

NEWHAM COLLEGE LONDON

NEWHAM COLLEGE SAFEGUARDING POLICY FOR CHILDREN AND VULNERABLE ADULTS

Document SG1	Safeguarding
Policy owner:	Head of Enrichment, Safeguarding and Welfare (Lead DSL)
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Review date	Last reviewed September 2022 Next review date September 2023
Applies to:	<p>The policy applies to:</p> <ul style="list-style-type: none"> • All teaching and non-teaching staff employed by the college • All external visitors entering the college during the college core day or for evening activities (including peripatetic tutors, sports coaches, guest speakers etc.) • All governors • All parents / carers • All students and apprentices • Education personnel (Local Authority Advisors, Inspectors, Social workers, awarding body external verifiers) • Building & Maintenance Contractors & Sub Contractors • Volunteers
Monitoring and evaluation:	Safeguarding Committee

Associated documents/policies for this document:

	HR Disciplinary and Grievance Policy
	HR Whistleblowing Policy
SG3	Prevent Strategy
SG6	Peer on Peer Abuse and Sexual Harassment

1. Introduction

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child'.

(Keeping Children Safe in Education – DfE, September 2022)

To ensure that the language of this policy conforms to Newham College parlance the terms "young people" refer to learners aged up to 18 and vulnerable adults.

This Safeguarding Policy is for all college staff, parents, governors, volunteers, and the wider college community. It forms part of the safeguarding arrangements for our college and should be read along with the college's Safeguarding Policy, Staff Code of Conduct Policy, Anti-Bullying Policy, Behaviour Policy, Health and Safety Policy, Educational Visit Policy, Acceptable IT Users Policy.

Our college is committed to safeguarding young people and vulnerable adults and to create a culture of vigilance in college. This policy should also be read in conjunction with Keeping Children Safe in Education (DfE, 2021).

Safeguarding and promoting the welfare of young people and vulnerable adults is defined as:

- Protecting young people and vulnerable adults from maltreatment
- Preventing impairment of young people and vulnerable adults' mental and physical health or development
- Ensuring that young people and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people and vulnerable adults to have the best outcomes

This policy should be read in conjunction with **Keeping Children Safe in Education, DfE)**

All staff who work with student on a regular basis should read Part One of Keeping Children Safe in Education 2022, together with Annex B of KCSIE, and DfE statutory guidance 'Working Together to Safeguard Children', and 'What to do if you're worried a child is being abused: Advice for practitioners' (DfE March 2015).

All staff members that have a back office role and do not come into contact with students in their daily role should read Annex A and Annex B of the KCSIE document.

2. Statutory framework

The Education Act 2002 Section 175, places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of young people and vulnerable adults who are students of the college.

The development of appropriate procedures and the monitoring of good practice in the London Borough of Newham are the responsibilities of the Newham Safeguarding Children's Partnership). In Newham, all professionals must work in accordance with the London Child Protection Procedures.

Our college also works in accordance with the following legislation and guidance

Keeping Children Safe in Education (DfE September 2022)

Working Together to Safeguard Children (HMG, 2018)

Education Act 2002

Schools; Covid- 19 Operational Guidance (DfE 27 August 2021)

London child protection procedures <http://www.londoncp.co.uk/>

Working Together to Safeguard Children (HMG, 2018)

Education Act 2002 Domestic Abuse Act 2021 Modern Slavery Act 2015

What to do if you're worried a child is being abused (HMG, 2015)

Counter-Terrorism and Security Act (HMG, 2015)

The Prevent duty Departmental advice for schools and childcare providers (DfE 2015)

Prevent Duty Guidance for Further Education Establishments in England and Wales (HMG 2015)

Serious Crime Act 2015 (Home Office, 2015)

Sexual Offences Act (2003)

Voyeurism (Offences) Act 2019

Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. (DfE July 2018)

<https://contextualsafeguarding.org.uk/>

Education (Pupil Registration) Regulations 2006

General Data Protection Regulations 2018 (GDPR)

Searching, screening and confiscation (DfE, 2018);

Use Of Force DfE current guidance.

