



# Safeguarding, Child Protection and Adults at Risk Policy

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## **Part 1: Capital City College Group Safeguarding, Child Protection and Adults at Risk Policy**

### **1. Purpose and Aims of the Policy**

The purpose of this policy is to outline the responsibilities within the Group in relation to safeguarding child and vulnerable adults in line with current legislation, guidance and best practice.

#### **The policy aims to:**

- Provide staff across the Capital City College Group (CCCG) with information and guidance regarding safeguarding expectations at a Group level and identify the guidance and support in place at each college site.
- Raise awareness of staff to safeguard all students and ensure they are well trained to recognise the signs, symptoms and effects of abuse and the confidence and knowledge to follow the procedures to raise a concern with the Designated Safeguarding Lead in each college of the Group if a concern is raised.
- Set out the framework to support staff in knowing what to do with regards to safeguarding children, vulnerable adults and any students in order to promote their welfare and safety in each Group college.
- Identify the names of the responsible persons in each college and across the Group and explain the purpose of their role.
- Describe what should be done if an employee or non-employee of the Group has a concern about the safety and welfare of a student.
- Through this policy and the Group procedures promote an environment where students and staff feel secure and are listened to and teach each other with mutual respect.
- Detail the on-site arrangements across the Group for reporting a concern and information relating to the on-site procedures for each college as detailed in Part 2 of this policy.
- Outline how complaints or allegations against staff will be handled.
- Set out expectations regarding record keeping, confidentiality and information sharing.
- Ensure the Group complies with 'Safer Recruitment' principles and duties for all staff and ensure agency and external providers of services to our students adhere to the same safeguarding recruitment standards of the Group.
- To promote the health and development of young people's and adults at risk development in ways that will foster security, confidence and independence and to promote this through the curriculum, tutorial, enrichment activities and the student engagement programme.
- Outline how the implementation of this policy will be monitored and complaints will be dealt with.

## 2. Scope

The CCCG recognizes its safeguarding responsibilities to all its students. Drawing on the guidance and legislation detailed in 3.4 the scope of this policy covers the following definitions.

- 2.1 A 'child' is someone who has not yet reached their 18<sup>th</sup> birthday
- 2.2 An 'adult at risk' is any person over the age of 18 years, 'who is or maybe in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness'
- 2.3 Staff means all employees, full-time or fractional and all agency, franchise, contract and volunteer staff working at or for the Group.
- 2.4 The term 'student' refers to anyone who is under the age of 18, and who meet the definition of a vulnerable adult.
- 2.5 Visitor means any person who enters the building who is not a staff member.
- 2.6 Volunteer means any person who undertakes unpaid employment.
- 2.7 Non-employee refers to parents, carers, family members, members of the public, Various agency representatives.

## 3. Policy Statement

- 3.1 The Group aims at all times to create and maintain a safe environment for all students, staff, volunteers and visitors. This policy is one of a suite of policies and procedures intended to ensure that the Group fulfill their safeguarding responsibilities. This policy is consistent with all other policies adopted by the Group and in particular should be read in conjunction with the policies identified in **(Appendix 1)**.
- 3.2 The Group core safeguarding standards and principles are:
  - All our students have the right to access their College place free from fear of harm and protected from mistreatment, abuse and exploitation.
  - The welfare and safety of our students is paramount and this principle underpins all safeguarding work.
  - Disclosures about abuse or neglect made by students will be taken seriously and prompt actions taken to support them.
  - A commitment to the Health safety and wellbeing of students, which underpins a successful learning experience.
  - A commitment to ensure a safe and secure environment through safe recruitment practice and procedures and compliance with Health and Safety requirements.
  - A commitment to ensure that ongoing safeguarding training and support is in place for all staff across the Group.

- 3.3** The Capital City College Group (CCCG) fully recognises its responsibility for safeguarding and protecting all students attending our colleges. The Governing Body holds responsibility for ensuring that the safety of students is at all times of paramount importance and safeguarding arrangements are effective in practice, monitored carefully and any deficiencies promptly remedied. This policy sets out the clear and consistent framework for delivering these responsibilities in line with safeguarding legislation and statutory guidance.
- 3.4** Whilst the Governing Body holds the overall statutory responsibility for the child protection and safeguarding functions of the Group, the day to day operational responsibility rest with the Chief Executive. The statutory duty to ensure action to safeguard and promote the welfare of young people and adults receiving education and training from each of the colleges/training company within the group will be delegated to a senior manager and designated person responsible for safeguarding to lead on local arrangements in each of the Groups colleges.
- 3.5** This policy sets out The Capital City College Group safeguarding framework, standards and commitment to ensure that all its students are protected from abuse and the risk of harm including Radicalization and Extremism as expressed in the Prevent Duty. This policy should be read in conjunction with individual college on-site reporting procedures and guidance detailed in **Part 2** of this policy.
- 3.6** This policy draws upon the duties conferred by the Children Acts 1989 and 2004, S175/157 of the 2002 Education Act, the Education & Inspection Act 2006, the serious Crimes Act (2015) and the guidance contained in 'Working Together to Safeguard Children' (2015), Keeping Children Safe in Education (DfE 2018), What to do if you're worried a child is being abused'(DfE 2015), and the multi-agency procedures produced by the London Safeguarding Children Board as adopted by the local authorities where our colleges sit. The policy is applicable to all on-site off-site and online activities undertaken by our learners whilst they are the responsibility of one of the Groups colleges.
- 3.7** In respect of students aged 18 and over we adhere to the principles and procedures detailed in 'protecting adults at risk: London multi-agency policy and procedures for protecting adult at risk from abuse.
- 3.8** Our policy applies to all staff employed within the CCCG including teaching and non-teaching staff, temporary and agency staff, clerical and domestic staff and staff working on site employed by other services and agencies and those working with students on placements, governors, external visitors, consultants and volunteers working in each of our colleges.
- 3.9** The Group supports the procedures set out by each local safeguarding children's board where our colleges are located and takes account of local threshold criteria that can be found in **Part 2** of this policy alongside individual college on-site reporting procedures.
- 3.10** The Group reserves the right to refuse admission to any student who may pose a risk to vulnerable adults and has appropriate student admissions procedures in place.

## 4. Procedures and Guidance including Sub-Contracted providers

- 4.1 This policy should be read in conjunction with the other related Group policies and government guidance detailed in **Appendix 1**.
- 4.2 All staff must read and understand Part 1 of 'Keeping Children Safe in Education' statutory guidance for schools and colleges. (DfE)
- 4.3 All new staff and governors are given an Executive copy of the Safeguarding, Child Protection and Adults at Risk Policy as part of the Group induction process and are expected to read and sign to confirm that they have read and will adhere to the full policy.
- 4.5 All staff should know how to recognize types of abuse and neglect **Appendix 2** and what steps they should take to raise a safeguarding concern with a Designated Person in their college, how to record concerns and respond to students in need or at risk. Guidance in Managing disclosures can be found in **Appendix 3** of this policy and will be included as part of staff induction and ongoing support is available from the Designated Safeguarding Leads located on each site **Appendix 9**.
- 4.6 Each college in the Group has set out their on-site procedure and guidance to follow if staff receive a disclosure, are concerned a student is at risk of harm or worried about their well-being. These can be found in **Part 2** of this policy and includes the identification of Designated Safeguarding Leads and Safeguarding Persons located in each college. It is very important that all staff know what to do and are well trained and confident to follow their college reporting procedures.
- 4.7 Where students attend other Group sites or provision, including Centre's and facilities owned, leased or used by sub-contracted partners, it is the responsibility of each site' or the sub-contracted partners' safeguarding staff or Designated Person to manage any concerns about those students appropriately, ensuring that there is good, effective and timely communication, liaison and information sharing with the Designated Person.
- 4.8 The safeguarding Roles and Responsibilities of all members of staff in the Group are detailed in **Appendix 4**. All Staff must ensure they read and understand the role they undertake in safeguarding Students and how the Designated Safeguarding Lead in their college will deal with a concern they could raise and what happens if a referral is made to a social care agency.

## 5. Supporting Students

- 5.1 Each college within the Group have in place pastoral support systems that reflect the governing body's legal obligation and commitment to safeguard and promote the welfare and wellbeing of all students. The Group recognizes the value of early help, early intervention and coordinated support through full cooperation with interagency working arrangements.
- 5.2 The Group will support students to be successful and feel confident in terms of their:

- Physical, mental health and emotional wellbeing
- Protection from harm and neglect
- Education, training and recreation
- Contribution to society
- Social and economic wellbeing

**5.3** The Group recognise that a student who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. The Group recognise that a student may feel helpless and humiliated and may blame themselves for what has or is happening to them. The colleges within the group help to provide a vital source of stability in the life of a student who has been abused or is at risk of harm. The Group recognise that the behavior of a student in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

**5.4** The Group also acknowledge that young people/adults at risk who are affected by abuse or neglect, may demonstrate their needs and distress through their words, actions, behavior, demeanor, academic work or other young people. The Group has a strong commitment to an anti-bullying and harassment policy and will consider all coercive acts and inappropriate child-on-child/student-on-student behavior and unlawful sexual activity within a Child Protection context.

**5.5.** The Group aim is to support students by:

- Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviors in accordance with our anti-bullying policy (**Appendix 1**); all allegations of bullying must be recorded.
- Promoting a caring and safe environment for all our students
- Providing an environment where students are able to make positive relationships with staff and are better able to talk to staff about their lives. In this way staff are able to 'hear the voice of the child'
- Providing opportunities through the curriculum for students to learn strategies to protect themselves ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. E.g. through awareness raising activities and workshops including sexual health, anti-bullying, drug and alcohol support, gang prevention and health and well being
- Working in partnership with other services involved in safeguarding students and notifying Children's Social Care or the Adults at Risk Team as soon as there are significant concerns about a student.

**5.6** Safeguarding is promoted through a students' course (tutorial, enrichment and curriculum) and students are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for students is available through a range of student support services. These aims are underpinned by the Group Policies detailed in **Appendix 1**.

**5.7** The Group will also be vigilant to the attendance and particular needs of students who might be at risk due to:

- Female genital mutilation (FGM)
- Forced marriage

- Radicalization
- Involvement in gang activity
- Relationship abuse
- Sexual exploitation and bullying linked to race, gender or sexual orientation.
- Risk of offending
- Homelessness
- Refugee/asylum seeker status
- The effects of substance abuse within the family
- Those who are young or adult carers

Please refer to **Appendix 5** Local and National Safeguarding Priorities  
**Appendix 6:** The Prevent Duty/Radicalisation.

- 5.8** Students with Learning Difficulties and/or Disabilities and those with medical needs. Research suggests that students with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated or may not understand that they are being abused.

The Group acknowledges the legal obligation to support students with medical needs and will work with students, parents and the health authorities to implement health care plans that support the attendance, inclusion and attainment of students with acute or chronic medical conditions.

