

## Safeguarding, Child Protection and Adults at Risk Procedures and Information

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## APPENDIX 1: 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 learners' 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 Adults at Risk 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 including annual SG refresher training
- Comply with the Group's staff code of conduct at all times that makes clear the appropriate boundaries for communicating with learners 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 learner.
- 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 Designated Safeguarding Lead and the Designated College/CCCT Safeguarding Leads to effectively carry out their lead responsibilities and ensure that relevant staff can attend strategy discussions, child protection, child in need conferences and other inter-agency meetings and to contribute fully to the assessment of learners.
- 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 learners,

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 learners 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.

- **All** governors are required to receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole - KCSIE, 2023.

### **Group Nominated Safeguarding Lead**

The Executive Principal 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, can identify those children for whom there are child protection concerns and can make appropriate referrals.
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Working with the colleges/training arm Nominated Leads with the aim of ensuring the policy and procedures are effective throughout the organisation.
- Ensuring that Group staff receive appropriate annual safeguarding training and appropriate training is provided for Governors.
- Ensuring the Group offers a safe environment for staff and learners 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 Vice Principals/Managing Director Capital City Training**

College Vice Principals/Managing 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 learners.
- Ensuring the College/CCCT designated lead for safeguarding fulfils their duties.

### **Group Designated Safeguarding Lead**

- CCCG Governing Body should ensure an appropriate **senior member** of staff, from the college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.
- The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

This person will be responsible for:

- Being appropriately trained and undertaking regular training updates to ensure they can act as a source of support and expertise to the College/CCCT.
- Overseeing the implementation of the safeguarding 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 at each College/CCCT.
- Ensuring there is an identified College/CCCT Designated Safeguarding Lead.

- Ensuring all staff are vigilant to harm and abuse, can 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 and the deputy DMAASV as to determine the appropriate action, where there is concern over the conduct of a member of staff or volunteer towards a learner.
- Providing the Group Nominated Safeguarding Lead with reports on safeguarding alerts and cases as required.
- Providing a termly and annual Group Safeguarding Report to the Strategic SG Board.
- Receiving (with other College DSLs) relevant supervision support as delineated in KCSIE 2023
- 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 learners 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 for Safeguarding at each College/CCCT**

- Each college/CCCT within the group, in addition to the Group Designated Safeguarding Lead and the Group Nominated Lead (Executive Principal) 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 of other Safeguarding Officers 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 member of the safeguarding team, who will act in accordance with this policy and the Group procedures and report back to the Designated Safeguarding lead.

## **The Designated Lead at each College/CCCT is responsible for:**

- Ensuring there is a system for monitoring and recording concerns about learners 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 learners 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 learners 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 learners 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 learners, 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 learner support services their role in monitoring learners 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 'Keeping children safe in education' May 2023 Key additions/focus are:
- Promotion of the welfare of children; the need to include bullying and cyber bullying in behaviour policies; focus on online safety and the importance of addressing harmful sexual behaviours and abuse, with reference to Tackling Child Sexual Abuse Strategy - GOV.UK (www.gov.uk), 2021.