Children Act 1989

Children Act 2004

Children and Social Work Act 2017

The Homelessness Reduction Act 2017

Preventing and Tackling Bullying (DfE, 2017),

Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)

Advice on Whistleblowing in Maintained Schools (DfE 2014)

<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>

The College will ensure that learners are taught about how to keep themselves and others safe, including online.

Relevant topics will be included within Relationships and Sex Education (for all our Pre 16 students)

The College will mainly cover relevant issues through tutorials.

3. College roles and responsibilities

All adults working with or on behalf of young people and vulnerable adults have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key adults in colleges and in the Local Authority who have specific responsibilities under child protection procedures.

3.1 The Governing body/Corporation Board

The Governing body/Corporation Board ensures that a strong Safeguarding culture is embedded within the college, that our commitment to keep our learners safe is explicit and understood by all in the college community and that our practice reflects The Governing body/Corporation Board vision and values.

The Governing body/Corporation Board ensures that all required policies relating to child protection and safeguarding) are in place and that the safeguarding policy reflects statutory and local guidance. Safeguarding is a standing item on the agenda of all Audit and Risk Committee meetings which in turn is fed up to the Governing body/Corporation Board. The policy is reviewed annually.

The Governing body/Corporation Board ensures that the policies, procedures, practice and professional development and training in the College are effective and comply with the statutory requirements at all times. The Governing body/Corporation Board will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and the GDPR.

The Governing body/Corporation Board ensures that there is a named Designated Safeguarding Lead and Deputy Safeguarding Lead(s) in place, that they have their safeguarding role explicitly within their job descriptions and are appropriately trained for their role, as set out in Keeping Children Safe in Education document. The link governor/trustee for safeguarding visits the College regularly for meetings with the DSL and to observe safeguarding first hand. The DSL reports directly to Principal and Deputy Principal on issues arising from their role which impact on the College who in turn report to the Governing body/Corporation Board.

The Governing body/Corporation Board checks that safeguarding is included in **Behaviour, Online** and **all related policies including the staff Code of Conduct** and is highlighted in all policies as the overarching responsibility of all staff at all times, particularly in procedures involving sanctions or searches, in college and out.

The Governing body/Corporation Board ensures that the college contributes fully to inter-agency working in line with statutory and local guidance and uses the appropriate referral pathways. It ensures that information is stored and shared appropriately and in accordance with the statutory requirements as set out in the Data Protection Act 2018 and in line with GDPR requirements.

The Governing body/Corporation Board ensures that all Governors, staff members and volunteers undergo appropriate safeguarding and child protection training that is regularly updated, at least annually, to provide them with the relevant skills and up to date knowledge to keep all our learners safe.

The Governing body/Corporation Board ensures that all staff have the knowledge, skills and understanding of young people who have an allocated social worker. It recognises their additional vulnerabilities with those of looked after and previously looked after children and monitors college action with all these learners to keep them safe.

The Governing body/Corporation Board ensures that learners are taught to keep themselves safe, including on-line, making sure that appropriate filters and monitoring systems are in place in college. This responsibility includes learners' who are accessing on-line learning from our college, at home. Our learners' will also be taught how to keep themselves safe through teaching and learning opportunities in RSHE and through whole-college practice led by staff as part of the provision of a rich and balanced curriculum.

The Governing body/Corporation Board and college leadership team are responsible for maintaining robust safer recruitment procedures that help to deter, reject or identify people who may abuse learners, young people and vulnerable adults. It adheres to statutory responsibilities to check adults working with learners' and has recruitment and selection procedures in place (see the college 'Safer Recruitment' policy for further information). It also ensures that volunteers are appropriately supervised in college.

The College will make an informed decision on if it is necessary to conduct background checks through an online search as part of due diligence when shortlisting candidates. The College will undertake a risk assessment and use professional judgement when deciding whether to obtain an enhanced DBS certificate for any volunteer undertaking unregulated activity.

