

## Safeguarding and Prevent Policy

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# **SAFEGUARDING and PREVENT POLICY**

## **1. Scope and Purpose**

College is committed to prioritising and promoting safeguarding and to protecting children, young people and vulnerable adults from harm. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

The term 'safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people safe. Therefore, safeguarding encompasses student health and safety, preventing and dealing with abuse, bullying, meeting the medical needs of those with medical conditions, providing first aid, security (including e-safety), safeguarding from drugs, substance and alcohol abuse.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

College has clearly defined responsibilities under the Children Act 2004, Keeping Children Safe in Education, Working Together to Safeguarding Children 2018, Human Rights Act 1989, Equality Act 2010 and Statutory Guidance September 2022 for students aged under 18. The College extends these responsibilities, within the scope of this policy, to students with learning difficulties, irrespective of age, if they are vulnerable to abuse as a result of their learning difficulty. The policy also applies to people enrolled as students at College or for whom the College has accepted a responsibility for care.

This policy applies to all groups regardless of age, disability, gender, marital status, parental responsibilities, sexuality, race, religion and gender re-alignment and it is the duty of all staff, governors, students, visitors and contractors to follow it. The policy applies regardless of site of study. Safeguarding concerns should be reported direct to the safeguarding team using the MyConcern platform or to [safeguarding@stanmore.ac.uk](mailto:safeguarding@stanmore.ac.uk).

For the purpose of this policy, 'children, include everyone under the age of 18.

Vulnerable adults are 'adults at risk'. An "adult at risk" is any person over the age of 18 years, "who is or maybe in need of Community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness

### **1.1. Key Principles**

The following principles underpin all of our work with young people and vulnerable adults. Our approach will:

- set out the framework to support staff in knowing what to do with regards to safeguarding children, vulnerable adults and any students in order to promote their welfare and safety at college and at off-site provision. be measured by its effectiveness
- be student-centred

- actively involve students and their families
- support the achievement of best possible outcomes for students
- be holistic in approach
- ensure equality of opportunity
- be multi/ inter-agency in approach
- be a continuing process rather than an event
- identify and provide the service required and to monitor the impact of provision on students' progress

raise awareness of staff to safeguard all students and ensure they are well trained to recognise the signs, symptoms and effects of abuse and have the confidence and knowledge to follow the procedures to make a referral to the Designated Safeguarding Lead at the college

## **1.2. Helping Students to keep themselves safe**

Students will be advised about college procedures in relation to safeguarding as part of their induction into the college, via the VLE, via the college tutorial curriculum and by periodic targeted poster campaigns. The college will provide students with reminders about who to contact should they have a safeguarding concern.

Students will be advised about health and safety procedures to ensure that they know how to stay safe within the college environment; whilst undertaking practical activities and when on a work placement.

Students will be provided with guidelines about keeping themselves safe on- line as part of their induction into using the college's IT network.

Students attend and participate in tutorial sessions designed to raise awareness of issues and concerns which may impact on the ability of the student to keep themselves safe as part of the group tutorial provision and enrichment. These include online safety, , sexual health, consent, sexual offences, harassment and exploitation, drugs and alcohol awareness, domestic violence, crime, anti-bullying, equality and diversity, emotional resilience, healthy relationships, gang activity prevention, health & well-being, British values, Prevent, danger of being drawn into extremism and radicalisation and concepts relating to sexual consent, coercion, so called honour -based violence, female genital mutilation (FGM) and how to access support. These sessions are aimed at different levels and abilities to enable all students to participate.

College works in partnership with other services and agencies involved in safeguarding students including (not an exhaustive list) MASH teams, safer Colleges, safer neighbourhoods team, CAMHS (Children and Adolescent Mental Health Services), and charities.

We recognise that because of the day-to-day contact with young people, staff are well placed to observe the outward signs of abuse. College will therefore:

- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to
- Ensure that young people and vulnerable adults know that there are adults in the College whom they could approach if they are worried

- Include opportunities in the curriculum for young people/ vulnerable adults to develop the skills they need to recognise and stay safe from abuse.

#### Definitions and indicators of Abuse and Neglect (source: KCSIE 2022)

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. There could be **psychological abuse**, such as threats or harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion. There could be discretionary abuse that includes abuse based on child or vulnerable adult's race, gender or impairment such as their mental

health and physical health.

**Child Sexual Exploitation (CSE)** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Child Criminal Exploitation (CCE) Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

**Harmful sexual behaviours** The below focuses on learner's, who are under 18 and who present with harmful sexual behaviours. It is important to be aware that adults present with HSB as well.

Our Learner's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB both ages and the stages of development are critical factors. Sexual behaviour between learners can be considered harmful if one is much older, particularly if there is more than two years' difference or if one of the learners are pre-pubescent and the other is not. However, a younger learner can abuse an older learner, particularly if they have power over them. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Learners displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

**Sexual violence** When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003134; Rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16.

**Sexual Harassment** 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of College/college. When we reference sexual harassment, we do so in the context of

child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment is a broad term and it can happen to females, males, others, children and adults.

Where situations of any of the above abuse/harassment occur, students are encouraged to find someone to speak to and staff must report these concerns immediately to the Safeguarding team. Students are also encouraged to speak to their teacher to raise their concern as a safeguarding alert. All safeguarding concerns are taken seriously. A record of events, with dates and a short description, any offensive pictures, videos, texts, or IMs as evidence for any further action should be placed securely or given to the police. If staff hear, see something or students are bystanders it is important to stop and challenge abuse, bullying and sexual harassment by taking immediate action. Counselling and guidance can be provided to students who need to talk about their feelings and experiences in a safe environment where they will not be judged.

Where specific safeguarding issues arise, expert and professional organisations will be contacted to provide up to date guidance and practical support. These will include relevant local social care, the Harrow Strategic Safeguarding Partnership, the Police, substance abuse support agencies, mental health and wellbeing support agencies and housing charities.

These specific issues could relate to:

- Child sexual exploitation
- Sexual violence, harassment, harmful sexual behaviours
- Bullying, including cyberbullying
- Homelessness and vulnerable housing issues
- Domestic violence
- Drug and Alcohol related issues
- Honour-based crime including Forced Marriage
- Female genital mutilation
- Gangs and youth violence
- Gender-based violence/ violence against women and girls (VAWG)
- Mental health
- Private fostering
- Extremism and radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking

Part A of the statutory guidance on Keeping Children Safe in Education gives more detail about each of these types of abuse and also specific safeguarding issues such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), child on child abuse and Female Genital Mutilation (FGM). There is a specific legal duty for FGM requiring health and social care professionals and teachers to report any known cases of FGM that have been carried out on a girl under the age of 18 to the police.

Appendix 1 gives Further Information on Safeguarding Children in Specific Circumstances

## **Child on child abuse**

Safeguarding issues may not only arise from an adult causing a risk to harm to a young person. We recognise that children can also be vulnerable to physical, sexual and emotional bullying and abuse by their peers, or they may be the perpetrator of such behaviour. Child on child abuse can include bullying, teenage relationship abuse, physical abuse, sexual violence, sexual harassment, non-consensual sexual activity, sharing of nude and semi-nude images and/or videos, up skirting, hazing type violence and rituals.

We will always address such abuse seriously, involving partner agencies where required. We will remain alert to the possibility that a child or young person who has harmed another may well also be a victim. Staff should not dismiss abusive sexual behaviour as 'normal' between young people and should report all concerns to the safeguarding team.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff need to understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff need to report any concern around child on child abuse to the safeguarding team immediately, including those that have happened outside of the College or college premises, and/or online (what to look out for and indicators of abuse are set out in Part one of Keeping Children Safe in Education). Staff can speak to any staff from the safeguarding team or designated safeguarding lead should they need further guidance and support.

