

Safeguarding for Children and Vulnerable Adults Policy

2021 – 2022

Updated:	September 2021
Persons Responsible:	Exec. Dir Resources / Head of Student Experience
Approved by:	Executive Team/Governors
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For action by:	All Staff
For information to:	All Staff

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Statement

West Thames College recognises its statutory duty and responsibility to safeguard and promote the safety and welfare of children, young people and those adult deemed 'vulnerable'. This is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children.

In accordance with the Counter-Terrorism and Security Act 2015, there is a statutory duty on colleges to "have due regard to the need to prevent people from being drawn into terrorism". This is known as the Prevent duty. To fulfil this duty, West Thames College liaises closely with the local area prevent lead to receive updates regarding local concerns and to refer students of concern to the Channel process and recognises the positive contribution it can make towards protecting its students from the immersing grooming issues surrounding radicalisation to violent extremism through the tutorial programme and by initiatives held within the curriculum and enrichment programmes.

West Thames College is committed to the safety and wellbeing of all students, staff and those who have direct links with the organisation including offsite students, apprentices and sub-contracting providers. The college actively promotes the positive welfare of all students, those with additional needs, mental health and physical health and expects all teaching and support staff, volunteers, WEX and partner agencies to adhere to these practices at all times.

Staff must read this guidance alongside [Keeping Children Safe In Education 2021 Part One](#)

West Thames College works with our local Safeguarding Partnership and Prevent multi-agencies to ensure that arrangements are in place to identify, assess and support those who are suffering or potentially suffering from harm. *This is covered in further detail within Appendix 3.* In doing so, we are guided by the following key principles:

- All students regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Safeguarding young people is everyone's responsibility.
- It is better to help young people as early as possible, before issues escalate and become more damaging.
- Working in partnership with children and vulnerable adults, their parents, carers and their agencies is essential in promoting children's and vulnerable adult's welfare.

Sexual Violence and Sexual Harassment

West Thames College is committed to providing an environment in which all students, staff and visitors feel safe and respected. Incidents of sexual violence and sexual harassment will be taken seriously. All victims will be able 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 abuse, misconduct, sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report.

All reports of sexual violence and harassment will be responded to under the colleges Safeguarding and Academic and Misconduct Disciplinary policies and procedures.

The Purpose and Scope

The purpose of the policy is to provide protection for the children and vulnerable adults undertaking education and training at West Thames College. And to ensure that all staff have an awareness of safeguarding issues that can put children at risk of harm. Recognising the indicators and signs and know how to identify it and report it.

This Policy applies to all those working in, studying and visiting any College site including students, the College workforce, Governors, volunteers and visitors to the College including contracted services such as agency staff, employers offering work placements, transportation companies and contractors with direct access to children, young people and vulnerable adults.

Legal framework

The policy will enable West Thames College to deliver actions and services with procedures which are in accord with:

Working Together to Safeguard Children July 2018

- Keeping Children Safe in Education September 2021
- Prevent Duty 2015
- Sexual Violence and Sexual Harassment September 2021
- Children Act 1989 & 2004
- Education Act 2002 & 2011
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018 (including GDPR)
- Protection of Freedoms Act 2012
- Section 26 (1) of the Counter Terrorism and Security Act 2015
- Mandatory Reporting of Female Genital Mutilation -Procedural Information 2020
- Sexual Offences Act 2003 - Position of Trust
- Protection of Freedoms Act 2012
- Childcare (Disqualification) Regulations 2018

For the purposes of this policy, 'children' refers to everyone under the age of 18. The Care Act 2014, which covers England, defines the person who should be subject of a safeguarding enquiry as an adult who:

- needs care and support community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or is unable to protect him or herself against significant harm or exploitation.
- is experiencing, or at risk of, abuse or neglect; and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities, special educational needs, addiction, or who have suffered abuse or trauma.

Any person up to the age of 24 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding & child protection legislation.

Review timing and access to this policy

This Safeguarding for Children and Vulnerable Adults Policy will be reviewed by the Designated Safeguarding Lead, Head of Student Experience on a regular basis to ensure it remains current and incorporates all revisions made to local or national safeguarding guidance. The policy will be subject to annual review initiated by the Head of Student Experience with the support of the Executive Director Resources & Student Experience and presented to the Governing Body for approval. The policy will be published on the West Thames College website and will be available for all staff on Connect.

The Head of Student Experience with the support of the Executive Director Resources & Student Experience will prepare an annual report for the Governing Body, which reviews how the duties have been discharged.

The implementation of this policy will be monitored by the following groups and key staff:

- Corporation – via the Annual Report
- The College Executive Team
- Executive Director, Resources & Student Experience – via operational meetings
- The College Management Team – via reports to CMT meetings
- Designated Safeguarding Team – via operational meetings and the Safeguarding Strategy Group

We will seek to safeguard and promote the welfare of children and vulnerable adults by:

- Valuing them, listening to and respecting them
- Adopting safeguarding practices through procedures and a code of conduct for staff and volunteers
- Adopting safeguarding practices that prevent the impairment of children's mental and physical health or development
- Developing and implementing an effective e-safety strategy and related procedures
- Developing and implementing an effective Prevent strategy and related procedures
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information and good practice about child protection with students, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know and involving students and parents appropriately
- Providing effective management for staff and volunteers through supervision, support and training
- Promoting our policies and values to make it clear that ours is a tolerant and welcoming community for all learners
- Educating and supporting students to fulfil their potential and be successful in their future lives
- Fostering positive relationships with police and community partners and working in partnership to promote *Share Values* and to enable students to engage successfully with their communities and to engage with, rather than marginalise extreme political views
- Encouraging and developing learners' resilience and critical thinking skills to challenge and debate in an informed way, through our teaching, learning and assessment strategies.
- Equipping staff with the knowledge of possible signs / indicators of concern with regards to extremist opinions, how to deal with these and challenge them effectively and / or refer through key reference and support channels

- Equipping staff with the knowledge of possible signs / indicators of concern with regards to grooming and recruitment, how to deal with these and / or refer through key reference and support channels
- Facilitating staff to develop and share teaching, learning and assessment strategies around resilience, e-safety and critical thinking skills as appropriate
- Equipping staff with the skills to recognise signs/indicators of physical, emotional, sexual abuse and neglect

1. Safeguarding Procedures

Responsibilities

All members of the College community, including staff, governors, students and contract staff, are responsible for safeguarding and promoting the welfare of children and vulnerable adults, and must consider, at all times, what is in their best interests.

All staff, including volunteers

All staff who come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. New employees will receive initial training through the induction process.

All staff must comply with the following responsibilities to:

- A. complete safeguarding training annually
- B. read Keeping Children Safe in Education, Part One
- C. read the Safeguarding for Children and Vulnerable Adult Policy and associated procedures.
- D. safeguard and promote the welfare of children and vulnerable adults.
- E. alert a Safeguarding Officer if they have concerns about a child or vulnerable adult
- F. ensure they follow the Staff Code of Conduct as outlined in the Staff Quick Guide.

As part of the mandatory online training **All Staff** must read and understand Part 1 of Keeping Children Safe in Education. If a DSL is not available any staff member who has a concern about a child's welfare should liaise with their manager following the referral processes set out in paragraph 56 of KCSIE, ensuring that any and all communication is documented. Staff should expect to support social workers and other agencies following any referral.

2. Designated Safeguarding Leads and Officers

The College's safeguarding arrangements are overseen by the Executive Director Resources & Student Experience, supported by the Head of Student Experience & Safeguarding (DSL) who manages operational delivery.

The Designated Safeguarding Lead maintains overall picture of the safeguarding concerns received. The DSL along with the Safeguarding Officers, act as the College's source of support, advice and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend specific training as appropriate, liaise with the Head of Student Experience & Safeguarding, College Management Team and other College departments where necessary, and make referrals to external agencies. Other aspects of their role include:

- obtaining information from staff, volunteers, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information.
- assessing information quickly and carefully and asking for further information where appropriate.