3.2 The Designated Safeguarding Lead (and Deputies)

The HOESW (Lead DSL) in college takes the lead responsibility for managing safeguarding referrals, safeguarding training and raising awareness of all safeguarding policies and procedures in college and that everyone in college, including temporary staff, volunteers, supply teachers/agency staff and contractors are aware of these procedures and that they are followed at all times. This includes a whole college responsibility to support learners affected by child on child abuse in all its forms.

The role of the DSL is to help promote education outcomes by sharing information about welfare, safeguarding and child protection issues that learners with a social worker, are experiencing, or have experienced, with teachers and college leadership staff. They are a source of advice and support to other staff on safeguarding matters and make sure that timely referrals to Newham MASH (Multi Agency Safeguarding Hub) are made in accordance with current London Child Protection Procedures. The Head of Enrichment, Safeguarding and Welfare (HOESW & Lead DSL) will work with the local authority and other agencies as required. If for any reason the HOESW is unavailable, Deputy Designated Safeguarding Officers (DDSL) will act in their absence.

The HOESW (Lead DSL) will also be alert to the additional vulnerabilities of learners with a social worker, ensuring that staff know who those learners are, understand their academic progress and attainment and maintain a culture of high aspirations for these learners. The HOESW (Lead DSL) will also support staff to identify the challenges that learners in this group may face and any additional support and/or adjustments that can make to best support them.

In addition, in most cases homelessness would be considered in the context of learners living with their families, however the HOESW (Lead DSL) will be alert that some learners may be homeless independently and this will require a different level of intervention and support.

3.3 The Principal

The Principal works in accordance with the requirements upon all college staff. In addition, the Principal ensures that all safeguarding policies and procedures adopted by The Governing Body/Corporation Board are followed by all staff.

The Principal will ensure that learners are taught about safeguarding themselves and their peers, including e.g. the emotional impact of on-line nude image sharing, sexist abuse, body shaming or the sexual targeting of learners with SEND or protected characteristics, as part of the broad and balanced curriculum. This includes covering relevant issues through Relationships, Sex and Health Education (RSHE) and through other curricular opportunities.

The Principal ensures that all learners, individually or collectively through the college course representatives are encouraged to promote the responsible use of social media, practical safety around the college and responsibility for their own and others' wellbeing, as an explicit, valued and integral element of a strong college safeguarding culture.

The Principal ensures that there is immediate access to an individual member of staff, appropriately trained, to listen, reassure and provide practical support to move on, for learners at need in the college.

The Deputy Principal for Curriculum and Quality will work closely with the HOESW (Lead DSL) to ensure strategy is developed and policy and compliance are adhered to so to be enable a culture of continuous improvement and excellence.

3.4 All college staff

As outlined in the 'Keeping Children Safe in Education' Guidance it is everyone's responsibility to provide a learning environment in which our young people and vulnerable adults can feel safe to learn, even if circumstances preclude their physical presence in college.

Staff are prepared to identify learners who may benefit from early help and understand their role and responsibilities within this process. This includes identifying any emerging problems so appropriate support may be provided and in liaison with the HOESW (Lead DSL) report any concerns. All staff members are aware of and follow college processes as set out in this policy and are aware of how to make referrals to the Safeguarding Team in the following 4 ways;

- Call 0208 257 4146 between 8:45am and 5:00pm daily
- Email safeguardingteam@newham.ac.uk
- Press the Confide button on their college device
- See the team in person in the Student Services Department (Ground Floor)

If the concern is brought to a staff members outside of the dedicated times above, then staff members can call the following partners and agencies for support.

Out of office number – Newham MASH (Multi Agency Safeguarding Hub) Team 0208 430 2000
If they feel they or someone else is in immediate danger, they can call 999.

All staff should be able to reassure targeted learners that they are being taken seriously and that they will be supported and kept safe. A learner should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a learner ever be made to feel ashamed for making a report.

The College recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect learners. Our Safeguarding culture in college depends upon every member of staff being proactive in recognising opportunities to promote and support the development of these protective factors.