- 5.9** Staff who work with students in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behavior or presentation that might indicate a concern that should be shared immediately with the Colleges Designated Safeguarding Person or in their absence another member of the safeguarding team.
- 5.10** Intimate Care and Toileting of Disabled Students If a student has particular needs which require intimate care or the administration of medication, a meeting will be held with the student, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The student's wishes and feelings will be taken in to account and respected throughout this process.
- 5.11** Students aged under 16 who are taken to **Hospital** must be accompanied by a member of staff. The member of staff must make direct contact with the parent /carer/relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/carer/relative arrives. If a student age 16-18 is taken to hospital, the member of staff must make direct contact with the parent carer/relative to make them aware of the situation. As a general rule the member of staff is not required to accompany the student in the ambulance, where parent/carer/ relative has been made aware of the situation.

Where the student is over 18 and is a vulnerable adult the member of staff must also make direct contact with the parent /carer/ relative to make them aware of the situation. It is expected that the member of staff will accompany the student



in the ambulance, and remain at the hospital until the parent/relative arrives. In all cases, the appropriate Designated Person or in their absence a deputy should be made aware as soon possible of the situation.

- 5.12** Students Under 18 living alone or without any parental or guardian support. Staff must report any students who are living alone or without parental or guardian support to the Designated Lead person within their respective College.
- 5.13** Private Fostering. If a member of staff becomes aware of a student under the age of 18 who is 'privately fostered' and are cared for by someone other than a parent or close relative (e.g. step-parents, siblings, siblings of a parent and grandparents) for 28 days or more must make a referral to the appropriate Designated Person or in their absence a deputy who will notify Children's Social Care if:
- They become aware of a private fostering arrangement which is not likely to be notified to the local authority
  - They have doubts about whether a child's carers are actually their parents, and there is evidence to support these doubts, including concerns about the child's welfare

Further information about private fostering arrangements can be found at [www.baaf.org](http://www.baaf.org)

- 5.14** The Group acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education **Appendix 7**. The Group works to ensure that all students are given every opportunity to achieve their chosen qualification.
- 5.15** The Group have clear procedures regarding the use of restraint and reasonable force in line with the Physical Restraint Policy **Appendix 1** and in relation to this policy **Appendix 8**.

## **6. Safeguarding Training for Capital City College Group Staff**

- 6.1** Safeguarding our students is a key priority for the CCCG and we are committed to ensuring that all staff are well trained and feel confident to carry out their safeguarding duties and responsibilities.
- 6.2** The Group's nominated designated safeguarding staff undergo a dedicated induction course and then refresher training at every year. Ongoing safeguarding training as new guidance and local and national priorities emerge will be undertaken to ensure they are aware of current safeguarding issues and best practice.
- 6.3** All staff will undertake initial Safeguarding, Child protection and Adults at Risk and Prevent Duty training and that their training is refreshed every year.
- 6.4** The responsibility of ensuring that all staff employed by the Group received appropriate training rests with the Group Director Human Resources and Organisational Development.
- 6.6** A central record of staff training is held with the Group's HR team.

- 6.7** Initial training for staff will meet the requirements of Working Together to Safeguard Children, Keeping Children Safe in Education, and Protecting Adults at Risk and ensure that:
- All staff can recognise possible signs and indicators of abuse in students.  
**Appendix 2** Specific training is delivered to enable staff to safeguard and promote the welfare of Adults at Risk and students with SEND.
  - All staff know who they should report to if they have a concern about a student's welfare and well-being.
  - All staff understand the Group's safeguarding child protection and Adults at Risk policy and procedures and are clear about their statutory duties.
  - All staff are aware of how to manage a disclosure from a student or a member of staff in order to promote the best outcomes for that student.
  - All staff are aware of the need to work within professional boundaries and adhere to the Group code of conduct to safeguard students.
  - All staff are aware of the importance of keeping detailed and accurate written records of any concerns about a student.
  - All staff are aware of the boundaries of confidentiality and disclosure and understand when the disclosure of confidential information would be a proportional response to the need to safeguard a student.
  - All staff have a duty to report any child protection and vulnerable adult issues to the Designated Person or a nominated member of the Safeguarding Team.
  - All staff understand that they have a duty to safeguard and promote the welfare of students through tutorial and enrichment activities.
  - All staff are aware of the 'early help' process, and understand their role in it to prevent problems escalating.
- 6.8** Organisations who provide a service on behalf of the Group such as security, catering, hourly paid teaching or support staff are expected to ensure appropriate initial and refresher training has been provided for their staff. This may necessitate the service provider undertaking the training offered by the Group.

## **7. Safer Recruitment and Staff Appointments**

- 7.1** The Governing Body takes seriously its responsibility to ensure safer recruitment and selection practice and recognizes that it is vital in safeguarding and protecting students. The Group is committed to the process of maintaining a culture of safer recruitment and adopting recruitment processes that will help to deter, reject or identify unsafe adults who might abuse students or who are unsuitable to work with them. The Governing Body is committed to evidencing this practice in relation to all staff working with students in the Group.
- 7.2** All staff recruited to the Group will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate Disclosure and Barring Services (DBS), barred/prohibited persons list checks will be undertaken in accordance with guidance issued by Cambridge Education @Islington Human Resources and current DfE guidance "Keeping Children Safe in Education: Statutory guidance for schools and colleges". The Group will continue to uphold best practice in safer recruitment.
- 7.3** Relevant members of staff and governors who are involved in recruitment will undertake online or face-to-face safer recruitment training, which has been

accredited by the 'Safer Recruitment Consortium'. All recruitment panels must have at least one member who has successfully completed this training and individuals who are in charge of recruitment, will also have successfully completed this training within the past 5 years.

- 7.4 The Group will only use employment agencies that can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the Local Authority's Designated Officer (LADO). Staff joining the Group on a permanent or temporary basis will be given a copy of this policy or the Executive Summary and contacts for the college site they are working. Additionally, induction briefings will include safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures within the Group.

## 8. Work Experience, Placements and Work Based Learning

- 8.1 The individual Colleges will ensure that:
- Risk Assessment Health and safety checks are undertaken prior to establishing work experience placements
  - Employers and providers are aware of and are carrying out their responsibilities in relation to Safeguarding and the protection of Children and Adults at Risk, and ensuring that providers have appropriate policies and procedures in place which are followed by all staff.
  - Group staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement.
  - Group staff are appropriately trained to carry out the health and safety work placement audit.

## 9. Staff Code of Conduct

- 9.1 The Group recognises that positive professional relationships with students will support and promote the best outcomes for them. All staff (paid and voluntary and for the purposes of this policy includes Apprentices but not students on work placement) are expected to adhere to the Group '**Code of conduct (Appendix 1)**' in respect of their contact with students and their families, on site, off site and online.
- 9.2 Staff must ensure that they fully understand and maintain the professional boundaries explicit in the Group Code of conduct and that any relationship between a professional and a student under the age of 19 or a student who is a vulnerable adult may result in an immediate referral to the Local Authority Designate Officer (LADO). Should a personal relationship already exist when a student joins the Group, the member of staff must inform their line manager so appropriate arrangements can be made to secure safe practice.
- 9.3 The Group recognises that in certain Performing Arts disciplines such as Dance contact with a student to improve their understanding of the exercise or movement may occur through touch. All staff tutoring these curriculum areas must ensure they are fully conversant and follow the Group **Safe Touch Policy and Code of Practice. (Appendix 1)**.

## 10. Information Sharing and Confidentiality

- 10.1** The Group respect the right of students and families to have their personal information treated respectfully and confidentially in line with General Data Protection Regulations (2018) and local statute and guidance. Confidential Child Protection information regarding students in our Group will be shared with staff on a strictly need to know basis. A member of staff will 'need to know' information when it will demonstrably benefit the student and maintain appropriately agreed confidentiality at all times.
- 10.2** All staff must be aware of their responsibility to share information with the appropriate Designated Person and with other agencies in order to protect and safeguard students. This must be done in accordance with the Group's Safeguarding, Child Protection Policy and Adults at Risk Policy and the College reporting procedures where staff are based. Where there is uncertainty about the need to share information advice will be sought by the appropriate Designated Person on this issue and where necessary from the appropriate local authority.
- 10.3** No one in the Group may guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information. Where a student has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the student.
- 10.4** No one in the Group may guarantee to a student that they will keep a secret or confidence and must always make it clear to student in language that is appropriate, that any information which leads a member of staff to be concerned that a student is suffering or is at risk of suffering harm will be shared with the appropriate Designated Person in order to take measures to safeguard the student at risk.
- 10.5** Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a student.

## 11. Managing Disclosures – Group Standard Guidance for all Staff

- 11.1** The Group are committed to ensuring staff in all our colleges are well trained and feel confident to deal with disclosures of abuse. **Appendix 3** set out the Group Standard Guidance for Staff – Managing Disclosures. This should be read in conjunction with the College on-site reporting procedures that must be followed where staff have a concern about a student, receive a disclosure of abuse or a disclosure that they are at risk of harm detailed in **Part 2** of this policy and **Appendix 9**.
- 11.2** The Group recognise that child protection is a difficult and sometimes upsetting subject for those who work with students. Working with a student who has suffered harm or is at risk of harm may be stressful and distressing. The Group are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the Designated Person or another member of the safeguarding team, and to seek further support as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe

practice; such concerns will be addressed sensitively and effectively in accordance with agreed whistle blowing procedures. KCSE Part 1 (2018) provides a link for staff to access 'What to do if you're worried a Child is Being Abused' offering further guidance.

We believe that working within the clear framework of the Group Safeguarding, Child Protection and Adults at Risk protection policy and procedures will support staff in carrying out their duties and responsibilities effectively.

## **12. Recording and Referral**

- 12.1** Concerns about students should be recorded on the Group's individual/personal learning plan and on the Centers' central 'at risk' register, which will detail the concerns about a student, discussion with the appropriate Designated Person or in their absence, another appropriate member of the safeguarding team and parents or carers where appropriate and any agreed actions and outcomes. Tracking sheets, referrals to Children's Social Care and Child Protection Conference and Core Group meeting minutes will be held confidentially, separately from a student's main Group records.
- 12.2** Records should be signed and dated and kept in chronological order. Group actions minuted in child protection conferences/strategy meetings must be implemented.
- 12.3** Recording is a tool of professional accountability and is central to safeguarding and protecting students. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed.
- 12.4** Sub-Contractors are required to have in place a robust system to record concerns about student's (the cause for concern and the action taken) and to have this information readily available for identified individuals within the Group.
- 12.5** If a student discloses that they have been subjected to abuse to any staff member in the Group, the staff member must follow the agreed protocol for each College outlined in Part 2. The Designated person or a nominated officer will then respond within an hour, confirm the next steps and if necessary make a referral to the appropriate agency e.g. Children's Social Care in the students home borough.
- 12.6** Where a student is transferring to another college or establishment, the College's Designated Safeguarding Lead Person should liaise with the college or establishment and forward them copies of the student's safeguarding records.
- 12.7** Learners under 16 years' old who are enrolled at Schools or other organisations are, in normal circumstances, also subject to the policy of the referring organisation, however, in urgent situations the College safeguarding staff will contact external agencies without delay and then coordinate with the sending institution.

