Safeguarding, Child Protection and Adults at Risk Policy 2020-2021

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1.   COVID 19 AND SAFEGUARDING STATEMENT

In light of COVID 19 and the movement across the FE sector to remote on-line learning, the Group have been following the Department of Education "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers" and the "Guidance for FE and Providers" on Safeguarding.

The Group recognises there are a range of potential challenges to ensure the safety and well-being of students, who are no longer in a structured educational setting. For those young people deemed as vulnerable being in an educational setting can be an important lifeline particularly where their needs cannot be met safely at home or where they may be at risk of harm. The strategy of the Group has included:

- Learning off site as a new factor in the Group's Safeguarding Risk Assessment.
- Continuing to ensure the monitoring and engagement of vulnerable young people such as those who have a child in nee/child protection plan, are a looked-after child, have an education, health and care (EHC) plan or those at risk of becoming NEET ('not in employment, education or training'.
- Enabling participation in education through providing financial support in the form of Free School Meals, Bursary payments, payment of £200 for laptops, and students who are in significant financial difficulty continue to be assessed for hardship payments.
- E-Safety training for Staff to support their awareness and understanding of the potential dangers of on-line platforms and an on-line Safeguarding module for students that include E-Safety.
- Contacting at risk and vulnerable students regularly. This includes weekly welfare checks through phone and video calls; and through the use of emails and text messages.
- The Safeguarding & Welfare Teams continue to actively engage with partners through local and London wide safeguarding partnership forums to ensure our practice is informed by government guidance.
- Continuing to provide students with useful guide and tips on maintaining good mental health, and the launch a programme of 30 minutes listening sessions for students who are struggling with motivation and isolation issues.
- Remind staff of the need to follow the Code of Conduct when delivering on-line teaching and to ensure that the guidance in the External Visitors Policy are followed including that a speaker must not be left unsupervised with a group of students, therefore a member of staff should be in the TEAMs on line session throughout.

Due to the need to maintain social distancing, the Group will continue to deliver much of the learning to student remotely. Over time, as restrictions are lifted, the Group will begin to re-introduce classroom and workshop-based learning. For many learners, this will mean a transition from remote education to blended learning (for example, a combination of remote and traditional classroom, workshop or workplace learning).

The Safeguarding approach of the Group will be updated to take account of the changing circumstances with the aim to meet the varied needs of different learner groups, including the engagement and support to vulnerable learners.

2. Legislative Framework

2.1 Safeguarding Young People (Children)

In June 2004 Section 175 of the Education Act 2002 came into force. This places an explicit responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, appropriate arrangements must be made in accordance with any guidance and legislation issued by the Secretary of State as detailed in Appendix1.

Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002) under this, Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. KCSIE is updated annually, this policy is in line with the September 2020 version.

- KCSIE (2020) defines safeguarding and promoting the welfare of children as: protecting children from maltreatment;
- Preventing impairment of children's mental health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy and the associated Group and College procedures have been developed in response to KCSIE and the associated Statutory legislation. The Children Act (1989) defines a child as any person under the age of 18 years. This includes all 14–16 year old children attending College sites.

2.2 Safeguarding Adults at Risk

This policy and the associated procedures have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication "Safer Practice, Safer Learning "(2007). The guidance applies to all education providers of post-16 learning and skills.

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 19 or above at the point of enrolment.

The term 'Adult at Risk' is used to describe a vulnerable adult

3. Purpose of Policy

The Group recognizes its safeguarding responsibilities to all its students and staff. Drawing on the guidance and legislation detailed in Appendix the purpose

of this policy is to:

- Set out the framework to safeguard children, vulnerable adults and any students in order to promote their welfare and safety.
- Outline the responsibilities within the Group in relation to safeguarding child and vulnerable adults in line with current legislation, guidance and best practice.

4. Policy Statement & Scope

4.1 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).**

4.2 The Group's core safeguarding standards and principles are:

- The welfare and safety of our students is paramount and this principle underpins all safeguarding work.
- All our students have the right to access their College (on site or remotely) free from fear of harm and be protected from mistreatment, abuse and exploitation.
- 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, underpinning 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.

4.3 The Group fully recognises its responsibility for safeguarding and protecting all students at each college and the training provision (CCCT). 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.

4.4 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 Group's colleges.

4.5 This policy sets out the Group's 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 reporting procedures and guidance detailed in **Part 2** of this policy.

4.6   The policy is applicable to all on-site, off-site and online activities undertaken by our leaners whilst they are the responsibility of one of the Groups colleges.

4.7   Our policy applies to all staff employed within the Group regardless of contract type staff working on site employed by other services and agencies and those working with students on placements, governors, external visitors, consultants and volunteers working for each of our colleges.

4.8   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.

4.9   The Group reserves the right to refuse admission to any student who may pose a risk   to other students and has appropriate student admissions procedures in place.

5.   Safeguarding Procedures and Guidance on reporting Concerns -

5.1   Each college in the Group has set out their 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:

- Nominated College Safeguarding Lead who is a member of the SMT with a responsibility for safeguarding issues with College
- College Designated Safeguarding Leads who has day to day operation responsibility for safeguarding.
- Safeguarding Team who ensure that safeguarding needs are met with the College.

5.2   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.**

5.3   Where students attend other Group sites or provision, including Centres 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.

5.4   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.

5.5   All staff must read and understand Part 1 of 'Keeping Children Safe in Education' statutory guidance for schools and colleges. (DfE)

5.6   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.

6.   Complaints and Allegations against Staff and volunteers

6.1   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.

6.2   The Group Nominated Lead for Safeguarding and Child Protection Hilary Moore (Assistant Principal, Employment Skills and Support) 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 Head of Human Resources Operations) 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.

6.3   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).**

7.   Recording and Referral

7.1   Concerns about students should be recorded on the Group's individual/personal learning plan and on the College/ CCT's or Centre's' 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.

7.2   Records should be signed and dated and kept in chronological order. Group actions minuted in child protection conferences/strategy meetings must be implemented.

7.3   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.

7.4   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.

7.5   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 student's home borough.

7.6   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.

7.7   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.

8.   Supporting Students: Mental Health and Well Being

8.1   Each college within the Group has 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 as outlined in KCSIE 2020. The Group recognizes the value of early help, early intervention and coordinated support through full cooperation with interagency working arrangements.