This includes the use of appropriate forms of online communication directly from staff to learners. The college use the functions through the platform for online learning such as Microsoft Outlook and Teams.

All staff engage with and support learners in promoting responsible use of social media, safety around the college and responsibility for their own and others' wellbeing, as an integral element of a strong college safeguarding culture.

4. Types of abuse / specific safeguarding issues

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Our college is aware of the signs of abuse and neglect so we are able to identify young people and vulnerable adults who may be in need of help or protection. Within those four main types of abuse there are specific types of abuse that our college is alert to.

The 'Keeping Children Safe in Education' states that young people and vulnerable adults can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

4.1 Child on child abuse (formally known as Peer on peer abuse)

Our college may be the only stable, secure and safe place in the lives of young people and vulnerable adults at risk of, or who have suffered harm. However, on occasions their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people and vulnerable adults.

The College has a dedicated Policy for Peer on Peer Abuse and Sexual Harassment.

Child on child abuse can manifest itself in many ways. This may include bullying (including cyber bullying); on-line verbal abuse; gender-based abuse; verbal sexist abuse; unwanted, unthinking or coerced nude or semi-nude image sharing; or sexually harmful behaviour. We do not tolerate any bullying, abuse or harmful behaviour in college and will take swift action to intervene where this occurs.

We use the curriculum tutorials to help learners understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable or unsafe. Staff are pro active and vigilant in recognising when a child may need to tell an adult of their choice about what is happening to them, will acknowledge how they feel and support them through the next steps of reporting to MASH, if that is what it takes to keep them safe. The college staff understand the different gender issues that can be prevalent when dealing with peer on peer abuse.

Consensual image-sharing between older learners of the same age may require a different response as it may not be abusive but the learners still need to know that it is illegal and risky to maintain privacy as well as jeopardising future job searches, for example.

4.2 Sexual Violence and Harassment

Sexual violence and harassment can occur between learners of any age individually or in groups. Learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood will adversely affect their educational attainment. The college takes all victims seriously and they will be offered the appropriate support.

Predatory behaviour or a dismissive attitude towards sexual harassment may be prevalent online or feature in the learners lived experience of home, friendship groups or society at large, but it is not indicative of respect for other pupils and therefore it is unacceptable at the college.

An example of such harassment is 'Upskirting' or 'down shirting', which typically involves taking a picture under a person's clothing or from above without them knowing, with the intention of viewing their genitals, buttocks or breasts to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim and it is a criminal offence under the Voyeurism (Offences) Act 2019.

The college culture of safeguarding ensures that the message that abusive behaviours are unacceptable is explicit through the curriculum, college environment and staff modelling appropriate language and respectful relationships. We do not accept that it is 'just part of growing up' or a joke. The college manages such incidences in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other concerns will follow the same procedures. Learners initiating such abuse or sexualised behaviour will be subject to an AIM risk assessment / Brook Traffic Lights which will inform a safety plan for everyone involved, including themselves.

The College has a dedicated Policy for Peer on Peer Abuse and Sexual Harassment.

4.3 Learners with special educational needs and disabilities (SEND)

The College understands that learners with special educational needs and disabilities (SEND) can face additional safeguarding challenges. The college recognises that additional barriers can exist when recognising abuse and neglect in this group of young people. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learners disability, without further exploration;
- Being more prone to peer group isolation than other learners;
- Instances of peer on peer sexual abuse where the perpetrators are young people will always require safeguarding support and a significant subgroup of these learners will have SEND;
- Learners with SEND and /or protected characteristics are statistically more likely to be identified as targets for bullying or sexual abuse by their peers;
- Communication barriers that make telling an adult difficult;
- The requirement of personal or intimate care.

The College takes into consideration these additional vulnerabilities and challenges and staff are proactive in safeguarding all our vulnerable learners.

4.4 Children Missing from Education (CME)

As part of the college enrolment process we ask parents and carers to provide a minimum of two contact details and we will regularly ask parents and carers to ensure that they are kept up to date.