- consulting with relevant local safeguarding children partnerships and adult safeguarding teams, to clarify doubts or worries and ensure consistency and integrity of local processes.
- making referrals to statutory child protection agencies, i.e. through the Multi Agency Safeguarding Hub (MASH) or the Police without delay, and working in full cooperation with external agencies as required
- maintaining appropriate records of any safeguarding referral, complaint or concern (even if that concern does not lead to a referral).
- ensuring that parents of children within the College are aware of the College's Child Protection and Vulnerable Adult policy.
- working with external agencies and organisations including Prevent Leads to ensure students are kept safe.
- working with Human Resources to ensure that staff receive basic training in child protection issues and are aware of the College safeguarding procedures.

Additionally, the Designated Safeguarding Leads will:

- convene regular operational and strategy meetings to ensure coherence, integrity and monitoring of processes relating to the safeguarding of children and vulnerable adults.
- work closely with the Executive Director Resources & Student Experience and the Head of Student Experience to ensure that policies and procedures comply with legislation.
- work with local Youth Offending Services and Probation Services to ensure that applications from offender learners are risk assessed.
- Ensure that the Safeguarding for Children and Vulnerable Adult Policy is presented to the Corporation for approval annually.
- provide an annual report to the Corporation of the College setting out how the College has discharged its duties.
- alert the Principal and the Corporation to identified deficiencies in procedure or policy at the earliest opportunity.
- The Executive Director Resources & Student Experience will retain ultimate lead responsibility for the College's arrangements and the procedures for safeguarding.

3. The Principal

is responsible for ensuring that:

- the College's Safeguarding policy and procedures are fully implemented and followed staff.
- Designated Safeguarding Leads have sufficient time and resources to carry out their roles.
- all staff feel able to raise concerns about the safety of children and vulnerable adults.
- such concerns are dealt with sensitively, effectively and in a timely manner.
- Governors and staff receive regular safeguarding training and updates

4. The Governing Body:

As set out in Keeping Children Safe in Education 2021, College Governors must ensure that they:

- The College complies with its duties under the legislation.
- An appropriately Governor Safeguarding Lead is appointed.
- Appropriate policies and procedures are in place, that the Safeguarding Policy is updated annually and is available to the public.
- Arrangements are in place for children who go missing from education.
- The College contributes to inter-agency working in line with the statutory guidance (Working Together to Safeguard Children 2018).
- Safeguarding arrangements take into account the procedures and practice of the relevant

- local authorities and Local Safeguarding Children Partnership
- Information sharing between agencies is appropriately facilitated and promoted and is not a barrier to the promotion of welfare.
 - all members of staff undergo safeguarding training at induction and on a regular basis thereafter.
 - that opportunities exist for the expertise of staff to contribute to and shape safeguarding arrangements and policy.
 - appropriate filters and monitoring systems for online safety are in place, including sexting.
 - students are taught about safeguarding, including whilst online, through teaching and learning opportunities, as part of a broad and balanced curriculum.
 - The College has processes for ensuring safe recruitment and dealing with allegations of abuse against members of staff.
 - the student's wishes and feelings are taken into account in determining action and support.
 - staff have the skills, knowledge and understanding necessary to keep "*Looked After Young People*" safe, and that a Designated Safeguarding Lead (DSL) is in place.
 - there is an External Speakers/Visitors Policy in place.

5. College Management Team

All college managers have a responsibility to ensure that staff in their areas are informed of the policy and procedures and that their areas are managed with due regard to the College's commitment to safeguarding and promoting the welfare of children, young people and vulnerable adults. In the case of Curriculum Managers (CQTM) this includes the delivery of a curriculum and contributing to tutorial arrangements.

6. Contractors working at College sites:

Contractors undertaking work at College sites are required to:

- Conform to the College's Health and Safety and Safeguarding requirements.
- Agree with the College's requirements for briefing contractor's staff. This will depend on the nature, location and duration of the work
- Contractors will be given a pink coloured lanyard

7. Safer recruitment and training

West Thames College ensures that all appropriate measures are applied in relation to everyone who works in the College who is likely to be perceived by the student as a safe and trustworthy adult, including volunteers and staff employed by agencies. Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the candidate against the Disclosure & Barring Service (Enhanced DBS) in accordance with Keeping Children Safe in Education.

In line with statutory changes, underpinned by regulations, the College will maintain a Single Central Record (SCR). This document includes all staff, including agency staff, and those providing education to children and ensuring that all individuals (paid employee, volunteer or others) are included in the mandatory online training processes for Safeguarding and Prevent.. This will be updated annually.

8. Safe Practice

Safe working practice ensures that students are safe and that all staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions, work in an open and transparent way, work with other colleagues where possible in situations open to question, discuss and/or take advice from college management over any incident which may give rise to concern and report any incidents following College safeguarding procedure.

Staff are expected to apply the same professional standards regardless of gender, sexuality or disability, are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

College staff having concerns about another member of staff should report these concerns to an appropriate colleague e.g. Manager, Head of HR & Professional Development, where staff members have concerns about the Principal, these will be reported to the Chair of Governors. Where staff members have concerns about the Chair of Governors, these will be reported to the Principal and the Local Authority Designated Officer (LADO)

College staff having concerns about safeguarding practices all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding processes and that such concerns will be taken seriously by the Executive Team.

Staff can view the whistleblowing procedures within the staff handbook, Appropriate whistleblowing procedures are in place for concerns to be raised with the college's Executive Leadership team. Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed [NSPCC Whistleblowing Advice Line](#). Staff can call 0800028 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

9. Staff development and training

All staff and workers who come into direct contact with learners must undertake initial training on the subject of safeguarding, PREVENT, the College's procedures and attend a refresher session yearly.

All new starters must complete the on-line Safeguarding and Prevent training which includes a copy of the latest available version of *'Part One: Safeguarding Information for all Staff'* as appearing in *Keeping Children Safe in Education 2021*, Equality and Diversity, Health & Safety Induction and Fire Safety training within their probationary period, Agency staff and Consultants within 4 weeks of commencing employment and the on-line, The Staff quick guide sign-posts to all relevant College policies and procedures and, and will be asked to indicate that they have read and understood its contents.

All existing staff have completed mandatory Safeguarding and Prevent training which includes a copy of the latest available version of *'Part One: Safeguarding Information for all Staff'* as appearing in *Keeping Children Safe in Education 2021* refreshers annually during CPD days.

In addition, staff will receive regular updates via email, meetings or bulletins to keep their skills and knowledge up to date.

All Designated Safeguarding Leads will undertake training on inter-agency working and refresher training at least every two years, to keep their knowledge and skills up to date. The Lead Governor will also undertake inter-agency training.

10. Prevent Strategy

West Thames College is an inclusive organisation that actively promotes our *Shared Values* based on Integrity, Excellence, Equality and Respect. The Government has placed a duty on educational establishments including Further and Higher Education Colleges that they have a key role in helping prevent people being drawn into terrorism, which includes violent extremism but also non-violent extremism.

The Prevent strategy has three specific strategic objectives;

- Respond: to **ideological** challenge of terrorism and the threat faced from those who promote it;
- Prevent **individuals** from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and **institutions** where there are risks of radicalisation that need to be addressed.

The college will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced whilst protecting students from the risk of harm and abuse.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

11. Confidentiality and sharing information

Data Protection legislation (including GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk.

Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

In cases where the college considers it necessary or has been asked to seek consent from both parents, you may wish to assume that parental consent has not been given unless all parents agree. Such an approach ensures that the college has treated the views of each parent equally

and will also help to safeguard the position of the college in terms of exposure to any potential civil liability where, for example, the student is injured while on a trip.

12. Safeguarding students aged under 16

West Thames College has a significant number of pre-16 students attending the college on a regular basis. All allegations or suspicions of abuse must be reported in line with the colleges safeguarding procedures.

A member of the 14-16 Department will liaise with the school as appropriate, ensuring that the Safeguarding Concern is reported to the appropriate investigating agency, either by the school or by the college. A written record of any discussions/referrals will be made on Myconcern as per college procedure.

The process of safeguarding 14-16 Direct Entry students will remain as per Appendix.

13. Shared Site Providers

Ambitious College, The Rise and The Woodbridge Park Education Service are based on the main campus in Isleworth and Skills + Logistics Centre in Feltham. All staff have a responsibility to ensure that they follow their organisations policy to safeguard and promote the safety and welfare of children, young people and those adult deemed 'vulnerable' as aligned with West Thames College. All policies are stored in a central place.