### **Sexual violence and Sexual Harassment**

Sexual violence and sexual harassment can occur between two or more learners of any age and sex, from primary age to college age. It can occur also through a group of learners sexually assaulting or sexually harassing a single learner or group of learners.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

College should be aware of the importance of:

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to

children accepting it as normal and not coming forward to report it

- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

When there are concerns of sexual violence or sexual harassment, staff must follow the safeguarding procedures outlined above. The DSL or DDSL will review actions on a case-by-case basis, using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. The colleges sexual violence and sexual harassment risk assessment will be completed and implemented to mitigate risk (appendix 5).

## **Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If there are concerns around student's mental health, the welfare team needs to be informed. Staff must contact the safeguarding team immediately if there are serious concerns where the student could be at risk of immediate harm.

## **LGBTQ+**

The college to have a team of LGBTQ+ representatives. These are staff from various departments who have had the basic training on how to support LGBTQ+ students. Induction would include the list of LGBTQ+ representatives. Students will have access to speaking with these staff in a safe place.

### **1.3 Student Behaviour and Equality of Opportunity**

College recognises that young people/ vulnerable adults who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helpless and humiliated, and they may experience some sense of responsibility or blame. College may be the only stable, secure and predictable element in the lives of young people at risk. When at college their behaviour may be challenging and defiant or they may be withdrawn. Therefore, the college will endeavour to support the young person by ensuring that:

- The college ethos promotes a positive, supportive and secure environment and gives students a sense of being valued.
- The college expectations of student behaviour are aimed at supporting vulnerable students in the college. The college will ensure that students know that certain behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred towards them.
- The college liaises with other agencies that support the student such as Multi Agency Safeguarding Hub, the Harrow Strategic Safeguarding Partnership, the Police, substance abuse support agencies, mental well-being support agencies and housing charities. The college also liaises with similar services in Barnet, Brent, Hillingdon, Ealing & Hammersmith, Hertfordshire, dependent on the address of the student.
- Statutory policies that are relevant to safeguarding and prevent duties and promoting the welfare of young people are implemented and reviewed.

### **1.5 Looked after Children**

Designated Teacher for Looked After Children (LAC) and Care Leavers (CL) is Shariesse Brown.

Staff at College recognise that LAC and CL remain vulnerable and it's important that all agencies work together to safeguard them. This group of students are extremely vulnerable, the most common reason for learners becoming looked after is as a result of abuse and/or neglect and the College is aware of the need to monitor their welfare and ensure the is support of learners that fall into this category.

Staff at College are also aware that these experiences can leave learners with complex emotional and mental health needs, and this can increase their vulnerability to abuse. At College we will work with all agencies and will use the students PEP's and LAC reviews as a supportive measure to make sure their welfare and safety is paramount at all times. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe.

In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL, DDSL and Designated teacher has details of children's social workers and relevant virtual College heads;
- Gayle Brown and Shariesse Brown are responsible for promoting the educational achievement of LAC<sup>11</sup> and CL in line with statutory guidance.

- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL, DDSL and PSM to ensure that any safeguarding concerns regarding LAC and CL are quickly and effectively responded to.
- The PSM and designated teacher works with virtual College heads to promote the educational achievement of LAC and CL, including discussing how pupil premium plus funding can be best used to support LAC and meet the needs identified in their personal education plans.

## **2 Process/Procedure**

### **2.1 Framework**

This policy has been developed in accordance with the principles established within the statutory guidance 'Keeping children safe in education' 2022, HSCB (Harrow Safeguarding Children Board) procedures and the requirements of the Prevent statutory duty.

The College will operate within the guidelines of the Code of Practice and explanatory Guide for Registered Persons and other recipients of Disclosure Information, issued by the Disclosure & Barring Service. The Disclosure and Barring Service (DBS) requires employers to complete the DBS application for all employees who regularly come into contact with children and vulnerable adults and College maintains an up-to-date register of contractors working on campus. Reviewed as requested by HR Policies.

The College recognises that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our students from harm, and that the student's welfare is our paramount concern. DBS checks for existing staff will be renewed on a 3 year basis.

All staff have a role in providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual student. To this end, safeguarding is considered to be "everybody's responsibility".

### **2.2 The aims of this Policy are:**

This policy is written in accordance with KCSIE and government's Prevent strategy and similarly should be read by all staff. The aims of this policy are:

- To support the development of all students in ways that will foster security, confidence and independence.
- To provide an environment where students feel safe, secure, valued, respected, and feel confident, knowing how to approach staff within the college if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and support staff of the need to safeguard young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring young persons and vulnerable adults

known or thought to be at risk of harm, and to ensure we, the College, contribute to assessments of need and support packages for them.

- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the college that will be followed by all members of the college community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Local Authority, the Local Safeguarding Children Team, the Youth Offending Team, the Police and Social Services.
- To ensure that all staff working within our college who have access to children and vulnerable adults have been checked as to their suitability, including verification of their identity, qualifications, and a robust vetting policy aligned to the DBS process and a single central record of checks is maintained.
- To ensure that the college is fulfilling the duty in sections 26 and 29 of the Counter Terrorism and Security Act 2015 and the college will fully participate in work to prevent people from being drawn into terrorism.
- To ensure that there are clear procedures to deal with any risks, concerns or disclosures made in regard to Prevent.

### **3. Implementation**

The College will follow the guidelines set out by DfE and the Harrow Strategic Safeguarding Partnership.

In particular, the College will:

- Have a named person as the Designated Safeguarding Lead (DSL), that person being the Vice Principal Curriculum and Quality.
- Have a named Deputy Designated Safeguarding Lead (DDSL), that person being the Director of Student Services
- Have a team of Safeguarding Officers who are trained to a minimum of level 3 safeguarding practices
- Ensure that all staff are aware of their individual responsibility for the protection of children and vulnerable adults in their care and that they are aware of the staff in the safeguarding team..
- Arrange basic training for all staff so that they are aware of basic principles of safeguarding, safeguarding process at the college, recognising the signs of abuse/neglect, how to report them, how to respond to the disclosure made by the students and report them to the safeguarding team.
- Arrange training for all staff so they can use the MyConcern platform to report any safeguarding concerns.
- Establish an effective, accurate record-keeping system to monitor all students about whom concerns have been expressed, whether or not these concerns lead to a child protection referral. These records will be held electronically, with access limited to the safeguarding team. The data collection will comply with GDPR legislation.
- Ensure that clearance is received from the Disclosure and Barring Service (DBS) service for all staff who may, in the course of their work, be alone with a student.

- Develop effective links with other agencies and will contribute to inter-agency enquiries, child protection conferences, common assessments framework meetings and other related groups as appropriate.
- Publish the College's responsibilities for safeguarding and the protection of children and vulnerable adults in student handbooks, college website and information to staff and parent/ carers.
- Fulfil any special responsibilities or task required in the care of children on the child protection register.
- Ensure all members of staff are provided with safeguarding and child protection awareness at induction.
- Ensure all members of staff and governors are provided with regular refresher training
- Ensure that child protection type concerns or allegations against adults working at the college are referred to the Local Authority Designated Officer (LADO) for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring, following resignation, dismissal, or when we cease to use their service in the case of a volunteer.

The DSL, DDSL and Safeguarding Officers will be trained and supported in the task of overseeing all child protection matters within the College. All members of the Safeguarding team will undertake updated training every two years to Level 3 standards. The Executive Director of HR and the HR team will undertake specific training with regard to their responsibilities for staff record keeping and recruitment.

The College undertakes to adhere to the requirements of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Where safeguarding concerns have an impact on the student being able to commence or complete a programme of study, a Safeguarding Panel meeting will be convened. The DSL, in conjunction with the Safeguarding team (Safeguarding Team members) review the issues and produce a safeguarding risk assessment if the student is to commence or continue with their study.