### **Legal Framework, Statutory Guidance and Linked CCG Policies**

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

#### **Legislation:**

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



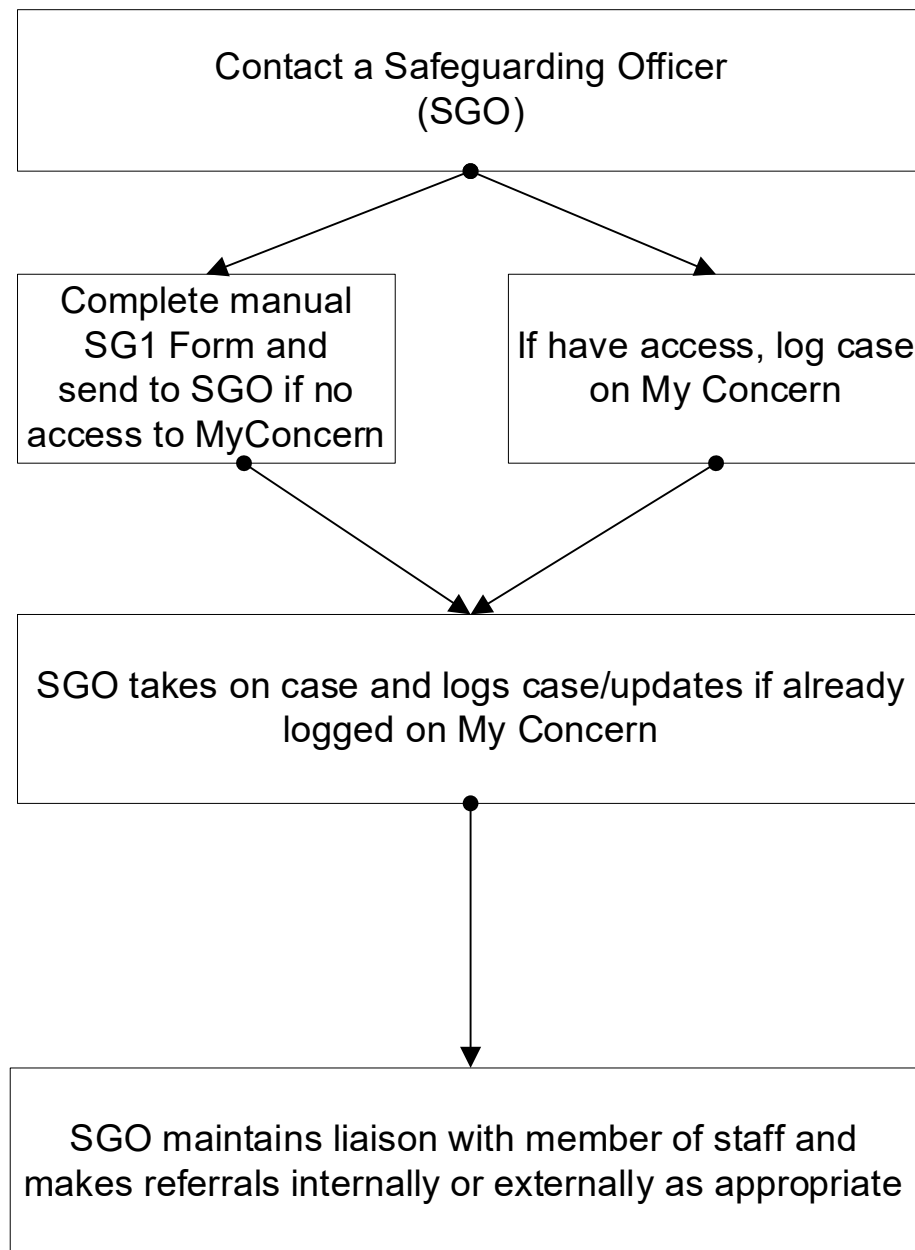
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- Keeping Children Safe in Education (2021, 2022 and 2023)
- London Safeguarding Children Board multi agency procedures (version 5) 2017
- Protecting Adults at risk: London multi-agency policy and procedures for protecting adults at risk from abuse
- DfE The Designated teacher for looked-after and previously looked-after children (statutory guidance on their roles and responsibilities) February 2018
- DfE ‘Coronavirus (COVID19) safeguarding in schools, colleges and other providers’ and the ‘Guidance for FE and Providers’ updates (as advised)
- HM Government strategy - Tackling Child Sexual Abuse Strategy - GOV.UK (www.gov.uk), 2021
- Searching, screening and confiscation at school, published 13 July 2022 and came into force on 1 September 2022
- Virginity testing and hymenoplasty multi-agency guidance - guidance for organisations and anyone who may come in to contact with women and girls affected by virginity testing and hymenoplasty, published 1 July 2022 and came into force on 1 September 2022
- Serious Violence Duty 2022
- Marriage and Civil Partnership (Minimum Age) 2022

### **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)
- Equality Diversity & Inclusion Equality, Diversity & Inclusion Policy
- Search and Restrain Policy Update link here to new policy
- Social Media Social Media Policy and Guidance for staff and learners CCCG
- Complaints Procedure Policies & Strategies - Complaints Policy.pdf - All Documents (sharepoint.com)
- Educational Visits (Individual College Procedures)
- ICT Acceptable Use policy – Policies & Strategies - ICT Acceptable Use Policy.pdf - All Documents (sharepoint.com) and Policies & Strategies - ICT ESafety Policy.pdf - All Documents (sharepoint.com)
- Recruitment Policy - Policies & Strategies - Recruitment Policy.pdf - All Documents (sharepoint.com)
- Disclosure and Barring Service - Disclosure and Barring Service

## CCCG SAFEGUARDING PROCEDURE FLOWCHART



The link to the SG1 form can be found here: [SG1 form .docx \(sharepoint.com\)](#)

## APPENDIX 2: Types of Abuse and Neglect

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

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

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

### Child on child abuse

All staff should be aware that children can abuse other children referred to as child on child abuse; it can happen both inside and outside of college and online.