14. External Referrals - Early Help

If early help is appropriate, the Designated Safeguarding Lead or Safeguarding Officers will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

15. Knife Crime safeguarding students

Knife crime has a huge impact on children and the communities in which they live not just in London but nationally. It is important to remember that knife crime does not exist in a vacuum and children who are victims or perpetrators may also be experiencing multiple vulnerabilities.

Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
- offences such as robbery or assault can be aggravated if a knife is involved
- it is also an offence to carry a knife in a public place without good reason.

West Thames College, as a member of the Hounslow Education Partnership, has worked with local schools and the Metropolitan Police Service to design and sign-up to a consistent approach communicating the warning signs and dangers of knife crime to parents/carers/guardians. This work also includes a consistent approach to weapons possession.

All Staff have a responsibility to ensure the safety of all students whilst on the premises through policies and practice. The college has a zero-tolerance approach to students found in the possession of bladed objects. The *Standards for Success* lays out the clear expectations of students' behaviour.

16. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

It is important for staff to note that the abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

All staff need to know some of the following indicators that may signal that children are at risk from, or are involved with serious violent crime. These include:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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 can be indicators for both CSE and CCE, as can:

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

If staff suspect a student maybe at risk of CSE or CCE they should report following the safeguarding procedure.

17. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

18. Peer on Peer abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). It can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it report it using [MyConcern](#).

All staff should be clear as to the Safeguarding and Disciplinary policies and procedures with regards to peer on peer abuse. Staff should maintain an attitude of ***‘it could happen here’*** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

West Thames College is committed to providing a safe environment for all students to learn and thrive, it is therefore important for all staff to challenge inappropriate behaviours between peers, many of which is listed below, that are actually 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 our students and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.

Staff should not assume a colleague or another professional will take action and report information that might be critical in keeping children safe.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault,

(this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcingsomeone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

19. Tackling female genital mutilation and sexual exploitation

Female genital mutilation or FGM is a severe form of violence against women and girls. It is abuse and therefore a safeguarding matter. FGM is an offence under the Female Genital Mutilation Act 2003 and since October 2015 there has been a statutory duty to report actual or suspected cases.

All suspected cases will be referred as part of the College's existing safeguarding obligations. Any girl or woman presenting with FGM is considered to be a potential victim of crime and will be referred to the Police and relevant support services.

West Thames College is committed to protecting our students from sexual predators and paedophiles. Where there is evidence or suspicion of any student being involved in sexual exploitation this matter will be reported to the Police and relevant support services.

20. Early Help

The college is committed to providing **'Early Help'** to all students identified as needing support. The college will be more effective in promoting the welfare of children than reacting later. Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care.

Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child. Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need

- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including absences for part of their timetabled day.

21. Contacting a Designated Safeguarding Officer

Anyone who suspects that abuse is taking place inside or outside the College setting, or to whom a student discloses issues relating to safeguarding, should contact one of the Safeguarding Officers immediately. Contact information can be found on CONNECT and in the weekly T-Mail.

All staff to whom a student discloses concerns that may be related to safeguarding must report them using [MyConcern](#). Urgent Safeguarding Concerns must be reported immediately to the Safeguarding Team by phone or email.

The Designated Safeguarding Lead will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including contributing to case conferences.

22. What to do if you witness abuse

If a member of staff directly witnesses abuse, an immediate action should be determined by the circumstances, the possible consequences of any delay whilst assistance is requested and the need for the member of staff to have due regard for their own safety.

When the incident concludes the member of staff should stay with the 'victim' until he/she can be left in the care of another responsible adult and the incident should then be immediately reported to a Safeguarding Officer, Security or the line manager, as appropriate. Notes of the incident should be made, dated and signed. See the Safeguarding Reporting Procedure appearing as Appendix 4.

23. Online Safety Including Use of social media and technology

The College understands that the use of technology has become a significant component of many safeguarding issues. An effective approach to online safety empowers our college to protect and educate the whole college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. In child sexual exploitation, radicalisation and sexual predation, for instance, technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

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

The College have appropriate filters and monitoring systems in place. This will be informed by age and access considerations and responsibilities under the Prevent Duty whilst being mindful that 'over-blocking' does not lead to unreasonable restrictions that may impact on teaching and learning.

The College's Strategic plan commits the College to using social media as a learning tool. In doing so it is the duty of staff responsible for setting up these initiatives to ensure that students are given access to information which will help them to protect their identities whilst online. This will be through the tutorial and enrichment programmes.

Staff should be aware of the conditions of use of College and personal IT facilities as set out in the IT acceptable use and E-Safety policies. In terms of their own use of technology, staff should be aware of the following:

- Staff will **NOT** give any student their personal mobile phone number and will only contact the student on their mobile phone from a College landline, College mobile or College messaging facility.
- Staff members should not have personal telephone numbers of any student on their mobile phone.
- Communication by email should only be through the College's email system and personal emails must not be shared with students.
- Staff will ensure that they follow the College's policy about access to and use of the internet.

Any staff with concerns about the inappropriate use of social media or technology or any issues around 'sexting', cyber-bullying or other inappropriate conduct should contact their Manager and Safeguarding Officer without delay.

Remote learning

Where students are being asked to learn online at home teaching staff should ensure students have been given clear guidelines on how to keep safe while learning.

24. Arrangements for Apprentices

The College will work closely with Employers and Apprentices to ensure learners are kept safe from abuse and understand who to contact if they have any concerns. See Appendix 4 for procedures.

25. Risk assessing and supporting offender learners

The College asks students enrolling on courses to declare whether they have unspent criminal convictions. The risk assessment process covers those learners who have declared convictions or are referred either via the Youth Offending Service (YOS), Probation Service or equivalent, or other relevant Police authority, and is set out in the Criminal Conviction Disclosure Policy.

It includes learners who require a DBS as part of their course and for whom a conviction is disclosed.

26. Visitors to College Sites

All visitors are required to sign-in at Reception on arrival and are to be collected and returned to Reception by the person they have arrived to see.

Staff are required to complete an External Visiting Speakers form to cover the risk assessment of visiting speakers and other visitors to College sites.

27. Multi-Agency Working

Arrangements are in place with our safeguarding partners e.g. Local Authority, Police, Clinical Commissioning Group (CCG) and Education with published list of relevant agencies who have equal and joint responsibility for safeguarding. All details and description is on partnership page of www.hscb.org.uk. All staff including the Executive Team, DSL and Governing body have been made aware of these arrangements.

The College will allow access to children's and adult's social care from the host authority and, where appropriate, from a placing authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment relating to the person's circumstances or risk of abuse. The College recognises the importance of information sharing between professionals and local agencies and that data protection fears should not be a barrier to information sharing as the safety of the child or vulnerable adult should be of the utmost importance.

28. Procedures

The College follows the government guidance as set out in Keeping Children Safe in Education:

- Ensure the College has a Designated Safeguarding Lead for child protection who has received appropriate training and support for this role. This will be a senior manager of the College.
- Ensure there is a nominated Governor responsible for child protection.
- Ensure every member of staff (including temporary and supply staff and volunteers) and the Corporation knows the name of the Designated Safeguarding Lead responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse including extremism and radicalisation and responsibility for referring any concerns to the designated senior person or the nominated person responsible for child protection.
- Ensure that parents have an understanding of the responsibility placed on the College and staff for child protection by publicising these obligations.
- Notify children's social care if there is an unexplained absence of a child who has a child protection plan.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences and local networks.
- Keep written chronological records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, separate from the main Student file, and in secure locations.

- Follow local authority procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

Detailed advice for the guidance of College staff appears as Appendix 4.