8.2   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

8.3   The Group provides clear guidance on how best to the varied needs of different learner groups, including the engagement and support to those deemed as vulnerable. (Appendix 10).

9.   Safeguarding Training for Capital City College Group Staff

9.1   Safeguarding our students is a key priority for the Group and we are committed to ensuring that all staff are well trained and feel confident to carry out their safeguarding duties and responsibilities.

9.2   The Group's nominated designated safeguarding staff undergo a dedicated induction course and refresher training 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.

9.3   All staff will undertake initial Safeguarding, Child protection and Adults at Risk and

Prevent Duty training and that their training is refreshed every year.

9.4   The responsibility of ensuring that all staff employed by the Group received appropriate training rests with the Group Director Human Resources and Organisational Development.

9.5   A central record of mandatory Safeguarding staff training is held with the Group's HR team.

9.6   Organisations which 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.

10.   Safer Recruitment and Staff Appointments

10.1   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 Group is committed to evidencing this practice in relation to all staff working with students in the Group.

10.2   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 DfE guidance "Keeping Children Safe in Education: Statutory guidance for schools **and colleges, DfE Regulated** activity in relation to children and the relevant regulations and codes of practice as issued by the DBS. It is the policy of the Group to undertake DBS re-checks. In line with the advice from the AOC (August 2019) this will include the introduction of annual self-declaration and a DBS re-check every 5 years for those in positions of "regulated activity". The Group will continue to uphold best practice in safer recruitment as outlined in KSCIE 2020.

10.3   All applicants for employment are required to complete either an approved application form or a CV, which requires them declare if they have a criminal conviction. The Group reserves the right to decline any applicant who fails to answer the question. The Group shall consider taking disciplinary action in accordance with the staff disciplinary procedures if it is discovered that a member of staff has provided false or incomplete information as part of the recruitment process.

10.4   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 3 years.

10.5   The Group will only use employment agencies which can demonstrate that they have carried out pre-employment checks on 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 where they work. Additionally, induction briefings will include safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures within the Group.

10.6   All students and applicants for admission to a programme of study offered by the Group are required to complete either an approved application form or an enrolment form, which requires them declare if they have a criminal conviction. As applicants are required to disclose details of criminal convictions, the Group reserves the right to decline any applicant who fails to answer the question. The Group shall consider taking disciplinary action in accordance with the student disciplinary procedures if it is discovered that a student has provided false or incomplete information as part of the enrolment process.

10.7   Where it is revealed that during a course a student has obtained a criminal record and not disclosed this, the College may consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.

11.   Work Experience, Placements and Work Based Learning

11.1   The individual Colleges and CCCT 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, 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.

12.   Staff Code of Conduct

12.1   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.

12.2   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.

12.3   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).

13.   Information Sharing and Confidentiality

13.1   The Group respects 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 confidentially at all times.

13.2   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.

13.3   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.

13.4   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.

13.5   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.

14.   Managing Disclosures – Group Standard Guidance for all Staff

14.1   The Group is 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**.

14.2   The Group recognises 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 is 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.

14.3   The Group believes that working within the clear framework of the Safeguarding, Child Protection and Adults at Risk Protection Policy and Procedures will support staff in carrying out their duties and responsibilities effectively.

15.   E -Technology & E-safety

15.1   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 11 and 12.**

15.2   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.

16.   Extended Services and Activities

16.1   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.

16.2   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.

16.3   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.

16.4   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.

17.   Site security, Contractors and Agency Staff

17.1   All students and staff should be able to feel safe when they are on the campus. All staff and students are expected to have appropriate ID at all times. 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 allowed access to a site unless they are met and accompanied by a member of staff Appendix 1 Health & Safety Policy & External Visitors Policy.

17.2   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.

17.3   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.

18.   Working in Partnership with Parents and Carers

18.1   The Group is 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.

18.2   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.

18.3   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.

18.4   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.

19.   Monitoring and Review

19.1   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.

19.2   This policy will be reviewed and updated annually by the Group's Strategic Safeguarding Child Protection and Prevent Board and approved by the Group Leadership Team. In addition, the policy will be reviewed by the Governors' every two years

19.3   Each college Principal /Operations Director 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.

19.4   Students will be involved in ascertaining the effectiveness of the policy and how safe they feel in their learning environment.

19.5   All safeguarding training for staff will be evaluated for relevance and impact.

19.6   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.

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.capitalccg.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:

NAME	SITE	TEL	ROLE
Janet Davidson	CHSCC	02077009402	Safeguarding Champion & Child Protection & Adults at Risk Officer
Lorraine Gaylor	SFC	02075200609	Safeguarding Champion
Philippa Cooke	CAS	02075207360	Safeguarding Champion & Child Protection & Adults at Risk Officer
Faith Patterson	CBAT	02077047207	Safeguarding Champion
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
Grace Bowman	CHSCC	02077009234	Child Protection & and Adults at Risk Officer

- 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 My Concern (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.
- In the unlikely event that you are unable to access My Concern from home, you should email your concern to the Safeguarding Manager or Deputy using: safe.candi.ac.uk as it

is important to report any concern immediately.

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

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 (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers** (DMAASV) - **Hilary Moore,** Assistant Principal CONEL on **0208 442 3487** or the **Deputy DMAASV – Trovene Hartley,** Head of HR Operations, **020 700 9269.**

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 to speak to Students either on site or remotely.

- 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.keepingsafe.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 ISLINGTON

https://www.islingtonscb.org.uk/SiteCollectionDocuments/2015.05.21%20ISCB%20Threshol%20Document.pdf