#### **4. Confidentiality and information sharing**

In all dealings with students who are disclosing matters that may require action or intervention, staff are made aware that we do not promise to keep information confidential between the staff member and the student – students are made aware that information shared with the members of staff will be acted upon and shared with other agencies at need.

Members of the Safeguarding Team who have access to confidential or restricted information will disclose information about a student to other members of staff on a 'need to know' basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children, young people and vulnerable adults.

All staff must be aware that they cannot promise a young person to keep secrets which might

compromise the young person's safety or wellbeing or that of others who may be at risk. We will always undertake to share our intention to refer a young person to Social Care with their parent/ carers unless to do so could put the young person at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Education Lead at MASH.

The Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Practitioners may share information without consent (where it is not possible to gain consent) where there is good reason to do so and that the sharing of information will enhance the safeguarding of a child in a timely manner.

## **5. Supporting Staff**

We recognise that staff working in the College who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL, DDSL or Safeguarding Officers, HR Manager and/ or their immediate line manager, and to seek further support as appropriate.

Members of the Tier 1 Safeguarding Team will have regular monthly access to supervision sessions with a trained professional.

## **6. Roles and Responsibilities**

The Governing Body of College recognises that under section 175 (section 157 for the Independent sector) of the Education Act 2002, places a statutory duty on the governing body (or proprietors) to have policies and procedures in place that safeguard and promote the welfare of students at the college.

### **6.1. Role of Governing Body**

Governing bodies have a strategic leadership responsibility for their college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to KCSIE guidance, ensuring policies, procedures and training in their colleges are effective and comply with the law at all times. They should ensure that all governors receive appropriate safeguarding and child protection training at induction.

To ensure compliance with our legal duties, the Governing Body has nominated a Designated Governor for Safeguarding & Child & Vulnerable Adult Protection who:

- works with the DSL to ensure that fellow governors have a clear understanding of their duties with regard to safeguarding
- liaises with the DSL and the Principal

The Governing Body executes its duty to ensure that the policies, procedure and training at College are effective and comply with the law at all times by: 15

- Delegating operational responsibility to the Principal for the purpose of safeguarding and promoting the welfare of children receiving education or training at College
- Giving scrutiny to regular reports provided by the Designated Safeguarding Lead: this annual report provides an update on the College Safeguarding action plan and details numbers and types of incidents and concerns which have arisen, along with updates from the counselling service, health & safety and HR (recruitment and staff training)
- Remediating any deficiencies or weaknesses in safeguarding arrangements without delay
- Ensuring that College has a safeguarding policy and procedures which are updated annually and satisfy statutory requirements as outlined in 'Keeping Children Safe in Education'
- Ensuring that College has a staff code of conduct which provides staff/ volunteers with clear guidelines about expected behaviour and handling of allegations made against staff/volunteers and that complies with Harrow Strategic Safeguarding Partnership procedures. The code of conduct should balance the need to protect children whilst protecting staff/ volunteers from false/ unfounded accusations
- Ensuring that a Designated Safeguarding Lead is appointed to lead on safeguarding, to advise/support staff and to liaise with the LA and other agencies. He/she will have status/authority to carry out the role e.g., commit resources to safeguarding and direct staff as appropriate
- Undertaking regular Governor safeguarding training
- In addition, the Chair of Governors is nominated to be responsible for liaising with partner agencies, as appropriate, in the event of the allegation of abuse being made against the Principal
- Ensuring that filters and monitoring systems in place are effective and are regularly reviewed for their effectiveness.
- Ensuring that the organisation using the college premises for non-college activities (regardless of whether their clients/service users are on the college`s roll) have appropriate safeguarding arrangements in place.

## **6.2. The Role of the Principal**

The principal should ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The Principal will ensure, through the Senior Leadership Team and the Safeguarding Team, that:

- Policies and procedures are fully implemented and followed by all staff
- Sufficient resources and time are allocated so that the DSL & Safeguarding Officers and staff can attend strategy discussions, inter-agency meetings, contribute to assessments etc.
- Staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with whistle blowing policies
- Policy/procedures are available to parents/carers on request
- Safer recruitment is adhered to and checks on new staff and volunteers carried out
- Cases are reported to the Disclosure and Barring Service (DBS) if a person ceases to work in an education setting and there are grounds for believing he/she may be

- unsuitable to work with children, or may have committed misconduct
- In absence of the DSL, the Principal will take on their designated duties.

### **6.3. Role of Vice Principal Curriculum and Quality**

The Vice Principal Curriculum and Quality will:

- Will act as the Designated Safeguarding Lead
- Chair the College Strategic Safeguarding Group
- Oversee and review the College Safeguarding Policy and Procedures including linked policies
- Raise awareness of developments in Safeguarding good practice and regularly update staff on emerging local and national issues
- Ensure the quality assurance of provision of safeguarding information, advice and guidance
- Ensure compliance with national standards and Harrow Strategic Safeguarding Partnership guidance through annual audits.
- Monitor the staff training record alongside the HR Department
- Develop initiatives which maintain the highest profile for Safeguarding in the work of the College and its partners
- Refer, or ensure that a member of the team refers, cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with managers to inform of any issues/ ongoing investigations and ensure there is always cover for the role.
- Arrange training in how to recognise signs of abuse, and when it is appropriate to make a referral
- Use working knowledge in how Local Safeguarding Children Board (LSCB) works, the conduct of case conferences, and be able to attend and contribute to these when necessary.
- Ensure all staff have access to and understand the College Safeguarding and prevent Policy.
- Ensure all staff have induction training and are able to recognise and report any concern as they arise
- Ensure that detailed, accurate and secure electronic records of referrals/concerns are kept
- Have access to resources and attend relevant or refresher training courses at least every 2 years
- Ensure the Safeguarding Policy is updated and reviewed annually by the Safeguarding Team and Governors
- Ensure students/ parents/ carers see copies of the Safeguarding Policy, which alerts them to the fact that referrals may be made, and the role of College
- Where a young person leaves College and progresses or transfers within an educational establishment, ensure that file/information is transferred to the new

establishment

- Refer a child if there are concerns about possible abuse, via the relevant referral process and acting as a focal point for staff to discuss concerns. Referrals should be made via the electronic system that all staff have personal access to, and a response will be returned maintaining compliance with GDPR
- Keep chronological records of concerns about a child even if there is no need to make an immediate referral
- Ensure that all such records are kept confidentially and securely, separate from student records, until the young person's 25th birthday and are copied onto their next education provider
- Ensure that an indication of further record-keeping is marked on the student records.
- Liaise with other agencies and professionals as necessary and appropriate
- Ensure that either they, or an appropriate Deputy attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report which has been shared with the parent/carers
- Ensure that any student currently with a child protection plan who is absent without explanation for two days is referred to their key worker's Social Care Team
- Provide an annual report for the Governing Body, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Governors; number and type of incidents/ cases, and number of children with child protection plans (anonymised)
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College or college may put in place to protect them.
- 

#### **6.4 Role of DSL – this post is assigned to Vice Principal – Curriculum & Quality**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Director of HR so they can inform the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required.
- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety) and ensure that children needs are considered holistically
- liaise with the senior mental health lead and support teams where safeguarding concerns are linked to mental health

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and College and college leadership staff
  - The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training.
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- be aware of the requirement for children to have an appropriate adult when getting investigated by the police.
  - The DSL will ensure adequate and appropriate DSL cover arrangements in place for any out of hours/out of term activities throughout the academic year and communicate to all.

