Cambridge Seminars College

# Cambridge Seminars College (CSC) Safeguarding Students Policy & Procedure

Cambridge Seminars College

## Introduction, Aims, Purpose and Scope

Cambridge Seminars College fully recognises its responsibility to safeguard all students aged under 18 (U18s) and vulnerable adults in its care. We recognise that all staff, volunteers, accommodation providers and students have an active and full part to play in protecting U18s and vulnerable adults from harm. This policy applies to all staff, students, accommodation providers, volunteers and contractors engaged by Cambridge Seminars College.

All our staff believe that the college should provide a caring, positive, safe and stimulating environment, which allows learning for the individual and promotes individual achievement and progression.

This policy has been drawn up in accordance with the Cambridgeshire local safeguarding agency and in compliance with the DfE guidance: "Keeping Children Safe in Education 2021", which replaced Safeguarding Children and Safer Recruitment in Education/Every Child Matters (From January 2007)

The aims of this policy are:

- To practise safe recruitment in checking the suitability of staff and volunteers to work with students (including EDBS with barred list checks where appropriate)
- To practise safe recruitment in checking the suitability of accommodation providers - including those provided through agencies and/or residences - to work with and host students (including EDBS with barred list checks where appropriate.
- To raise the awareness of both teaching and non-teaching staff, accommodation providers and volunteers, of the need to safeguard students, including raising awareness of signs of abuse, bullying, radicalisation and extremism.
- To promote correct behaviour and ensure that all staff maintain appropriate behaviour and follow CSC procedures and Standards of Behaviour when in contact with students; important not only in safeguarding students, but also in protecting staff from wrongful accusation.
- To establish a safe environment in which students can stay, study, learn and develop.
- To emphasise the need for good channels of communication between all members and all levels of staff, accommodation providers, students, volunteers and external agencies.
- To maintain an appropriate level of separation between students under 16 (though the college does not usually accept students U16) and students 18+ in any accommodation provided by the college, during any activities organised

either by the college or by sub-contractors.
- To put in place a clear and structured procedure within the college to be followed in cases or suspected cases of abuse or other safeguarding issues.
- To develop and promote effective working relationships and channels of communication with other agencies, including the Police and Family Services.
- To minimise conflict of interest and encourage reporting and whistleblowing.

While the main focus of this Safeguarding Policy is prevention, CSC recognizes that there may be occasions when staff, students, or external contacts have concerns about potential or actual harm to under 18 students or vulnerable adults. This policy makes provision for such concerns, ensuring they can be raised effectively and appropriate action taken.

**Procedures**

Our college procedures for safeguarding students will be in line with national guidance and the Cambridgeshire Student Protection Procedures under the auspices of the Cambridgeshire Local Safeguarding Students Board (LSCB).
We will ensure that:

- We have a Designated Safeguarding Lead (Student Services Manager Charlotte Longhurst) who undertakes regular training in Safeguarding, Student Protection and Inter-Agency working and has successfully completed a Safeguarding Students Level 3 training programme.
    - She will liaise with local statutory students' agencies as appropriate.
    - All members of staff, accommodation providers, volunteers & staff from external & supply agencies are aware that she is the Designated Safeguarding Lead, responsible for student protection matters.
- We have an Alternate Designated Safeguarding Lead (Phil Scherb) responsible for Safeguarding in Charlotte Longhurst's absence. He has successfully completed a Safeguarding Students Level 3 training programme. He will undertake regular training in Safeguarding, Student Protection and Inter-Agency working.
    - He will liaise with local statutory students' agencies as appropriate in Charlotte Longhurst's absence.
    - All members of staff, accommodation providers, volunteers & staff from external & supply agencies are aware that he is the Alternate Designated Safeguarding Lead, responsible for student protection matters in the absence of Charlotte Longhurst.
- Safer recruitment practices will be followed at all times for in-house staff: ○
    - All members of staff with regular unsupervised access to students are