City and Islington College: How to Report a Concern
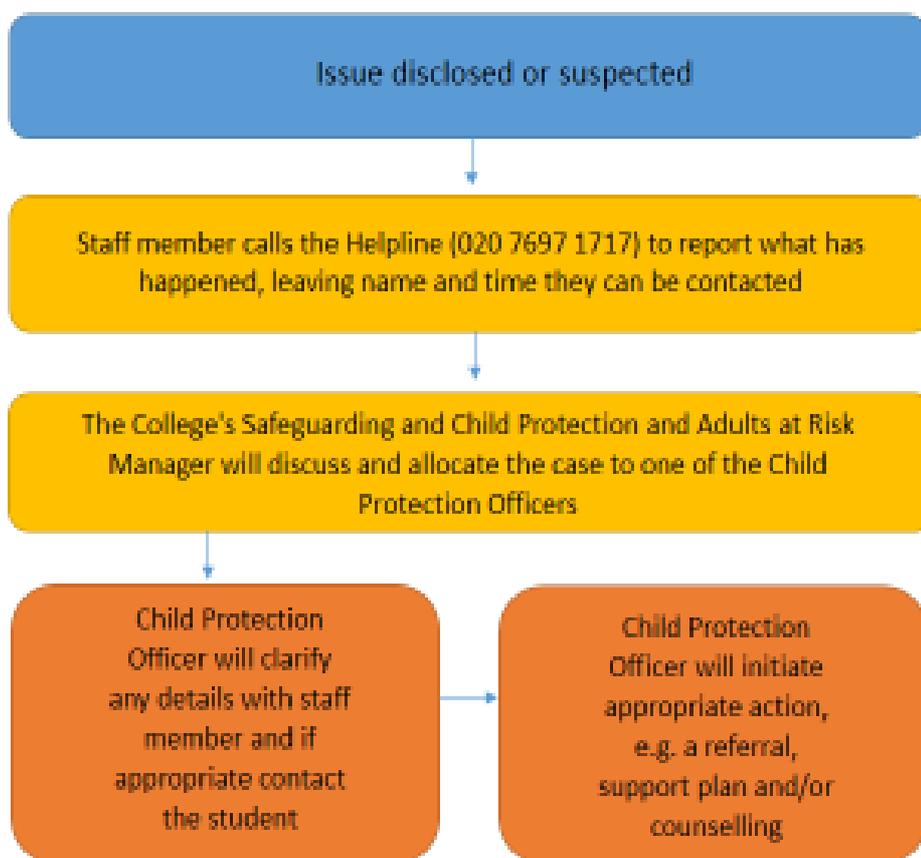
Issue disclosed or suspected

↓

Staff member calls the Helpline (020 7697 1717) to report what has happened, leaving name and time they can be contacted

↓

The College's Safeguarding and Child Protection and Adults at Risk Manager will discuss and allocate the case to one of the Child Protection Officers

↓

| Child Protection Officer will clarify any details with staff member and if appropriate contact the student | → | Child Protection Officer will initiate appropriate action, e.g. a referral, support plan and/or counselling |

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) - **Hilary Moore,** Assistant Principal CONEL **on 0208 442 3487** or the **Deputy DMAASV – Trovene Hartley,** Head of HR Operations, **020 700 9269.**

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 CCCG Safeguarding, Child Protection and Adults at Risk Policy. The policy can be found on the CCCG Website: www.capitalccg.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;

- All concerns should be reported through My Concern. You can access My Concern through WKC dashboard or www.myconcern.education
- If the concern is urgent, contact the Safeguarding Team on 0207 832 5331 or accompany the student to a Safeguarding Officer at your Centre.
- To report a concern through My Concern, log on and complete the online form
- Record as much relevant information on the form, the nature of your concern, the date you were notified of the concern.
- Select the Safeguarding Officer for your Centre and submit.
- Once you click submit, the Safeguarding Team will be alerted, and they team will carry out the appropriate risk assessments and where appropriate, will refer the case for internal support to an external agency.
- You will receive updates on the referral through My Concern.

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 020 7832 5384.

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

NAME	TEL	ROLE
Jasbir Sondhi	0207 832 5100 / 0777 6769452	College Director Nominated SMT Safeguarding Lead/ SPOC (Cross College)
Brooks Seyoum	0207 832 5384 / 07341 736 850	Head of Student Support & Safeguarding Lead (Cross College)
Carly Billiau	02077 832 5170 / 07341 127 158	Welfare & Safeguarding Officer (King's Cross)
Aine Pretty - McGrath	0207 025 1924 / 07458 127 164	LAC & Safeguarding Officer
Laura Meyers	0207 8325334 / 07458 127 162	Mental Health & Safeguarding Officer (Soho/ Regent's Park)
Laura Edwards	0207 664 6850 / 07458 127 780	LDD Coordinator/ Safeguarding Officer (Alexandra Centre)

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 (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers** (DMAASV) - **Hilary Moore,** Assistant Principal CONEL on **0208 442 3487** or the **Deputy DMAASV** – **Trovene Hartley, Head of HR Operations, 020 700 9269.**

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 to speak to Students either on site or remotely

- 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.keepingsafe.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 links:

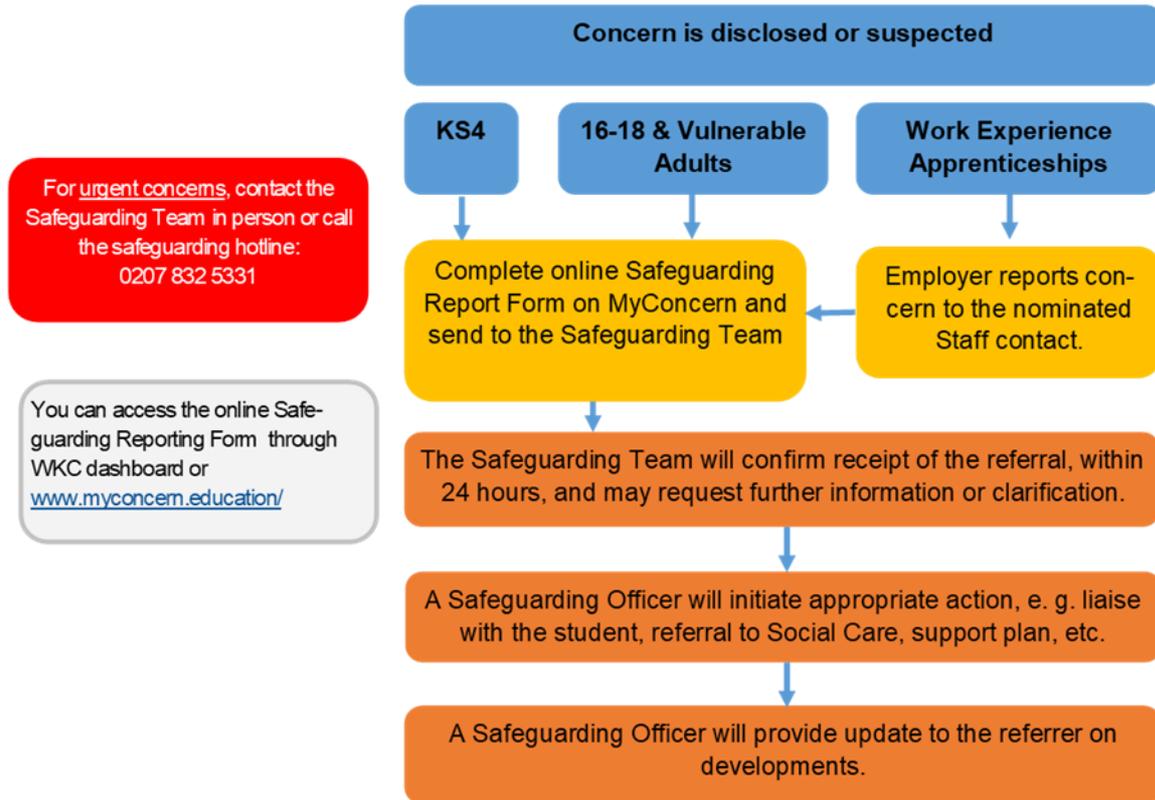**Threshold Criteria for Children's Services Westminster**

