

THRIVE. ACHIEVE. EXCEL.



MONT ROSE®  
COLLEGE

# Safeguarding Policy

## 2025 – 2027

**Approved by:** Academic/Quality Assurance Board

**Date of approval:** 03/02/2025

**Effective date:** 03/02/2025

**Next review date:** 31/03/2027

VERSION: 002

## 1. Introduction

1.1 Mont Rose College (MRC) is dedicated to upholding the highest standards in order to protect and preserve those for whom it is responsible. This Code of Conduct is intended to safeguard those in positions of confidence as well as those for whom they are responsible. It outlines what to do if there is a concern for a child's or adult's health or known threats, such as when a member of the College is accused of something. It also contains information to ensure that members of the College do not place children or adults in danger.

### Addressing safeguarding concerns

1.2. The Welfare Officer is the safeguarding coordinator for MRC and is responsible for all safeguarding issues in respect of MRC staff, students, and visitors. The Welfare Officer shall also ensure that the code of practice is implemented effectively. If, however, the Welfare Officer is not available to solve pressing safeguarding problems, the next officer on the management hierarchy, like a Student Services Manager, is responsible for handling such issues.

1.3. Any potential harm should be brought to the attention of the College and administrators in charge of safeguarding at the earliest based on the procedure highlighted in this policy. Actions and interventions shall be in accordance with the provisions of this policy, while the College shall also comply with the relevant GDPR and standard policies on reporting and sharing information on safeguarding.

1.4. The MRC Safeguarding Coordinator is to evaluate their information about potential safeguarding issues and decide whether or not a referral to an external agency should be made. Unless the College is directed to do so by the Local Authority under the terms of the Care Act 2014, MRC cannot examine safeguarding concerns; it is the responsibility of the Local Authority under Section 47 of the Children Act 2004. Where appropriate, the MRC Safeguarding Coordinator or other members of staff nominated by the College Safeguarding Coordinator will contact those bodies.

## 2. Definitions

2.1. A member of the College is depicted as a member of the MRC staff or Students' Union, a member of the MRC Governing Body or a member of the academic and non-academic board, and a student of the College.

2.2. A 'child' or 'children' is a person or people under the age of 18 years old (Children Act 1989).

2.3. An adult at risk, as established by the Care Act 2014 is a person that the Local Authority has fair cause to believe has a need for care and help (whether or not the authority is addressing any of those needs), is suffering or at risk of abuse or neglect, and is unable to defend themselves against abuse or neglect, or the risk of it, as a result of those needs.

2.4. Annex 1 contains definitions of different forms of violence as well as symptoms of abuse.

2.5. Annex 3 contains guidelines on reducing risk in the area of safeguarding, and all members of the College can familiarise themselves with it.

### **3. Ethics**

3.1. All the affiliates of MRC are responsible for helping to deter violence by recognising their obligations under this code of practice and documenting any suspicions they may have using the procedures described in this document.

3.2. All visitors, including contractors, must be informed of and adhere to this Code of Practice.

3.3. MRC representatives must take precautions to prevent circumstances where harassment charges could be made against them either directly or indirectly. All MRC members' actions must follow this safeguarding policy's provisions.

3.4. Any complaint or suspicion of wrongdoing against a child or vulnerable adult will be taken seriously and dealt with promptly and appropriately.

3.5. The College shall provide the appropriate support to all of its students who report concerns about safeguarding through HR, MRCSU, Student Support, Admin Assistant, or Welfare.

3.6. All internal disciplinary inquiries into a member of the College's actions shall be undertaken until all formal investigations by the Police and/or Social Services or any other appropriate agency have been completed. Members of the College could, however, be removed or suspended pending the results of an external inquiry, if necessary.

3.7. Affiliates and representatives of MRC must be mindful of their safeguarding obligations before engaging in any aspect of an MRC operation requiring interaction with children or vulnerable adults at risk.

I. Where a student is on a relevant placement, they must be given a copy of the placement provider's safeguarding procedures; if they are not, they must obtain one before having contact with children or at-risk individuals in the placement context. If a placement provider does not make their Safeguarding Policy accessible to students, they should notify the College.