subject to enhanced DBS clearance with barred list check.
    - Identity checks include sight of original passport, qualifications, utility bill, bank statement and driving license. All documents are copied and signed
    - and dated as original seen and digital copies retained.
    - Two references are sought and checked, gaps on CVs investigated and self- declarations signed (Children's Act). To Whom It May Concern references are not accepted.
    - Enhanced DBS are housed securely online. There is also a single centralised register of all staff, in addition to individual digital 'cards' held securely on 'TRELLO'.
    - Potential staff are advised at outset that we are a safer recruiter and that these steps will be taken.
- Written confirmation will be sought from all external agencies that their staff, (when given regular unsupervised access - regulated activity - to students in our care), have been appropriately screened and that all checks have been carried out on their staff's identity, references, right to work in the UK and their suitability to work with students.
- Student behavioural policies and student contracts are implemented to work against bullying. Posters and signage to promote awareness of bullying for students. This includes cyber bullying and appropriate online behaviour. A 'Report it and Sort it' campaign to promote awareness and whistleblowing is prominent throughout the college.
- Staff training and documentation to raise awareness of the signs of bullying both on and offline. This to be done at induction and included in the three year safeguarding refresher training.
- All staff to be given this Safeguarding Policy and Part 1 of Keeping Children Safe in Education (2021).
- Homestay Hosts who host students U18 to be given this policy, and the additional guidance in *Hosting Students Aged Under 18*.
- Accommodation to be allocated so as to avoid housing students under 16 with students over 18. On a case by case basis accommodation of students under 18 with students over 18 to be carefully considered and a written recording of a decision and suitability made (risk assessment).
- In Acacia House residence, no students aged under 16 are permitted. Students aged 16/17 to always have their own accommodation unit (en-suite room) and to be housed/grouped/roomed sensitively and appropriately with respect to gender and age.
- The parents of students aged under 18 are recommended to appoint a nominated guardian who will be known to all staff but will not be employed by the college.
- During the Academic Experiences junior programme (or at any other time), without

exception, no students aged 18+ will be permitted to attend activities where students aged under 16 are present.

- No students under 16 are permitted to attend main college activities. This includes groups and closed groups where the group should be advised of this prior to booking. This does not apply to students aged 16 or 17 on the regular college programme.
- Under no circumstances are parents/friends etc of any students permitted to join any activity where u18s may be present.
- Allegations against CSC staff must be reported to appropriate CSC management immediately. Set procedures and protocols are in place for any management response to protect both the student and the adult. (Details below)
- CSC procedures, policies and protocols will be regularly reviewed and up-dated.
- All new members of staff and adult volunteers will be given basic Safeguarding training and PREVENT training and will be alerted to the proper procedures as part of their induction into the college. They will also be given a copy of this policy.
    - Staff are provided with child protection updates as and when appropriate and necessary.
    - All new staff members are provided with the Safeguarding Policy, Keeping Children Safe in Education Part One 2023, Attendance and Behaviour Policy, and Staff Code of Conduct as part of their induction training.
    - All permanent staff will receive updated training every three years. Homestay hosts who host or plan to host students under 18 are to be given this policy, basic safeguarding training and be subject to the Safer Recruitment Policy as part of their preparation or initial recruitment.
    - Further guidance to be provided in *Hosting Students Aged Under 18*, as needed and at biennial re-inspection visits.

## Responsibilities

The Designated Safeguarding Lead works together with the Directors, Mr. Mukhamed Ali Kurmanbayev and Ms Aziza Tlevlessova all of whom have successfully completed a Safeguarding Students Level 3 training programme. Mr. Phil Scherb, Principal, performs an annual review of the Safeguarding documentation and an ongoing on-site inspection of the college to ensure that relevant staff training is appropriate and up to date. Mr. Phil Scherb reports his findings to the Directors.

**The Directors are responsible for:**

- Conducting an annual review of the college Safeguarding policies and procedures and of the efficacy with which the related duties have been

discharged.

- Ensuring that any deficiencies or weaknesses in Safeguarding and Safer Recruitment arrangements are remedied without delay.
- Approving amendments to Safeguarding and Safer Recruitment arrangements in the light of changing regulations or recommended best practice.
- The Directors have a legal duty to respond to requests from the ISA for information they hold.