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

Concern is disclosed or suspected

| KS4 | 16-18 & Vulnerable Adults | Work Experience Apprenticeships |

For urgent concerns, contact the Safeguarding Team in person or call the safeguarding hotline: 0207 832 5331

You can access the online Safeguarding Reporting Form through WKC dashboard or www.myconcern.education/

Complete online Safeguarding Report Form on MyConcern and send to the Safeguarding Team

Employer reports concern to the nominated Staff contact.

The Safeguarding Team will confirm receipt of the referral, within 24 hours, and may request further information or clarification.

A Safeguarding Officer will initiate appropriate action, e. g. liaise with the student, referral to Social Care, support plan, etc.

A Safeguarding Officer will provide update to the referrer on developments.

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

Tel: 0207 832 5331

E-mail: 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) - **Hilary Moore, Assistant Principal** CONEL on **0208 442 3487** or the **Deputy DMAASV – Trovene Hartley, Head of HR Operations, 020 700 9269.**

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.capitalccg.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 5331** 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 0207 025 1948 or** Margaret Gotlib, Designated Safeguarding Lead on **0207 963 4137.**

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 on 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

Name	Position	Contact number
Jackie Chapman	Operations Director Nominated Safeguarding Lead	0207 0251948 07807762 937
Margaret Gotlib	Head of Quality and Administration, and Designated Safeguarding Lead	0207 9634137
Kate Child	Employability Business Operations Manager, Deputy Designated Safeguarding Lead	0207 9634156

Keeping You Safe

All staff must observe appropriate professional boundaries with all students at all times in accordance with the Group's 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 (or volunteer) towards a student to the **Designated Member for Allegations**

against Staff and Volunteers (DMAASV) - **Hilary Moore, Assistant Principal** CONEL on **0208 442 3487** or the **Deputy DMAASV – Trovene Hartley, Head of HR Operations, 020 700 9269.**

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 to speak to Students either on site or remotely

- 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.keepingsafe.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.

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.

Local Authority Links:

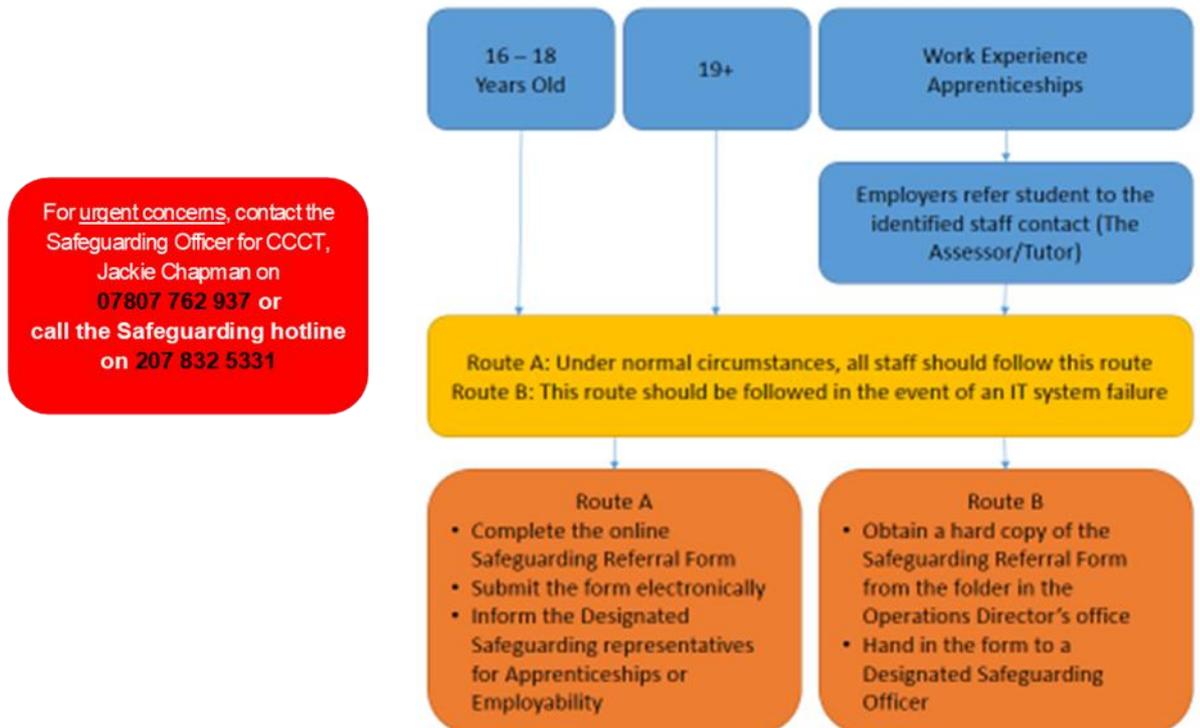**Threshold Criteria for Children's Services Westminster** https://www.rbkc.gov.uk/pdf/Threshold%20of%20Needs%20Guide.pdf

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

| 16 – 18 Years Old | 19+ | Work Experience Apprenticeships |

Work Experience Apprenticeships → Employers refer student to the identified staff contact (The Assessor/Tutor)

For **urgent concerns**, contact the Safeguarding Officer for CCCT, Jackie Chapman on **07807 762 937 or** call the Safeguarding hotline on **207 832 5331**

Route A: Under normal circumstances, all staff should follow this route
Route B: This route should be followed in the event of an IT system failure

Route A
- Complete the online Safeguarding Referral Form
- Submit the form electronically
- Inform the Designated Safeguarding representatives for Apprenticeships or Employability

Route B
- Obtain a hard copy of the Safeguarding Referral Form from the folder in the Operations Director's office
- Hand in the form to a Designated Safeguarding Officer

If you are unsure about what do or need guidance, contact the Safeguarding Officer for CCCT:

Jackie Chapman   07807 762 937

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) - **Hilary Moore,** Assistant Principal CONEL on 0208 442 3487 or the **Deputy DMAASV** – **Trovene Hartley,** Head of HR Operations, **020 700 9269.**

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.