### 13. E -Technology & E-safety

- 13.1 The Group has identified and appointed members of staff with the responsibility for monitoring the safe and appropriate use of E technology and to deal with any concerns about inappropriate use. **Refer to Appendix 1 - ICT Acceptable Use Policy, Social Media Policy and the E - Safety Policy and Appendix 10.**
- 13.2 The Group promotes E-safety in the delivery of the curriculum. E-safety refers to the safe use of internet and other electronic forms of communication such as e-mail, text messages, face-book and other social media platforms that can expose young people and vulnerable adults to risks. The Group will support students to recognise and manage risks associated with online activity that can be harmful such as online grooming, and the inappropriate use of social media for sexting, hazing and cyber bullying and other abusive acts that intimidate, threaten or lead to physical, emotional or psychological harm of any student in the Group.

### 14. Extended Services and Activities

- 14.1 The Governing Body of the Group is responsible for controlling the use of Group premises both during and outside normal hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made. Where services are provided directly under the supervision and management of the Group, the Group's safeguarding policies and procedures will apply.
- 14.2 Where activities and services are provided separately, the Governing Body will seek assurances and evidence that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the Group on these matters where appropriate. Evidence of appropriate policies and procedures must be provided to the Governing Body.

The Governing Body will only work with providers that can demonstrate that they have effective child protection policies and procedures in place, provide appropriate training and that the vetting arrangements for their staff are compatible with those of local authorities and government guidance. The Governing Body will enter into a formal letting contract with the provider once these conditions are met but reserve the right to withdraw permission for any letting. There will be at any one time, a number of professionals delivering services to students on behalf of the Group in the community as well as on the Group site. These professionals may be employed by partner agencies or other agencies.

- 14.3 All staff providing services to students whether in Group or in the community on behalf of the Group must adhere to the Group's Safeguarding, Child protection and Adults at Risk policy.
- 14.4 Staff from partner agencies working with students off site will follow the referral procedures of their own agency and will inform the appropriate Designated Person they have made a child or vulnerable adult protection referral as a matter of priority.

## **15. Site security, Contractors and Agency Staff**

- 15.1** All students and staff should be able to feel safe when they are on the campus. All staff and students will wear their ID at all times and will not be allowed to enter a site without it. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be admitted to a site unless they are accompanied by a member of staff **Appendix 1** Site Security Policy.
- 15.2** Regular contractors who work on site will be DBS checked as part of their service level agreement/contract and will be expected to read and sign the Executive Summary, and adhere to the Safeguarding Child Protection and Adults at Risk Policy and Staff Code of Conduct. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.
- 15.3** Agency staff and those who work within the Group for one or two days will be asked to provide their DBS check before they can begin work. They will be given an Executive summary of the Safeguarding, Child Protection and Adults at Risk Policy and will be asked to sign to confirm that they have read and will adhere to it.

## **16. Working in Partnership with Parents and Carers**

- 16.1** The Governing Body and staff of the Group are committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Staff working for the Group will engender an environment which develops co-operative working relationships within which parents and carers feel respected.
- 16.2** Parents and carers will be encouraged to access the safeguarding policy, and a summary of it is included in the literature given to students and families on admission which links to the appropriate page on the Group web site. The Group believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that the Group will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.
- 16.3** Wherever possible and appropriate the Group will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care. The Group will be alert to the needs of parents/carers who do not have English as their first language and use translation services as necessary.
- 16.4** There may be instances, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the Group's Designated Person or a member of the safeguarding team judges that a student's wellbeing will be imperiled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser Gillick competence' and this will inform judgements and decisions.

## **17. Complaints and Allegations against Staff and volunteers**

- 17.1** The Group take seriously all complaints made against adults in positions of trust. Procedures are in place in the Group for students, parents/carers and staff to share any concern that they may have about the actions of any member of staff or volunteer and detailed in **Part 2**. Allegations made against staff and volunteers will be dealt with according to the process laid out in DFE guidance and local social care/police arrangements where each college is located will be followed to investigate and resolve complaints without delay.
- 17.2** The Group Nominated Lead for Safeguarding and Child Protection (Group Director of Human Resources and Organisational Development) is the identified Designated Member for Allegations against Staff and Volunteers (DMAASV) who will deal with issues of staff ( or volunteer) inappropriate conduct towards a student. The DMAAVS or Deputy DMAAVS (The Deputy Director of Human Resources and Organisational Development) will work with the respective College Nominated Safe Guarding Lead to confirm the details of individual cases and to reach a decision on the way forward, including reporting the matter to the Local Authority Designated Officer. If the Chief Executive or Chair of Governors is the subject of the allegation or concern, this should also be reported to the Group Nominated Safeguarding and Child Protection Lead (or Deputy) in order that they may activate the appropriate procedures.
- 17.3** Group staff will not investigate cases of suspected abuse themselves. The Group will cooperate fully with the Police and Children’s Social Care. Please refer to the procedures detailed in **Part 2** and refer to the Staff Code of Conduct (**Appendix 1**)

## **18. Monitoring and Review**

- 18.1** A full safeguarding child protection and vulnerable adult report will be submitted to the Governing Body for the Group annually. This will include on behalf of each College monitoring information in relation to staff training, number of concerns raised regarding students including e-safety, record keeping, interagency referrals and outcomes in order to measure the effectiveness of this policy and strengthen practice where needed. In addition a termly report will be submitted to each College Education Board and the Training Board.
- 18.2** This policy will be reviewed and updated annually and scrutinised by the Governing Body.
- 18.3** Each college CEO and the Group Nominated-Lead for Safeguarding will monitor all incidents and cases that fall within the scope of this policy to ensure staff act promptly in response to safeguarding concerns.
- 18.4** Students will be involved in ascertaining the effectiveness of the policy and how safe they feel in their learning environment.
- 18.5** All safeguarding training for staff will be evaluated for relevance and impact.
- 18.6** All complaints arising from the operation of this policy will be considered under the Group’s complaint procedures with reference to the Local Authority’s Strategic Lead for safeguarding as necessary.



**October 2018**

Signed \_\_\_\_\_ Chair of Governors \_\_\_\_\_ Date

Signed \_\_\_\_\_

**Review Date August 2019**

## **Part 2: Safeguarding Reporting Procedures and Guidance for staff at each Group College**

### **A. City and Islington College**

The reporting procedures of City and Islington College should be read in conjunction with the CCCG Safeguarding, Child Protection and Adults at Risk Policy. The policy can be found on the CCCG Website: [www.cccg.ac.uk](http://www.cccg.ac.uk)

City and Islington College has a specific statutory duty to safeguard and promote the welfare of children and adults at risk including complying with the requirements for the Prevent Duty and the promotion of British/Our Values. The aim of City and Islington College is to ensure that all staff (and those who provide a service on our behalf) are supported in their legal responsibility to undertake a duty of care and to report all safeguarding and child protection concerns including the mandatory reporting of Female Genital Mutilation (FGM).

#### **How to Report a Concern**

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that the steps below are followed:

- Immediately contact the Child Protection and Adults at Risk line on 020 7697 1717 leaving your name and contact details, availability, the nature of your concern and if appropriate the date you were notified of the concern
- The **College's Safeguarding, Child Protection and Adults at Risk Manager, Ruth Jno Baptiste**, and (The Designated Safeguarding Lead) will return your call within an hour you will then be guided to record the concern raised on MyConcern (Safeguarding and Child protection Monitoring System) via the CIC Staff Intranet page
- The completed form will then be directed to a designated member of the Safeguarding team who will carry out further investigations and where appropriate will refer the case for internal support or to an external agency

#### **Centre Based Designated Members of Staff for Safeguarding, Child Protection and Adults at Risk:**

<b>Name</b>	<b>Site</b>	<b>Tel</b>	<b>Role</b>
Janet Davidson	CHSCC	02077009402	Safeguarding Champion & Child Protection & Adults at Risk Officer
Lorraine Gaylor	SFC	02075200609	Safeguarding Champion
Ramin Narimani	CAS	02075207474	Safeguarding Champion
James Jordan	CLL	02077047207	Safeguarding Champion

Faith Patterson	CBAT	02077047207	Safeguarding Champion
Philippa Cooke	CAS	02075207360	Child Protection & Adults at Risk Officer
Julie Donna Best	CLL	02077045583	Child Protection & Adults at Risk Officer
Deborah Evans Rolfe (Nursery)	CBAT/ CLL	02077008790	Child Protection & Adults at Risk Officer
Elisa Gilmour	CBAT	02077008632	Child Protection & Adults at Risk Officer
Monica Jassal	SFC	02075207477	Child Protection & and Adults at Risk Officer

**Please note:**

- The Child Protection and Adults at Risk line operates between 09:00 – 18:00. After 18:00 all messages left will be actioned the following day
- In case of an emergency in out of office hours call the emergency services (999) and also report the matter via the Child Protection and Adults at Risk line on 020 7697 1717

If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism they should discuss this immediately with the **College's Specific Point of Contact (SPOC) David Smith on 020 7700 9339 or the College's Safeguarding, Child Protection and Adults at Risk Manager Ruth Jno Baptiste (The Designated Safeguarding Lead) on 020 7697 1717.**

**Keeping You Safe**

All staff must observe appropriate professional boundaries with all students at all times in accordance with the CCCG Code of Conduct. It is compulsory for all staff to confirm they have read, understood and agree to abide by the contents of the agreement. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students and should behave in a way which is professionally appropriate at all times.  
Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.
- Staff must immediately report the inappropriate conduct or behavior of a member of staff towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins -**

Group Director of Human Resources and Organisational Development on **0207 700 9220 / 0207 391 6477** or the Deputy DMAASV – **Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.

### **General Guidance**

Although it may be tempting, no member of staff should ever guarantee to a student that they can keep a concern raised as confidential. If there is any suggestion that the student may be suffering or at risk of suffering harm it must be made clear to the student that the appropriate Centre based Safeguarding Champions/Child Protection and Adults at Risk Officers will be contacted in order to keep them safe.

If a student discloses that they are being physically or sexually abused or exploited it is important for staff to ask questions for clarification only. This is to avoid asking questions to generate a particular answer.

