



## Safeguarding Audit Report for Shrewsbury Colleges Group (SCG)

Date of Audit:	28 <sup>th</sup> and 29 <sup>th</sup> January 2020
Audit Commissioned by:	Shrewsbury Colleges Group
Key Contact:	James Staniforth, Principal and CEO
Audit conducted by:	Gillian Sommers, MSc. Safeguarding Consultant

### **Introduction**

Shrewsbury Colleges Group was formed in August 2016 through the merger of Shrewsbury Sixth Form College and Shrewsbury College. The College operates from three campuses; London Road, which offers a wide range of technical and professional courses and Welsh Bridge and English Bridge Campuses which offers academic courses. In addition, the College works with 300 employers to deliver Apprenticeship programmes to 400 students, (16-18 and adults) and offers Higher Education and part time courses. In total, Shrewsbury Colleges Group works with around 10,000 students each year.

The safeguarding audit was conducted by Gillian Sommers, MSC. an independent safeguarding consultant, qualified to Level 4 in Safeguarding, with over 20 years' experience of working in the Further Education and Skills Sector.

The purpose of the audit was to carry out a full review of all safeguarding practices including policies and procedures, site security, training, staff and student awareness and the impact of these practices on both students and staff.

During the audit, all three campuses were visited, 38 students interviewed both individually and in groups and 14 members of staff were spoken to on an informal basis with one member of staff requesting confidentiality. All students and staff were selected by the auditor at random.

### **Leadership and Management of Safeguarding**

Leadership and management of safeguarding is very good. The Group Vice Principal, Curriculum Support and Business Development, leads an experienced and very effective team of safeguarding practitioners. The structure of the team ensures that all three campuses have safeguarding trained staff on-site and available to students at all times during the College day. The team are trained to appropriate levels in safeguarding and Prevent as well as in a multitude of other safeguarding related topics/subjects, e.g. Mental Health Among Young Adults (16-25), Child Sexual Exploitation, STORM Suicide Prevention Course, Train the Trainer and Prevent Train the Trainer Courses. The team are highly visible and known to staff

and students alike. Each campus has numerous posters displayed identifying the Safeguarding Team and how to contact them.

All policies relating to safeguarding are up to date and include clear procedures for staff to follow in the event of a safeguarding concern. The College has in place a robust staff code of conduct, entitled 'Safe Working Practices' This is updated as appropriate and re-distributed to staff, so serves as a constant reminder of their responsibilities as 'trusted' adults.

Staff training records were inspected and showed that of the current staff employed, including governors, casual staff and volunteers, 9 staff (all new starts) had yet to complete safeguarding training and 32 staff (all new starts) had yet to complete Prevent training. A plan was presented with the intended dates for the outstanding training to be completed. All staff and governors have been sent a copy of the revised Keeping Children Safe in Education 2019 (Part 1) This guidance is also sent in the 'new start welcome pack' along with The Prevent Duty. The staff spoken to felt strongly that they had been given adequate training to understand their safeguarding responsibilities.

Safeguarding is a standard agenda item at Senior Leadership Team (SLT) meetings. HR send out a fortnightly communications newsletter to staff, 'In the Loop' which includes a safeguarding section. This is used to update staff on important changes, current risks etc.

Governors have a strong overview of safeguarding arrangements and receive regular reports through the Quality Committee, Annual Safeguarding Report and Audit and the Safeguarding Committee Minutes. The Governing Board have appointed a governor to take responsibility for safeguarding. The Safeguarding Governor attends the Safeguarding Committee and meets the Group Vice Principal - Curriculum Support and Business Development, the Director, Curriculum Support and the Safeguarding Manager on a termly basis.

Although, audit reports of the Single Central Record are presented to the Safeguarding Governor through the Quality Committee, there has been no physical sight of the record or random checks on staff vetting.

The College employs a suitably qualified and experienced Health and Safety Officer who is responsible for ensuring that the sites are safe, that risks are assessed and mitigated where possible and that accidents and incidents are recorded and reported as required.

#### Evidence to support findings

- Safeguarding Policies and Procedures including Prevent and Safe Working Practices
- Prevent Risk Assessment and Action Plan
- Safeguarding Team Training Record
- All Staff Training Record
- College noticeboards and posters
- Discussions with staff
- Safeguarding Committee minutes
- Single Central Record
- Meeting with Health and Safety Officer
- In the Loop staff communication

**It is recommended** that the Safeguarding Governor checks the SCR and a selection of staff files on a termly basis to further reassure the Full Governing Board that the College is fully compliant with statutory safer recruitment requirements.