All learners, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our college recognises that a person missing education is a potential indicator of abuse or neglect and will follow the college procedures for unauthorised absence and for attendance and punctuality. Parents of those under 16 should always inform the college any reason for any absence. Where contact is not successfully made, a referral may be made to another appropriate agency (MASH, Social Care or Police).

The college will inform the local authority of any person under 16 who fails to attend college regularly or has been absent without permission for a continuous period of 10 days or more in line with the requirements for Children Missing Education policies.

4.5 Contextual safeguarding

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of the college and can occur between learners outside of the college environment. The HOESW (Lead DSL) and all staff will consider whether learners are at risk of abuse or exploitation in situations outside their families.

[Contextual Safeguarding](#) is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the relationships that young people form in their neighbourhoods, colleges and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The college staff need to engage with individuals and groups who do have influence over/within extra-familial contexts, and recognise that risk assessment of, and intervention with, such sources of influence on our learners are a critical part of our safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of our safeguarding systems in college in recognition of the fact that young people are vulnerable to abuse in a range of social contexts.

Contextual abuse takes different forms and learners can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation and serious youth violence. If the college is concerned a learner is being exploited in an extra-familiar context, as previously outlined, the college will follow the procedures set out in this document and consult or refer to the MASH, from where they are likely to be referred to the PCEHH.

4.5.1 Newham PCEHH – Preventing Child Exploitation and Harm Hub

The PCEHH is a weekly multi-disciplinary meeting chaired by the Director of Early Help and Children's Health. The PCEHH helps to identify and engage with young people who may be potentially at risk from any form of exploitation by responding to earlier 'critical moments' indicated via referrals from MASH. The PCEHH forms part of Newham's understanding and response to Child Sexual Exploitation (CSE), Missing, Criminal exploitation / gangs and county lines, serious youth violence (SYV), harmful sexual behaviour (HSB) and modern slavery in the borough.

It is well documented that focusing on prevention, early identification and intervention helps disrupt activity that might increase the probability of learners and young people being exploited. Where there are low or emerging risks of child exploitation with no safeguarding concerns but heightened vulnerabilities, the young person is referred to the PCEHH for a multiagency discussion to agree a co-

ordinated package of support for the whole family. Involving all family members can be a key determinant in supporting learners and young people to remain safe and achieve good outcomes.

The PCEHH sits within the Early Help service, which works with the whole family. This means that the PCEHH also considers both inter-familial as well as intra-familial concerns as part of a co-ordinated and contextual safeguarding approach. All cases must have followed existing safeguarding procedures prior to being discussed at the PCEHH, including strategy meeting/discussion where appropriate.

4.5.2 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. This can happen to learners from any background or community. This power imbalance can also be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the learner needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals, groups, males or female or adults. Abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve enforcement or enticement-based methods of compliance and may, or may not be accompanied by violence or threats of violence. Learners can be exploited even when the activity appears consensual.

Criminal exploitation of young people and children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity; drug networks or gangs grooming and exploiting children and young people to carry drugs, weapons and money for them. Key to identifying potential involvement may be 'missing episodes' when the learner may have been trafficked for the purpose of transporting drugs, weapons or money. The college will consider a referral using the MASH service or a direct referral using the National Referral mechanism for human trafficking.

4.5.3 Serious Violence

There are a number of indicators, which may signal that a young person is at risk from, or involved with serious violent crime. These may include increased absence from college, a change in friendships, or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change of attitude or well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a learner has been approached by, or is involved with, individuals associated with criminal networks or gangs.

4.6 Honour Based Abuse

So-called honour-based abuse (HBA) encompasses abuse committed to protect or preserving "honour". It often involves a wider network of family or community pressure and can involve multiple perpetrators. This includes Female Genital Mutilation (FGM), forced marriage and such practices such as breast ironing (see more on this below).

4.6.1 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and is a form of child abuse.