29. Safeguarding Team

All designated staff (with the exception of the Designated Corporation Member for Safeguarding) can be contacted on the College’s dedicated safeguarding email:

Email: safeguardingdisclosure@west-thames.ac.uk, names and contact details are given below:

Designation	Post Held	Name	Extension
Executive Chair of Safeguarding and Prevent (DSL)	Executive Director Resources & Student Experience	Michael Michaelides	2035
Designated Safeguarding & Prevent Lead (DSL)	Head of Student Experience & Safeguarding	Samantha Louisy	6827
Designated Safeguarding & Prevent Lead (DSL)	Head of Quality and Standards	Graeme Baker	2160
Designated Safeguarding Lead (DSL) (Skills Centre + 14-16)	Director of Skills + Logistic Centre	Beverley McGuire	6850
Designated Safeguarding Lead (DSL) 14-16	Alternative Provision Manager (14-16)	Julie Macsorley	2041
Safeguarding Officers	Student Experience Coordinator	Jaskaran Sidhu	2393
	Student Experience Coordinator	Lucy Jackson	6867
Safeguarding Administrator	Student Experience & Safeguarding Administrator	Davinder Marwaha	2117
Allegations against or Staff Concerns	Head of HR	Louise Owen	2296
Allegations against the Principal	Chair of Governor	Simon Wilcox	2323
College Governor	Governor Safeguarding Lead	Laura Weatherill	2323

Appendix 1 – Indicators of abuse and neglect

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. It is important to remind staff of their legal responsibility to read Part One of Keeping Children Safe in Education 2021.

Abuse

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. 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

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 (also known as peer on peer abuse) all staff should be aware of it the colleges policy and procedures for supporting the student and reporting it.

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 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 care-givers); or ensure access to

appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other safeguarding issues all staff should be aware of include:

Abuse of Trust

All staff need to know that inappropriate behaviour with or towards children is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for a person over 18 (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if he/she does not teach the child.

Serious Violence

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

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. The DLS and Safeguarding Officers will 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 reported following the safeguarding procedure.

Mental Health

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 students 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 student that is also a safeguarding concern, immediate action should be taken, following the safeguarding procedure as shown in Appendix 3.

Cyber-Bullying

"Cyber-bullying" is when a child is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another child using the Internet, interactive and digital technologies or mobile phones. It has to have a minor on both sides, or at least have been instigated by a minor against another minor. Once adults become involved, it is plain and simple cyber-harassment or cyber-stalking.

Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

Financial abuse

Money can be a very powerful method for a perpetrator to exert control. But what is financial abuse. Financial abuse may include: Taking money from the person; not allowing them access to shared money; making them account for everything spent; making them beg for money; causing them to lose, or forcing them to give up, employment; forcing them to commit crimes for money; not allowing them to buy necessities, for themselves or their children, including sufficient food; withholding of child maintenance. Financial abuse can also be when the perpetrator is spending money needed to maintain the home on themselves and may continue after a relationship has ended.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Children missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include including neglect, sexual abuse, and child sexual and criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the college's unauthorised absence and children missing from education procedures.

Curriculum Quality Team Manager supported by Student Learning Advisors ensure that learners not attending for any reason are followed up.

The Safeguarding Designated Leads will routinely liaise with education services and refer any persistent non-attendance as well as any in-year withdrawals due to non-attendance, so that if there are any undisclosed safeguarding or child protection issues these can be acted upon by the relevant borough children's services.

Looked after children and previously looked after (LAC)

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Head of Inclusion, Student Learning Advisor, and Designated Safeguarding Lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Care Leavers

The Head of Inclusion holds the information regarding allocated local authority Personal Advisor who is appointed to guide and support the care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

Local Authority Designated Officer (LADO), statutory guidance and procedures state that every Council has a duty to manage allegations and concerns about any person who works with children and young people in their area.

Appendix 2 - Possible Signs & Symptoms of Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list and many of the signs and symptoms could fall into more than one category. Guidance on recognising signs & symptoms of can be found in [Part A, Chapter 1. Section 1.1 of London Child Protection Procedures \(2016\)](#). Students with learning difficulties often exhibit some of these signs (*e.g. reluctance to get undressed for physical activities, constant tiredness*) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that disabled young people are 3 times more likely to experience abuse or neglect than non-disabled peers.

Physical Abuse

- Unexplained and so called “accidental” injuries, burns or bruising
- Improbable excuses or refusal to explain injuries
- Refusal to undress for physical activities
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted

Emotional Abuse

- Physical, mental and emotional development delays
- Sudden speech disorders
- Continual self-deprecation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual attention seeking behaviour
- Extremes of passivity or aggression

Sexual Abuse

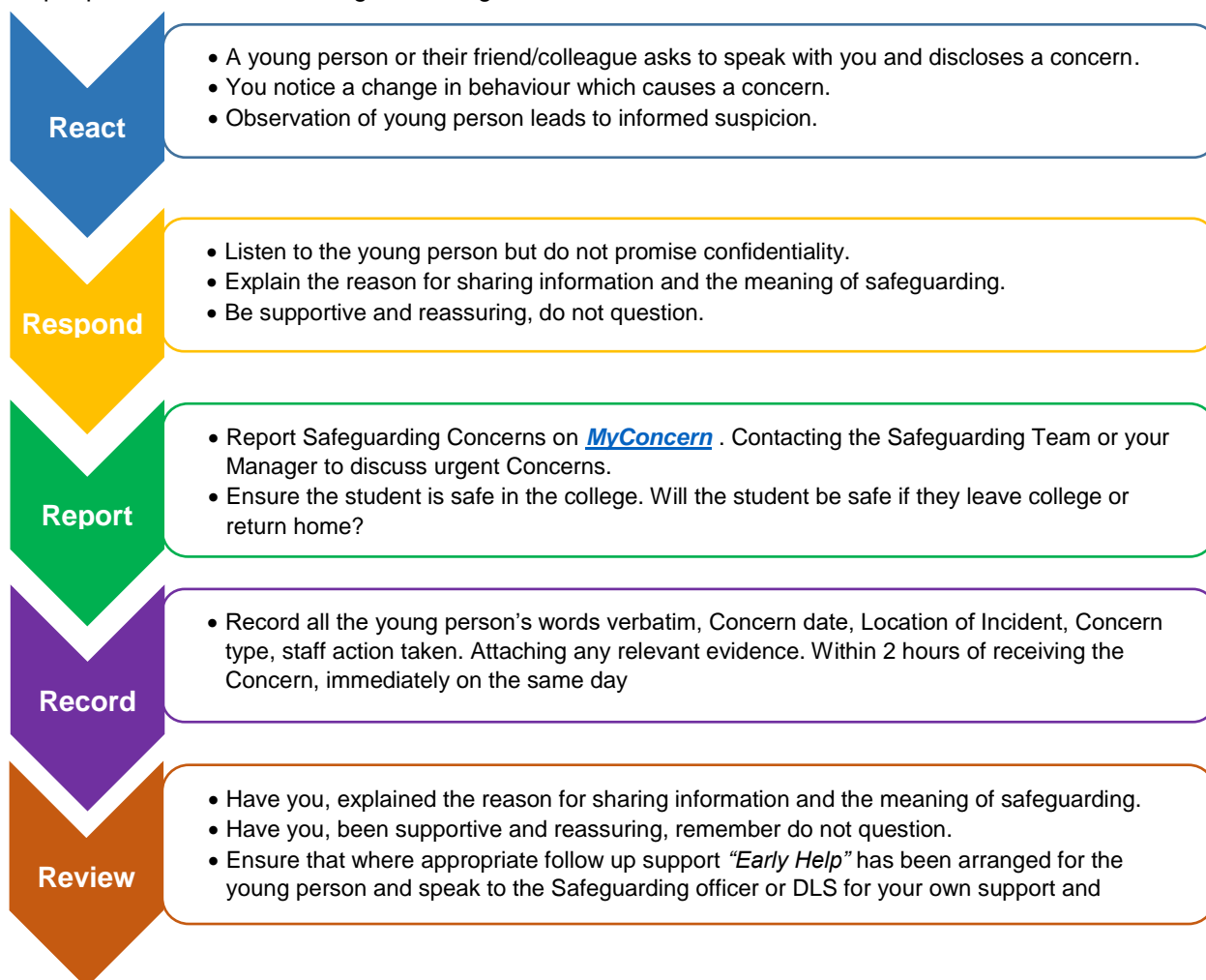
- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Itchy or pain in the genital area
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Neglect

- Constant hunger
- Poor personal hygiene, poor state of clothing
- Constant tiredness
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Stealing food/money
- Poor college attendance
- Compulsive attention seeking

Appendix 3 - Detecting and Responding to Safeguarding & Prevent Concerns

Safeguarding is everyone's responsibility. All college staff must remain alert to the changing behaviours of a young person and their parents/carers which raises safeguarding concerns. Do not let other considerations, like the fear of damaging relationships with adults, get in the way of protecting young people, refer to the following 5 R's for guidance.