All staff are expected to be familiar with the following protocol for inviting external speakers, groups or organisations into the College:-

- Organiser (e.g. Tutor) must read the External Visitor's Guidance and complete an External Visitor's Risk Assessment

The College has produced a 'Keeping Safe' guide that contains information on the types of abuse that young people and vulnerable adults may experience and also external organisations that offer support. The booklet can be accessed through this link [www.keepingssafe.ac.uk](http://www.keepingssafe.ac.uk)

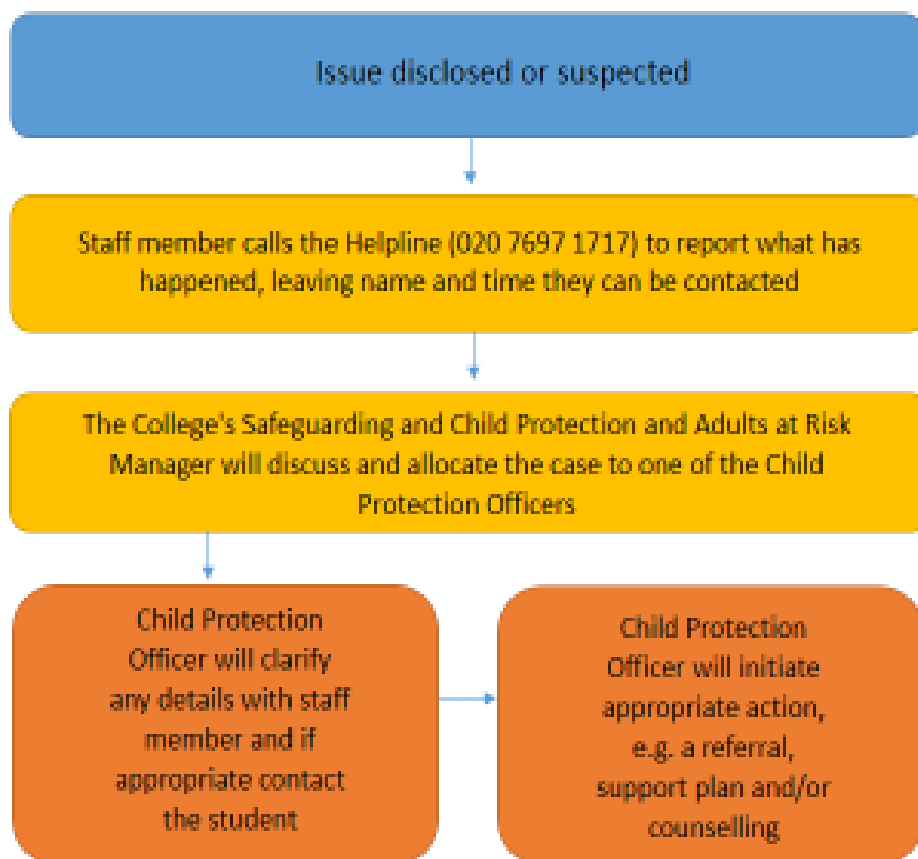
The Group has a dedicated Safeguarding site that also includes E-safety. This is updated regularly and contains material relating to the latest trends and topical new items.

### **Local Authority Link:**

#### **Threshold Criteria For Children's Services CAMDEN**

<https://www.cscb-new.co.uk/wp-content/uploads/2017/09/Thresholds-for-childrens-services.pdf>

## City and Islington College: How to Report a Concern



Staff must immediately report the inappropriate conduct or behavior of a member of staff (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins** (Group Director of Human Resources and Organisational Development) on **0207 700 9220 / 0207 391 6477** or the **Deputy DMAASV – Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

### In responding to a disclosure Staff are reminded to:

- **Receive:** Listen carefully, stay calm and respond sensitively. Do not ask leading questions
- **Reassure:** Confirm the student has done the right thing in talking to someone and let them know the information must be passed but will be treated as Confidential.
- **Record:** Make a note of key points – date, time and the nature of the incident in the student own words.

## B. Westminster Kingsway College

The reporting procedures of Westminster Kingsway College should be read in conjunction with the CCG Safeguarding, Child Protection and Adults at Risk Policy. The policy can be found on the CCG Website: [www.cccg.ac.uk](http://www.cccg.ac.uk)

Westminster Kingsway College has a specific statutory duty to safeguard and promote the welfare of children and adults at risk including complying with the requirements for the Prevent Duty and the promotion of British/Our Values. The aim of Westminster Kingsway College is to ensure that all staff (and those who provide a service on our behalf) are supported in their legal responsibility to undertake a duty of care and to report all safeguarding and child protection concerns including the mandatory reporting of Female Genital Mutilation (FGM).

### How to Report a Concern

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that you follow the steps below;

- Complete the online **safeguarding report form**. Record as much relevant information on the form, the nature of your concern, the date you were notified of the concern.
- Submit the form, members of the WKC Safeguarding Team are alerted immediately. The completed form will be emailed to a designated member of the Safeguarding team.
- The Safeguarding team will carry out further investigations and where appropriate will refer the case for internal support to an external agency.
- You will receive email confirmation from a Safeguarding Officer that the case has been taken up

### In the event of an IT or telephone network failure

- Complete a paper copy of the **safeguarding report form**. These may be found in the **red safeguarding folders** which are located in staff rooms across the Westminster Kingsway College estate.
- Hand the paper copy of the form to one of the people identified in the table below.
- When the services return, you will receive email confirmation from a Safeguarding Officer that the case has been taken up.

If the risk to a student is immediate either call **020 7832 5331** or accompany the student to one of the Safeguarding offices listed below:

- Kings Cross: K003A
- Victoria: V041C
- Soho: S003C

Significant concerns about a student becoming radicalised and/or supporting violent extremism should be reported the Safeguarding Team. This information will be immediately relayed to the **College's Specific Point of Contacts (SPOCs) Jasbir Sondhi, WKC Safeguarding Nominated Lead on 0207 832 5100 or Brooks Seyoum (Welfare and Safeguarding Manager) on 0207 832 5331.**

**Please note:** The Online Safeguarding Referral system operates on a 24 hour basis. Referrals made after 5pm will be actioned the following day. **After 5pm**, emergency safeguarding concerns should be reported to the evening Duty Manager by calling **020 7832 5111**. This service is available until **8.30pm** from Monday to Thursday evening only.

### **Designated Members of Staff Safeguarding, Child Protection and Adults at Risk**

<b>Name</b>	<b>Tel</b>	<b>Role</b>
Jasbir Sondhi	02078325100	College Director Learner Services/Nominated Safeguarding Lead
Brooks Seyoum	0207 832 5332	Safeguarding & Welfare Manager / SPOC Victoria Centre
Carly Billiau	02077 832 5331	Learner Welfare and Safeguarding Officer King's Cross
Elliott Stevenson	0207 832 5334	Mental Health and Wellbeing Lead / Safeguarding Officer Soho / King's Cross Centre
Laura Edwards	02076646850	LDD Coordinator/ Safeguarding Officer Alexandra College

### **Keeping You Safe**

All staff must observe appropriate professional boundaries with all students at all times in accordance with the CCCG Code of Conduct. It is compulsory for all staff to confirm that they have read, understood and agree to abide by the contents of this document. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students and should behave in a way which is professionally appropriate at all times. Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.
- Staff must immediately report the inappropriate conduct or behavior of a member of staff towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins** - Group Director of Human Resources and Organisational Development on **0207 700 9220 / 0207 391 6477** or the Deputy DMAASV – **Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.

The College has produced a 'Keeping Safe' guide that contains information on the types of abuse that young people and vulnerable adults may experience and also external organisations that offer support. The booklet can be accessed through this link [www.keepingssafe.ac.uk](http://www.keepingssafe.ac.uk)

The Group has a dedicated Safeguarding site that also includes E-safety. This is updated regularly contains material relating to the latest trends and topical new items.

**Local Authority links:**

**Threshold Criteria for Children's Services Westminster**

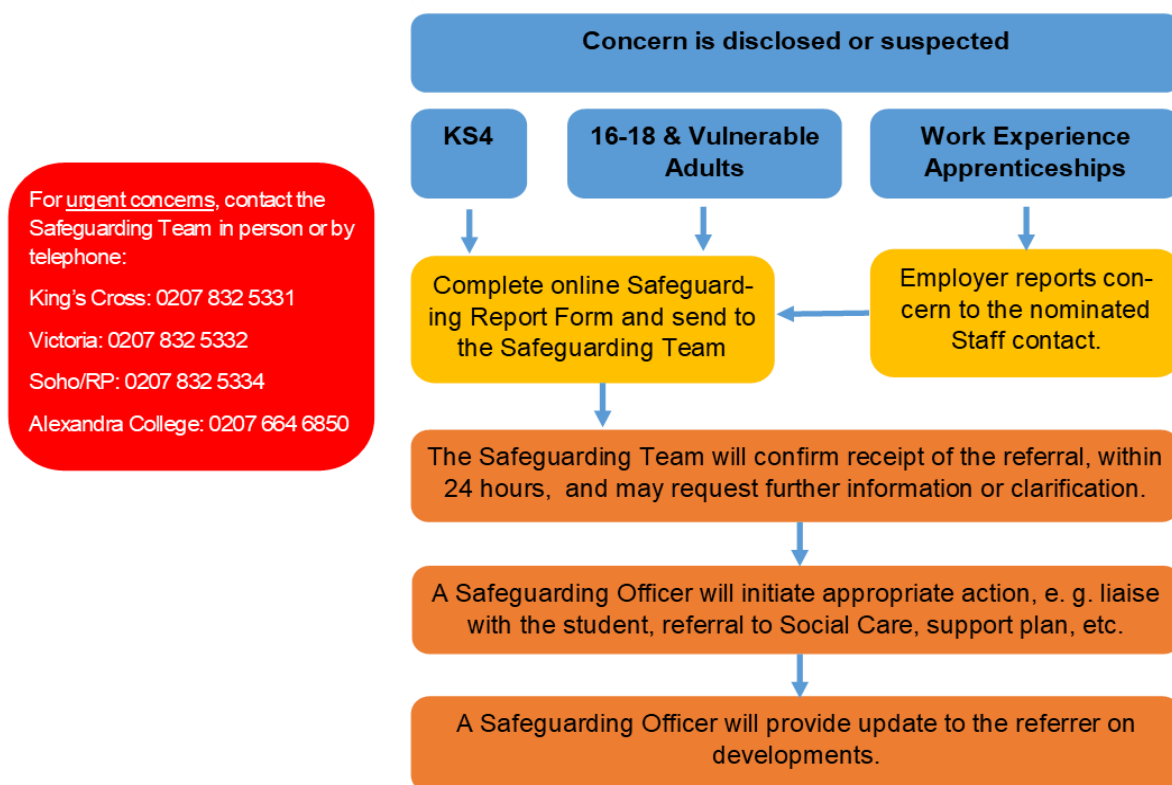
<https://www.rbkc.gov.uk/pdf/Threshold%20of%20Needs%20Guide.pdf>

**Threshold Criteria for Children's Services CAMDEN**

<https://www.cscb-new.co.uk/wp-content/uploads/2017/09/Thresholds-for-childrens-services.pdf>



## Westminster Kingsway College: How to Report a Concern



For urgent concerns, contact the Safeguarding Team in person or by telephone:  
King's Cross: 0207 832 5331  
Victoria: 0207 832 5332  
Soho/RP: 0207 832 5334  
Alexandra College: 0207 664 6850

If you are unsure about what to do or need guidance, contact the Safeguarding Team.

[safe@westking.ac.uk](mailto:safe@westking.ac.uk)

Staff must immediately report the inappropriate conduct or behavior of a member of staff (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV)** - **Claire Collins** (Group Director of Human Resources and Organisational Development) on **0207 700 9220 / 0207 391 6477** or the **Deputy DMAASV** – **Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

### In responding to a disclosure Staff are reminded to:

- **Receive:** Listen carefully, stay calm and respond sensitively. Encourage the student to talk but do not pressurize them and do not ask leading questions.
- **Reassure:** Confirm the student has done the right thing in talking to someone and let them know the information must be passed but will be treated as sensitively and discreetly.
- **Record:** Make a note of key points – date, time and the nature of the incident in the student own words.