#### **6.4. Role of DDSL and the Safeguarding Team (Safeguarding Officers- SOs)**

- The Deputy Designated Safeguarding Lead is the Director of Student Services. Main site as well as satellite centres have team of Safeguarding Officers.
- The DDSL and SOs will operationally deal with all safeguarding referrals. All safeguarding concerns/referrals will be triaged in one working day during term time. .
- The SOs will meet weekly with the DSL to ensure that all members of the team are aware of current cases, records kept, and lessons learnt from recent cases are cascaded through the team as ongoing professional development.
- The SOs will help the LRC Manager in supporting parents and carers to raise awareness about online safety for their children.
- When receiving disclosure and doing risk assessment, staff need to record the time and location of the incident and any action require to make the location safer.
- Be aware of importance of understanding intra familial harms and any necessary support for siblings following incidents

#### **6.5. Role of ALL Staff and Duty of Care**

Staff must:

- Fully comply with the requirements of College's safer recruitment policy
- Fully comply with the staff code of conduct
- prioritise safeguarding and adopt a preventative approach in all engagements with students

- promote a safe environment for students
- identify students who are experiencing or are likely to experience significant harm
- identify students who they consider may be in danger of becoming radicalised or engaging in extremist activity
- seek assistance from the DSL or the Safeguarding team when appropriate as stated in the Safeguarding Policy
- report any concerns direct to the Safeguarding team
- promote the welfare of young people and vulnerable adults
- promote the ethos of the College that students feel secure, valued and listened to
- promote student health and safety at induction and throughout their period of study and complete safeguarding tutorial training and ongoing training events, briefings, and workshops that they are requested to attend.
- access first aid/medical resources when required
- promote students' well-being via participation in the tutorial curriculum and embed safeguarding into curriculum and other activities such as enrichment where relevant
- recognise students experiencing distress and act to support including seeking advice from

The Safeguarding Team. As per KCSIE 2022, staff are advised that not all children may feel ready or know how to tell someone that they are being abused, exploited or neglected. comfortable in disclosing the safeguarding concern or incident. Staff need to be vigilant and monitor students' attendance, behaviour, and their progress at all times. It is important that staff determine how best to build trusted relationship that facilitates communication.

- Staff to have professional curiosity and be vigilant to ensure any sudden changes are picked up, explored and if there are safeguarding concerns, they are reported.
- All staff especially DSL and the Safeguarding team need to consider whether children are at risk of abuse or exploitation in situation outside their families.
- challenge inappropriate behaviour on campus e.g., bullying, substance misuse, banter, inappropriate comments and to refer to relevant college policies to ensure correct procedures are followed
- complete the mandatory training for safeguarding and prevent – ensure that they are fully aware of the college safeguarding and prevent policy and KCSIE part A.

## **Duty of Care**

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and young people from discrimination and avoidable harm

Staff should develop respectful, caring and professional relationships between themselves and young people. Staff behaviour should demonstrate integrity, maturity and good judgement. E.g., management of risk in external visits/residential visits and fully comply with the Staff Code of Conduct.

## **7. Offsite provision**

Staff working in offsite provision should familiarise themselves with the College Safeguarding Policy. The provisions in this policy apply equally to students studying in offsite locations as well as those

studying on the main site. All off site have assigned safeguarding Officer/s.

## **8. Online Safety**

The DSL has overall responsibility for online safety; they can be supported by appropriately trained deputies and should liaise with other staff as appropriate, but this responsibility cannot be delegated. The DSL has accessed appropriate training and/or support to ensure they understand the unique risks associated with online safety, can recognise the additional risks learners with SEN and disabilities (SEND) face online, and have the relevant knowledge and up to date capability required to keep children safe online.

All staff (including governors and trustees) should receive online safety information and training at induction. Online safety should be addressed as part of whole staff regular (at least annual) child protection training and staff should receive updates as appropriate.

Children should be taught about online safety, including as part of statutory Relationships and Sex Education (RSE), however Colleges and colleges should recognise that a one size fits all approach may not be appropriate, and a more personalised or contextualised approach for more vulnerable children e.g. victims of abuse and SEND, may be needed.

College has an essential role to play in both preventing online child-on-child abuse and responding to any concerns when they occur, even if they take place offsite and should have appropriate systems in place to support and evidence this.

College will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the specific risks their children face.

The DSL has access to the UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' and the DfE 'Harmful online challenges and online hoaxes' guidance to ensure they are familiar with its content and when it should be followed.

College uses appropriate filtering and monitoring approaches are in place which are suitable for the local context and use of technology. The leadership team and relevant staff should have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

College ensures there are regular and appropriate parental engagement in online safety, and specific concerns should be responded to in line with child protection policies.

DSL to ensure online safety approaches are regularly (at least annually) reviewed.

## **9. Network monitoring**

College recognises the benefits and opportunities which new technologies offer to teaching and learning. Our approach is to implement safeguards within the College, and to support staff and students to identify and manage risks. We believe this can be achieved through a combination of security measures, training and guidance and implementation of our associated policies. In furtherance of our duty to safeguard students, we will do all that we can to make our students and staff stay 'e-safe' and to satisfy our wider duty of care. In accordance with the E-Safety Policy, the IT network is monitored for any signs of risk to students.

For the safety of all users, especially young persons, the College makes use of automated systems designed to prevent access to content, data or programs considered unsuitable. This includes (but is

not limited to) objectionable web sites which may host pornographic images, sites posing security threats, and the viewing of terrorist and/or extremist material.

The Safeguarding and IT team to monitor this on a rota and report and concerns flagged.

### **10. Drugs, Weapons and Inappropriate substance Screening**

As part of our commitment to ensuring a safe site for all users, we do not permit the carrying of drugs, weapons, alcohol or any other inappropriate substance or alcohol on site. We will carry out occasional, random knife screen search. We may also invite the police to install knife arch and carry out an out of hours drug screening activity.

### **11. Students Who May Pose a Risk**

Where an applicant`s student history indicates that they pose a risk to other students or staff, a risk assessment must be undertaken prior to the enrolment. This will establish whether College is an appropriate environment for that person, and if so, what arrangements can be put in place to support that person to ensure the safety of others and their own safety. This is usually undertaken at a Safeguarding Team Panel meeting as deemed appropriate given the profile of the individual concerned. In depth process is covered in the admissions policy under criminal conviction.

Safe recruitment of staff - College undertakes to ensure that its staff (including supply staff) or volunteer are fit to work in a college setting with children and vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its students.

The College has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made on appointment:

- wherever possible a minimum of two references, satisfactory to the College, one of which should be from a senior manager, Principal or Human Resources Department of a previous employer.
- documentary evidence checks of identity, nationality, residency and "right to work" status
- enhanced DBS disclosure
- a check under Section 142 of the Education Act 2002 (formally known as List 99)
- documentary evidence of qualifications
- Carryout online social media searches as part of due diligence checks on shortlisted candidates

Records of all checks carried out are kept centrally in the Human Resources Department.

A curriculum Vitae (CV) should only be accepted alongside a full application form, as on its own it is not sufficient to support safer recruitment.

All staff interviews will have a Safer Recruitment trained member of staff on the interview panel.

### **12. Staff Training**

All staff will receive adequate training to familiarise themselves with safeguarding issues and responsibilities.

Key messages for staff are:

- Child abuse can affect any young person and may be carried out by anyone. It is usually carried out by someone well known to the young person
- Safeguarding is everyone's responsibility
- Abuse has a profound emotional and/ or physical effect on the young person, the family and the wider community
- All people who work with young people need to know of their responsibilities
- Some groups of young people seem to have an increased risk of abuse, for example, looked after children, children with disabilities or children living in stressful, violent or chaotic situation
- Being alert to signs which may indicate abuse
- Keeping up to date with legislation and guidance
- The importance of working together on campus and with external agencies

Those staff with specific safeguarding responsibilities will have specific training particular to their role at least once every two years.