CCCT Staff who are working off site must report a safeguarding incident to the Designated CCCT SG lead and where appropriate the SG Contact for the organisation/site where employed.

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.capitalccg.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, e.g. MASH referrals
- 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

- 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 uploads onto My Concern and informs the learning manger/other member of staff who raised the issue, and the DSL ensures case is allocated and updated including feedback to the learning manager and other staff, e.g. welfare by the allocated officer

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

NAME	ROLE	CONTACT NUMBER
Hilary Moore	Assistant Principal. 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 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 3958)** operates between 09:00 – 18:00. Telephone calls and e-mails are addressed the same day 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 3487/2679.

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 between14-16 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

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 (or volunteer) towards a student to the **Designated Member for Allegations against Staff and Volunteers (DMAASV) - Hilary Moore, Assistant Principal** CONEL **on 0208 442 3487** or the **Deputy DMAASV – Trovene Hartley, Head of HR Operations, 020 700 9269.**

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 to speak to Students either on site or remotely

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Local Authority Link:
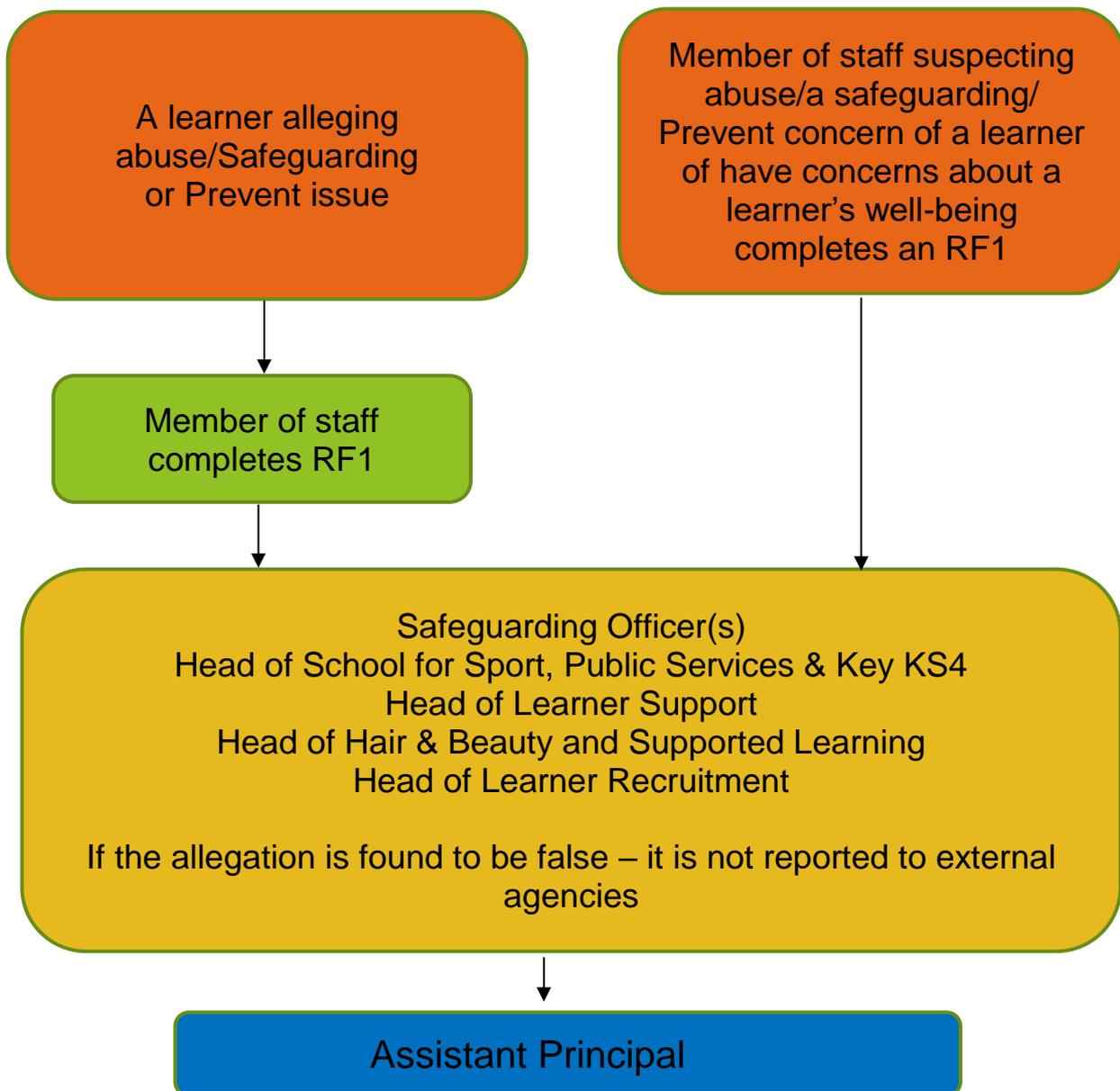
Threshold Criteria for Children's Services Enfield
https://new.enfield.gov.uk/enfieldlscb/wp-content/uploads/2017/06/London_Child_Protection_Procedures_Threshold_Document_2015.pdf

Children's Services – Haringey
https://www.haringey.gov.uk/children-and-families/childrens-social-care/child-protection

CONEL: How to report a Concern

A learner alleging abuse/Safeguarding or Prevent issue

Member of staff suspecting abuse/a safeguarding/ Prevent concern of a learner of have concerns about a learner's well-being completes an RF1