## C. Capital City College Training (Regents Park Site)

**The information that follows applies to all staff who work from or out of the Regents Park Site.**

The reporting procedures of Capital City College Training (CCCT) should be read in conjunction with the CCCG Safeguarding, Child Protection and Adults at Risk Policy. The policy can be found on the CCCG Website: [www.cccg.ac.uk](http://www.cccg.ac.uk)

CCCT has a specific statutory duty to safeguard and promote the welfare of children and adults at risk including complying with the requirements for the Prevent Duty and the promotion of British/Our Values. The aim of CCCT is to ensure that all staff (and those who provide a service on our behalf) are supported in their legal responsibility to undertake a duty of care and to report all safeguarding and child protection concerns including the mandatory reporting of Female Genital Mutilation (FGM). It outlines procedures to follow should an applicant declare a criminal conviction, caution or bind-over. In addition it outlines procedures to follow should an applicant declare a criminal conviction, caution or bind-over.

### **How to Report a Concern**

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that you follow the steps below:

- Complete the online **safeguarding report form**. This form can be accessed via the Group Intranet page or below. Remember to record as much relevant information on the form
- Submit the form. Members of the WKC Safeguarding Team will be alerted immediately.
- You will receive email confirmation from a Safeguarding Officer that the case has been taken up.
- Inform the CCCT Safeguarding leads

### **In the event of an IT or telephone network failure**

- Complete a paper copy of the **safeguarding reporting form**. These may be found in the **Safeguarding folders** which are located in staff rooms across in CCCT's Regent Park Centre.
- Inform the CCCT Safeguarding leads
- Hand the paper copy of the form to one of the people identified in the table below.
- When the services return, you will receive email confirmation from a Safeguarding Officer that the case has been taken up.

If the risk to a student is immediate either call **020 7832 5334** or accompany the student to one of the following Safeguarding offices Regents Park – Room 103 or Room 304.

### **Please note:**

The Online Safeguarding Referral systems operates on a 24 hour basis. Referrals made after 5pm will be dealt with the following weekday morning.

**After 5pm**, emergency safeguarding concerns should be reported to the evening Duty Manager by calling **020 7832 5111**. This service is available until **8.30pm** from Monday to Thursday evening only.

Significant concerns about a student becoming radicalised and/or supporting violent extremism should be communicated to any of the individuals listed in the table below. This information will be immediately relayed to the **College's Specific Point of Contact (SPOC) Jackie Chapman, CCCT Nominated Safeguarding Lead** or Margaret Gotlib, Designated Safeguarding Lead.

#### **How to deal with a declaration of criminal convictions**

Should a prospective learner declare on their enrolment form, or at any other time, that they have had a criminal conviction, caution or bind over, we must follow the College Group Safeguarding Procedure before confirming a place on the course/apprenticeship.

Prospective learners must fill in the Declaration Form including contact details so that the Safeguarding Officer can follow up the declaration in a timely fashion.

Scan and send the form to the Apprenticeship or Employability Safeguarding Lead. Let the student know that they will be contacted by a member of the Safeguarding Team within five working days. The learner may not start a programme until this has been completed and it has been confirmed that they may start.

#### **Designated Members of Staff Safeguarding, Child Protection and Adults at Risk**

<b>Name</b>	<b>Position</b>	<b>Contact number</b>
Jackie Chapman	Director of Employability & Employer Engagement Vocational Skills- Nominated Safeguarding Lead	0207 025 1948
Margaret Gotlib	Head of Quality and Administration, and Designated Safeguarding Lead	0207 963 4137
Kate Child	Employability Business Operations Manager, Deputy Designated Safeguarding Lead	0207 963 4156

#### **Keeping You Safe**

All staff must observe appropriate professional boundaries with all students at all times in accordance with the CCCG Code of Conduct. It is compulsory for all staff to confirm they have read, understood and agree to abide by the contents of this document. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students and should behave in a way which is professionally appropriate at all

times. Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.

- Staff must immediately report the inappropriate conduct or behavior of a member of staff towards a student to the Designated Member for Allegations against Staff and Volunteers (DMAASV) - **Claire Collins** (Group Director of Human Resources and Organisational Development) on **0207 700 9220 / 0207 391 6477** or the Deputy DMAASV – **Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.

**If you have any questions, concerns or issues, please do not hesitate to contact Jackie Chapman or Margaret Gotlib, or any of the members of the Capital City College Training Safeguarding Team. Their details may be found in the table overleaf.**

The Group has a dedicated Safeguarding site that also includes E-safety. This is updated regularly and often contains material relating to the latest trends and topical new items insert hyper link.

#### **Local Authority Links:**

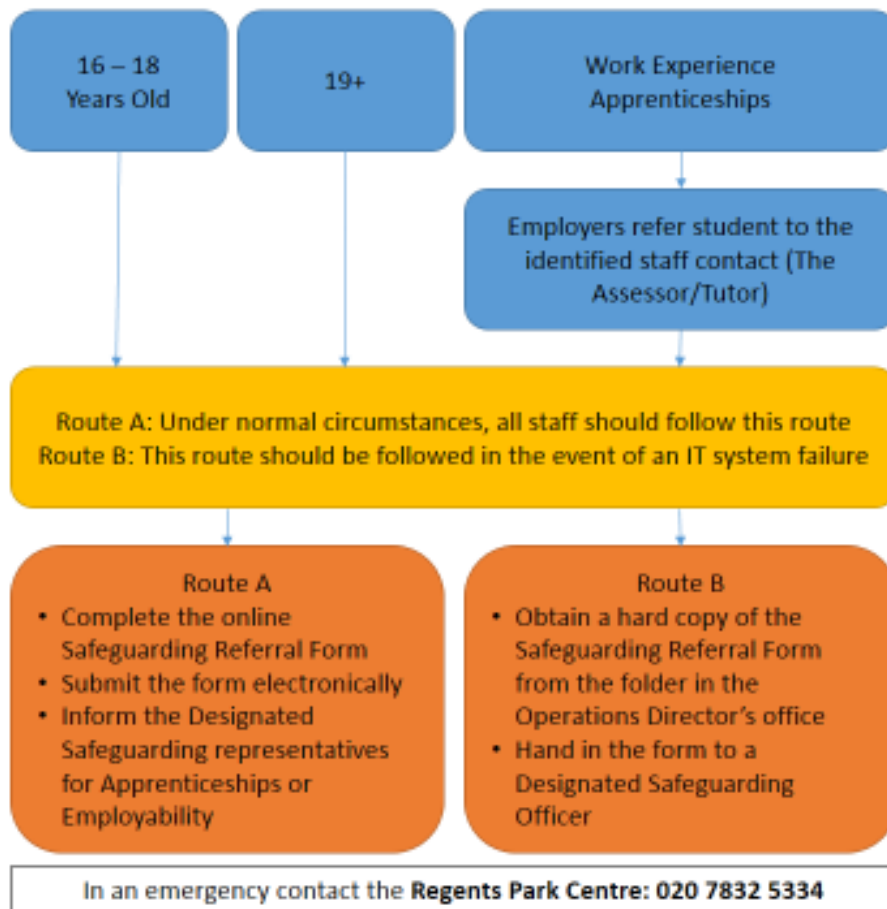
##### **Threshold Criteria for Children’s Services Westminster**

<https://www.rbkc.gov.uk/pdf/Threshold%20of%20Needs%20Guide.pdf>

##### **Threshold Criteria for Children’s Services CAMDEN**

<https://www.cscb-new.co.uk/wp-content/uploads/2017/09/Thresholds-for-childrens-services.pdf>

**Capital City College Training (Regents Park Site): How to Report a Concern**



Staff must immediately report the inappropriate conduct or behavior of a member of staff (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins** (Group Director of Human Resources and Organisational Development) on **0207 700 9220 / 0207 391 6477** or the **Deputy DMAASV – Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

**In responding to a disclosure Staff are reminded to:**

- **Receive:** Listen carefully, stay calm and respond sensitively. Encourage the student to talk but do not pressurise them and do not ask leading questions
- **Reassure:** Confirm the student has done the right thing in talking to someone and let them know the information must be passed but will be treated as Confidential.
- **Record:** Make a note of key points – date, time and the nature of the incident in the student own words.

## **D. The College of Haringey, Enfield and North East London (CONEL)**

The reporting procedures of **(CONEL)** should be read in conjunction with the CCCG Safeguarding, Child Protection and Adults at Risk Policy. The policy can be found on the CCCG Website: [www.cccg.ac.uk](http://www.cccg.ac.uk)

**CONEL** has a specific statutory duty to safeguard and promote the welfare of children and adults at risk including complying with the requirements for the Prevent Duty and the promotion of British/Our Values. The aim of **CONEL** is to ensure that all staff (and those who provide a service on our behalf) are supported in their legal responsibility to undertake a duty of care and to report all safeguarding and child protection concerns including the mandatory reporting of Female Genital Mutilation (FGM).

### **How to Report a Concern**

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that you follow the steps below:

- Staff call or email a safeguarding officer if required for advice or to report.
- Staff send RF1's to Safeguarding Officers and THE Designated Safeguarding Lead (DSL) who manages any external organisation communications leading from RF1's.
- Each safeguarding officer has been given specific allocations to curriculum schools across the college although they will also pick up cases as they come up regardless of whose area they are in.
- The safeguarding officers keep each other informed of who is dealing with the case and notify the DSL's personal assistant of any updates so this can be recorded and easily tracked and actioned.
- The RF1 paperwork along with The Safeguarding Policy are on The College's Intranet, Connect, in the Policies, Procedures, Guidelines and Resources section.
- The RF1's are sent to the safeguarding officers where these are then updated with the actions regarding the concern.
- The safeguarding officer then sends this updated information to the DSL's personal assistant who records this on a centralized spreadsheet.

### **Names of all the Designated Safeguarding Lead and the Designated Members of Staff for Safeguarding at CONEL:**

<b>Name</b>	<b>Role</b>	<b>Contact Number</b>
Hilary Moore	Director Employment Skills & Support. Designated Safeguarding Lead (DSL)	020 8442 3487/ 2679
Jonathan Silman	SG Officer/ Head of School Sport/Public Services/KS4	02084423423/ 3644
Jan Dunster	SG Officer/Head Of Learner, Information & Support	02084422658/ 3877

Ann Atkin	SG Officer/ Head of School Hair/Beauty/Supported Learning	02084423654/ 3188
Theo Ellis	SG Officer and Head of Learner Recruitment	02084423104/3691

Please note: The Help line (**0208 442 3948**) operates between 09:00 – 18:00. Telephone calls and e-mails are addressed the same day as receipt except calls to the Help Line made after 18:00; such messages will be actioned the following day.