The Executive Director of HR and the HR team will undertake specific training with regard to their responsibilities for staff record keeping and recruitment.

Safer Recruitment training will be implemented to ensure that every recruitment panel has at least one safer recruitment trained panel member, as per paragraph [11 above](#).

Governors will have training regarding their responsibilities as governors on joining the board and at least once every two years thereafter.

All staff must read and understand Part 1 of Keeping Children Safe in Education and confirm that they have done so.

### **13. Managing allegations against staff and volunteers**

The primary concern of College is to ensure the safety of the student. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally.

There are occasions where a student will accuse a member of staff of abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

Any instance of a student being abused by a member of staff is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. The College will ensure that any member of staff facing an allegation will be provided with support, including a named contact if they are suspended. We will work effectively with the LADO to help ensure that the matter is dealt with as quickly, fairly and consistently as possible in the interests of all concerned.

This part of the guidance relates to members of staff, supply staff, contractors and volunteers who are currently working in any college or college regardless of whether the college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Executive Director of HR or Principal except where the suspect is either of these.

If the allegation concerns the Principal or the Executive Director of HR, the matter should be discussed with whichever of them is not suspected who will then discuss it with the Chair of the Board of Governors, in addition to following the normal procedures for safeguarding.

If the allegation concerns the Designated Senior Person, the matter should be dealt with under the normal procedures.

The member of staff will be advised to:

- contact their union representative or other support network/ organisation
- keep records of all conversation, meetings attended, letters received and telephone calls relating to the allegation
- If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under the College Disciplinary Procedure.

This procedure also applies to volunteers who work in an unpaid capacity.

If an allegation against a member of staff has occurred, then the Executive Director of HR will liaise with the Local Authority Designated Officer (LADO) as to the appropriate actions to be taken and will involve feeding back to the LADO on the outcome of these agreed actions.

Whilst recognising our duty to support staff, the welfare of our students remains our paramount consideration.

The College will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the College. We recognise our legal duty to refer to the Disclosure Barring Service (DBS) and any other relevant professional body details of anyone who has harmed or poses a risk of harm to a child.

### **Concerns that do not meet the harm threshold:**

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold (Please see 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education). Please see further detail on processes and timescales within Appendix 6.

Concerns may arise through, for example:

- Suspicion;
- Complaint;
- Disclosure made by a child, parent or other adult within or outside the College; or
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns:**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; and/or
- Using inappropriate sexualised, intimidating or offensive language.

### **Sharing low-level concerns:**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
  - Empowering staff to share any low-level concerns;
  - Empowering staff to self-refer;
  - Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
  - Providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and
  - Helping to identify any weakness in the College's safeguarding system.
- Responding to low-level concerns:

If the concern is raised via a third party, the Executive Director of HR or delegated member will collect evidence where necessary by speaking:

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

The Executive Director of HR will use the information collected to categorise the type of behaviour and determine any further action, in line with the College's code of conduct.

### **Record keeping:**

All low-level concerns will be recorded in writing, The Executive Director of HR will then record the concerns on the HR secure computer drive. This drive is our information management system to record information regarding the adults in our setting. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR;
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority;
- Retained at least until the individual leaves employment at the college; and
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **14. Associated Safeguarding Procedures**

The Safeguarding Policy is supported by a set of procedures which include:

### **Whistleblowing**

We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff and students should be aware of their duty to raise concerns, where they exist, about the management of child protection and the protection of vulnerable adults, which may include the attitude or actions of colleagues and are encouraged to do so.

This includes the requirement to self-disclose any personal information which may impact on their suitability to work in an education setting.

Where internal reporting arrangements are viewed not to have been taken seriously or with sufficient rigour, any member of staff can raise concerns externally if the matter is not resolved by the Principal or Chair of Governors e.g., via the Local Authority's Designated Officer.

### **Missing from Education**

Attendance has direct links with safeguarding as well as success on study programme. Staff working with students need to closely monitor their attendance. Any absence without valid reason must be followed up as per the attendance strategy daily. If there has been no contact with student in 7 days, then their parents/carers must be sent a letter home asking them to contact us immediately. If no contact has been established with the student or their parents/carers in 14 days, staff must inform the Safeguarding team. If there are safeguarding concerns present, staff must raise them as soon as they become aware of them. They should not wait for 14 days.

### **Physical Intervention**

We understand that physical intervention may be required where a student, staff member or visitor may be at risk but understand that physical intervention of a nature which causes injury or distress may be considered under child/vulnerable adult protection or disciplinary procedures.

### **Bullying**

Our procedure on bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under safeguarding/child protection procedures. This includes cyber, racist, homophobic and gender-related bullying.

## **Racist Incidents/Hate Crime**

The College takes allegations of racism seriously and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding/child protection procedures.

### **15.Prevention**

We recognise that the College plays a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- Work to establish and maintain an ethos where children, young people and vulnerable adults, feel secure and are encouraged to talk and are always listened to.
- Ensure that all children, young people and vulnerable adults in the College know who they can approach if they are worried or in difficulty.
- Include across the curriculum and tutorial, opportunities which equip young people with the skills they need to stay safe from harm and to know to whom they should turn for help.

### **16.Health & Safety**

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safety and security of our students both within the College environment, and when away from the College when undertaking College placements and educational visits.

Staff may be made aware that a child or vulnerable adult may have been abused through an incident being relayed to them by a student or by another person, or from their own observations.

All complaints, allegations or suspicions of abuse shall be taken seriously. However, staff should not investigate suspected incidents since this may contaminate evidence in a future investigation by the Police or Social services. The Police or Social services who are specially trained in this area take responsibility for investigations.

### **17.Associated Documents**

This policy should be read alongside the following policies and protocols: -

- The Student Charter
- Bullying and Harassment Policy
- Single Equality Scheme
- The Health and Safety Policy
- Human Resources Procedures
- The Data Protection Policy

- The IT Acceptable Use Policy
- E-safety Policy
- The Student Code of Conduct and Behaviour Policy
- The Staff Code of Conduct and Disciplinary procedure
- The College Complaints procedure
- Staff Recruitment and Selection Policy
- Admissions Policy
- Teaching and Learning Policy
- Confidentiality Policy
- External speakers Policy
- Video calling Protocols
- Restraint guidance and Policy
- Screen and Search Policy
- Whistleblowing
- Work experience
- Safeguarding and Prevent Action Plan at College
- Attendance strategy
- Serious Threat policy

## **18.Prevent Procedure**

### **PREVENT Procedure: Detecting and Preventing Radicalisation and Extremism**

#### **Background**

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to prevent the radicalisation of people and to stop people moving from extremism into terrorist-related activity.

#### **Context**

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. As an organisation that interacts with young people, College ensures that staff and students are aware of these risks and are familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

#### **The College Procedure**

The College has developed internal support mechanisms and referral procedures. This procedure outlines who staff and students should contact any concerns about fellow staff or students. The College has developed links with external agencies that provide training and support. If, once internal processes are completed, it is considered that additional external support or referral is required, this will be arranged via the Safeguarding Team or the designated member of the Executive team, whichever is most appropriate. External support will normally involve an individual

being asked to voluntarily receive tailored support from appropriate external individuals or organisations.

### **Definition of Radicalisation**

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence”. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination
- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies and/or faiths

### **Who are we safeguarding?**

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure
- Indoctrination

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far-reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing vulnerable individuals in.