Member of staff completes RF1

Safeguarding Officer(s)
Head of School for Sport, Public Services & Key KS4
Head of Learner Support
Head of Hair & Beauty and Supported Learning
Head of Learner Recruitment

If the allegation is found to be false – it is not reported to external agencies
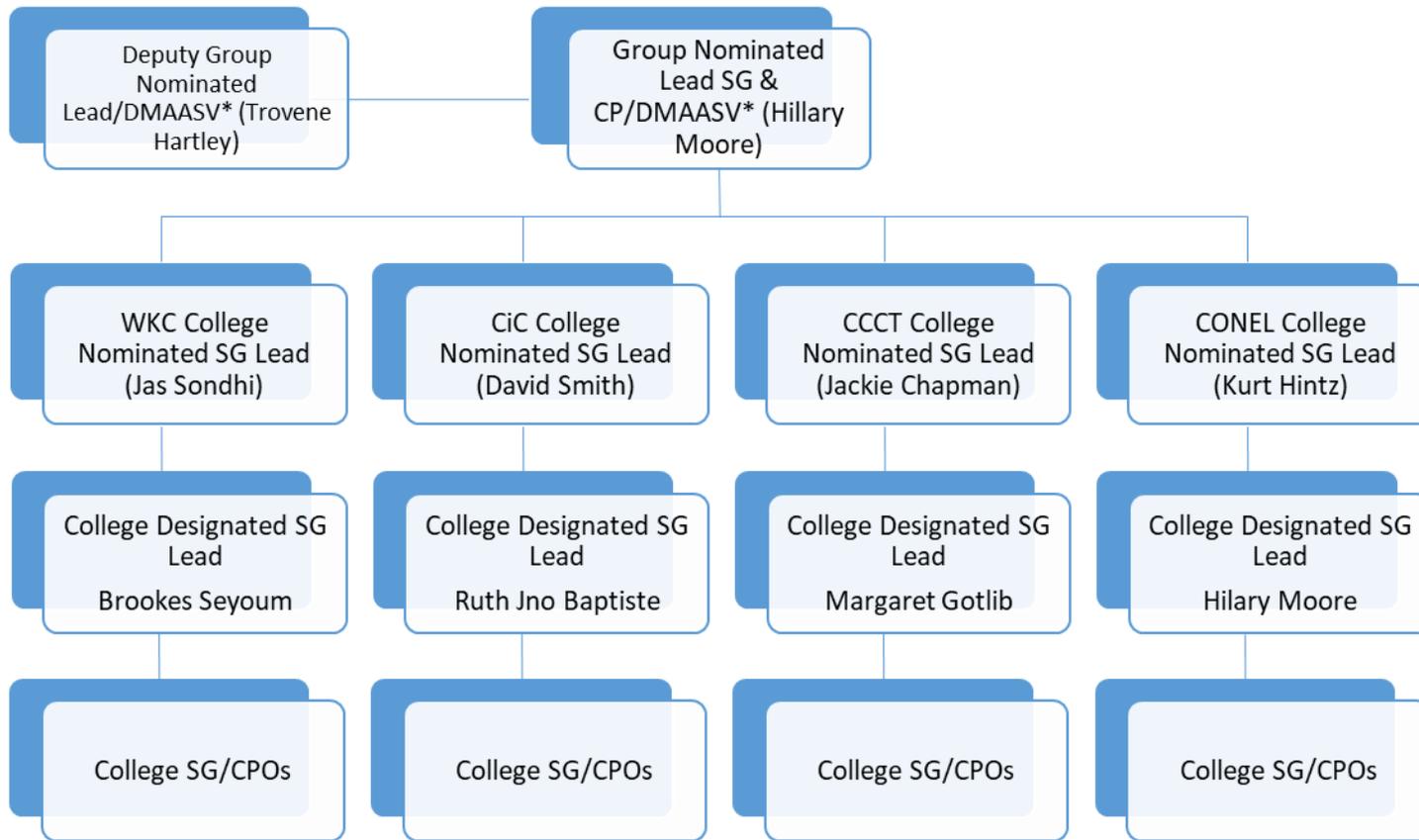
Assistant Principal

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) - **Hilary Moore,** Assistant Principal CONEL **on 0208 442 3487** or the **Deputy DMAASV – Trovene Hartley,** Head of HR Operations, **020 700 9269.**

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.

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┌─────────────────┐          ┌─────────────────┐
│ Deputy Group    │          │ Group Nominated │
│ Nominated       │          │ Lead SG &       │
│ Lead/DMAASV*    │──────────│ CP/DMAASV*      │
│ (Trovene        │          │ (Hillary        │
│ Hartley)        │          │ Moore)          │
└─────────────────┘          └─────────────────┘
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WKC College Nominated SG Lead (Jas Sondhi)	CiC College Nominated SG Lead (David Smith)	CCCT College Nominated SG Lead (Jackie Chapman)	CONEL College Nominated SG Lead (Kurt Hintz)
College Designated SG Lead Brookes Seyoum	College Designated SG Lead Ruth Jno Baptiste	College Designated SG Lead Margaret Gotlib	College Designated SG Lead Hilary Moore
College SG/CPOs	College SG/CPOs	College SG/CPOs	College SG/CPOs

* 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 1 Legal Framework, Statutory Guidance and Linked CCCG 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
- Rehabilitation of Offenders Act 1974 and Legal Aid, Sentencing and Punishment of Offenders Act 2012)
- Data Protection legislation.

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) – updated Feb 2019.
- DfE (2018) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018)
- DfE (2020) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018) – updated September 2020.
- DfE Regulated activity in relation to children: scope (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
- DfE "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers" and the "Guidance for FE and Providers" on Safeguarding May 2020.