We know that if a teacher/lecturer in the course of their work discovers that an act of FGM appears to have been carried out on a girl under the age of 18, staff must and will report this to the Safeguarding Team who in turn will contact the Police immediately. The HOESW (Lead DSL) will advise/support staff in this position and work with appropriate colleagues and agencies to support the girl and liaise with the family.

4.6.2 Forced marriage

A forced marriage is one that is entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. College staff understand how to report concerns where this may be an issue by following the standard safeguarding reporting methods.

4.7 Prevention of radicalisation

Learners can be vulnerable to extremist ideology and radicalisation. Protecting learners from this risk is similar to protecting them from other forms of harm and abuse. The Counter-Terrorism and Security Act (HMG, 2015) Section 26 places a duty on colleges in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the PREVENT duty.

It requires colleges to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;
- be safe spaces in which learners can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to radicalisation and being drawn into terrorism. All staff understand how to identify those who may benefit from this support and are aware of relevant agencies to contact in circumstances where an individual demonstrates indicators of concern. All concerns are directed to the Safeguarding Team who make the call to the borough Prevent lead or DfE London Prevent Coordinator.

The college has a separate Prevent Strategy

4.8 Mental Health and Wellbeing

All staff are aware that mental health can in some cases be an indicator that a learner has or is suffering from or at risk of abuse. Staff are able to observe learners day-to-day and identify those whose behaviour suggests they may be experiencing a mental health issue. Where there are mental health concerns about a learner that is also a safeguarding concern, immediate action will be taken following the college safeguarding policy and the senior Mental Health Lead (Director of Student Services) will be informed.

The college works to protect the emotional wellbeing and resilience of all learners and staff, as well as provide specific support for those with additional needs. The college understands that there are risk factors which increase a learner's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in a learner's life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised that some learners in the college may be suffering from mental ill-health and are at risk of self-harm or suicide but may present in college as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the mental health and well-being of our learners. It is equally important that parents share any concerns about the well-being of their child with college, so that appropriate support and interventions can be identified and implemented in partnership.

Where there are concerns that a learner may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a learner discloses self-harm or is found to be self-harming the HOESW (Lead DSL) or Mental Health Lead will take the time to establish any underlying concerns. The learner will be supported to access services using the appropriate Newham referral pathways (such as MASH, CAMHS).

4.9 Domestic Abuse

Domestic abuse is defined as "any incident or pattern of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical, sexual; financial and emotional, coercive or controlling behaviour"

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on learners, as victims in their own right, if they see, hear or experience the effects of abuse.

All learners can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on learners. In some cases, a learner may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

The college recognises that where there is Domestic Abuse in a family, the learners will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect learners in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The college will vigilantly monitor the welfare of learners living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required. Operation Encompass operates in London Boroughs and the college will use the information shared

5. Procedures

5.1 All staff members have a duty to identify and respond to suspected and actual abuse or disclosures of harm. Any member of staff, volunteer or visitor to the college who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the HOESW (Lead DSL) or, in their absence, the DDSL. Concerns about a learner at risk of radicalisation or extremism will be raised with the PREVENT Lead (HOESW, Lead DSL).

5.2 All action is taken in accordance with the following guidance;

- Newham Safeguarding Children Partnership guidelines – Pan-London Child Protection Procedures
- Keeping Children Safe in Education
- Working Together to Safeguard Children (DfE, 2018)
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

5.3 Where a learner is suffering or is likely to suffer from harm, a learner will be referred to the learners borough MASH Portal, immediately. Time-sensitive referrals may be telephoned first in case the learner needs to be kept in college, pending a Section 47 Strategy meeting when a social worker and police officer will come to the college. Less urgent concerns or requests for support will also be referred via the MASH Portal for consideration of Early Help support as appropriate.

5.4 Practice when Police are called to the school.

Before calling police to the college, the HOESW (Lead DSL) and senior staff will reflect upon the proportionality of this response, being aware of the learner's rights under the Equalities Act and Human Rights Act and if necessary, identifying and addressing concerns such as adultification if it is suspected of being present in staff decision making processes thus far.