## Safe Recruitment

Safer recruitment processes are robust and the Group Vice Principal, HR & Professional Development fully understands the College's responsibility to ensure that all staff, governors and volunteers are vetted in accordance with statutory duty. A clear 'journey' has been developed to ensure that at every stage of the recruitment process, appropriate action is taken and assurances secured. The initial advertisement, the job description and the contract of employment all include statements on the College's commitment to safeguarding and explain the requirement for Disclosure and Barring Service (DBS) checks, declarations of criminal records and the requirement for suitable references. 30 members of staff including the HR team, SLT, Curriculum Leaders and other staff who are responsible for interviewing prospective staff have undergone Safer Recruitment Training.

An inspection of the Single Central Record showed that the following checks are being carried out in compliance with current employment legislation, as well as relevant safeguarding legislation and statutory guidance:

- Identity check
- Right to work check
- Barred list check
- Enhanced DBS check
- Prohibition from teaching check
- EEA check
- Check of professional qualifications relevant to the post.

Of the 690 entries on the SCR, there were a small number of gaps where the DBS certificate had not been received for a new member of staff. In each case, there was evidence that all other checks had been made and that a risk assessment had been carried out prior to commencement of employment. An inspection of the risk assessments showed how the risk was mitigated, e.g. supervision, limited access to IT. A 'red sheet' system is in place which acts as a reminder for HR to follow up missing information.

In addition to the vetting process, the College request two references for all new staff and follow up on gaps in employment at interview. Where agency staff are used, the College has in place a Service Level Agreement which requires the agency to carry out the necessary vetting checks prior to engagement. There were a number of entries on the SCR for Teaching Assistants (TAs) who were previously agency staff and who were now employed directly by the College on a permanent basis. This led to the dates for vetting checks preceding the date of employment but was explained by the transfer of 'status' from agency to employed.

Two references are sought for all new members of staff or for staff transferring from agency to employed status. In some instances, references had been provided for TAs by current SCG staff. The Group Vice Principal, HR & Professional Development explained that the College were happy to accept references from SCG teaching staff who had been supported by the TA as they had the most recent experience of their competence and suitability to the role.

The Group Vice Principal, HR & Professional Development has a clear understanding of the College's responsibility to work with the Local Authority Designated Officer when an allegation is made against a member of staff and the responsibility to report the matter to the Disclosure and Barring Service.

Every new member of staff attends an induction day on commencement of employment. The induction includes a 3-hour session on safeguarding which is delivered by the Safeguarding Team. This is followed up over the next few weeks with more detailed Prevent training.

#### Evidence to support findings

- Resourcing Policy and Safe Working Practices
- Safer Recruitment Policy
- Single Central Record and associated risk assessments
- Single Central Record
- Recent advert, job description, application form and contract of employment
- Reference request template
- Staff induction booklet
- Staff induction presentation
- Staff Training Record

#### **Students' Awareness of Safeguarding and Risk**

Students' awareness of safeguarding and risk is very good. At the start of their course, all full-time students attend an induction programme. This involves various activities including meeting the Safeguarding Team, a presentation on the support available at the College and training from the LRC on E-Safety. Every student, regardless of programme is issued with a Student Handbook which includes information on safeguarding, Prevent and E-Safety and details where students can go for support. Apprentices and part-time students have a similar induction relevant to their course and delivered by their course tutor/assessor. Full time students also complete the Education and Training Foundation Safeguarding and Prevent training during the first term of their course. Apprentices complete this training during the first year of their course.

The 2018 - 2019 student exit survey and the 2019-2020 student induction survey showed that 99% and 94% of respondents respectively felt safe at the College. The 6% of respondents who stated that they did not feel safe in the induction survey were identified and all but 1% stated that they had responded this way in error and did actually feel safe at the College leaving a consistent 99% response rate.

The College delivers a comprehensive tutorial programme which is differentiated for Year 1 and Year 2 students and includes a wide range of themes around personal safety, safeguarding and well-being. Tutors are given links to age appropriate resources to further enhance the sessions. Weekly themes are linked to national initiatives, e.g. World Mental Health Day, Safer Internet Day.

Assessors use review meetings to check that Apprentices feel safe and understand risks. Outcomes are recorded on 'Smart Assessor'. Apprentices, HE and part-time students have access to the same level of support as the full-time students.