It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse, they should speak to their designated safeguarding lead (or SGO).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children; many are abusive in nature.

Downplaying certain behaviours, for example, or dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- such abuse may not be between children and young people of the same age

.**All** staff should be clear as to CCG's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All such inappropriate behavior between children and young people can lead to an unsafe culture which normalizes abuse

It can be that children may not be ready to talk about their experiences of abuse, neglect and/or recognise that they are being abused. Staff should speak to an SGO if they have any concerns about a child and develop positive relationships with children and young people, which facilitates communication.

**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.

**Child on child abuse and Violence:** staff must be aware of child on child 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 this abuse.

**Domestic Violence** – staff must appreciate and be aware of the impact of domestic abuse including both short-term and long-term detrimental impact on children's health, wellbeing and ability to learn if experiencing domestic abuse at home or within their intimate relationships. Staff must raise their concerns with a SGO and/or refer to learner welfare team.

**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 learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic, or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

**Extremism:** The Government has defined extremism in the Prevent strategy as; 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces.' Safeguarding issues may also be recognised in the specific circumstances identified below:

- Child pornography and the Internet
- Forced marriage of a child

- Young carers
- Looked after children and children living away from home
- Pregnancy of a child
- Self-harming and suicidal behaviour
- Bullying
- Radicalisation/extremism
- INCEL (involuntary celibates) extreme misogynistic views
- Conspiracy theorist organisations

This list is not exhaustive.

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

### **Approach – Ask and Assess**

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

### **Give Support and Listen**

- Listen without interrupting
- Encourage the learner to talk
- Ask appropriate clarifying question
- 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 learner 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 online 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 learner'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 a body map sheet to indicate any areas of bruising or injuries
- Remember that the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

**Please note:**

Once the online SG form (SG1) has been submitted (or the case has been logged through the My Concern reporting process) to one of the College's Safeguarding/Child Protection Officer, the member of staff does not need to take further action, unless the Safeguarding Officer requires them to.

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

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

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

- Depending on the outcome of the various meetings and actions taken to protect the learner, the Safeguarding/Child Protection Officer will lead on arranging 'wrap around' support for the learner
- 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 give people a sense of regaining control of their lives and doing something positive including: books/leaflets, computerised packages, websites, or cognitive-behavioural based apps
- Complementary therapies, e.g., mindfulness, massage therapy, yoga, relaxation strategies, nutrition, exercise, creativity, avoiding alcohol/drugs
- Wellness Recovery Action Planning

## **APPENDIX 4: 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. It forms is part of the Group's wider safeguarding obligations to protect children and vulnerable adults.

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 learners 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 familiarise 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 learners from radicalisation to violent extremism. The Group will continue to empower its learners to create communities that are resilient to extremism and protect the wellbeing of particular learners 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, including INCEL (extreme Misogyny and Involuntary Celibate ideology [The National Grid for Learning - Incel training \(lqfl.net\)](http://lqfl.net))

If staff have any significant concerns about a learner 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: Check

- **City and Islington College: David Smith – 020 7700 9339**
- **Capital City College Training: Jackie Chapman – 020 7025 1948**
- **CONEL: Hilary Moore – 020 8442 3487**
- **Westminster Kingsway College: Jasbir Sondhi – 020 7832 5100**

## **APPENDIX 5: Young Carers**

The Group works to ensure that all learners are given every opportunity to achieve their chosen qualification. The group acknowledges that some learners are likely to be young carers whose responsibilities at home may adversely affect their education. It is acknowledged that due to COVID there was 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 COVID19. The Group have in place a range of initiatives to help learners who may become a carer.