Best practice for staff considering police intervention to be necessary:

- To consult the HOESW (Lead DSL) and DDSL's about the reason to involve the police.
- To consult the MET Police Safer Schools Officer (SSO) before contacting police directly, unless the risk is considered to be escalating at a rate that precludes contacting the SSO.
- The college will prioritise contacting the SSO for advice before asking for other officers to attend.
- A learner will not be searched on site by police at all unless there is a good reason to do so (IE after a college search using dedicated systems and only carried out by those trained to do so, or taken offsite to a police station without an appropriate adult (Lead DSL, DDSL) being present if their parent cannot accompany them.

In the event that a learner is interviewed on site by police, the Lead DSL or member of the Safeguarding Team will act in loco parentis at that interview to provide support to the learner. Parents/carers will be informed directly that the police have been called to the college in connection with their child, subject to the safeguarding guidelines below. A suitably trained Appropriate Adult (AA) must be present if the learner is subsequently arrested and/or taken to a police station and the Lead DSL will ensure that arrangements for such support are in place before the learner leaves the school premises, with the reason for the arrest and the name of the appropriate adult concerned, confirmed.

[Appropriate Adult | Youth Justice Legal Centre \(yjlc.uk\); DRAFT GUIDE FOR \(publishing.service.gov.uk\)](#)

No learner may be subject to a full body search by police on college premises (unless for reasons already mentioned above). Any such search should be carried out at the police station with an AA in attendance to the search if a parent or carer cannot be located in a reasonable timeframe.

Wherever possible, the college will share any safeguarding concerns, or an intention to refer a learner to the MASH with parents or carers. However, the college will not do so where it is felt that to do so could place the learner at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the MASH or the Police in making decisions about when it is appropriate to share information with parents or carers.

5.5 If a member of staff continues to have concerns about a learner and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for re-consideration of the case with the HOESW (Lead DSL) who will escalate the concern as appropriate.

If, for any reason, the HOESW (Lead DSL) or DDSL is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in and around the college to ensure that all staff members have unfettered access to safeguarding support, should it be required. Any individual may refer to the MASH teams where there is suspected or actual risk of harm to a learner if the Safeguarding Team are uncontactable. All staff can find the contact details on the learner's local borough websites usually under 'Children and Young Peoples Services' or doing a MASH google search.

Early Help:

All staff should, in particular, be alert to the potential need for early help for a learner who:

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

- has a parent/carer in custody

Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

When new staff, agency staff, volunteers or regular visitors join the college they are informed of the safeguarding arrangements in place, the name of the HOESW (Lead DSL) and Deputies and how to share concerns with them.

6. Training

The HOESW (Lead DSL) and Deputies undertake safeguarding training appropriate to the role every two years as a minimum. The Principal, all staff members and governors receive appropriate training that is regularly updated. In addition, all staff members receive safeguarding updates as required, but at least annually (usually October), to provide them with relevant skills and knowledge to safeguard learners effectively. Records of any safeguarding training undertaken is kept for all staff and governors.

The college ensures that the HOESW (Lead DSL) and Deputies also undertake training in inter-agency working and other matters as appropriate.

6.1 Positive Handling and de-escalation practice keeps learners and staff safe in college. This is refreshed every 3 years and is undertaken by all staff in a rolling programme which builds a collegiate responsibility for everyone's safety and wellbeing.

6.2 All agency staff complete the safeguarding induction programme before starting work in the college, which prioritises safeguarding practices and policies that need to be read and understood. .

7. Professional confidentiality

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents / carers or learners) or promise to keep a secret. In accordance with statutory requirements, where there is a safeguarding concern, this must be reported to the HOESW (Lead DSL) or Deputies and may require further referral and subsequent investigation by appropriate authorities.

Information on individual safeguarding cases may be shared by the HOESW (Lead DSL) or Deputies with other relevant staff members. This will be on a 'need to know' basis only and where it is in the learners's best interests to do so.