II. All research undertaken by MRC members within its authority shall comply with this Code of Practice.

3.8. MRC is obligated and may when required, seek advice and guidance from external bodies such as the Police or a Designated Local Authority Personnel on any safeguarding matter.

3.9. MRC and its management shall provide appropriate support and protection to members who act in good faith to report suspicions, abuse, or concerns about the members of the College and their actions related to safeguarding.

3.10. MRC shall comply with the relevant legislation in all interventions regarding safeguarding, including the Equality Act 2010 and GDPR.

## **4. Inquiries and requirements**

4.1. MRC and its affiliates shall observe due diligence in the appointment of people working with children and adults at risk, including preventing unsuitable persons from such activities. Actions taken in this regard shall include but not be limited to Occupational Health Assessment, DBS checks, and other checks and balances operational within the College.

4.2. The College shall, at intervals, examine the contracts of affiliates to decide if they are legally qualified to work with children and adults at risk. Specifically, mentors and student support shall be required to present evidence of checks such as DBS where appropriate to work with at-risk children and adults.

4.3. Members and staff working with children and adults at risk are also legally obligated to report any circumstance that may affect their DBS status. Such circumstances shall include but not be limited to investigations by Social Services or where such individual is barred from working with children or adults at risk.



## **5. MRC members training**

5.1. Members of the College who work with children or vulnerable adults should receive proper training on topics to be mindful of when dealing with children and adults at risk, as well as how to handle any disclosure made to them.

5.2 The Designated MRC Safeguarding Coordinator will complete adequate training and, if needed, advise HR and other relevant authorities on MRC member training requirements.

## **6. Information Management**

6.1. Any records relating to child safety concerns will be retained in compliance with applicable data security laws and regulations and the College Record Retention Schedule.

Details regarding safeguarding disclosures may only be shared outside of the College with Social Workers, the Police, or others if the legislation requires it or if it is reasonable to do so to report or avoid harm to a child or adult at risk.

6.2. Concerns about safeguarding that have not been forwarded to an external agency will be held by the College for a year in compliance with the College's Records Retention Schedule in a secure location. From 2016 updates onwards, this code of practice complies with all applicable GDPR Provisions and existing UK and international standards.

## **7. Exclusion**

7.1. If MRC finds it appropriate to instantly exclude students under the Colleges' procedures, which is a neutral act, such an act must be proportionate to the existence of the claims. And, if necessary, the academic consequences of such exclusions will be conveyed to the students who have been excluded. If a student is found not guilty of an allegation, fair efforts may be made to assist the student in continuing their studies.

## **8. Procedure for reporting safeguarding concerns**

8.1. Procedures for reporting safeguarding concerns

Confidentiality

I. When a member of MRC has their own Safeguarding issues or is told of any concerns by anyone else, they must not reveal this information to someone other than

the MRC Safeguarding Coordinator or someone deputizing for them or any other member of the management team who is tasked with handling such obligations.

II. In the absence of the Safeguarding Coordinator, when safeguarding concerns are raised with the HR, the deputy, or any other staff responsible for safeguarding, they can refer the case back to the Safeguarding Coordinator if they become available. Suppose immediate action is necessary and the Safeguarding Coordinator is unavailable. In that case, the staff handling the case must communicate with other relevant or appointed members of the MRC Senior Management before acting on the information obtained.

#### Procedure for investigating concerns

I. Member of MRC should not start any investigation into reports of abuse, suspicions, or any allegations of related matters until the appropriate authority, including Social Services, the Police, or any other statutory body, provide written advice.

II. Members of MRC should also refrain from interviewing children and vulnerable adults as such action may distort the testimony of those involved and, subsequently, the investigation that the appropriate authorities may conduct. No attempt should be made to examine physical evidence of abuse.

#### 8.2. Reporting safeguarding concerns within office hours

I. MRC members should report safeguarding concerns to the College Safeguarding Coordinator as soon as possible.

II. Where the Safeguarding Coordinator is unavailable, the concern shall be directed to the deputy or any other designated personnel authorised by the Safeguarding Coordinator.

III. Concerns shall be reported by filling out the appropriate form and passed on to the designated officer.

IV. A confirmation receipt shall be provided by the designated officer to the reporting party and shall be forwarded to the MRC Senior Staff overseeing the safeguarding actions.