### **Who are young carers?**

Young carers are children or young people under 18 who are responsible on a regular basis for a family member who has an illness or a disability. Whilst within many families, children and young people helping out around the house is seen as a normal part of family life, young carers have added responsibilities which may include sole or main responsibility for:

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

### **How can you identify a young carer?**

- The learner 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 learner 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 learners 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: 020 7697 1717**
  - **Westminster Kingsway College: 020 7832 5331**
  - **Capital City College Training: 020 7832 5334**
  - **CONEL: 020 8442 3958**

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 6: Restraint and Reasonable Force

This guidance should be read in conjunction with the Group's Search & Restraint Policy, 2023, which is informed by the DfE guidance 'Use of Reasonable Force', and Section 93 of the Education and Inspections Act 2006 which 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 learner 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 learner is not on Group premises e.g., on college visits. Section 45 of the Violent Crime Reduction Act 2006 gives authorised 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/wholeschool](http://www.teachernet.gov.uk/wholeschool). 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. Learners displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioral, emotional and social difficulties or with severe behavioural difficulties should be handled according to the guidance in [www.teachernet.gov.uk/wholeschool/sen/piguide](http://www.teachernet.gov.uk/wholeschool/sen/piguide). Section 548 of the Education Act 1996 states that the use of force as a punishment is unlawful. Groups have two duties under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001):

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

## APPENDIX 7: Safeguarding and Guidance for Remote Learning & Teaching

### WHAT SIGNS SHOULD STAFF 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 learners 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 **never** share their personal details with learners.
  - Always use college/work email to contact 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 learners online.
  - Under no circumstances should a speaker be left unsupervised with a group of learners.
  - Staff must ensure that the session is recorded.

- Report any safeguarding concern on MY CONCERN as promptly as possible (where have access) or contact a SGO and complete an SG1. 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, or contact an SGO.



## **APPENDIX 8: Supporting Learners**

The Group recognises that a learner who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. The Group recognise that a learner 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 learner who has been abused or is at risk of harm. The Group recognises that the behavior of a learner 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/learner-on-learner behavior and unlawful sexual activity within a Child Protection context.

The Group's aim is to support learners 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 learners.
- Providing an environment where learners can 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 learners 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 learners and notifying Children's Social Care or the Adults at Risk Team as soon as there are significant concerns about a learner.

Safeguarding is promoted through a learners' course (tutorial, enrichment, and curriculum) and learners are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for learners is available through a range of learner 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 learners 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
- Extreme ideologies including INCEL [The National Grid for Learning - Incel training \(lgfl.net\)](https://www.lgfl.net)

Please refer to **Appendix 4** Local and National Safeguarding Priorities **Appendix 5** 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.

Research suggests that learners 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 learners with medical needs and will work with learners, parents, and the health authorities to implement health care plans that support the attendance, inclusion, and attainment of learners with acute or chronic medical conditions.

Staff who work with learners 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 learner has particular needs which require intimate care or the administration of medication, a meeting will be held with the learner, their parents, carers, and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The learner's wishes and feelings will be taken in to account and respected throughout this process.

Learners 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 learner in the ambulance and remain at the hospital until the parent/carer/relative arrives. If a learner aged 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 learner in the ambulance, where parent/carer/ relative has been made aware of the situation.

Where the learner 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 learner 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 learners 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 learner under the age of 18 who is 'privately fostered' and are cared for by someone other than a parent or close relative (e.g. step parents, siblings, siblings of a parent and grandparents) for 28 days or more must make a referral to the appropriate Designated Person or in their absence a deputy who will notify Children's Social Care if:

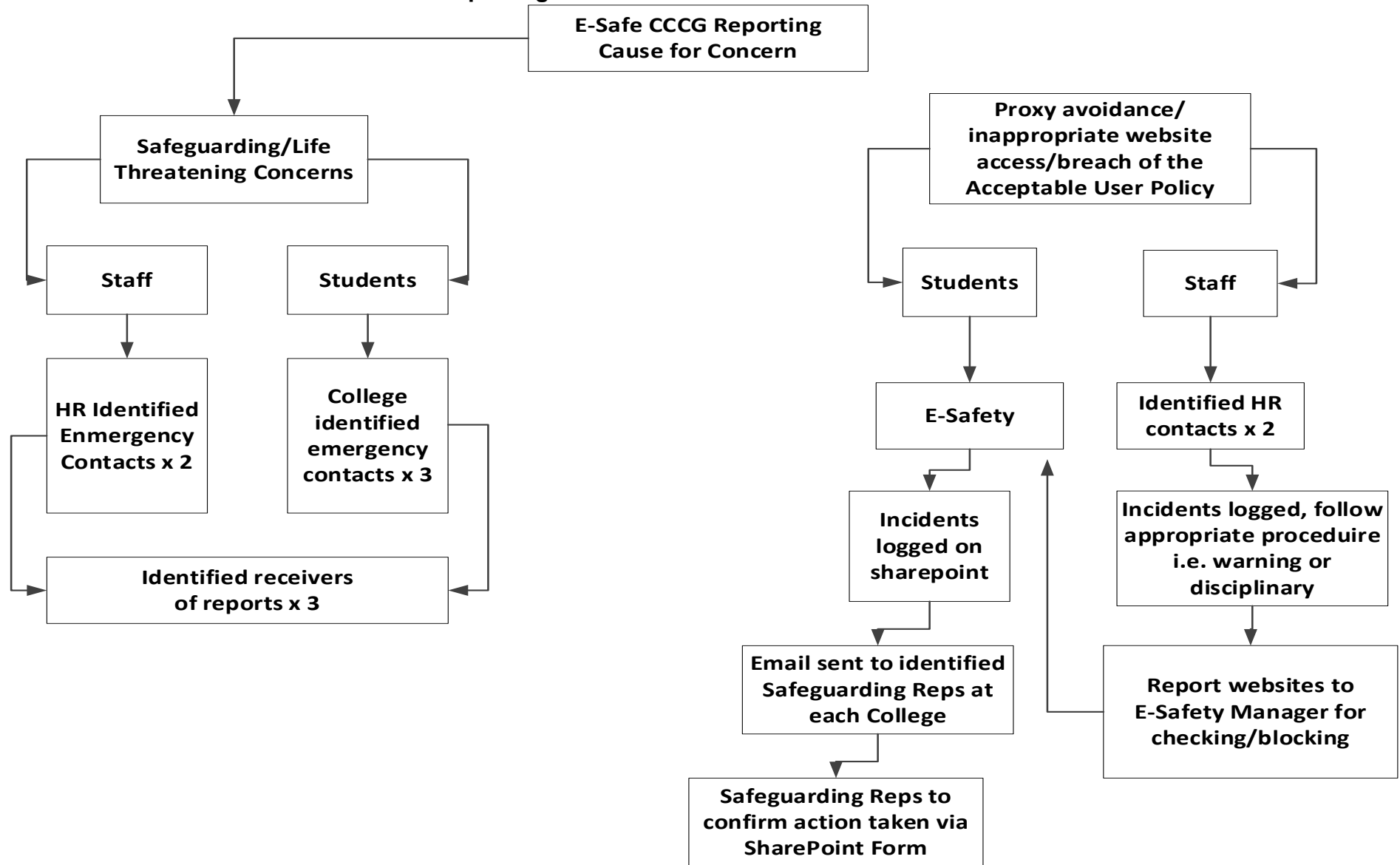
- They become aware of a private fostering arrangement which is not likely to be notified to the local authority.
- They have doubts about whether a child's carers are actually their parents, and there is evidence to support these doubts, including concerns about the child's welfare.

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

The Group acknowledges that some learners are likely to be young carers whose responsibilities at home may adversely affect their education **Appendix 7**. The Group works to ensure that all learners 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**.

**APPENDIX 9: E-Safe/Smoothwall CCCG Reporting:**



## **APPENDIX 10: 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 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 MS 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.
- 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 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:
  - **City and Islington College: 020 7697 1717**
  - **College of Haringey, Enfield and North East London: 020 8442 3958**
  - **Westminster Kingsway College: 020 7832 5331**

## APPENDIX 11: Useful staff resources

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, Department for Health, and Home Office
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance
- [FGM Fact Sheet](#).

### Radicalisation

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)
- [Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

### Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and Home Office guidance
- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance
- [Child exploitation disruption toolkit](#) - HO statutory guidance
- [County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

### Online safety-advice

- [Childnet](#) provide guidance for schools on cyberbullying
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
- [NSPCC E-safety for schools](#) provides advice, templates, and tools on all aspects of a school or college's online safety arrangements
- **Sexual violence and sexual harassment**
- [Tackling violence against women and girls strategy](#)- Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance

### Serious Violence

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence: for schools and colleges](#) - Home Office advice