If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism they should discuss this immediately with the **College’s Specific Point of Contact (SPOC) Hilary Moore on 020 8442 3487.**

### Keeping You Safe

All staff must observe appropriate professional boundaries with all students at all times in accordance with the CCG Code of Conduct. It is compulsory for all staff to confirm they have read, understood and agree to abide by the contents of this document. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students and should behave in a way which is professionally appropriate at all times. Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.
- Staff must immediately report the inappropriate conduct or behaviour of a member of staff towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins** - Group Director of Human Resources and Organisational Development on **0207 700 9220 / 0207 391 6477** or the Deputy DMAASV – **Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317.**

Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.

### Referral Process for Year 10 and 11 learners of compulsory school age:

Where staff are involved in delivering learning to learners attending College who are aged between 14-16 they should recognise that all policies relating to safeguarding apply to these learners.

- If a learner from this cohort is referred by a member of staff or self refers, then a safeguarding officer will report the matter to the DSL in the first instance and not Social Services except in the case of an emergency in which case staff should contact external agencies without delay.
- The DSL will then ensure that the school, which has the duty of care, is informed as a matter of urgency and before the end of the working day. If the DSL cannot be located, then a member of the safeguarding team will contact the school. Normally the School would then take over the case using their safeguarding policy and procedure.

- Where agreed in writing with sending institutions, the college may take full responsibility for the safeguarding case including contact with external agencies and parents while keeping the sending institution informed. This may be the case for some 14-16 full time learners attending the College.
- However, in all cases if in doubt, the default position will be to use the College safeguarding policy and procedures.
- Where a school is not involved the DSL or the Safeguarding Officer with responsibility for KS4 will contact Social Services if appropriate and make a referral following the College safeguarding policy and procedures

The college has a dedicated Safeguarding site that also includes E-safety (tbc). This is updated regularly and often contains material relating to the latest trends and topical new items.

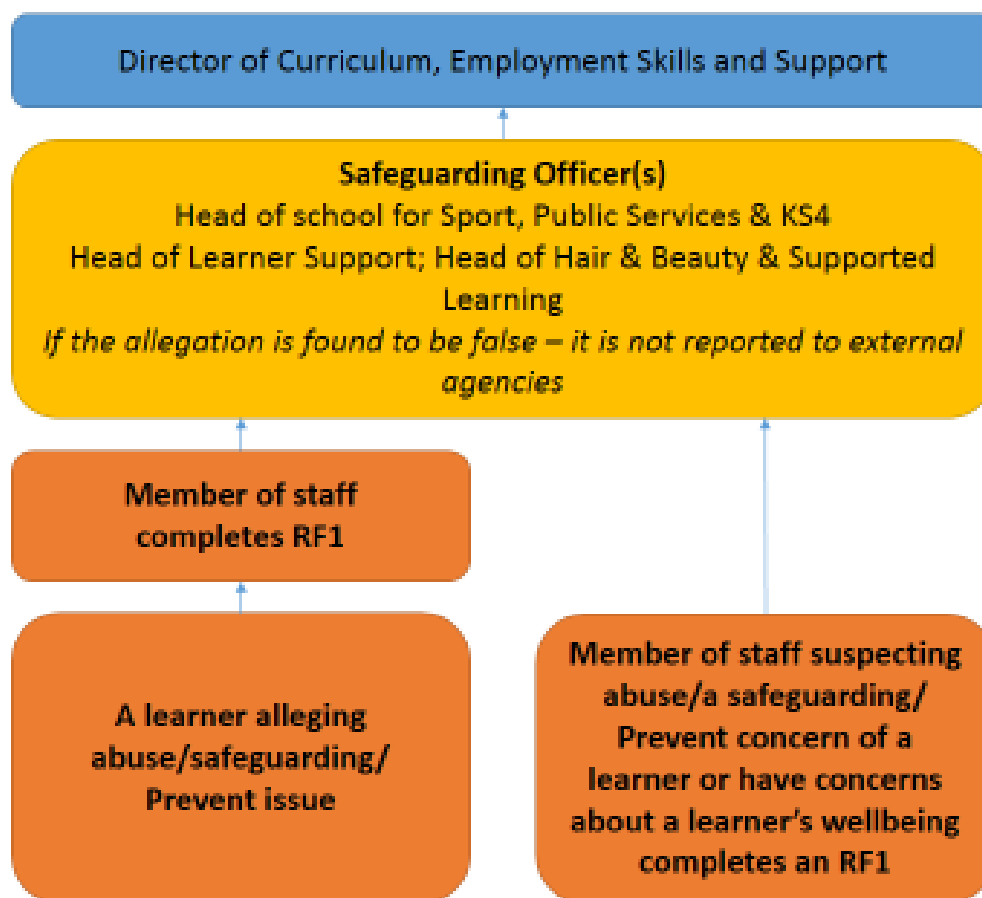
**Local Authority Link:**

**Threshold Criteria for Children's Services Enfield**

[https://new.enfield.gov.uk/enfieldlscb/wp-content/uploads/2017/06/London\\_Child\\_Protection\\_Procedures\\_Threshold\\_Document\\_2015.pdf](https://new.enfield.gov.uk/enfieldlscb/wp-content/uploads/2017/06/London_Child_Protection_Procedures_Threshold_Document_2015.pdf)



## CONEL: How to Report a Concern



Staff must immediately report the inappropriate conduct or behavior of a member of staff (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Claire Collins** (Group Director of Human Resources and Organisational Development) on **0207 700 9220 / 0207 391 6477** or the **Deputy DMAASV – Ellen Tsang**, Group Deputy, HR Director Operations & Quality on **0207 700 9317**.

In responding to a disclosure Staff are reminded to:

- **Receive:** Listen carefully, stay calm and respond sensitively. Encourage the student to talk but do not pressurise them and do not ask leading questions.
- **Reassure:** Confirm the student has done the right thing in talking to someone and let them know the information must be passed but will be treated as Confidential.
- **Record:** Make a note of key points – date, time and the nature of the incident in the student own words.

## Part 3: Appendices

### APPENDIX 1 Legal Framework, Statutory Guidance and Linked CCG Policies

The Safeguarding, Child Protection and Adults at Risk policy and Group college on-site procedures has considered and is compliant with the following legislation.

#### Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Inspection Act 2006
- Serious Crimes Act (2015)
- The Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- School Staffing (England) Regulations 2009 (as amended)
- Equality Act 2010
- Protection of Freedoms Act 2012
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Children and Families Act 2014
- Sexual Offences Act 2003
- The Education (Pupil Registration) (England) Regulations 2006 (as amended)
- Mental Capacity Act 2005
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014

#### Statutory guidance

- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018)
- 'Safeguarding Children and Safer Recruitment in Education' (Dept for Children, Schools and Families 2010).
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2015) 'Information sharing: advice for practitioners'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Keeping children safe in education' September 2018
- DfE (2016) 'Disqualification under the Childcare Act 2006'
- DfE (2017) 'Child sexual exploitation'
- DfE (2017) 'Sexual violence and sexual harassment between children in schools and colleges'
- London Safeguarding Children Board multi agency procedures (version 5) 2017
- Protecting Adults at risk: London multi-agency policy and procedures for protecting adults at risk from abuse

- DfE The Designated teacher for looked-after and previously looked-after children (Statutory guidance on their roles and responsibilities) February 2018

**CCCG policies that relate to this policy include**

- Learning and Behaviour Policy
- Health and Safety
- Whistle Blowing Policy
- Code of Conduct for Staff
- Site Security Policy
- Bullying and Harassment (Students)
- Equality Diversity & Inclusion
- Physical Restraint Policy
- Inclusive Learning (including students with learning difficulties and/or disabilities)
- Social Media Policy
- ICT acceptable use
- Complaints Procedure
- Religion and Belief
- Safer Recruitment
- Protection from Abuse Procedures
- Educational Visits
- Safe Touch Policy and Code of Practice
- `Restraint and Reasonable Force Policy
- E-Safety Policy

## APPENDIX 2: Types of Abuse and Neglect

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

**Emotional abuse** the persistent emotional maltreatment of a child such as to cause severe and persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

**Sexual abuse** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Child Sexual Exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Neglect and Acts of Omission** is when a vulnerable adult or child does not have their basic needs met, such as adequate food or warmth or help with personal hygiene. It may also include inadequate shelter including exclusion from home or abandonment, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. Signs might include deteriorating health, appearance or mood.

**Psychological Abuse**, such as threats of harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion.

**Discriminatory Abuse**, this includes any sort of abuse based on a vulnerable adults or child's race, gender or impairment such as their mental or physical health

**Institutional Abuse**, this is poor professional practice in an institution designed to safeguard both children and adults, including neglect, and can take the form of isolated incidents right through to ill treatment or gross misconduct.

**Financial or Material Abuse**, this is when a child/vulnerable adult are exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

**Peer on Peer Violence**

Staff must be aware of peer on peer abuse and how this can manifest itself through bullying, sexual harassment sexting and many other forms. Staff must be familiar with their respective Learning and behaviour policy which addresses the factors associated with Peer on Peer abuse

**Radicalisation, Extremism and Terrorism** in respect of safeguarding individuals from radicalisation, the College works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for students through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

**Extremism**, the Government has defined extremism in the Prevent strategy as; "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces"

Safeguarding issues may also be recognised in the specific circumstances identified below:

- Child pornography and the Internet
- Forced marriage of a child
- Young carers
- Looked after children and children living away from home
- Pregnancy of a child
- Self-harming and suicidal behaviour
- Bullying
- Radicalisation/extremism

This list is not exhaustive.

## **APPENDIX 3: Managing A Disclosure – Group standard guidance for all staff**

### **Approach – Ask and Assess**

- Open the conversation.
- Ask the *Safeguarding Question*. -e.g. *How are you, are you okay?*
- Set aside any judgments you may hold.
- Resist the temptation to give advice, argue or deny their feelings/experience

### **Give Support and Listen**

- Listen without interrupting.
- Encourage the learner to talk.
- Ask appropriate clarifying questions.
- Give reassurance but don't make promises.
- Do not ask the learner to repeat their disclosure.
- Reflect back what the learner has said using minimal prompts (Mmm, Ah, etc.).
- Silence can be supportive.
- Open body language.
- Comfortable eye contact.
- Don't offer glib advice e.g. cheer up, things could be worse.

### **Record and Report**

- Make brief notes as soon as possible, possibly during the meeting.
- Use the words spoken by the student not your interpretations or 'proper' words.
- Record other non-verbal behaviour which the learner might exhibit.
- Write up the notes as soon after the meeting as possible using the on-line safeguarding/child protection form.
- Do not destroy your original notes – they may be asked for at a later date. Scan these and store in the student's folder in the 'Confidential' area on the respective College area.
- Complete all areas of the online form with all the relevant details.
- If appropriate, use the body map sheet to indicate any areas of bruising or injuries.

**Please note:** Once the online form has been submitted or the case has been passed to one of the College's Safeguarding/Child Protection Officer, the member of staff does not need to take no further action unless the Safeguarding Officer requires them to.