This raises the question of what those signs of radicalisation will look like. They will often look a lot like adolescent troubling behaviour:

**Emotional** Angry, mood swings, newfound arrogance, perceived sense of injustice, sense that other people are “wrong”

**Verbal** Expressing opinions that are at odds with generally shared values, language, phrases and ways of speaking/writing not previously seen/known

**Physical** Appearance (tattoos), change in routine, dress, new obsessions and pre-occupations

### **What to do if you believe someone to be at risk of radicalisation**

The College will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable. This is the ethos promoted by Harrow Police Prevent team.

**Notice** Recognition of any changes in behaviour or appearance similar to those outlined above

**Check** Speak with someone you trust (like a tutor/colleague) and see what they recommend but trust your instinct if you are still concerned

**Share** Speak to one of the safeguarding officers to report your concerns.  
Remember –trust your instinct

If you are a student and concerned about another student, please **Check** with your tutor in the first instance and **Share** with the Safeguarding Team.

If you are a student and are concerned about a member of staff, or a person who is not a member of the College, e.g. guest speakers, please **Check** with the Safeguarding Team and **Share** with the Director of Student Services or the Executive Director of Human Resources.

If you are a member of staff and are concerned about a student, please **Check** and **Share** with the Safeguarding Team or your line manager.

If you are a member of staff and are concerned about another member of staff, please **Check** with your Line Manager and **Share** with the Executive Director of Human Resources.

If you are a member of staff and are concerned about a person who is not a member of the College, e.g., a guest speaker, please **Check** and **Share** with the Vice Principal Curriculum and Quality.

### **Responsibility for contacting PREVENT**

Any of the following people are responsible for making decisions to contact the Counter Terrorism Team if serious concerns are raised about a student:

- ✓ Designated Safeguarding Lead (DSL)
- ✓ Deputy Designated Safeguarding Lead (DDSL)
- ✓ Safeguarding Officers

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at the Metropolitan Police if serious concerns are raised about a member of staff:

- DSL
- DDSL
- Safeguarding Officers
- Executive Director Human Resources

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at the Metropolitan Police if serious concerns are raised about a person who is not a member of the College, e.g., a guest speaker:

- DSL
- DDSL
- Executive Director Human Resources

NB. As outlined in Keeping Children Safe in Education (2022), anyone has the right to refer to Social Care regarding any concerns for an individual. The College confers this right with regards to extremism and anyone can report a concern to Harrow Police by dialing 101. Where this does occur, please inform the Safeguarding Team with regards to a student or member of the public who visits the College and the Executive Director of Human Resources with regards to a member of staff.

### **Fundamental British values**

As part of the College's commitment to delivering the Prevent agenda students will be engaged through promotional events and tutorials to understand the dangers associated with involvement in extremism and the promotion of fundamental British values. Furthermore, students will be encouraged to develop their critical thinking skills through tutorials and as part of the curriculum.

Fundamental British values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

Extremism should not form part of the curriculum or teaching and students are encouraged to respect other people and no student is discriminated against contrary to the Equality Act 2010. The College believes spiritual, moral, social and cultural (SMSC) standards will be strengthened by actively promoting fundamental British values and encouraging students to respect other people, with particular regard to the protected characteristics set out in the Equality Act 2010.

### **Press Releases**

In the event we are alerted to the fact that a student has been radicalised and actively working with an extremist/terrorist group then we will make sure that we communicate with the press and stakeholders at the earliest convenience. The College takes the position that it is best to work with the stakeholders to inform them of any instances before press releases where possible. If any Governor or staff member are approached by press or other agencies they should refer all items to the Head of Marketing, who is responsible for drafting and managing any communication, and who in turn will alert the Principalship.

### **Responding to local and national risks**

The college is consulting with the wider Safeguarding community and awaiting direction from the Government on how to implement the 'Run, Hide, Tell' advice that is being advocated if an individual is involved in an incident. We are taking into consideration the risk of spreading alarm with the need to safeguard members of the college community. The college continues to liaise closely with regional prevent coordinators to get regular updates. The safeguarding and prevent strategic action plan is to reflect such risks and actions to be taken to mitigate these risks to

safeguard students and staff at the college.

### Useful Contact List

- Harrow Prevent Coordinator: Samia Malik (07989 332078)
- Brent Prevent Coordinator: Kibbi Octave (0208 937 4225)
- FE/HE Regional Prevent Officer for London Jennie Fisher email [jennie.fisher@education.gov.uk](mailto:jennie.fisher@education.gov.uk) (07880 469 588)

Barnet radicalisation and prevent – Barnet MASH (0208 359 4066) or email [BarnetCST@barnet.gov.uk](mailto:BarnetCST@barnet.gov.uk)

Anti-terrorist hotline - 0800 789 321

### Useful Websites

- <https://www.gov.uk/government/publications/prevent-duty-guidance>
- <https://act.campaign.gov.uk/>

## Appendix 1 Further Information – Safeguarding Children in Specific Circumstances, Mental health, and support for parents/carers

### 1 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. There may also be community safety incidents within the vicinity of the College which can raise concerns amongst children and parents.

Opportunities for students to develop their confidence and abilities around keeping themselves are embedded into the College curriculum.

### 2. Children and the court system

Guidance is available for when children are required to give evidence in **criminal courts** [5-11 year olds](#) and [12-17 year olds](#).

Making arrangements for children via the **family courts** following separation can be stressful and trench conflict in families. The Ministry of Justice has launched useful online guidance [Get help with child arrangements](#) (also known as contact, access or custody).

### 3 Children with Disabilities or Special Educational Needs

Our College is committed to ensure that children with disabilities or special educational needs have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the same outcomes as non-disabled children. We recognise children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This is because they can experience greater vulnerability as a result of negative attitudes and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairments.

This understanding is incorporated into our staff training, so that we all remain vigilant to identifying the additional vulnerabilities for these children in our care and provide the appropriate level and type of pastoral support.

Staff should bear in mind that additional barriers can exist when recognising abuse and neglect in children with special educational needs and/or disabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical

conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and communication barriers and difficulties in managing or reporting these challenges.

#### **4 Children missing from education**

A child going missing from education, particularly repeatedly, is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

The College will fulfil its statutory duty in notifying the local authority when removing a pupil's name from the admission's register outside of the normal transition points. We will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority before deleting their name from the register. We will also notify the local authority within five days of adding a pupil's name at a non- standard transition point.

When one of our pupils goes missing from home or care we will contribute to the police and local authority's efforts to identify and locate the child by completing the [Grab Pack for a Missing Children](#). For further guidance see [Children missing education](#)

#### Children with a family member in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) (National Information Centre on Children of Offenders) provides information to support professionals working with offenders and their children, to help mitigate negative consequence for those children.

#### **5 Child Sexual Exploitation and Child Criminal Exploitation**

Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator.

Child Sexual Exploitation and Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

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Whilst age may be the most obvious, this power imbalance can also be due to a range of other

factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of Child Criminal Exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss College or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;

Our College will support the multi-agency activity to combat these crimes and help to divert and support any young pupils affected by CSE and CCE. We will follow the HSCB protocol for identifying and managing cases of CSE and/or CCE and promote the use of the HSCB's SAFEGUARD Identification Tool Identification tool in our child protection training. Also see section 'Child on Child Sexual Violence and Sexual Harassment.

## **6 Serious violence**

Colleges are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in serious violent crime. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. We recognise that even low levels of youth violence can have a disproportionate impact on a pupil or the wider College/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise we will work collaboratively with our partner agencies to help prevent escalation of harm.

For further information refer to government guidance [advice to Colleges on gangs and youth violence](#) and [Preventing serious violence: a multi-agency approach](#).

Support for young people affected by gang association can be obtained via [London gang exit](#)

## **7 County Lines**

This is a geographically widespread form of criminal activity involving drug networks or gangs that groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural or seaside areas. Missing episodes can be an important identifying factor, where the victim may have been trafficked for these purposes. In close working relationship with our local MASH a referral to the National Referral Mechanism will be considered for any such concerns.