Dealing with a safeguarding concerns

Abuse can happen anywhere, and at any time. A staff member may be the first person that a child or vulnerable adult has discussed the abuse with. The member of staff's response to the person at this stage is crucial.

If a member of staff is told about actual or possible abuse, it is essential that they:

- **listen carefully and stay calm**
- **do not interview the child, merely clarify, in order to be sure that they understand what the child is telling them**
- **do not put words into the person's mouth**
- **Using [MyConcern](#) make a detailed report of the date, time, place, what the person said and did**
- **report any actions you have taken**

Staff should not investigate concerns or allegations themselves, but should report them immediately to a Safeguarding Officer. A reporting procedure appears at Appendix 4 and detailed procedures for the management of Safeguarding Concerns and allegations appears as Appendix 5.

Appendix 4: Safeguarding Reporting Procedure

If a student says they want to discuss something serious with you but seeks assurance that you will keep it confidential referring to the 5 R's in Appendix 3. You should explain that you cannot promise complete confidentiality in all circumstances as there are some things, such as child protection matters, that you have to report to others.

If the student then decides they do not wish to tell you more:

If the student does not wish to continue, they should be encouraged to access support. This could be from a member of their Student Learning Advisor, Safeguarding team or the College Counsellor.

Always ***err on the side of caution*** if you are left feeling worried or seriously concerned about the student, you should report this to a member of the Safeguarding Team.

You should:

- Inform the student that you must pass the information on, but that only those who need to know will be told. Assure them that they will be kept informed of developments
- Using MyConcern report what the student told you as soon as you can, using the student's own words, including the time, the setting and names of those present and give this immediately to a member of the Safeguarding Team. This should include the basic facts of the allegation, information about any visible injuries, the student's preferred course of action and their contact details.
- Inform the student that a member of the Safeguarding Team will make contact with them

If the safeguarding concern is made by a parent/guardian/carer, you should follow the same procedure and refer them to a member of the Safeguarding Team.

Individual staff should never deal with safeguarding concerns in isolation and should always refer to a member of the Safeguarding Team who has responsibility for child/vulnerable adult protection. The Designated Safeguarding Lead will usually decide whether to make a referral to Social Services or the Police, but it is important to note, any member of staff can refer their concerns directly. Please note: should any member of staff refer directly, they **MUST** at the earliest opportunity discuss the referral with the Designated Safeguarding Lead.

No member of staff should give a student their personal phone numbers, email address, home address or make contact via social media.

Once a referral is made to a member of the Safeguarding Team they will undertake the following: -

The member of the Safeguarding Team will make an initial assessment of the allegation; consult with the staff involved and the Designated Safeguarding Lead as appropriate. This will usually involve speaking to the student at the earliest opportunity.

A first priority is to ensure that the student is not in any immediate danger. Safeguarding Officers will seek medical attention if the student is suffering from a serious injury.

The student will be asked to repeat the safeguarding concern they have made. An account of the Concern must be reported on [MyConcern](#).

If the Concern meets the threshold for referral, the Designated Safeguarding Lead will support the student by contacting Social Services/ the Police Child Abuse Investigation Team/ the Forced Marriage Unit/ the NSPCC and/or College Counsellors, or any other agencies as necessary.

When a student is not sure about taking the allegation forward, a Safeguarding Officer or Designated Safeguarding Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.

Where appropriate, concerns may be discussed with a parent or guardian unless this may, either by delay or the behavioural response it may prompt, place the student at risk of further harm. The student's view will also be considered in deciding whether to contact their parent/guardian. A written record will be made of any discussion with parents or guardians.

In the event of a referral, the Safeguarding Officer or Designated Safeguarding Lead should inform the student of the proposed action and the reasons for the decision. Ideally this should happen before the appropriate agency is informed, unless doing so would place the student at greater risk of further harm.

The Safeguarding Officer or Designated Safeguarding Lead should contact Children or Adult Social Care of the appropriate local authority by telephone, in the first instance, and record the date and time this took place. The Designated Safeguarding Lead will agree with the recipient of the referral what the student and parents will be told, by whom and when. The Designated Safeguarding Lead will make a confirmation of the referral in writing within 48 hours.

All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential in a securely locked location and in accordance with the Data Protection Act 2018. However, where the police are involved then such records may need to be disclosed.

A Designated Safeguarding Lead will be the College contact if Social Services or the Police require further information about the student, and if necessary, represent the College at multi-agency strategy discussions or protection conferences. Other members of the Safeguarding Team may also represent the College at external meetings if appropriate.

There may be instances where more than one member of the Safeguarding Team will be involved in a particular concern. On occasion they may work collaboratively to deal with a case.

14-16 year-old students

- School will provide the college with information about each student to help assess any support needs.
- Support meeting or Risk assessment meetings will be carried out by College with Parent/School/Student if necessary.
- Students will be provided with a black coloured lanyard
- Induction will be provided by the teaching team in line with the college Induction process.
- Registers will be taken and any absences will be communicated to the parent/carers after 20 minutes of students not arriving to class, this is then recorded on Promonitor.
- Tutors follow up all student absences and punctuality concerns recording communications/interventions on Promonitor.
- In the event of students breaking college rules, the college will follow the college Disciplinary Policy and the school and or Local Authority will be notified.
- Schools receive weekly attendance reports, and if there are any issues or concerns they are included in all correspondence as well as being invited to any meetings.
- In the case where the college need to report and deal with a concern of abuse the colleges Alternative Provision Manager will contact the schools Designated Person.

WEX & Apprentices

- Employers will be visited by a WEX Advisor who will carry out a Health and Safety audit/inspection and risk assessment if required.
- Employers will provide name and contact details of the college Designated Safeguarding Lead.
- Employers will be provided with the relevant college policies and procedures and agree that they have understood them.
- Students undertaking work experience or Apprentices will be given an induction where staying safe and Prevent are included.
- Students undertaking work experience or Apprentices will be given the contact details of the college Designated Safeguarding Lead.

Appendix 5 - Procedure for Managing Allegations against a Member of Staff

Allegations of abuse against College staff

Any allegation made against a member of staff can be very damaging, irrespective of the outcome of any investigation. Keeping Children Safe in Education part 4, instructs the college on how to manage allegations which includes low level concerns. Conduct of College staff appears in Appendix 6.

Receiving and recording allegations

A member of staff who receives an allegation about another member of staff from a child or vulnerable adult should follow the guidelines in Appendix 5 for reporting a concern.

The allegation should be reported immediately to the Manager, Head of HR & Professional Development or Principal unless the Manager, Head of HR & Professional Development or Principal is the person against whom the allegation is made, in which case the report should be made to the Chair of the Corporation. The Head of HR & Professional Development or Principal may delegate responsibility to the Designated Safeguarding Lead who should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Designated Safeguarding Lead
- Record information about times, dates, locations and names of potential witnesses.
- Carry out an initial assessment of the allegation (after consulting with the appropriate Safeguarding Partner/or Local Authority Designated Officer (LADO) www.hscb.org.uk)
- Where the allegation is considered to be either a potential criminal act or indicates that the person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the relevant Safeguarding Children Partnership.

It is important that the Head of HR & Professional Development or Principal does not investigate the allegation. The initial assessment should be on the basis of the information received and should result in a decision whether or not the allegation warrants further investigation.

In certain cases the allegation may represent inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or vulnerable adult. In such cases the matter should be addressed in accordance with the College Staff Disciplinary Procedures. In other cases the allegation may be able to be shown to be false because the facts alleged could not possibly be true (see Unsubstantiated, Malicious or False Allegations below).

Receiving an allegation

Where a student makes an allegation to a member of staff

- Listen carefully to the student
- Ask them to explain or say more if you are not clear, but do not ask leading questions or offer alternative suggestions. (**Remember who, where, when, what, how, why**).
- If possible and with the agreement of the student, arrange for another member of staff to be present when taking a report from a student.
- Do not attempt to investigate the allegation yourself.
- Do not promise that you can keep confidential what the student has disclosed as you may have an obligation to report what they tell you. Use [MyConcern](#) to report Safeguarding Concerns received. The Concern Type and actions taken must be included in the report. **Share with colleagues only on a need to know basis.**

Where a parent makes an allegation

- Listen carefully to the parent
- Ask them to explain or say more if you are not clear (**remember who, where, when, what, how, why**). Do not attempt to investigate the allegation yourself.
- Inform the parent that allegations are taken seriously and will always be investigated.
- Remind the parent that the College has a Safeguarding for Children and Vulnerable Adults policy and procedures to investigate allegations.
- Write down as much detail as you can. All records of concerns and actions taken should be recorded and stored securely and confidentially. Share with colleagues only on a need to know basis.