### **Enact specialist safeguarding intervention– (Safeguarding/Child Protection Officers only)**

- Meet with the student to determine the extent of the issue.
- Make contact with relevant external agencies or relevant college managers depending on the nature of the disclosure.
- Attend necessary meetings, e.g. children in need, child protection, police interview, etc.
- Work with external agencies to ensure suitable protection is arranged for the student.

- Record all actions taken and outcomes of meetings with internal and external officers and/or agencies

**Encourage other supports - (Safeguarding/Child Protection Officers only)**

- Depending on the outcome of the various meetings and actions taken to protect the student, the Safeguarding/Child Protection Officer will lead on arranging 'wrap around' support for the student.
- Individuals who may become involved in providing 'wraparound' support are support staff, teachers, tutors, family, friend or from external agencies.
- Support groups and informal services can validate experiences, reduce isolation and provide peer learning for self-help.
- Self-help strategies can help and also give people a sense of regaining control of their lives and doing something positive including: books/leaflets, computerised packages, websites or cognitive-behavioral based apps.
- Complementary therapies, e.g. mindfulness, massage therapy, yoga, relaxation strategies, nutrition, exercise, creativity, avoiding alcohol/drugs.
- Wellness Recovery Action Planning.

## APPENDIX 4: Roles and Responsibilities

Safeguarding is everyone's responsibility and all staff carry out safeguarding roles and responsibilities. This appendix sets out the statutory roles and responsibilities of staff that hold specific safeguarding responsibilities reflected in their job descriptions and for which they are accountable.

### All Staff

- Fully comply with the requirements of the Group safer recruitment policy.
- Safeguard students' wellbeing and maintain public trust in the Group and in the teaching profession as part of the professional standards for teaching.
- Adhere to the Groups Safeguarding, Child Protection and Vulnerable Adults Policy and Procedures and ensure that they understand the on-site reporting procedures in the college where they are working.
- Ensure they complete Safeguarding Induction training and ongoing training events, briefing and workshops that they are requested to attend
- Comply with the Group's staff code of conduct at all times that makes clear the appropriate boundaries for communicating with students and their families.
- Remain vigilant and report any safeguarding concerns **immediately** following the procedures in place at the college they are working. (Part 2 of this policy).
- Report any concerns immediately to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) or the Deputy** regarding inappropriate behavior or conduct of a member of staff to a student.
- Do not promote any form of extremist or radical view that endorses or support the use of violent or non-violent acts.

### Chief Executive Officer (CEO)

- The CEO is responsible for ensuring that the Safeguarding, Child Protection and Adults at Risk policy and procedures adopted by the Governing Body are effectively implemented, followed by all staff and monitored for quality assurance in each of the colleges.
- It is the CEO's responsibility to allocate sufficient resources and time to enable the Group Nominated Safeguarding Lead and the Nominated College Safeguarding Leads to effectively carry out their lead responsibilities and ensure that relevant staff are able to attend strategy discussions, child protection, child in need conferences and other inter-agency meetings and to contribute fully to the assessment of students.
- The CEO is responsible for ensuring that all staff are confident in their safeguarding role and able to raise concerns about poor or unsafe practice regarding students, and that concerns will be addressed sensitively and in a timely manner in accordance with the Group's whistle blowing policy. We recognise that it is not the responsibility of students to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the CEO who will deal with the concerns appropriately.



### **Group Nominated Safeguarding Lead**

The Executive safeguarding lead will ensure the Group meets its statutory duty by:

- Ensuring the Group safeguarding and child protection and adults at risk policies are up to date and consistent with the appropriate laws and regulations and that policies are reviewed annually
- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the Group
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the Group
- Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities,
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans
- Working with the Colleges/Training Arm Nominated leads with the aim of ensuring the policy and procedures are effective throughout the organisation
- Ensuring that Group staff receive appropriate annual safeguarding training and appropriate training is provided for Governors.
- Ensuring the Group offers a safe environment for staff and students to learn and work
- Ensuring the appointment of a Governor with a responsibility for Safeguarding and Child Protection.
- Ensuring there is an identified deputy to act as the Designated Member for Allegations against Staff and Volunteers (DMAASV) in their absence.
- Ensuring for all staff who have a defined responsibility for Safeguarding that this is appropriately in their job description.
- Ensuring that safeguarding issues are brought to the attention of the governing body as required

### **The College Principals/CEO of Capital City Training**

College Principals are responsible for:

- Appointing a senior member of staff with responsibility for leading on safeguarding.
- Monitoring safeguarding cases within the college/ training arm and taking appropriate actions to safeguard students.
- Ensuring the College nominated lead for safeguarding fulfils their duties.

### **Nominated Safeguarding College Lead**

This person will be responsible for:

- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College/Training Arm
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College
- Ensuring the appointment of a designated member of staff for Safeguarding and an effective structure to support safeguarding across the College/Training Arm.
- Identify a named Specific Point of Contact (SPOC) for the referral of any concerns regarding radicalisation and extremism and who will fulfil the duties identified in Appendix 6 under the Prevent Duty.
- Ensuring there is an identified College Designated Safeguarding and Child Protection Lead

Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals

- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities,
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans
- Liaising with the Group Nominated Safeguarding Lead (DMAASV) or the deputy to determine the appropriate action, where there is concern over the conduct of a member of staff or volunteer towards a student.
- Providing the Group Nominated Safeguarding Lead with reports on safeguarding alerts and cases as required.
- Providing a termly Safeguarding Report to the respective College Education Board and the Training Board.
- In liaison with the Group Director Human Resources and Organisational Development, ensuring all staff receive appropriate safeguarding training at induction and on an annual basis refresher safeguarding training
- Ensuring the College offers a safe environment for staff and students to learn and work
- Ensuring that safeguarding issues are brought to the attention of the Group Nominated Safeguarding Lead.
- Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children.
- Ensuring College Procedures as outlined in Part 2 of the Policy are reviewed each term and updated to reflect any changes of staff including Local Authority contacts.

#### **The Designated Lead Member of Staff for Safeguarding**

- Each College/Training Arm within the group in addition to the Nominated Lead for Safeguarding will also have a Designated Lead Member of Staff for Safeguarding. This post will act as a source of support and guidance on all matters of child protection and safeguarding within their College/Training Arm.
- Staff must report any concerns to the Designated Person or one of the deputies via the approach outlined in **Part 2**. Staff are also able to discuss safeguarding, child protection and Adults at Risk issues with the Designated Person, one of their deputies, or a nominated member of the safeguarding team, who will act in accordance with this policy and the London child protection procedures and report back to the Designated Member of Staff for Safeguarding.

#### **The Designated person is responsible for:**

- Ensuring there is a system for monitoring and recording concerns about students at an early stage which is implemented across the College/Training Arm and adhered to by all staff.
- Managing child protection concerns and making referrals to Children's Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate
- Attending and providing reports to 'child in need' meetings, child protection conferences and core group meetings and contributing to child protection and 'child in need' plans
- Monitoring the attendance and progress of students who are the subject of 'child in need' or child protection plans and implementing the College/Training Arms part of the plan
- Informing Children's Social Care of any proposed change of College/Training Arm of a child who is subject to a 'child in need' or child protection plan and alerting them if a child who is subject to a protection plan is absent from College/Training Arm without reasonable justification
- Ensuring that relevant information about students is shared with staff on a 'need to know basis'

- Maintaining accurate child protection records which are held securely and confidentially
- Ensuring all staff are aware of the need to record concerns about students and enabling them to do this as part of a College/Training Arm-wide process, such as in tutorial records, individual/personal learning plans. These would include bullying and racial issues.
- Ensuring complete and accurate records are forwarded to receiving Colleges, such as tutorial records and the individual/personal learning plan
- Ensuring students, parents and carers have access to the Colleges safeguarding policies and procedures
- Having a working knowledge of the role and function of the appropriate Safeguarding Children Board
- Clarifying to personal and lead tutors, deputy directors and student support services their role in monitoring students at risk in terms of welfare and tracking cases of concern
- Training for staff with designated child protection and safeguarding responsibility occurs every year.
- Undertaking the role of LAC Designated Teacher, as outlined in the revised DfE (2018) 'Keeping children safe in education' September 2018: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/683561/The\\_designated\\_teacher\\_for\\_looked-after\\_and\\_previously\\_looked-after\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf)

### **Modern Day Slavery**

Modern Day Slavery as it is a crime and a violation of a person's fundamental human rights. This can be done through bullying, harassment and coercing a person into doing something they do not want to do. Modern Day Slavery, takes on various forms such as forced labor, human trafficking, and is closely linked to Gangs, Children Missing in Education and Child Sexual Exploitation. Colleges have had a duty since November 2015 to report anyone they believe is a suspected victim of slavery or human trafficking.

### **Trafficked and Exploited Students**

A trafficked student is coerced or deceived by the adult who brings them into the country. Trafficked students are denied their human rights and are forced into exploitation e.g. domestic servitude, forced marriage, criminal activity, begging, benefit fraud, acting as a drug mule, sweatshop or restaurant work. Students may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes. Recognition of trafficked and exploited students will normally rely on a combination of general signs of abuse and neglect and issues concerned with the student's immigration status. These students may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent, presenting with a history of missing links and unexplained moves. Group staff should make a referral to Children's Social Care if they suspect a student is a victim of modern slavery or human trafficking.

### **Children Missing in Education**

Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at Group including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

The Group will support students by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some students run away because they feel there is no other option. Students need to know where they can access help if they are thinking of running away and what alternatives are open to them. As a Group, we are well placed to advise young people about the dangers of running away and to point them to available support. If Group staff become aware of a young runaway, they should ensure they inform the appropriate Designated Lead or one of their Deputies who in turn will contact the Police Liaison Officer and the Education Welfare Service.

### **Forced Marriage/Honor Violence/Killings**

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A student who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the student themselves, or the student's peer group, a relative or member of the student's local community or from another professional.

Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, child abuse or neglect, family/young person conflict, a student absent from Group or a missing/runaway. Forced marriage may involve the student being taken out of the country for the ceremony, is likely to involve non- consensual and or under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honor killing'.

Young men as well as women are victims of forced marriage.

Honour based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonored their family. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are a risk from their parents and families.

Group staff should respond to suspicions of a forced marriage or honour based violence by making a referral to Children's Social Care 0207 527 7400 and if the risk is acute, to the Police Child Abuse Investigation Team 020 7527 8102. Group staff should not treat any allegations of forced marriage or honour based violence as a domestic issue and send the student back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage.

**For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement.**

Further information and advice can be obtained from the Forced Marriage Unit [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage) or 020 70080151 and the Honour Based Violence Helpline 0800 599 9247.

### **Female Genital Mutilation**

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003. Despite the harm it causes, FGM practicing communities consider it acceptable to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is thought to be 6 - 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of students at WKCIC Group is such that they are not necessarily in the 'high risk' category for FGM, a student may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

### **Group staff should be alert to the following indicators:**

- The family comes from a community that is known to practice FGM
- A student may talk about a long holiday to a country where the practice is prevalent.
- A student may confide that she or a sister or family member is to have a 'special procedure' or to attend a special occasion
- A student may request help from a teacher or another adult
- Any female student born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk. Any information or concern about a student or member of her family being at risk of FGM must be reported to via the appropriate Designated Person and will be treated as an immediate child protection referral to the student's home borough.