**The Designated Safeguarding Lead is responsible for:**

- Adhering to Cambridgeshire LSCB and national guidance, Cambridgeshire Student Protection Procedures, and college procedures with regard to referring a student if there are concerns about possible abuse;
- Ensuring that all Student Protection takes place and that all staff and homestay hosts are aware of the need to safeguard students under 18 at all times.
- Keeping written records of concerns about a student even if there is no need to make an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from student records;
- Operating safer recruitment procedures (including EDBS and barred list checks and in compliance with Independent colleges Standards 2019).
- Ensuring that any deficiencies or weaknesses in Safeguarding and Safer Recruitment arrangements are remedied without delay.
- Supporting students.

## Safer Employment Practices

Cambridge Seminars College (CSC) complies with all legal and regulatory requirements for safer recruitment and employment of all staff. All posts, including those involving accommodation, which have a clear need for direct access to students are subject to criminal records clearance. In accordance with ISI/BAC guidelines, all staff with regular, unsupervised access to students and young people up to age 18 must have EDBS barred list checks.

Where a member of staff may have been living and/or working outside the UK for an extended period prior to appointment, a Certificate of Good Conduct/Police Clearance Certificate or equivalent is required from that country. Written confirmation of appropriate screening is sought from supply agencies and external

organizations prior to commencing work. Further identification checks are carried out upon arrival.

To deter unsuitable people from applying for positions in our organisation, the hiring process, including job postings and interviews, ensures that candidates know CSC is committed to safeguarding students in our care and is a Safer Recruiter.

**Group Leaders**

- Where Group leaders either accompany or will have sustained unsupervised contact with students under 18, CSC will require that identity checks and EDBS barred list checks are carried out.
- In cases where the group leader is not a British national or has been living outside of the country for a sustained period, a Certificate of Good Conduct/Police Clearance Certificate or equivalent from the country of residence will be required in lieu of EDBS barred list checks.
- Clear agreements (Group Leader Agreement) will be in place to ensure that Group Leaders are clear as to their responsibilities for their group on a case by case basis, and that this is agreed in advance in writing with the college. Guidance detailing the level of care expected will be provided. This includes but is not limited to provision of meals and supervision.
- Group leaders will only be responsible for students from their own group.
- Group leaders to be given a copy of this policy and provided with a link to basic safeguarding training.
- Where group leaders are organising their own activities, CSC will provide a checklist and a briefing covering the following:
    - Suggested supervision ratios.
    - A customisable risk assessment.
    - Advice about traveling to and from activities.
    - Agreed curfew and free time guidelines.

**Homestay Hosts**

- Homestay Hosts hosting students under 18 will be subject to the Safer Recruiting policy and procedures, as a minimum requiring EDBS barred list checks and two character references. This will apply to all adult residents in the host household, either through answering YES on Q66 (or equivalent), or in having separate checks.
- Homestay Hosts hosting students under 18 will be given extra guidance to raise awareness of Safeguarding issues and identify the signs of abuse and bullying.
    - This guidance will include who to contact should they have any concerns. See *Hosting Students Aged Under 18*.

- Host families will also be made of aware of curfew times and rules for what students under 18 may do outside of scheduled activity time. They will be aware of relevant contacts, actions to take and procedures to be followed within the college should this not be adhered to.
- Parents and guardians will be made aware in writing through the booking process of which meals will be provided for students under 18.
- Any accommodation agencies used by CSC will be bound by the same conditions and procedures. Written agreement will be sought at management level.
- Accommodation to be allocated so as to avoid housing students under 18 in homestay with students 18+. On a case by case basis, requests for accommodation of students under 18 with students 18+ to be carefully considered and a written recording of a decision and suitability made (risk assessment).
- Students aged under 16 will not be housed with students aged 18+. Exceptions may be made in the case of siblings where written consent is sought from the parents, a risk assessment carried out and a written record of a decision kept.