Where another member of staff makes an allegation

Remind the member of staff that they should not discuss the allegation with other members of staff.

What Happens Next?

Taking into account all the information available, the Head of HR, Principal or Executive Director will decide on the next steps.

Enquiries and Investigations

Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Principal, Executive Director or Designated Safeguarding Lead should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal, Executive Director or Designated Safeguarding Lead is responsible for ensuring that the College assists with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The member of staff will be advised of their right to consult with a representative, (eg trade union representative).

- **Subject to agreement from the police or other investigating agency**, the Principal, Executive Director or Designated Safeguarding Lead shall:
- Depending on their age, ensure that the parents/carers of the person making the allegation have been informed that the allegation has been made
- inform the person making the allegation, or their parent/carer, that the investigation is taking place and what the likely process will involve
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- inform the Chair of the Corporation of the allegation and the investigation.

The Principal, Executive Director or Designated Safeguarding Lead shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic and may be considered at any stage of the investigation. Any decision to suspend a member of staff will be carried out in line with the College's Staff Disciplinary Policy.

The Principal (or Chair of the Corporation) shall consider carefully who is informed of the suspension and investigation. The Safeguarding Children Partnership and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the College's Staff Disciplinary procedures.

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with College's Staff Disciplinary Policy.

The person making the allegation (and if under 18, their parents) should be informed of the outcome of the investigation and proceedings.

The Principal should give consideration to what information should be made available to the general population of the College.

Unsubstantiated, malicious or false allegations

False, malicious or unsubstantiated allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Safeguarding Children Partnership in order that other agencies may act upon the information.

In consultation with the Executive Director, Designated Safeguarding Lead, Head of HR & Professional Development and the Principal shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken,
- give consideration to offering counselling/support,
- inform the parents/carers of the alleged victim of the outcome, where the victim is under 18,
- where the allegation was made by a person other than the alleged victim, consideration to be given to informing him/her or the parents/carers of that person, unless doing so would put the person at further risk,
- prepare a report outlining the allegation and giving reasons for the conclusion that it was either unsubstantiated, malicious or false and confirming that the above action had been taken.

Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, the College is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

Duty to refer to the Disclosure and Barring Service

If the College believes a person has "caused harm or poses a future risk of harm to vulnerable groups, including children" a referral about the person should be made to the Disclosure and Barring Service (DBS).

The Home Office further states that "an employer or volunteer manager is breaking the law if they knowingly employ someone in a regulated activity with a group from which they are barred from working". In addition, a "barred person" is breaking the law if they seek, offer or engage in regulated activity with a group from which they are barred from working, whether paid or voluntary.

There is an additional responsibility for the College if they are referring a teacher to the DBS. The College "should also consider referring the case to the Teaching Agency" who are responsible for regulating teachers in cases of "serious misconduct".

- Full details of the process relating to staff DBS checks can be found in the Recruitment and Selection Handbook

Support for staff

The College is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, the Designated Safeguarding Lead or with a trained counsellor. Staff wishing to be referred for counselling should contact HR.

Appendix 6 - Guidance on the conduct of College Staff

The College recognises that it is not practical to provide definitive instructions that would apply to all situations at all times when staff come into contact with children or vulnerable adults and to guarantee the protection of all involved.

Set out below are the standards of behaviour required of staff in order to fulfil their roles within the College. This code should assist in the protection of children, vulnerable adults and members of staff.

These guidelines also apply to volunteers who work in an unpaid capacity, all visitors and contractors.

Staff must:

- implement this protocol at all times.
- be aware of the potential risks at all times.
- take all reasonable protective measures when interviewing students (***such as, ask another person to be present and sit in a room where it is possible to be observed.***)

Staff must never:

- engage in a personal relationship with a student, beyond that appropriate for a normal teacher/ student relationship.
- allow or engage in inappropriate touching of any kind. The main principles of touch are: touch should always be in response to the student's need; touch should always be appropriate to the age and stage of development of the student; touch should always be with a student's permission
- engage in rough, physical games including horseplay with students.
- do things of a personal nature for student's that they can do for themselves or that their parent can do for them.
- physically restrain a student unless the restraint is to prevent physical injury of the student/other young people/visitors/staff or yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a student.
- have a student on their own in a vehicle. Where circumstances require the transportation of a student in a vehicle, another member of staff/ volunteer must travel in the vehicle. Also it is essential that there is adequate insurance for the vehicle to cover transporting students as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a student on their own, it is essential that another teacher and the parent is notified immediately
- take a student to the toilet unless another adult is present or has been made aware (this may include a parent, group leader) or as set out in the student's personal plan.
- spend time alone with a student on his/her own outside of the normal tutorial / classroom situation. If you find you are in a situation where you are alone with a student, make sure that you can be clearly observed by others.
- Engage with a student by personal electronic means, e.g. Facebook, e-mail, text. Where such contact is professionally necessary, College systems should be used.

Appendix 7 - Prevent

Detecting Radicalisation and Extremism - 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, protecting students from this risk is part of the colleges safeguarding approach.

- [Extremism](#) is the vocal or active opposition to our fundamental [Share Values](#), including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- [Radicalisation](#) refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. 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 them in. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately discussing their concerns with the designated safeguarding lead.

If you are a student:

- concerned about another student please "**Check**" with your SLA in the first instance and "**Share**" with the Safeguarding Team in Student Experience.
- 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 in Student Experience and "**Share**" with the Student Experience manager or the Executive Director.
- **If you are a member of staff:**
- concerned about a student, please "**Check**" and "**Share**" with the Safeguarding Team in Student Experience.
- concerned about another member of staff please "**Check**" with your Line Manager and "**Share**" with the Head of HR & Professional Development and Executive Director.
- concerned about a person who is not a member of the College, e.g. guest speaker, please "**Check**" and "**Share**" with the Student Experience Manager.

Referral Protocol

- Any member of staff may have suspicions that a student or colleague is vulnerable to radicalisation. Concerns may be based on appearance, opinions expressed, language used or changes in any of these over time.

- Such concerns should be raised with a Safeguarding Officer. You should not approach the person about whom you have the concern.
- The Safeguarding Officer will conduct a risk assessment and collect whatever additional information they need but the potential victim of radicalisation will not be contacted at this stage.
- If they conclude that the risk is credible they will raise this with the Designated Safeguarding Lead or Executive Director. If the potential victim is an employee of the college, the Head of HR & Professional Development will also be consulted.
- If it is concluded that the matter is to be reported externally, the local Prevent Coordinator will be contacted for advice in the first instance.