### **Domestic Abuse:**

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behavior is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.” \*

Forced marriage, ‘honour based violence’ and female genital mutilation are included in this definition.

It important to note that the definition includes young people aged 16 or over, therefore staff must be vigilant to domestic violence within young people’s relationships and refer this as a child protection concern to the CPVA.

Living with domestic violence is a form of emotional abuse and is included in the definition of emotional abuse as, ‘seeing or hearing the ill treatment of another’. If staff are aware that a student is witnessing, hearing, living with or experiencing domestic violence, they should inform the appropriate Designated Person or in their absence an deputy, who will in turn refer the matter to or to Children’s Social Care for the borough in which the student lives.

### **Gang Violence and Gang Grooming**

**(Adapted from “Safeguarding children affected by gang activity and/or serious youth violence”– London safeguarding children’s board section14.5)**  
[www.londonscb.gov.uk](http://www.londonscb.gov.uk)

As part of the teaching and tutorial process staff are well placed to pick up signs of anti-social behaviours, aggression, and bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators. Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime. Staff should follow the Group’s behaviour management and anti-bullying and harassment procedures and if necessary work collaboratively with external bodies such as Connexions and Reality around Gangs.

### **Sexual Exploitation**

‘Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them sexual activities.

Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social /economic and/or emotional vulnerability.’

Sexual exploitation may be organised or opportunistic. It may take place when a student is groomed using technology or is encouraged to think that they are entering into a relationship. It may be linked to gang membership. Boys as well as girls are sexually exploited. Young people are vulnerable to sexual exploitation in many ways and the vigilance of staff is key in identifying possible signs or indicators. The Rochdale Serious Case Review into the sexual exploitation of a group of young people highlighted the importance of FE Groups in identifying and meeting the needs of vulnerable young people who might be at risk of this form of abuse.

Staff must be vigilant to any signs or concerns that a student may be sexually exploited and report concerns as a matter of urgency.

## APPENDIX 6: The Prevent Duty

The Group will fulfill its obligations under the 'Counter Terrorism and Security Act' (2015), to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups through positive curriculum delivery building self-esteem and self-belief.

### **In addition, we will:**

- Establish a single point of contact for the 'Prevent' strategy
- Establish a register of students deemed to be at risk of being drawn into terrorism
- Develop an action plan to reduce the risk
- Train staff to recognise radicalisation and extremism
- Refer vulnerable people to 'Channel' risk assessment Panels
- Prohibit extremist speakers and events
- Manage access to extremist material
- Have regard to published DfE advice

Staff have a responsibility to familiarize themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College.

The Group recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The Group will continue to empower its students to create communities that are resilient to extremism and protect 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.

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 for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgment and discuss with other colleagues if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages.
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism they should discuss this immediately with the **College's Specific Point of Contact (SPOC) or the** Designated Safeguarding Officer.

Each College has a named Specific Point of Contact for referring any concerns:

- **City and Islington College: David Smith - 020 7700 9339**
- **Westminster Kingsway College: Jasbir Sondhi - 0207 832 5100**
- **CONEL : Hilary Moore - 020 8442 3487**
- **Capital City College Training: Jackie Chapman - 0207 025 1948**



## APPENDIX 7: Young Carers

The Group works to ensure that all students are given every opportunity to achieve their chosen qualification. The group acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education.

### What are young carers?

Young carers are children or young people under 18 who are responsible on a regular basis for a family member who has an illness or a disability.

Whilst within many families, children and young people helping out around the house is seen as a normal part of family life, young carers have added responsibilities which may include sole or main responsibility for:

- Emotional and physical support for the family member
- Carrying out their personal care (bathing, dressing and feeding)
- Administering medication
- Taking to medical appointments
- Looking after younger siblings

### How can you identify a young carer?

- The student seems tired and lacks concentration
- Illness or disability in the family
- Frequent lateness or absence
- Poor academic achievements, failure to complete assignments on time
- Isolation or difficulty in forming friendships
- Failure to engage in enrichment activities outside of college
- Behavioural problems
- Victims of bullying
- Parents not engaging with the college, e.g. attending meetings
- Unusual levels of maturity and responsibility

It is important to note that the above includes **possible** indicators that a student might be young carer.

### The Group's Approach

- Caring responsibilities can significantly impact upon a child's health and development.
- The Individual College's Designated Safeguarding Lead Officer will let all new students know who they are and what they can do to help.
- Young carers will be put in touch with the local Young Carers Service/ Local Authority Children and Families Services and families of any other support services.
- The College will liaise directly with parents who have mobility and communication difficulties, to provide information on meetings concerning their 16-18 year old child.
- In the event that a member of staff has a safeguarding concern about a young carer, the concern must be immediately reported to the Safeguarding Team via the respective helplines:
  - **City and Islington College: 0207 697 1717**
  - **Westminster Kingsway College: 0207 832 5266**
  - **Capital City College Training: 0207 832 5334**
  - **CONEL: 0208 442 3948**

The College will respect the rights of young carers' privacy, only sharing information about the young person and their family on a need to know basis.

## APPENDIX 8: Restraint and Reasonable Force

This guidance should be read in conjunction with the Group **Physical Restraint Policy** (Appendix 1) which is informed by the Dfe guidance 'Use of Reasonable Force' 2012... Section 93 of the Education and Inspections Act 2006 enables Group staff (including support staff, non-teaching staff and voluntary staff) to use such force as is reasonable in the circumstances to prevent a student from:

- Committing an offence;
- Causing personal injury to any person (including themselves) or damage to any property;
- Prejudicing the maintenance of good order and discipline

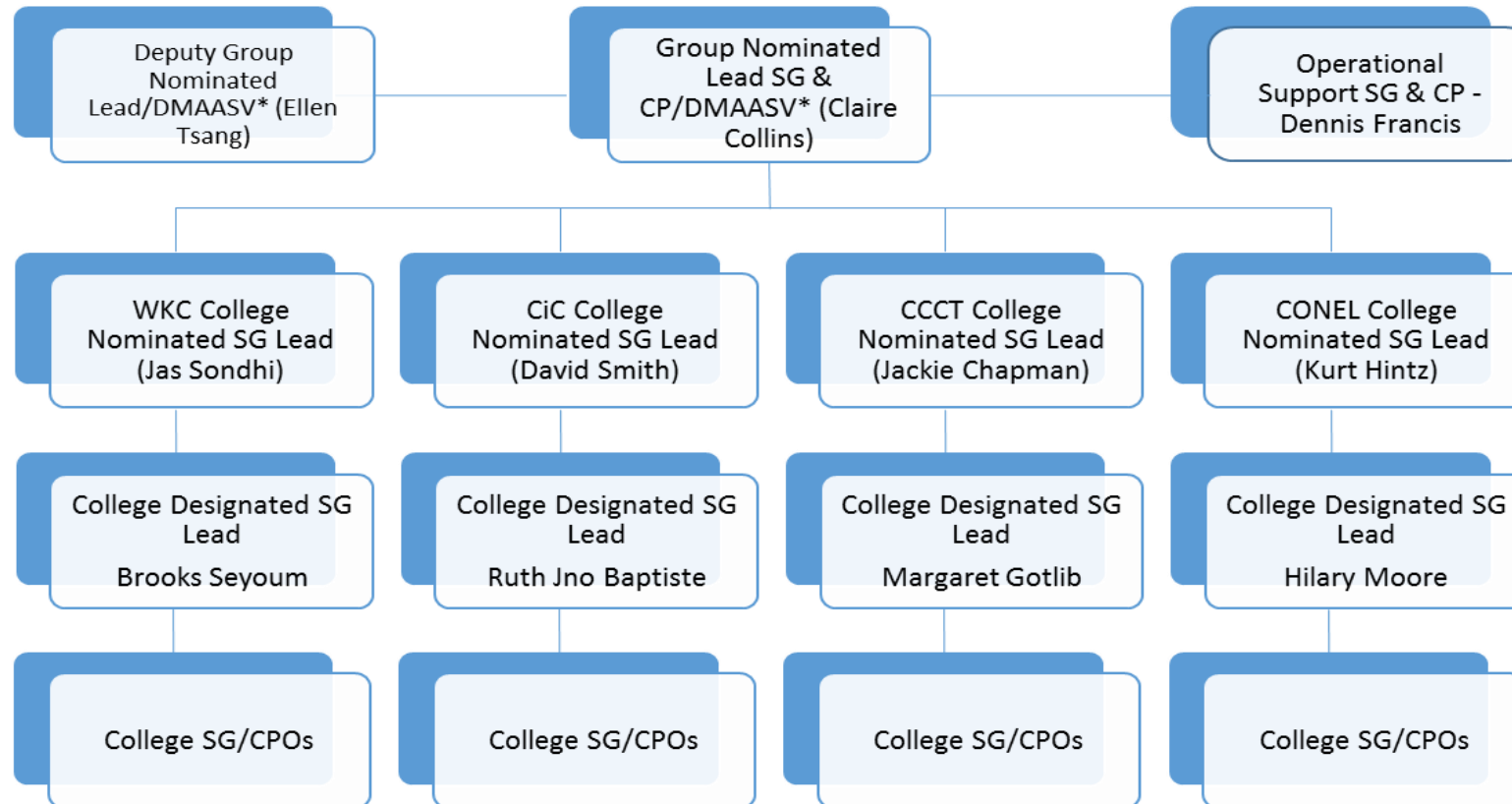
This includes occasions when the student is not on Group premises e.g. on College visits. Section 45 of the Violent Crime Reduction Act 2006 gives authorized staff the right to search pupils for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon. If resistance is expected the police **MUST** be called. Further guidance is at [www.teachernet.gov.uk/whole](http://www.teachernet.gov.uk/whole). Security staff are trained in the use of reasonable force and restraint.

Recording system and procedures in each Group college should be followed including completing the college recording form and reporting to the Local Authority in line with **Appendix 1** Physical Restraint Policy.

Parents/carers should be informed when reasonable force has been used and protocols agreed with parents/carers if use of reasonable force is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Students displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioural, emotional and social difficulties or with severe behavioural difficulties should be handled according to the guidance in [www.teachernet.gov.uk/wholeschool/sen/piguide](http://www.teachernet.gov.uk/wholeschool/sen/piguide). S548 Education Act 1996 states that the use of force as a punishment is unlawful. Groups have two duties under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001):

- Not to treat a child with a disability unfavorably without justification
- To take reasonable steps to avoid putting a child with a disability at a substantial disadvantage

## APPENDIX 9: CCCG SG & CP Management and Reporting Structure



\* DMAASV- Designated Manager for the allegations against staff and volunteers. Staff are expected to report any concerns on the inappropriate behaviour of staff/volunteers immediately to the DMAASV, or the Deputy.

## APPENDIX 10: E-safe CCCG Reporting