#### 8.3. Reporting of safeguarding concerns within office hours by students

I. Students with safeguarding concerns should make such concerns known to the available member of staff in confidence as soon as possible. The member of staff should follow the procedure highlighted in this document in reporting the concern to the Safeguarding Coordinator. Where possible, the student should report such

concerns directly to the Safeguarding Coordinator or any other designated personnel in the absence of the Safeguarding Coordinator.

8.4. Responses should be provided within 24hrs of reporting a safeguarding concern, and in cases where the concern is raised during a holiday, receipt should be provided on the earliest day back to work. Responses to concerns raised shall be provided through the contact details provided by the individual raising the concern. The Safeguarding Coordinator shall at all times consider the complexities of each case to determine if it is necessary to transfer such case to Local Authorities.

Referring a concern may lead to any of the following:

- A police inquiry
- Social services investigation
- Discipline or exclusion of the student or staff member involved
- Dismissal or referral of the offender to another organisation

8.5. MRC is not obligated to take any action on a reported concern until advised by the appropriate authorities or when such action is intended to protect a child or adult at risk. In emergencies, please dial 999.

## **9. Dealing with allegations or suspicion or abuse against MRC staff**

9.1. Concerns regarding an MRC employee should be reported following the procedures outlined in this policy. If the issue is clearly about bad practice rather than violence, HR and the related line management may initiate the disciplinary procedure after consideration and any preliminary investigation.

9.2. MRC can seek suspension and/or disciplinary action in compliance with the disciplinary procedure, regardless of the results of any Police and Local Authority investigations.

## **10. Reporting and managing safeguarding concerns relating to a student's demeanour**

10.1 If there is a safeguarding issue regarding student's behaviour on MRC premises, it must be reported in accordance with this policy's procedures. The student should not be told of the issues until the MRC Safeguarding Coordinator, or in their absence, another member of the Senior Management team, has given written consent, as discussing the problem with the student too soon could jeopardize any appropriate

investigation. Depending on the issue, the MRC Safeguarding Coordinator may have to contact the local authority.

## **11. Procedures for dealing with concerns of possible abuse outside MRC premises**

11.1 Members of the College may become aware or suspect that a child or adult at risk is being exploited by someone unrelated to the College as a result of their work within MRC. In these cases, the person may contact the MRC Safeguarding Coordinator as mentioned above or, if more necessary, contact the Police or the Local Authority directly. If there are questions about a child's health, a call should be made to the Child Services Customer Service Centre during business hours to seek necessary guidance. If there are questions about the safety of adults at risk, contact should be made with the Safeguarding Customer Service Centre. If there are questions about a child or an adult at risk after office hours, the emergency duty team should be contacted.

## **12. Procedure for dealing with external organizations using MRC facilities**

12.1 Before allowing their employees and volunteers access to children and at-risk individuals, the external organization should receive the necessary background checks. In addition, when using the College's facilities, the external organization must confirm that it has a safeguarding policy or equivalent in place. This involves current MRC facility customers. Existing external organizations that use the MRC's facilities will be asked to submit their existing policies as well as proof of staff and volunteer background checks at regular intervals. They should also be asked to provide information about how their risk assessments would avoid safeguarding issues if applicable. They must also be prepared to follow MRC safeguarding protocols if the department providing the facilities/services so demands.

## **13. Procedure for dealing with an allegation of abuse by an individual of an external organization using MRC facilities**

13.1. A child or at-risk individual on campus in connection with an external organization may make a claim of violence against a member of that external organization to a member of MRC. In this case, the MRC member must inform the MRC Safeguarding Coordinator, who would then submit the complaint to the external agency (unless



doing so will jeopardize the investigation) and, if applicable, the Police or Local Authority.

13.2. The MRC requires external organizations to adhere to their own Safeguarding Policies, and any external audits would necessitate assurance that sufficient action was taken. In addition, the MRC Safeguarding Coordinator will determine whether it is appropriate to allow the external company to continue using the facilities during the investigation and after, in conjunction with MRC senior managers and staff.

## **14. Concerns for safeguarding in research**

14.1. Study supervisors must ensure that someone working with children or at-risk adults as part of a research project for which they are responsible has completed an adequate DBS review. HR and the MRC Safeguarding Coordinator can help to decide which checks are necessary.