All 38 students interviewed stated that they felt safe at College. They explained how tutorial sessions include advice and information on staying safe and risks and were aware of the current weekly theme. They stated that the induction week gave them the information they needed about the support available at the College. Two students explained that they had experienced anxiety when they started college but had spoken to their tutor and had been offered immediate support and guidance. One student explained that she suffered from depression and high anxiety and had self-harmed in the past. She is currently receiving

counselling organised by the college and feels that without this support she would not be in such a good place now. When asked about risk, over half of the students said that poor mental health was their biggest concern. Three students felt that drugs generally presented the greatest risk to young people but stated that they had never seen drugs being used on campus.

The College holds student forums every term during which a series of questions are asked. Minutes from the autumn term student forum meeting shows that students were asked if they would know what to do if they or a friend felt unsafe. The response was, 'We would speak to tutors, Gill (Curriculum Leader) or the Safeguarding Team.'

#### Evidence to support findings

- Student Induction Plan and Student Handbook
- Student survey results
- Tutorial Programme
- Interviews with students - 38 across 3 campuses
- Minutes from Student Forum - December 2019

#### **Staff awareness of Safeguarding and Risk**

Staff awareness of safeguarding and risk is good. This is reinforced by regular training and updates on safeguarding and Prevent. All of the staff members spoken to stated that they felt adequately trained to recognise students at risk and understood the indicators that may suggest harm or abuse. Staff use Pro-Monitor to report concerns and felt that this was a good system.

The LRC staff at all three campuses are extremely pro-active in keeping themselves updated on risks and safeguarding. They have a designated 'Safeguarding Ambassador' within the team who actively shares with the team information on local issues in the community that may affect the students as well as national initiatives.

External trips and visits are well managed and staff understand their responsibilities when arranging such events. The development of an internal management system ensures that appropriate risk assessments are comprehensive and take into account students who may require additional support or who may be considered unsuitable for the trip. All residential and high-risk trips are approved by a panel chaired by the Group Vice Principal, Curriculum Support and Business Development. All other trips are approved by Curriculum Leaders or an SLT member.

One member of staff commented that they had not received any feedback after raising a safeguarding concern and felt that this was worrying as they wanted reassurance that the matter was being dealt with. This was not followed up as the member of staff could not recall the student's details. Another member of staff complained that they had made numerous comments on Pro-Monitor about a student who they were concerned about and that no-one had responded. When this was explored in greater detail, it emerged that they had in fact recorded the concern as an attendance issue and not a safeguarding issue. The matter had been followed up on several occasions by the Department's Student Support Tutor.

**It is recommended** that the Group Vice Principal, Curriculum Support and Business Development, explore the process for feeding back progress to staff when safeguarding concerns are raised.

## Evidence to support findings

- Staff Training Records
- Discussions with staff
- Pro-Monitor comments and follow ups
- LRC Safeguarding 'Manual'
- External Trips and Visits Policy and Procedure
- Internal Trips Management System

## **Multi Agency Working**

The Safeguarding Team's awareness of safeguarding and risk and the importance of multi-agency working is outstanding. The Director - Curriculum Support and the Safeguarding Manager are experienced safeguarding practitioners who are extremely pro-active. The Director - Curriculum Support sat on the Shropshire Safeguarding Children's' Board until the recent changes in 2019. He established and chairs the Shropshire Colleges' Safeguarding Leads Group and has strong links with the Local Authority, the police and the DfE Prevent Co-Ordinator. The Safeguarding Manager sits on the Shropshire Exploitation Panel and the Serious Organised Crime Joint Agency Committee. This active participation ensures that the team are fully aware of local risks and the potential impact on students.

Concerns about students are referred and escalated appropriately and the Safeguarding Team understand the assessment process for providing early help and statutory intervention, including local criteria for action and the Local Authority's children's social care referral arrangements. They understand how child protection case conferences and a child protection review conferences are managed and attend and contribute to these when required to do so.

Jeanette Hill - COMPASS and Assessment Manager from Shropshire Council commented that their relationship with the College is very strong. She stated that the Safeguarding Team have an excellent understanding of risk and safety thresholds and regularly contacted them for advice and to share intelligence as appropriate.

The Group Vice Principal, Curriculum Support and Business Development reports that in the last 2 years, the College had called the police to emergency situations on 2 occasions. The most recent occasion was in November 2019 when a student who had been excluded returned to the campus and refused to leave. The College have made many more calls to the non-emergency police line, 101 either on behalf of a student to report a crime, to report concerns about a student, or to pass on intelligence.