Further advice can be obtained from Home Office guidance [Criminal exploitation of children and vulnerable adults - county lines](#)

## **8 Cybercrime**

Cybercrime is a criminal activity committed using computers and/or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime.

If there are concerns about a student in this area then the DSL will consider referring them to the [Cyber Choices](#) programme. 34

## 9 Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children can also be victims, and perpetrators in their own relationships. Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships).

Our College recognises the immediate and long-term impact of domestic abuse on a child's development and emotional wellbeing. All staff will remain vigilant to identifying the signs so that early help and protective action can be instigated where appropriate. We endeavour to provide the child with a safe and caring environment at College to help mitigate the impact of home-life stresses.

Any notifications received from the police/MASH of domestic abuse incidents, will be promptly reviewed by our DSL. This will enable our College to respond appropriately to the impact on the child/young person and to share any additional information with MASH to assist in the overall identification and assessment of risk

### 10 So-called 'honour-based' abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### 11 Female Genital Mutilation (FGM)

FGM comprises all non- medical procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

In our College we recognise that whilst there is not necessarily an intention to harm a girl through FGM, the practice has serious short and long term medical and psychological implications. We are committed to work with families, partner agencies to promote understanding and safeguard pupils who may be at risk of this practice.

We aim to work sensitively with community groups where this may be a cultural belief and practice, however we will act to safeguard and promote our pupils welfare where required and will fulfil our duties under the [Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015). This places a statutory duty upon teachers to personally report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under 18.

Where it is suspected that a girl is at risk of FGM being undertaken then child protection procedures must be followed.

Further information can be found in:

[Multi-agency statutory guidance on female genital mutilation](#) and

[Mandatory reporting of female genital mutilation - procedural information](#)

## 12 Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. A lack of consent can be where a person does not consent or where they cannot consent e.g. if they have learning disabilities. There can also be links to so-called 'honour based' abuse. The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email: [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk). Our College recognises that it has an important role in safeguarding children from forced marriage by educating pupils about the law and their rights and in identifying signs of risk. Further information can be found in [Government Guidance on Forced Marriage](#).

## 13 Homelessness

Our staff will alert the DSL of families becoming or at risk of becoming homeless, so that the DSL can refer to housing services at the earliest opportunity. Indicators for the risk of homelessness can include debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Duties introduced under The Homelessness Reduction Act 2017 shift focus to early intervention. For further information refer to [Homeless Reduction Act Factsheets](#).

## 14 Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The College and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). [Protecting children from radicalisation: the Prevent Duty](#) provides guidance for Colleges and childcare providers on preventing children and young people from being drawn into terrorism. All staff are encouraged to familiarise themselves with the government's website [www.educateagainsthate.com](http://www.educateagainsthate.com). The website is designed to equip College leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

The College has a risk assessment process in place for considering and protecting children at risk of radicalisation and extremism. The risk assessment takes into consideration that the internet and use of social media have become major factors in the radicalisation of young people and our College's E-safety policy and curriculum embeds understanding of these particular risks.

Our College will help to identify young people at risk and work with local partnership arrangements including the **Channel Programme** to help support and divert any young people from associated harm: Click here for further guidance [Channel Duty Guidance](#)

## 3 Private Fostering

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. At **XXXX** we will confirm the status of every pupil's care arrangements on admission (or when a pupil's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face. See links for information on what constitutes [private fostering](#) and details of [The Children's Act 1989: private fostering](#).

## 4. Substance Misuse

We recognise the clear role our College has to play in preventing drug misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to

[DfE and ACPO Drug Advice for Colleges](#). (ACPO has changed to the National Police Chiefs' Council).

**Parental Substance Misuse:** Substance misuse (drugs or alcohol) may impact on parental capacity and can significantly exacerbate other concerns such as domestic violence or mental health issues. We will remain vigilant in identifying and supporting pupils and their families facing such issues, and work in collaboration with other agencies where necessary to prevent significant harm.

## 5 Mental Health

Our College seeks to promote positive mental health in our pupils and to identify and address those with less severe problems at an early stage and build their resilience. We are also committed to identifying and supporting pupils with more severe needs and to help make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS) where necessary.

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy DSL.

**Parental Mental Health:** We recognise that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children. For further guidance refer to [Parental mental health](#).

## 6 Trafficking and Modern Day Slavery

Our College will remain alert for children trafficked into the country who may be registered at our College for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, Traveller or migrant families – who collectively go missing from College. For further government guidance refer to [Safeguarding Children who may have been trafficked practice guidance](#).

## 7 Young carers

With so many adult responsibilities, young carers often miss out on opportunities that other children and young people have to play and learn. We are well placed to identify and respond to concerns and 'triggers' where children and young people may require additional help as carers. We will aim to respond early with our own pastoral support and where appropriate seeking help from local authority support services for young carers.

## 8 Parents and Carers

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. We have set out the College's approach, including the sites students will be asked to access and set out who from the college (if anyone) their student is going to be interacting with online. Parents have been offered the following links:

o Keeping children safe online - <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

o Thinkuknow - for advice from the National Crime Agency to stay safe online o UK Safer Internet Centre - advice for parents and carers <https://www.thinkuknow.co.uk/>

- [Mental health support for parents - https://www.youngminds.org.uk/parent/](https://www.youngminds.org.uk/parent/)

Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

## **Appendix 2 –Contact details for offsite provision**

When learning is being wholly delivered in offsite provision, then the managers and staff in that location will have a local safeguarding lead in addition to the College based safeguarding

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy DSL.

Parental Mental Health: We recognise that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children. For further guidance refer to Parental mental health.

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### **Young carers**

With so many adult responsibilities, young carers often miss out on opportunities that other children and young people have to play and learn. We in **XXXX** are uniquely placed to identify and respond to concerns and ‘triggers’ where children and young people may require additional help as carers. We will aim to respond early with our own pastoral support and where appropriate seeking help from local authority support services for young carers.

### **Parents and Carers**

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. We have set out the College’s approach, including the sites students will be asked to access and set out who from the college (if anyone) their student is going to be interacting with online. Parents have been offered the following links:

o Keeping children safe online - <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

o Thinkuknow - for advice from the National Crime Agency to stay safe online o UK Safer Internet Centre - advice for parents and carers <https://www.thinkuknow.co.uk/>

- [Mental health support for parents - https://www.youngminds.org.uk/parent/](https://www.youngminds.org.uk/parent/)

Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

## Appendix 2 continued—Contact details for offsite provision

When learning is being wholly delivered in offsite provision, then the managers and staff in that location will have a local safeguarding lead in addition to the College based safeguarding leads.

