowing Policy
- Information Sharing Protocol
- Data Protection Policy
- Freedom of Information Policy
- Complaints Policy and Procedures
- Student Computer Usage Policy
- Health, Safety and Welfare Policy

18. MANAGEMENT RESPONSIBILITY

The management responsibility is with the Assistant Principal – Student Support and Experience (The College DSL).

19. EQUALITY IMPACT ASSESSMENT

Blackburn College is committed to the promotion of equality, diversity and providing a supportive environment for all members of our community. Our commitment means that this policy has been reviewed to ensure that it does not discriminate (either intentionally or unintentionally) any of the protected characteristics of age, disability, gender (including gender identity), race, religion or sexual orientation and meets our obligations under the Equality Act 2010. Therefore, this policy has no adverse impact on any of the above protected groups.

Author:	<i>Assistant Principal – Student Support and Experience</i>
Owner:	<i>Assistant Principal – Student Support and Experience</i>
Date last approved:	January 2021
Date of review:	<i>September 2022</i>
Date of approval:	9 December 2022
Approved by:	<i>Safeguarding Governor and the Principal and Chief Executive</i>
Next Review date:	<i>August 2023</i>