The Safeguarding Manager works closely with the Shropshire County's Virtual School to support the 50 Looked After Students attending the College. Each have a Personal Education Plan (PEP) which is reviewed on a regular basis. Due to the high-risk levels of some of these students who are predominantly from out of county, the likelihood of absconding is high and therefore risk assessments are in place for these students and reviewed on an on-going basis.

The College has 150 commissioned students with Education Health Care Plans (EHCPs) 123 of which are enrolled on mainstream courses. Many are supported by a team of 47 TAs. Almost half of the students have a risk assessment in place to support their safety and Personal Emergency Evacuation Plans (PEEPs) are in place for those with limited mobility

Students who declare a criminal record are referred to The Group Vice Principal, Curriculum Support and Business Development for further assessment and suitability. The College will

refuse to accept a student if it is decided that their presence would put other students and staff at risk.

The College has a Fitness to Study Policy which is referred to when students present risky or unsafe behaviour on course or when they are simply too ill to continue with their course.

Transition arrangements for students are very good. The Safeguarding Team are pro-active in requesting CP and CIN files from feeder schools and will attend all annual reviews for students with EHCPs where the College is named. In addition to this, the Safeguarding Manager visits feeder schools in the summer term to discuss students who may require additional support when starting at the College. This information is recorded on REMs to ensure that curriculum staff are aware of students' additional support needs.

The Safeguarding Team discussed the increasing number of students presenting with poor mental health and agreed that it was a concern, particularly as external support is often inaccessible due to thresholds and waiting lists. The team were pleased however that the introduction of 'HADS', a triage system to determine the level of support or intervention required, had made a huge difference to the College Counsellor's workload and had significantly reduced waiting lists.

#### Evidence to Support Findings

- REMs and Pro-Monitor Records
- Annual Safeguarding Stats
- Discussions with staff
- Meeting with Safeguarding Team
- Telephone conversation with Jeanette Hill - SSCB
- Fitness to Study Policy
- Student Risk Assessments
- Student PEEPs
- Student PEPs
- Transfer of Files Request letter

#### **Site Safety and Security**

Students and staff spoken to all stated that the campuses are safe. Unaccompanied walks around each site confirmed that the campuses are as safe as they can be and that they have appropriate and proportionate levels of security. Each of the campuses are very different, both in terms of layout and location and as such it would be impossible to apply the same level of security across all campuses. For example, the English Bridge campus has one clear entrance and exit and a secure perimeter whereas the London Road campus has multiple access points owing to its close proximity to the sports centre and the public facilities, e.g. the restaurant and hair and beauty salons.

A comprehensive, colour coded lanyard and badge system is in place at each campus and all staff, students, contractors, associates and visitors are required to wear a lanyard at all times whilst on campus. It is college practice that any one not wearing an ID card will not be served in the refectory areas. At English Bridge campus, students and staff require their ID card to gain access to the building and classrooms. During the audit visit, a small number of students were challenged about not wearing their lanyard. All staff are expected to challenge any one not wearing a lanyard and students are encouraged to report any concerns to a member of staff.

Comprehensive risk assessments are in place for each curriculum department and its associated activities. These are completed by the relevant Curriculum Leader who receives training on how to carry out risk assessments from the Health and Safety Officer. Full site risk assessments are also in place for each campus that encompass the existing department and associated activity risk assessments.

The College has trained first aiders on duty at each campus who can be contacted by radio. Accidents, near misses and First Aid incidents are all recorded and held by the Health and Safety Officer. Inspection of these records show that they are completed in a timely fashion and include the required level of detail. There have been no **serious** incidents recorded this academic year.

There is a clear process for external lettings which are managed by the Commercial Manager. Lettings are only permitted during times when students are not on campus, e.g. evenings and weekends. The appropriate level of scrutiny is in place with regards to external lettings.

The Estates Health and Safety Manager has a clear process for managing contractors and all external workers engaged to carry out maintenance on the College site. Agreements exist with each of the contractors regarding vetting arrangements and contractors understand that no one will be allowed on site without the relevant checks having been made and recorded. A list of contractors, their staff and their DBS Certificate Numbers are held by the Estates Health and Safety Manager with a copy also held in HR. Contractors are required to wear black lanyards. A discussion with one of the contracting companies, chosen at random by the auditor confirmed that all staff working at the College have enhanced DBS checks and records of the staff are held by the College.