CCCG policies and procedures that relate to this policy include:

- Learning and Behaviour Policy (Individual Colleges)
- Health and Safety Health and Safety Policy CCCG
- Whistle Blowing Policy Whistleblowing Policy CCCG
- Code of Conduct for Staff Code of Staff Conduct CCCG
- College's External Visitors Policy (Individual College Policy)
- Bullying and Harassment (Students) (Individual College Policy)
- Equality Diversity & Inclusion Equality Diversity and Inclusion Policy CCCG
- Physical Restraint and Reasonable Force Procedures (Individual College Procedures)
- Social Media Social Media Policy and Guidance for staff and students CCCG
- ICT acceptable use (ICT) Acceptable Use Policy CCCG
- Complaints Procedure Complaints Policy CCCG
- Religion and Belief Religion and Belief Policy guidance for students and staff CIC
- Educational Visits (Individual College Procedures)   Educational visits for Learners (with forms) CONEL
- Safe Touch Policy and Code of Practice – (Individual College Procedures)
- ICT Acceptable Use policy – (including E-Safe)
- Declaration & Barring Service (DBS) - (TBC)
- Recruitment Policy - Recruitment Policy CCCG

NB: This Policy and Procedure list will be updated to reflect those agreed by the Harmonisation Group.

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/violence, up skirting, 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 radicalized and possibly entering the criminal justice system because of their actions. It is recognized 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.

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 ensuing 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/Operations Director Capital City Training
College Principals/Operations Director 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

APPENDIX 5: Local and National Priorities

It is acknowledged that due to COVID 19 some of the areas below have become more prominent such as Child Sexual Exploitation (CSE), due to remote on learning that has been taking place outside a structured and supervised learning setting and Domestic Violence, due to learning taking place at home. The Group have in place (See 1.1) a range of initiatives to help students who may be experiencing any of the vulnerabilities outlined.

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 labour, 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 their Safeguarding Team 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 inform their Safeguarding Team.

Honor–based Abuse (HBA) including Forced Marriage and Female Genital Mutilation

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

Forced Marriage

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 abuse is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonored their family. It is rooted in domestic abuse 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 abuse by making a referral to their respective Safeguarding Team. Group staff should not treat any allegations of forced marriage or honour based abuse 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 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 CCCG 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 abuse' 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 a 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

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 Reality around Gangs.

Child Criminal Exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques

such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Child Sexual Exploitation (CSE)

'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. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also 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.

The CCE indicators can also be indicators of CSE, as can:

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

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:

Under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), Schools and Colleges have a statutory to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups. This is known as the Prevent duty and is seen as part of Groups' wider safeguarding obligations to protect children and vulnerable adult.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into radicalisation and extremism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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 'Prevent'
- 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 – 020 7832 5100**
- **CONEL: Hilary Moore - 020 8442 3487**
- **Capital City College Training: Jackie Chapman – 020 7025 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. It is acknowledged that due to COVID there been an increase in Young Carers taking on more responsibilities in looking after parent (s) and siblings. While at the same time there has been an increase in those who have become a young carer due to the loss of a parent as a result of COVID 19. The Group have in place a range of initiatives to help students who may become a carer.

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)
- Administrating medication
- Taking to medical appointments
- Looking after younger siblings
- Financial support to the family

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 Colleges **Physical Restraint Procedures** (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. 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 Procedures.

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.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

WHAT ARE THE SIGNS TO LOOK FOR?

- **Poor attendance –** learners are expected to attend their online lessons and/or produce assessments. Poor attendance to online learning can look like:
  - Learner isn't logging on Teams/Google Classroom
  - Learner isn't replying to emails/texts from the teaching and pastoral team
  - Learner isn't engaging with the work set by teaching team.
- **Hostile home environment** – to allow us to check on our learners' wellbeing appropriately, video calls or phone calls are essential. Staff should look out for:
  - Busy background noise i.e. Shouting, screaming, crowd noises.
  - Learner refusing to answer phone calls or video calls – can be a sign of feeling unsafe with family/carers around.
- **Poor mental health and wellbeing –** although we are missing essential cues from face-to-face interactions, mental health struggles can be spotted in:
  - Learner sound as if woken up by phone call, regardless of time of the day
  - Learner isn't keeping in touch with friends and family regularly
  - Learner gets overwhelmed by assignments and miss deadlines often
  - Learner missing appointments for 1:1 with teaching/pastoral team regularly

GOOD PRACTICE TO SAFEGUARDING:

- **Attendance –** staff should attend appointments and classes on time to keep the students engaged.

- **Work/Home environment –** lessons should take place in a quiet room, ideally with bare walls. Avoid interruptions from family members, and family photos on walls, as it can trigger strong emotions in some of our learners.

- **Online interactions –** staff must <u>**never**</u> share their personal details with learners.
  - Always use college/work email to make contact with learner and external agencies
  - Use Teams or Google Meetup to call learners.
  - If using personal phone to make calls, set phone on Hidden caller ID.

- **External Speakers**
  - Staff must ensure they follow the External Visitors Policy when inviting external speakers to talk with students on line.
  - Under no circumstances should a speaker be left unsupervised with a group of students
  - Staff must ensure that the session is recorded

- **Report any safeguarding concern on MY CONCERN as promptly as possible.**
  Give as much detail as possible, asking yourself the following questions:
  - **What are we worried about?**
  - **What is working well?**
  - **What needs to happen?**

  If you think that a learner is a high risk of harm, **get in touch directly with the safeguarding team using the Safeguarding Hotline.**

APPENDIX 10: Supporting Students:

The Group recognises 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 recognises that the behavior of a student in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

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.

The Group's 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 so doing staff '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.

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.**

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
- Radicalisation
- 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
- Being Children in care

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

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

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.

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.

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.

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.