These local contacts are:

	Local Contact	Email
Blossom Beauty Academy	Rasha Abdelbaqi	<a href="mailto:Blossom.academy@stanmore.ac.uk">Blossom.academy@stanmore.ac.uk</a> 02084206089
Salon Hijab Academy	Mary Al-Khudri	<a href="mailto:info@salonhijabacademy.com">info@salonhijabacademy.com</a> 0208 204 8833
Crystal Palace	Julie Lee	<a href="mailto:j.lee@stanmore.ac.uk">j.lee@stanmore.ac.uk</a>
Dunstable	Kevin Randall	<a href="mailto:k.randall@stanmore.ac.uk">k.randall@stanmore.ac.uk</a>
Richings Park	Craig Lewis	<a href="mailto:c.lewis@stanmore.ac.uk">c.lewis@stanmore.ac.uk</a>
Silver Jubilee	Sedoda Asamany	<a href="mailto:s.asamany@stanmore.ac.uk">s.asamany@stanmore.ac.uk</a>
Welling	Jamie Coyle	<a href="mailto:j.coyle@stanmore.ac.uk">j.coyle@stanmore.ac.uk</a>

The specific responsibility of the local safeguarding officers is to ensure that:

- Their contact details are up to date and shared with the College Safeguarding Team
- Students know that they are covered by the College Safeguarding and Prevent Policy
- All staff at the local site have signed to say that they abide by the College Code of Conduct and the College Safeguarding and Prevent Policy
- All staff at the local site have read the Keeping Children Safe in Education latest version - part A guidance
- All staff complete their annual training
- All staff at the local site are recruited in line with Safer Recruitment Procedures
- All disclosures are recorded, and details are passed regularly to the College DSL

### **Appendix 3 Declaration for Offsite Provision**

The responsibilities of the Safeguarding Officers at offsite provision for College are listed below:-

The specific responsibility of the local Safeguarding Officer is to ensure that:

- Their contact details are up to date and shared with the College Safeguarding Team
- Records are kept in accordance with Data Protection and GDPR legislation
- Students know that they are covered by the College Safeguarding and Prevent Policy
- All staff at the local site have signed to say that they abide by the College Code of Conduct and the College Safeguarding and Prevent Policy
- All staff at the local site have read the Keeping Children Safe in Education latest version part A guidance
- All staff complete their annual training
- All staff at the local site are recruited in line with Safer Recruitment Procedures of College
- All disclosures are recorded, and details are passed regularly to the College DSL
- There is a safeguarding policy in place that covers all users at each of their delivery sites I confirm that I have read and understood these

responsibilities.

Name:	
Organisation:	

Site Location:	
----------------	--

Telephone number:	
Email:	
Signature:	

#### Appendix 4 Key local contacts for safeguarding children

<b>Harrow Children's Social Care &amp; Multi-agency Safeguarding Hub (MASH)</b>	<b>'Golden Number': 020 8901 2690</b> Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: <b>020 8424 0999</b>
<b>Police</b>	<b>101 or for emergency: 999</b>
<b>FGM - Mandatory reporting</b>	<b>Police on 101</b>
<b>Local Authority Designated Officer for Allegations against staff (LADO)</b>	Initial referrals via <b>MASH/Golden Number</b> above. (For on-going cases: <b>020 8736 6435</b> )
<b>Children and Young People with Disabilities 0-25 years</b>	<b>020 8966 6481</b>
<b>Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership</b>	<b><a href="http://www.harrowscb.co.uk/">www.harrowscb.co.uk/</a></b>
<b>NSPCC</b>	<b>0800 800 5000</b>
<b>Report Abuse in Education NSPCC Helpline</b>	<b>0800 136 663</b>
<b>Childline</b>	<b>0800 1111</b>
<b>Government's Whistle-blowing Service</b>	<b>0800 028 0285</b>

<b>via NSPCC Report Line</b>	
<b>Forced Marriage Unit</b>	<p><b>Tel: 020 7008 0151</b></p> <p>From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm)</p> <p>Out of hours: 020 7008 1500 (ask for Global Response Centre)</p> <p>Email: <a href="mailto:fmufco@fco.gov.uk">fmufco@fco.gov.uk</a></p>
<b>Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)</b>	<p><b>Tel: 020 7340 7264</b></p> <p>Email: <a href="mailto:counterextremism@education.gsi.gov.uk">counterextremism@education.gsi.gov.uk</a></p>
<b>Disclosure and Bring Service</b>	<p><b>Tel: 03000 200 190</b></p> <p>Email: <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a></p>

<b>Teaching Regulation Authority</b>	<p><b>Tel: 020 7593 5392</b></p> <p>Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
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In the first instance, contact with external agencies should be made via the DSL, where possible.

## Appendix 5: Sexual Violence and Sexual Harassment Risk assessment.

### **Risk Assessment for Peer-on-Peer Sexual Abuse/ Harmful Sexual Behaviour Process and Risk Assessment**

The terms victim and alleged perpetrator are used to identify the children involved. NB: there should be no assumption of guilt on the part of the alleged perpetrator, pending investigation.

Each section/question will be considered from the perspective of both pupils. Considerations will be given for the impact on, and needs of, the wider college community. All concerns and proposed actions will be recorded.

The college will work with the local multi-agency safeguarding teams in each local authority and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose.

**\*A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as "criminal acts: rape, assault by penetration and sexual assault".**

**\*This risk assessment should be completed with reference to Keeping Children Safe In Education, DFE Sexual Violence and Sexual Harassment in Colleges and colleges and the local policies on the intranet and publish on our internet sites**

#### **Incident reported**

CONSIDERATIONS	RISK (CONSIDER VICTIM, ALLEGED PERPETRATOR, OTHER PUPILS AND STAFF)	RISK LEVEL (HIGH, MEDIUM OR LOW)	ACTIONS TO REDUCE RISK	REVISED RISK LEVEL (HIGH, MEDIUM OR LOW)
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<ul style="list-style-type: none"> <li>• <b>What was the nature of the incident?</b></li> </ul>				
<ul style="list-style-type: none"> <li>• <b>Was it a crime?</b></li> </ul>				
<ul style="list-style-type: none"> <li>• <b>Is it necessary to limit contact between the children involved?</b></li> </ul> <p>Refer to KCSIE and DFE guidance on sexual harassment and sexual violence in Colleges and Colleges.</p>				
<ul style="list-style-type: none"> <li>• Is there an actual or perceived threat from the alleged perpetrator to the victim and/or others?</li> </ul>				
<ul style="list-style-type: none"> <li>• Is either the victim or the alleged perpetrator at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)?</li> </ul>				
<ul style="list-style-type: none"> <li>• Do they share classes?</li> </ul> <p>Yes</p>				

CONSIDERATIONS	RISK (CONSIDER VICTIM, ALLEGED PERPETRATOR, OTHER PUPILS AND STAFF)	RISK LEVEL (HIGH, MEDIUM OR LOW)	ACTIONS TO REDUCE RISK	REVISED RISK LEVEL (HIGH, MEDIUM OR LOW)
<ul style="list-style-type: none"> <li>• Do they share break Times?</li> </ul>				
<ul style="list-style-type: none"> <li>• Do they share transport to/from College?</li> </ul>				
<ul style="list-style-type: none"> <li>• Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of College?</li> </ul>				
<ul style="list-style-type: none"> <li>• How can such contact be limited?</li> </ul>				
<ul style="list-style-type: none"> <li>• Is there a risk of harm from social media and gossip?</li> </ul>				

Potential risk				
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**Further action taken by the College or college:**

Action	YES/NO	Date
Police informed		
Referral to MASH		

Updates

Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

## **Appendix 6 Allegations of abuse made against staff**

### **Allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a Learner, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a Learner or children in a way that indicates they may pose a risk of harm to a Learner and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the college.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Human Resources Manager, or the chair of governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgment.

### **Suspension of the accused until the case is resolved:**

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children;

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted (If under 18 years of age or a vulnerable adult); and If in doubt, the case manager will seek views from the college's designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence); and
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:  
Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.

Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.

(The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated

officer, police and/or children's social care services, as appropriate.

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer.

The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

If the Learner is under 18 or vulnerable, we will keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

## **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the college, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the college, while the college carries out the investigation. We will involve the agency fully, but the college will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week;
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days ;
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days; and
- However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

## **Specific actions**

Action following a criminal investigation or prosecution;

- The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

## **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the college will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the college will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension:

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the Learner or Learners who made the allegation, if they are still attending the college.

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate;
- Shown to be deliberately invented, or malicious, the college will consider whether any disciplinary action is appropriate against the individual(s) who made it; and
- Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate; and
- Shown to be deliberately invented, or malicious, the college will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Confidentiality and information sharing**

The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

**The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:**

Who needs to know about the allegation and what information can be shared;

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it arises

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- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it arises