**Residential Accommodation**

- In Acacia House no students under the age of 16 will be permitted.
- Students aged 16/17 in Acacia House will always have individual en-suite accommodation units with lockable doors.
- Students aged 16/17 in Acacia House will be allocated rooms with due regard to age and gender wherever possible.
- Parents/guardians of students aged 16/17 in Acacia House will be made aware in writing that their children may be sharing the building (but not washroom facilities) with other students aged 18+ who have not been subject to Safer Recruitment checks.
- There will be a first-aid trained warden resident at Acacia House, employed by CSC and trained in Safeguarding.
- There is a 24 hour emergency number for residents of Acacia House.
- Students under 18 will not generally be accommodated in third party residential accommodation. Where an exception may be made, a risk assessment will be carried out and a written record of a decision kept. In addition, all residential providers must meet or exceed all standards laid out in the Safeguarding Policy and the Safer Recruitment Policy.
- At least one member of staff to be first aid trained. A first aid kit is to be held on site. An arrangement to be made with a local doctor in the case of emergencies.
- When renting residential accommodation, written confirmation will be sought that suitable checks have been carried out by the owners into the suitability of their

staff who may come into contact with students under 18.
- Parents and guardians will be made aware in writing through the booking process of which meals will be provided for students under 18.
- Staff supervision to be provided at the ratio of 1:20 for 12-17 year olds.

**Parents/Guardians**

- All parents/guardians of students under 18 will be made aware in writing of periods when their child will not be supervised by CSC during their stay.
- All parents/guardians of students under 18 will be required to complete a Parental Consent form prior to booking confirmation. This lays out in writing the responsibilities of CSC and the supervision, level of care and support to be provided, and agrees a curfew time.
    - Any parents/guardians wishing to take part in any activities or parts of a college programme will not be permitted to do so unless they have, as a minimum, been subjected to the checks as per the Safer Recruitment Policy.
    - All parents/guardians of students under 18 will be made aware of the CSC Code of Conduct and disciplinary procedures and that in the event of an expulsion, they will be responsible for immediate repatriation where necessary.
    - CSC will, however, always ensure that expelled students under 18 continue to be Safeguarded until repatriation has taken place.

**All Staff are aware of:**

- The contents of the Safeguarding Policy and have the opportunity to ask questions in relation to policy & procedures.
- Guidelines for staff, to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example one to one tuition, conveying a student by car, engaging in inappropriate electronic communication with a student, giving personal contact details and so on).
    - This is outlined in the Standards of Behaviour, signed by all staff.
- Procedures for dealing with abuse by one or more students against another.
- The need to support/monitor any student as required.
- Procedures for dealing with accusations of abuse.

**Supporting Students**

Cambridge Seminars College (CSC) is committed to equal treatment for all students

regardless of race, ethnicity, sexual orientation, social background, special educational needs or any protected characteristic. We aim to create a friendly, caring and perceptive environment in which every individual is valued and the core values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs are supported and promoted. We will support all students by:

- Encouraging self-esteem and confidence whilst not condoning aggression or bullying.
- Encouraging disclosure during the admissions process.
    - Students flagged during the admissions process as having either mental or physical health issues are then referred to the student services manager for a meeting before the application is processed further.
        - This is to check what support the student has had previously and what support they would need to study successfully at the college.
    - Students will previous history of self harm or suicide will be asked to meet with the SSM multiple times, and provide details of medication, therapy, and current management of issues. Any student believed to still be at serious risk of self harm, will not be admitted to the college to study face to face without parent/guardian supervision.
        - This will be discussed with the Principal and a decision made based on assessed risk.
- Promoting a caring, safe and positive environment within the college.
- Providing clear guidelines to students and their parents on what behavior is unacceptable and will result in disciplinary measures and eventual expulsion from the course; bullying, incidents of racism or attacks on ethnicity, sexual orientation, social background or special educational needs, illegal activity or dangerous behavior that may cause harm to the student or to others.
- Providing forums for students under 18 to raise issues with management in addition to the open door policy through regular tutorials, learning journals and student council meetings.
- Formal student meetings with Academic and Student Service Manager after each exam week to discuss progress and address any concerns.
- Promoting core values of democracy, rule of law, including democracy, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- The college TRACES programme raises students awareness of subjects such as:

- transgender issues, boundaries and consent, body confidence, recognising controlling and abusive behaviour.
- the course also includes sessions on budgeting, living in student residence, time management and study skills.
- The above supported by and in conjunction with
  - Behaviour, Discipline, Attendance and Exclusion Policy.
  - Welfare and Pastoral Care Policy

**Illness**

- Any students under 18 falling ill may be supervised either in the Homestay, residence or within a sickbay on college premises, as needed
- CSC will not be responsible for keeping or administering medicine to any students unless through written agreement. In such cases, written instructions for administering medicines must be provided. Please see the First Aid policy for further details.
- In the event that parents/guardians cannot be contacted, CSC will act in 'loco parentis' in the event of a medical emergency. This will be agreed in writing before any U18s are admitted onto the programme.

**Physical Intervention**

- Staff must only ever use physical intervention as a last resort, and at all times, it must be the last resort.
- Like all colleges, we reserve the right for all staff to use reasonable force to control or restrain a student in specific circumstances. The Education and Inspections Act 2006 enables college staff to use "Such force as is reasonable in the circumstances to prevent a pupil from doing or continuing to cause personal injury to any person including the pupil themselves."
- We understand that physical intervention, the nature of which causes injury or distress to a student, may be considered under student protection or disciplinary procedures.

**Data**

- CSC understands its obligations when processing personal data under GDPR. CSC is required to process data of students under 18 and their parents/guardians in order to enforce its Safeguarding Policy.
- CSC will provide details of its data processing procedures in plain, transparent language to parents/guardians of those under 18 through its Privacy Statement.
- Active consent to process personal data as laid out in the Privacy Statement will be sought, and in the case of students under 18, the active consent of the

parents/guardians.

- Whilst students under 18 and their parents/guardians have the right to withhold consent to all or some of their data being processed, CSC reserves the right to refuse to enrol a student under 18, where the withholding of data prevents the effective implementation of the Safeguarding or other key policies.
    - Illustrative examples: parents' contact details, student date of birth.
- Whilst students under 18 and their parents/guardians have the right to request data be deleted or amended at any time, CSC reserves the right to terminate the enrolment of a student under 18 where the deleting of data prevents the effective implementation of the Safeguarding or other key policies.
    - Illustrative examples: student medical information, parents' contact details.

**Standards of Behaviour**

The standards of behaviour set out below are presented to all staff at Cambridge Seminars College (CSC) who come into direct and unsupervised contact with students (regulated activity). All staff must agree to and sign the document below as part of the employment process.

| **Staff Code of Conduct / Standards of Behaviour** | |
|---|---|

*As a staff member you are in a position of trust and have a significant influence on the personal development of our students. You play a key role in helping the college provide a positive and safe learning environment. The standards outlined below are designed to help achieve this and are part of the robust Safeguarding and Recruitment policies of Cambridge Seminars College (CSC). Together, these ensure we set a positive example at all times, safeguard our students from harm and protect staff from wrongful accusations. While these standards are primarily designed to safeguard students under 18, they apply to all students unless otherwise stated. Many thanks for your help and understanding in keeping our students safe and helping them fulfil their potential.*

- I understand CSC welcomes students and staff from a wide variety of cultures and backgrounds. I agree not to discriminate, insult or make inappropriate comments based on gender, gender identity, sexual orientation, race, age, nationality, religion or any other protected characteristic.