14.2. Before beginning the study, anyone undertaking it must ensure that the necessary ethics approvals have been received. In most cases, informed consent from parents/carers of children and at-risk individuals should be obtained. In most cases, children and at-risk adults should also be allowed to consent to participation.

14.3. Anyone undertaking studies should take appropriate measures to track the impact of their work on any children or at-risk individuals participating in the study to ensure that they are comfortable with it.

14.4. Where appropriate, a same-sex chaperone should accompany children and at-risk adults during one-on-one research.

14.5. The College should provide adequate training to members of the MRC who deal with children or at-risk adults on issues to be mindful of while dealing with children and at-risk adults, as well as how to manage any disclosure made to them.

## **15. Concerns over MRC members' own actions or conduct**

15.1. The Safeguarding Coordinator and or any other designated officer should be informed in the event that any of the following happens:

- If a member of MRC accidentally hurts a child or an adult at risk;
- If a child or adult at risk is considered or found to be in any form of distress;
- If the action of an MRC member leads to the sexual arousal of someone who is at risk
- If there is a concern over any relationship that could generate an abuse of trust;

- If a colleague is considered to be attracting the interest of someone in their care;
- If a person at risk is becoming attracted to a member of MRC;
- If there are safeguarding concerns over the behaviour of a person at risk by misinterpretation or misunderstanding an action of a member of MRC;
- If a member of MRC had to use some restraints of the level of force to prevent a child or adult at risk from self-harm or any other person or by causing substantial damage to the properties of the College.

## **16. Disclosure of abuse by MRC members over the age of 18**

16.1 Suppose a current or former student of the College over 18 discloses current or past harassment by someone unrelated to the College. In that case, they should be referred to the MRC Safeguarding Coordinator. Alternatively, confidential helplines and organisations identified in this document may be contacted, as well as the MRC Welfare Officers.

## **17. Safeguarding guidance for events on MRC premises**

17.1. All College events involving children or at-risk adults must contain the names of at least one individual who will serve as the activity's appointed Safeguarding Officer in their management plans. Relevant workers will be informed of the activity's Safeguarding Officer for brief non-residential visits to campus. Two appointed Safeguarding Officers are usually assigned to residential activities.

17.2. The identity and contact information for the Activity Safeguarding Officer must be shared with the children and at-risk adults participating in the activity, their parents or carers, teachers, and staff members, as appropriate.

17.3. Organizing activities involving children or at-risk individuals must ensure that all staff receive adequate training. The following points must be addressed: Risk assessment; dealing with a possible safeguarding disclosure; reporting a safeguarding allegation; confidentiality; code of conduct.

## **18. Prevent**

18.1. The Counter-Terrorism and Security Act of 2015 mandates that MRC "have due regard for the need to prevent people from being drawn into terrorism." It must take

into account the Home Secretary's advice under section 29. On September 18, 2015, the Prevent Duty Guidance for higher education institutions in England and Wales went into effect.

18.2. The MRC recognises that everyone, not just children or those identified as at risk under the Care Act 2014, could be drawn into terrorism. The College's preventive practices are specified in its Prevent Policy.

How to report a "Prevent" concern

18.3. If a member of the College is worried that another member of the College may be drawn into terrorism, or if they think an event at the College might have encouraged terrorism, they must report in writing it to the Prevent Duty Lead or the Safeguarding Officer. The Student Service Manager will acknowledge the receipt of the report.

18.4. The Student Services Manager will review the report and, if possible, will share it with the Prevent FE/HE Regional Coordinator or other external agencies.

## **19. Monitoring and review**

19.1. The HR/ Safeguarding Coordinator/ Student Services Manager and any other nominated staff member(s) will keep track of any safeguarding events. At all times, confidentiality will be upheld. Any issues or trends that arise will be addressed in a timely manner.

19.2. This Code of Practice will be revised in compliance with the MRC's record administration guidelines (on a periodic basis, with a complete review at a time decided upon by the Board) to ensure that it continues to work into the institution's structure. The MRC Safeguarding Coordinator will also oversee the Code of Practice to see if there are any legal or other changes in this region.