With the exception of the London Road campus, only staff, visitor and contractors are permitted to park at the College. Staff are required to display a staff parking pass. Visitors and contractors must log the details of their vehicle with reception or with the estates team. The College employs an external company to patrol and monitor the car park and issue fixed penalty tickets as required. The London Road campus permits students to park at the College but they must purchase and display an annual parking pass. There is a designated parking area for customers of the restaurant and the salons.

CCTV is installed at all three campuses.

#### Evidence to support findings

- Department Risk Assessments
- Site Risk Assessments
- Lanyard/ID Badge System
- Accident Report Log, First Aid Report Log, Near Miss Report Log,
- External Lettings Procedure and Conditions of Letting
- External Speaker Application Form
- External Events Schedule
- Approved Contractors List (including DBS details)
- Discussions with staff and students
- Telephone conversation with Roofrite (Contractor)



## **Student Behaviour**

The Student Conduct Policy and Procedure is comprehensive and clearly details the process of disciplinary action and consequences. So far, in the 2019-2020 academic year, there have been 52 disciplinary actions instigated and 11 suspensions, leading to 8 permanent exclusions. These were for a range of behaviours from inappropriate internet use, possession of cannabis on campus, to rudeness to staff. In a college which serves 10,000 students, this is a lower number of permanent exclusions than would be expected.

During the two-day visit, the behaviour of students was exemplary. They were courteous and polite and very willing to share their experiences and views of the College. Students that were challenged about lanyard compliance were apologetic and understood the reasons for the challenge. Wearing lanyards.

### Evidence to support findings

- Student Disciplinary Record
- Student Conduct Policy and Procedure
- Interviews with students
- Campus tours

## **Safer Use of IT**

The College has a very effective internet monitoring filter which provides additional protection. 'Smoothwall' is installed across all three campuses and is managed and monitored by the IT Manager. The system automatically generates a daily report which is sent via e-mail to the IT Manager for scrutiny. The report details every instance where a student or staff member has attempted to access an illegal or inappropriate site. The IT Manager, who has been trained in safeguarding, is aware of potential risks and escalates concerns to Curriculum Leaders or the Safeguarding Team as required. This is a very effective system and has led to numerous interventions where students have attempted to access inappropriate web sites. The IT Manager is currently the only recipient of the automated report which means that he is checking the log on a daily basis, even during holiday periods.

**It is recommended** that in the event of his absence, e-mails are re-directed to the Group Vice Principal - Curriculum Support and Business Development for continuity purposes.

### Evidence to support findings

- Acceptable Use of IT Policy
- BYOD Policy
- Demonstration of Smoothwall
- Incident Log E Mails
- Follow up E-Mails to Curriculum Leaders

## **Records and Referrals**

All concerns are recorded on the college Safeguarding System. This system is secure and has limited levels of access. All staff are able to share low level general concerns on Pro-Monitor. Only the Safeguarding Team can create a record on the secure Safeguarding System.

619 individual students were recorded as having a safeguarding concern in 2018-19. Over a half of these were for poor mental health and student emotional well-being. This result is indicative of the national picture.

The safeguarding system has a record of 693 records YTD which is an increase on the previous year. The increase in numbers for this stage in the year compared to full year in 18/19 is reportedly due to;

- Increased number of enrolments in September 2019
- Better sharing of information from feeder schools leading to more records being created
- Full use of the electronic safeguarding system by all three sites
- The process for identifying and supporting students with Emotional Health and Well Being is more defined for 19/20 and all EHWP referrals are recorded within the safeguarding system whereas previously only certain categories would have been recorded.

#### Evidence to support findings

- Demonstration of College Secure Safeguarding System
- Demonstration of Pro-Monitor
- Safeguarding Annual Report

#### **Summary**

The Shrewsbury Colleges Group campuses are safe places to learn, work and to visit. Every effort has been made by the SLT and Safeguarding Team to ensure the continued safety of both students and staff.

There is a strong culture of safeguarding evident which is underpinned by established policies and procedures. There is substantial evidence to support this statement as detailed in the report. Every effort has been made to ensure safe sites and safe students and staff.

It is the auditor's opinion that having visited and worked at many colleges across the country, Shrewsbury Colleges Group is one of the safest.

*G C Sommers*

G.C Sommers  
Safeguarding Consultant

31<sup>st</sup> January 2020