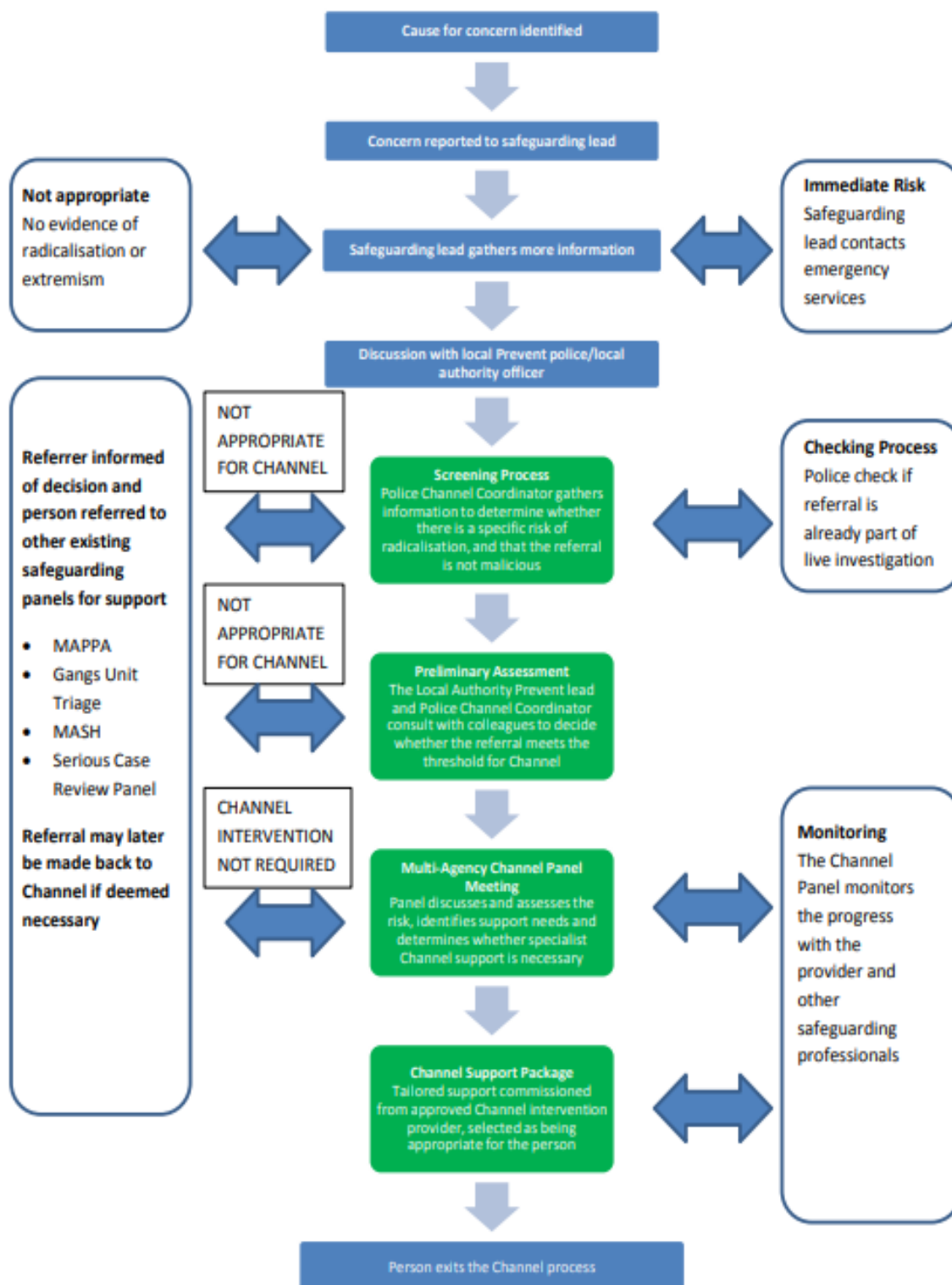
Possible outcomes would be:

- The matter is not to be taken further
- A background investigation will be undertaken by the Police, and in some cases
- The matter will be referred to the local Channel Panel*

Having referred a concern to the Prevent Coordinator (stage 7.3.5) the College will act under the Coordinator's advice and will only approach the subject of the concern if requested to do so.

**Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Each panel meeting is chaired by the local authority and brings together a range of multi-agency partners to collectively assess the risk. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person concerned.*

The Channel Process within FE Colleges (Prevent) *also used with WTC sub-contractors.*



Appendix 8 - Notifications of infectious diseases (NOIDs)

Concerns regarding NOIDs should be referred using the same procedure as for Safeguarding.

Notification of infectious diseases is the term used to refer to the statutory duties for reporting notifiable diseases. This statutory notification of infectious diseases has been a crucial health protection measure in the UK for over one hundred years. The purpose of notification is to enable the prompt investigation, risk assessment and response to cases of infectious disease and contamination that present a significant risk to human health.

Health protection legislation in England has been updated from 6 April 2010 to give public authorities modernised powers and duties to prevent and control risks to human health from infection or contamination.

The main feature of the legislation is to: extend the long-standing requirement on registered medical practitioners (RMPs) to notify the proper officer of a local authority of individual cases of specified infectious diseases (notifiable diseases) by also requiring them to notify cases of other infections or of contamination which they believe present, or could present, a significant risk to human health.

The measures are contained in the Public Health (Control of Disease) Act 1984 (as amended) together with the Health Protection (Local Authority Powers) Regulations 2010 and the Health Protection (Part 2A Orders) Regulations 2010.

These powers enable a local authority to request or require action to be taken to prevent, protect against or control a significant risk to human health.

They allow local authorities to:

- require that a child or young person is kept away from school/college;
- require a Head teacher/Principal to provide a list of contact details of students
- disinfect/decontaminate premises or articles on request;

Following any reasonable grounds for suspecting or a disclosure from students/staff, the Head of Student Service and/or the Human Resources Manager should be informed.

List of notifiable diseases

Examples of infections that should be notified under this provision are provided below for guidance.

- Acute meningitis
- COVID-19
- Diphtheria
- Food Poisoning
- Malaria
- Measles
- Meningococcal septicaemia
- Mumps
- Tuberculosis (TB)

A full list available at: <https://www.gov.uk/notifiable-diseases-and-causative-organisms-how-to-report#list-of-notifiable-diseases>

Appendix 9 – Linked College policies, procedures and Government Guide Lines

The following policies which are held on Connect should also be looked at for reference:

- Recruitment and Selection Handbook
- Whistle blowing procedure)
- E-safety Policy
- Work Experience Policy
- Searching of Students Policy and Physical Restraint Policy
- Data Protection Policy (Sept 2011) and Data protection Guidelines
- Code of Conduct
- Anti-bullying and Harassment Policy – Students
- Bullying and Harassment Policy
- How to Complain – A guide to the complaints procedure
- Academic and Misconduct Disciplinary Procedures
- Policy on Employment of ex-offenders
- Policy statement on recruitment of ex-offenders
- ICT Acceptable Use Policy – Staff
- ICT Acceptable Use Policy – Students
- E-Safety checklist – staff
- Procedures and guidelines for staff)
- [Safeguarding children and vulnerable adults: quick guide for staff](#)
- [Safeguarding and Prevent duty for employers](#)
- Staff Disciplinary Procedure
- [Partner Schools Safeguarding Policies - Onsite](#)
- [Hounslow Thresholds and Referral Protocol and HSCP Escalation Policy](#)

Government Guidelines

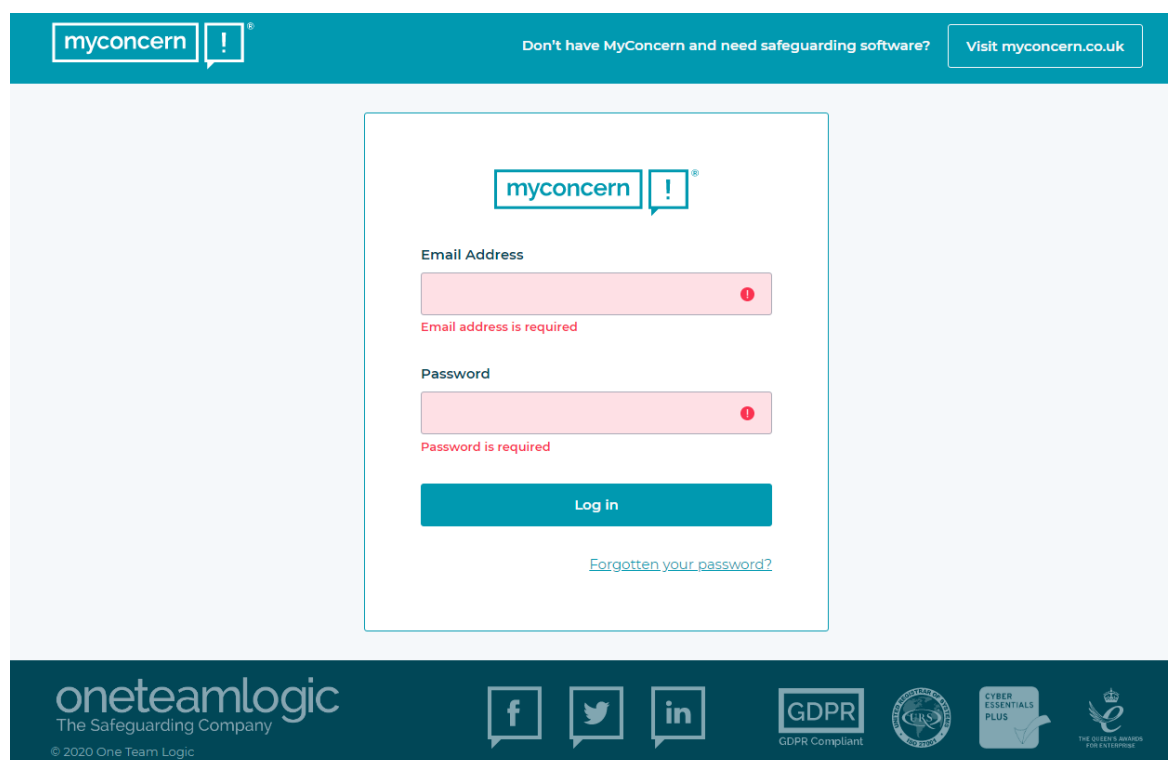
- [Keeping Children Safe In Education 2021](#)
- [Sexual Violence and Sexual Harrassment between children in schools and colleges 2021.pdf](#)
- [Revised Prevent duty guidance. Updated 1 April 2021](#)
- [Promoting children and young peoples emotional health and wellbeing . 2021](#)
- [Criminal exploitation of children and vulnerable adults county lines . 2020](#)
- [Working Together to Safeguard Children 2018.pdf](#)
- [Understanding and dealing with issues relating to parentalresponsibility, Updated 2018](#)
- [Mental health and behaviour in schools. 2018](#)
- [Preventing and tackling bullying advice. 2017](#)
- [Part A, Chapter 1. Section1.1 of London Child Protection Procedures \(2016\)](#)
- [Protection of Freedoms Act 2012](#)
- [Preventing youth violence and gang involvement. 2013](#)
- [Safeguarding Vulnerable Groups Act \(2006\)](#)
- [Disclosure and Barring Service](#)