- I understand the need to be sensitive to these issues during contact with staff and students.
- I agree to pay particular attention to the age, experience and cultural background of the student, and whether this makes him or her more vulnerable. I will also take into account any physical or mental disability, and whether this makes him or her more vulnerable.
- Should I become concerned that a student has a Special Educational Need or Disability, or be vulnerable in any other regard, I will inform my line manager immediately.
- I understand that relationships of a sexual nature between staff and students are forbidden. Any such relationships will result in dismissal.
- I will avoid sexually suggestive behaviour, or any physical contact likely to cause fear or embarrassment.
- I agree to challenge aggressive or sexually suggestive behaviour from a student or between students.
- I will avoid unnecessary or inappropriate meetings with students where no other adult is present. Exceptions are made for planned situations — such as 1-2-1 classes, educational or cultural visits — to which my line manager has previously agreed.
- If, for any reason, it is necessary to spend unscheduled time alone with a student under the age of 18, I agree to inform the Designated Safeguarding Lead and/or the College Principal immediately.
- I understand that contact via personal social networking websites (Facebook/Twitter/WhatsApp etc) with students under 18 is forbidden. Any such relationships may result in dismissal. *CSC strongly recommends staff do not have relationships with **any** students through personal social networking sites.*
- I will not give personal contact details (including mobile) to students under 18. Mobile phones will be provided in the event of trips. *CSC recommends you do not give any personal details to any students.*
- I agree not to photograph/video students with my personal electronic equipment without the express permission of my line manager.
- I agree to keep accurate records of attendance and to inform the office immediately if students Under 18 miss any of my classes.
- I will not convey students under the age of 18 alone by car.
- I understand that taking or being under the influence of alcohol or illegal drugs while working for or representing CSC is forbidden and will result in dismissal (barring certain social activities where moderate drinking may be permitted with the express agreement of the college).
- I have been informed of and understand my duty to challenge radicalization and extremism under Prevent. I have completed on-line Prevent training for practitioners.

- I agree to immediately report any concerns or disclosures regarding abuse, bullying or any other aspect of Safeguarding to the Designated Safeguarding Lead. I agree not to take any action independently, other than that laid out in the Safeguarding Policy.
- I understand the need to dress appropriately and to set a positive example for students through my appearance and behaviour.
- I have read and understood the policies in the Staff Google Classroom, specifically, the CSC Safeguarding and Whistleblowing Policies and Part One of Keeping Children Safe in Education 2023 regarding students aged Under 18.

**Student Code of Conduct / Standards of Behaviour**

The Code of Conduct laid out below is presented to all students on or before their first day. It is signed and copies kept for reference. Help is available for students whose first language is not English.

**Cambridge Seminars College Code of Conduct**

***These rules are here for the benefit of all the students and staff in the college. We want everyone to feel happy and safe here. We should all try to be considerate and respect other people. This includes in college, online, in any accommodation provided by the college or on any trips arranged by the college.***

- You must be on time for lessons. If you arrive more than 10 minutes after the start of the lesson, the teacher may ask you to wait until the start of the next lesson.
- You should attend college regularly. You must go to at least 90% of your lessons. Below 90% = no certificate at the end of your course and you may be expelled from the college with no refund. If you are Under 18 you must attend 100% of your lessons.
- Plagiarism is forbidden in the college. Copying, downloading or otherwise using other people's work without attributing it clearly, will invoke the disciplinary procedure.
- If you cannot come to college because you are sick, **YOU** must email, call or SMS the college by 9.00am
- You must not take food or drink into the classrooms.
- You must only use your phone/tablet/laptop in the classroom in the manner agreed by your tutor.
- You must respect all the students and staff. You must not offend anyone because of their nationality, religion, gender etc.
- Anti-social behaviour (such as being rude, aggressive, bullying, sexually

suggestive or disruptive) will not be tolerated. This includes any such behaviour online/via social networking sites such as Facebook/Twitter/Instagram/Snapchat etc.

- If you are under 18, you must not break any UK laws such as drinking alcohol in pubs, going to nightclubs etc. You must attend ALL of your lessons and be at home before your CURFEW as agreed with your PARENTS/GUARDIANS and CSC.
- You must abide by the core values of democracy, liberty, the rule of law and tolerance of different faiths or beliefs.
- The teacher reserves the right to ask you to leave class if you display any behaviour that is threatening to the students or the teacher, or negatively affects the atmosphere of the class. In such a case, you will automatically be referred to the Principal.
- The college reserves the right to remove you from your accommodation with no refund should your behaviour be disruptive to other residents, staff or homestay hosts.