Staff must report any students who are living alone or without parental or guardian support to the Designated Lead person within their respective College.
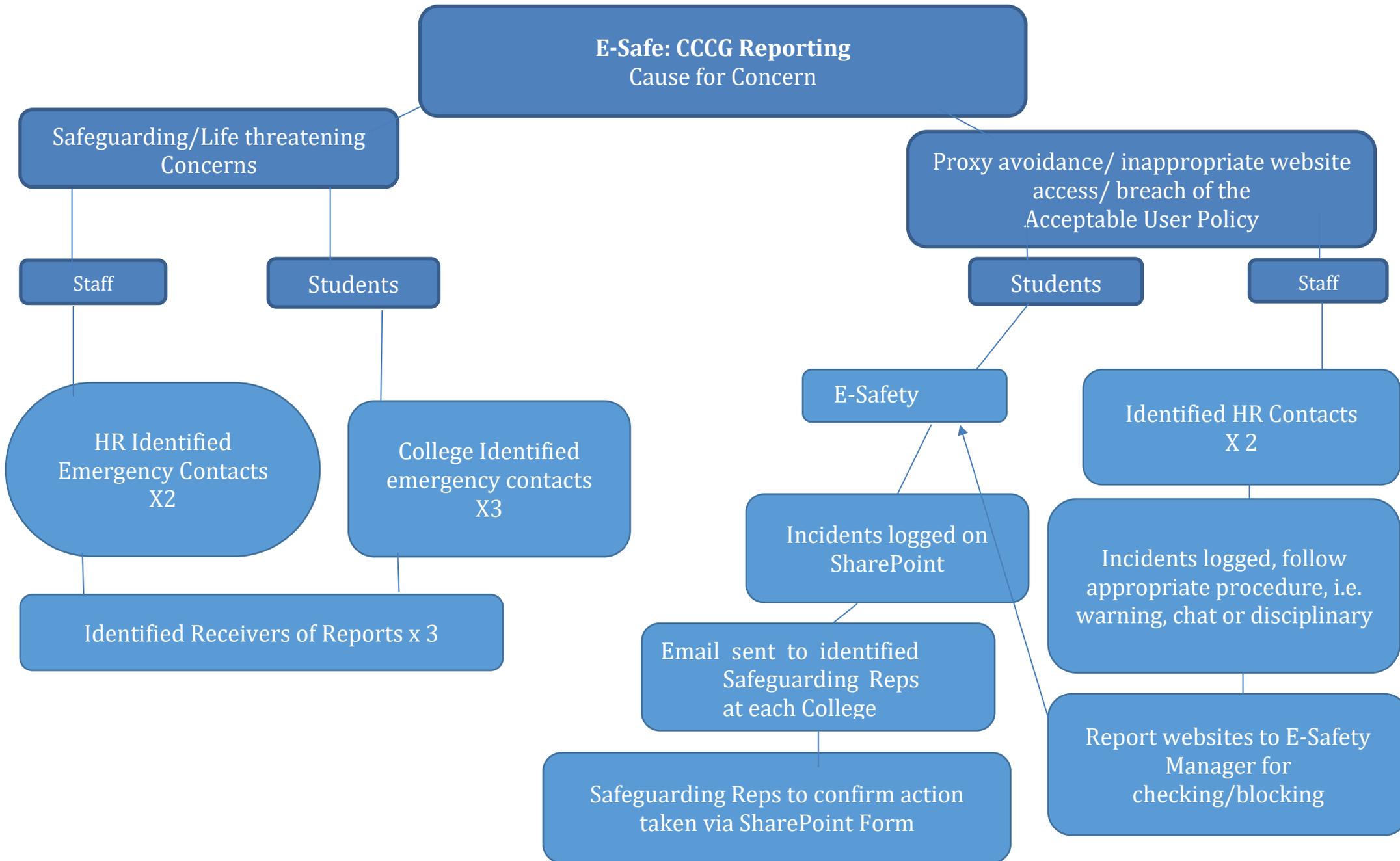
If a member of staff becomes aware of a student under the age of 18 who is 'privately fostered' and are cared for by someone other than a parent or close relative (e.g. step parents, siblings, siblings of a parent and grandparents) for 28 days or more must make a referral to the appropriate Designated 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

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. The Group has clear procedures regarding the use of restraint and reasonable force in line with the Colleges Physical Restraint Procedures **Appendix 1** and in relation to this policy **Appendix 8.**

E-Safe: CCCG Reporting
Cause for Concern

Safeguarding/Life threatening Concerns

Proxy avoidance/ inappropriate website access/ breach of the Acceptable User Policy

Staff

Students

Students

Staff

HR Identified Emergency Contacts X2

College Identified emergency contacts X3

E-Safety

Identified HR Contacts X 2

Identified Receivers of Reports x 3

Incidents logged on SharePoint

Incidents logged, follow appropriate procedure, i.e. warning, chat or disciplinary

Email sent to identified Safeguarding Reps at each College

Report websites to E-Safety Manager for checking/blocking

Safeguarding Reps to confirm action taken via SharePoint Form

APPENDIX 12: CCCG Protocols for Learners when learning online:

During induction and during the academic year, teachers and tutors will be going through key aspects of keeping safe online with their learners.

The learner protocols below have been produced as an appendix to the CCCG conjunction Safeguarding Policy and link to the ICT Acceptable Use Policy and the Anti-Bullying Policy.

- To protect all our learners, we ask that you are appropriately dressed and ready to learn when logging onto lessons using Teams, Google or Moodle e-Learning platforms.
- To help us to ensure your safety online, wherever possible, you are requested to turn on the camera and to use them during the scheduled lessons or break out rooms. If you have the option available to change or blur the background on the screen for privacy, we encourage you to do so.
- If you are unable to attend classes including online lessons, you must advise teacher/tutor/lecturer; you will be provided with their contact details and how to report an absence when you start your course.
- Do advise your teacher/tutor/lecturer if you are struggling to meet deadlines so that they can support you, whether online or on site
- You will have the opportunity in scheduled 1 to 1 meetings with your teacher/tutor/lecturer to advise of any needs or concerns so that you can be adequately supported; these meetings will occur either face-to face or online as on the timetable.
- When you log onto the College eLearning platform (MS TEAMS, Google or Moodle) on or off site, you will need to read and agree to the ICT Acceptable Use statement and the monitoring of the College's ICT systems. Please be aware that the safe use of ICT is monitored on and off site for all learners safety.
- We ask that you do not disclose your location online and not to give away personal details for example in a chat facility – whilst your teacher/tutor/lecturer will explain the importance of this to you, it is to safeguard you.
- Please keep password log ins safe and do not disclose them to anyone.
- You should ensure that Bluetooth is turned off on your mobile phone while you are engaged in lessons.
- Do not take photos of others while you are engaged in learning including using photos online in any context.
- To protect you we require your lanyard to be visibly worn when on site and also when attending online classes.
- Please report any concerns you have as to bullying online, in the same way as to any issues when on a College site, to your teacher/tutor/lecturer, who will address the issues raised to quickly to ensure that you and all learners feel safe.
- If you have any concerns as to your safety, you should refer these to your teacher/tutor/lecturer who will contact the Safeguarding team. But you can contact the team direct using the details for your College below:
  - o City and Islington College: 020 7697 717
  - o College of Haringey, Enfield and North East London: 020 8442 3958
  - o Westminster Kingsway College: 020 7832 5331 safe@westking.ac.uk