Appendix 10: Myconcern

MyConcern is a simple, safe, and secure solution for recording and managing all safeguarding concerns. It gives staff peace of mind by allowing their concerns to be communicated, listened to, and understood as well as having easily accessible guidance to policy and information.

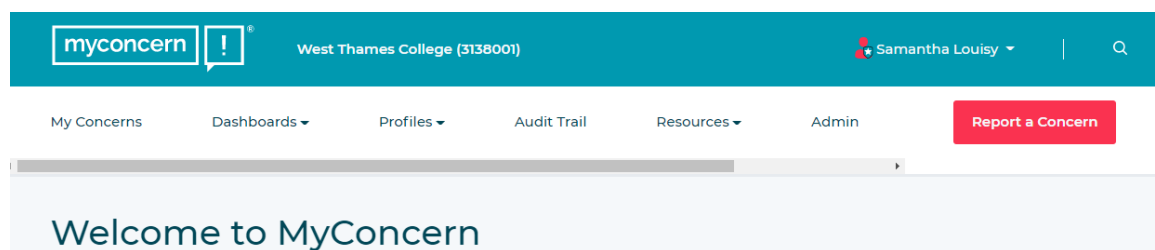
An account has been created for staff on MyConcern and you will receive an email invitation with a hyperlink to the MyConcern log-in screen.

Insert your username (your email address) and create a password for the first time. Once you have logged in to MyConcern you will be taken to the Home Page where you will be able to report



Reporting a concern

There is a large red button on the **Home Page** that enables you to **“Report a Concern”**.



Select **‘Report a Concern’** from the Home Page and complete the on-screen form. There is guidance on how to fill this in when you click on the individual sections.

Start typing a student’s name and then PAUSE – Click on the relevant name from the drop down list.

Concern Type: (Mental, Emotional, Physical Health, Neglect, Domestic Violence, Sexual Exploitation, Cyber-Bullying, FGM, Forced Marriage, Radiclisation)

Concern Summary

e.g. Injury – Megan arrived at College this morning with a badly bruised right eye.

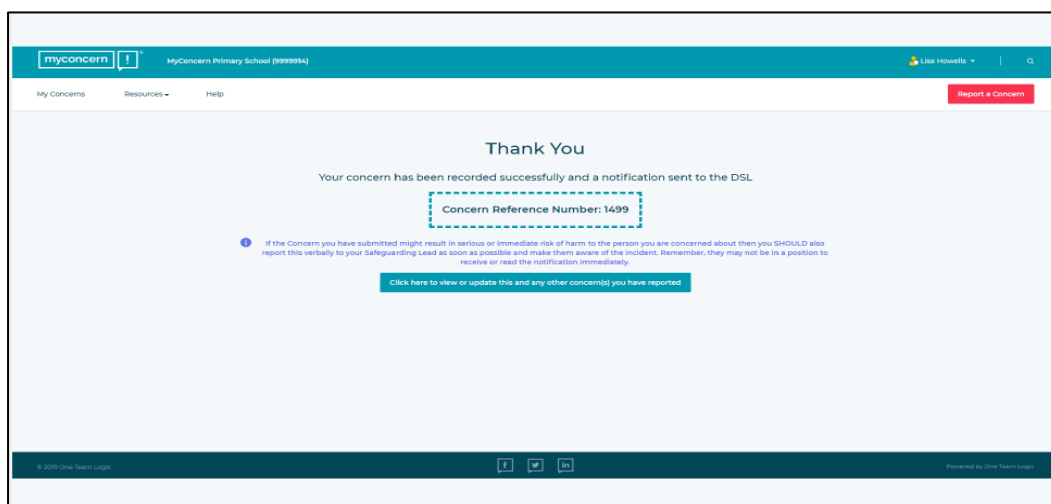
If required you will also have the option to submit documents by uploading them.

Attachment

Select File

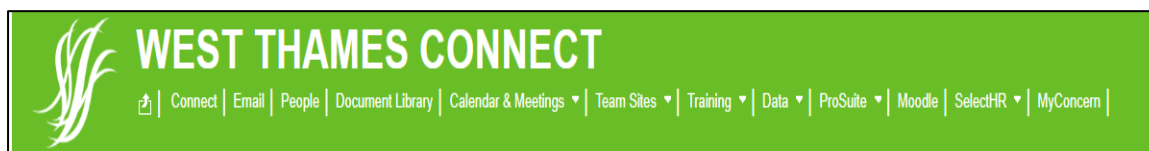
Please attach any media that is relevant to this concern.

Once you have submitted your concern the system will forward an automated email notification to the Designated Safeguarding Lead(s) and you will see an on-screen receipt with a reference number for your concern.



Please note: The Designated Safeguarding Lead(s) may not be in a position to view the notification immediately. If the concern you are reporting is of an urgent nature then it is recommended that you contact the Safeguarding Officer on duty.

For instant access MyConcern has been placed on CONNECT.



Appendix 11 - Case studies for discussion

One - Rebecca is 16. After a PHSE lesson she tells you that her mum has a new boyfriend. She says she is pleased for her mum but wishes she wasn't left in charge so often.

Rebecca tells you that her mum works really long hours and that she has to collect her younger brothers from school and look after them until she gets in from work. Most weekends her mum goes to see her boyfriend leaving Rebecca and her little brothers.

Sometimes she doesn't get back till late or forgets to leave money to buy food and there is nothing in the house to eat. Rebecca tells you that last weekend the youngest child was sick all night and that she didn't know what to do.

Rebecca says she is always getting into trouble for coming into school late and for not doing her coursework, but she feels tired and dizzy and cannot concentrate.

Primary type of abuse: _____

1. Consult with safeguarding colleague
2. Make a referral to social services/Multi Agency Safeguarding Hub (MASH)
3. No action
4. Do not know
5. No abuse

Two - Tunde is 16. He is a cheeky outgoing young man who is popular with staff and students. He comes into school one day with a cut under his right eye along his cheek-bone. You make a point of finding him during the day and ask him what has happened to his face. He tells you that he has had a fight with his father because he has been stealing food out of the 'fridge'. He tells you that his father came off much worse.

Primary type of abuse: _____

1. Consult with safeguarding colleague
2. Make a referral to social services/MASH
3. No action
4. Do not know
5. No abuse

Three - Erica is single a parent who works as a teacher. She has to leave home at 7.30am to get a lift to school. As a result, she leaves her two boys in the house by themselves. Graham is nine and Brian is six. They are alone for an hour before they take themselves to school.

Primary type of abuse: _____

1. Consult with safeguarding colleague
2. Make a referral to social services/MASH
3. No action
4. Do not know
5. No abuse