**Disciplinary Procedure — if you break college rules this will happen:**

- **First time:** We will speak to you and if you are under18 your parents/guardians will be informed.
- **Second time:** A member of the management team will give you a written warning. This will also be sent to your parents/guardians.
- **Third time:** You will get a final written warning from the Principal. This will also be sent to your parents/guardians.
- **Last time:** You will have to leave the college and accommodation immediately with no refund or certificate. UKVI will be informed you are no longer a student with us. Any study linked visas become invalid. Your parents/agents will be informed.

*Any behaviour may result in immediate expulsion from the college and/or any accommodation and referral to the police if the Principal believes it to be serious enough.*

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## Allegations against CSC staff or concerns about the wellbeing of a child

- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Designated Safeguarding Lead (Charlotte Longhurst). If the Designated Safeguarding Lead is absent, the allegation should be reported to the Alternate Designated Safeguarding Lead (Phil Scherb).
- The Designated Safeguarding Lead should record any information about dates, times, location and potential witnesses.
- If the allegation made to a member of staff concerns the Designated Safeguarding Lead, the person receiving the allegation will immediately inform the Alternate Safeguarding Lead.
- If a member of staff has any concerns about the wellbeing of a student under 18, they should inform the Designated Safeguarding Lead immediately. In the absence of the Designated Safeguarding Lead, they should inform the Alternate Designated Safeguarding Lead (Phil Scherb)

**Referrals:**

- In response to disclosures or general concern for the wellbeing of a child, referrals to social services or to the police will not be made independently by the Designated Safeguarding Lead but will be subject to consultation with the Local Authority Designated Officer (LADO) tel.01223 727 967.
- The Directors should also be made aware of the allegation or concern. Consultation may also be sought from the NSPCC.
- In case of referrals, CSC will contact the Local Authority Designated Officer.
- In case of serious harm, including where there may be immediate risk of harm, the police should be informed immediately from the outset.
- Relevant Contact Telephone Numbers:
    - Student Protection –0345 045 5203
    - Local Authority Designated Officer – 01223 727 967
    - Cambridgeshire Emergency Duty Team- 01733 234724
    - NSPCC 0808 800 500
    - Childline 0800 1111
    - Police Child Protection Team 101
    - Cambridgeshire Students and Young People's Services – 01733 234724 Monday –Friday 8am-8pm

    - Students' Social Care Services 0845 045 5203 and out of these hours 01733 234 724

- If anyone employed by Cambridge Seminars College (CSC) is deemed unsuitable to work with students, and thus their services are no longer required, the company will report to the Independent Safeguarding Authority (ISA) within one month of that person leaving. Any such report will include evidence about the circumstances as far as possible. The contact address is ISA, PO Box 181, Darlington DL1 9FA (tel 0300 123 1111). CSC is aware that failure to make a report constitutes an offence.
- In any and all such cases, CSC will not enter into any compromise agreements.
- CSC is aware that it is an offence under the Vetting and Barring Scheme (VBS) to employ or take on as a volunteer in regulated activity anyone who is barred from such an activity.
- It is an offence not to refer to the ISA details of anyone who is removed from regulated activity, or who leaves employment while under investigation for allegedly causing harm or posing a risk of harm.

**Staff support**

- In line with current procedures, a member of staff accused of abuse may be suspended from duty with pay, pending investigation and subject to bi-weekly internal review. Where possible, appropriate alternative duties will be carried out by the staff member accused, and suspension seen as a last resort.
- A suspension does not imply guilt: it is for the protection of both the student and the adult.
- If an allegation is not substantiated and the person returns to work, CSC will support that person.
    - CSC will keep a written record of all allegations, resulting inquiries and outcomes.

***For more information please see Dealing with Allegations of Abuse – Staff Guide. This is available in the staffroom and google classroom folders.***

**<u>Allegations against other students</u>**

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the college's Code of Conduct and Behavioural Policy.

**<u>Safeguarding allegations</u>**

- Occasionally, allegations may be made against students by others in the college, which are of a safeguarding nature.
- Safeguarding issues raised in this way may include:
    - physical abuse
    - emotional abuse
    - sexual abuse and sexual exploitation.
    - online abuse including, but not limited to, the categories above.
- It is likely, though not mandatory, that to be considered a safeguarding allegation against a pupil, some of the following features will be found:
    - The allegation:
        - is made against an older student and refers to their behaviour towards a younger or a more vulnerable student.
        - is of a serious nature, possibly including a criminal offence.
        - raises risk factors for other students in the college.
        - indicates that other students may have been affected by this
        - student indicates that young people outside the college may be affected by this student.

Examples of safeguarding issues against a student could include:

- <u>Physical Abuse</u>
    - Violence
    - Forcing other students to use drugs or alcohol
- <u>Emotional Abuse</u>
    - blackmail or extortion
    - threats and intimidation
    - name calling
- <u>Sexual Abuse</u>
    - indecent exposure, indecent touching or serious sexual assaults
    - forcing others to watch pornography or take part in sexting
- <u>Sexual Exploitation</u>
    - encouraging other children to attend inappropriate parties
    - photographing or videoing other children performing indecent acts These would be considered a safeguarding issue whether online or in person.
    - Upskirting, Hazing etc.

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**What to do**

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern and should discuss it with the Designated Safeguarding Lead/Alternate DSL.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).
- It may be appropriate to exclude or suspend the student being complained about for a period of time in line with the college's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough college investigation should take place into the matter using the college's usual disciplinary procedures.

**Mental Health Support and Suicide Prevention**

Disclosure is sought and flagged on the admissions form during the admissions process if there is any concerns with previous mental health or suicidal/self harm attempts.

Students meet with the Student Services Manager prior to confirmation of enrolment to discuss current support and to assess the wellbeing of the student before accepting them onto the course. Students with concerns have access to the 24/7 emergency college phone number, unlimited unscheduled meetings with the SSM, and the contact details of all available third party support available in the area. These students are also registered as a priority with the local GP within their first week of arrival to the college.

Any students with severe Mental Health issues or a history of self harm, will be placed in either Host Families with experience of these, or within our Acacia House residence where a member of staff resides to offer the support.

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**Homelessness**

Students found to be struggling with finding accommodation or finding themselves homeless will be offered support and assistance to find the right options for them.

**Community safety incidents**

Community safety incidents such as, but not limited to; Anti social behaviour, engaging in conversations with unknown members of the public, traffic incidents will all be thoroughly risk assessed before activities are conducted with students outside the college premises. Staff are correctly trained, well briefed and carry a first aid kit, mobile phone, copy of risk assessment, and have a list of emergency contacts for these scenarios.

**Discrimination**

-LGBTQ+
-Our application form gives the gender option to select as 'Male/Female/Other' then an option to select pronouns such as 'She/He/Them/Other'. If 'other' or 'them' is selected at the admissions point of the application process, the SSM will have a meeting with the student to discuss how they would like to be supported through their studies.
-Unisex toilets are available for students that wish to use them.

**Keeping students safe online**

Sharing and/or accessing inappropriate content online. Online gambling, financial fraud, INCELs. Support will be given to students to be aware of these issues through our TRACES programme, and any students found to be struggling with these issues, will be offered the appropriate support through third party help systems such as Centre 33, Gamble Aware, Action Fraud helplines.

**Created by Phil Scherb August 2019**
**Reviewed by Phil Scherb August 2023**
**Next review no later than July 2024**

See also:

- ***Safeguarding Students and Safer Recruitment in Education Policy***
- ***Dealing with Allegations or Suspicions of Abuse – Staff Guide***
- ***Standards of Behaviour***
- ***Welfare Policy***
- ***Code of Conduct***
- ***Transgender Policy***
- ***Keeping Children Safe in Education - Part 1***
    - ***https://assets.publishing.service.gov.uk/government/uploads/system/uploads***

***/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf***

- ***Anti-Radicalisation and Extremism Policy (PREVENT)***