8. Records and information sharing

Where there are concerns about the safety of a learner, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. College staff must have due regard for the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) The college is confident of the processing conditions that allow them to store and share information for safeguarding purposes. This allows them to share information without consent, if it is not possible to gain consent or if to gain consent would place a learner at risk.

Well-kept records are essential to good safeguarding practice. The college is clear about the need to record any concern held about a learner within the college, the status of such records and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible on email or Confide Button noting what was said or seen, with the date, time and location. All records will be dated and signed online, with the name printed and will include the action taken. This is then presented to the Safeguarding Team, who will decide on the appropriate action and record it accordingly.

Any records related to safeguarding are kept in an individual learner file for that learner, separate to the EBS/Ontrack file. All safeguarding records are stored securely and confidentially and will be retained for 6 years after the learner's leave, or until they transfer to another college or educational setting.

Where a learner transfers from the college to another educational setting including colleges, their records will be forwarded or transferred electronically to the new educational setting with notice given to the receiving DSL.

Lack of information about their circumstances can impact on the learner's safety, welfare and educational outcomes. In addition to the learner file, the HOESW (Lead DSL) should also consider if it would be appropriate to share any additional information with the college/education provider in advance of a learner leaving to help them put in place the right support to safeguard the learner and to help the learner thrive in the new setting. For example, information that would allow the new college/education setting to continue supporting the learners who have had a social worker and been victims of abuse and have that support in place for when the learner arrives on day one.

Transferring settings do not need to keep copies of child protection files, but if they do they must be kept in accordance with data retention (and for the shortest practical time).

In Child Protection cases where there may be ongoing involvement from transferring settings, for example **if any siblings still attend the college**, HOESW (Lead DSL) may wish to take copies of chronologies. Electronic systems may have an option to link this information.

If a learner who is subject of a child protection plan leaves the college and the college is unaware of the name of the learner's new education placement, then the learner's key worker/social worker from Early Help or Children's and Young People's Social Care should be contacted to find out where to send files to.

Where a learner joins the college, the college will request all records from the previous educational setting. If none are received within the statutory time, the HOESW (Lead DSL) or Deputies will request the information again through the local boroughs senior management teams.

9. Interagency working

The college will be pro-active and prioritise inter-agency working to contribute to safeguarding learners. It is the responsibility of the HOESW (Lead DSL) to ensure that the college is represented and a report is submitted to any child protection conference or core group meeting for learners on the college roll or previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s) and/or carer(s). Whoever represents the college will be fully briefed on any issues or concerns the college has and will be prepared to contribute to the discussions and planning at the meeting(s).

If a learner is subject to a child protection or a child in need plan (CP/CIN), the HOESW (Lead DSL) will ensure the child is monitored regarding their college attendance, mental health and emotional well-being, academic progress, welfare and presentation. The HOESW (Lead DSL) will ensure the college prioritises attendance at core group meetings and provide appropriate information to contribute to the plan at these meetings. Any concerns about the child protection plan and/or the learner's welfare will be discussed and recorded at the core group meeting, unless waiting for the next meeting would place the learner at further risk of significant harm. In this case the HOESW (Lead DSL) or Safeguarding Team

will inform the learners' key worker immediately and then record that they have done so and the actions agreed.

When the colleges becomes aware that a learner who is being, or is going to be, privately fostered the college has a duty under Section 10 of the Children Act 2004 to inform the Local Authority to ensure the appropriate safeguards are in place. The Safeguarding Team will make an appropriate referral using the Local Authority referral pathway.

10. Allegations about members of the workforce

The aim of our college is to provide a safe and supportive environment that secures the well-being and best learning outcomes for young people and vulnerable adults. All staff members and agency staff are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Code of Conduct and Professional Behaviour policy. The college, however, recognise that sometimes allegations of abuse are made and when they occur they are distressing and difficult for all. The college understands that some allegations are genuine and that there are adults who deliberately seek to harm or abuse young people and vulnerable adults. The college takes all possible steps to safeguard the young people and vulnerable adults and ensure that the adults in the college are safe to work with learners.

It is the Colleges policy that college staff, agency and volunteers are required to have an Enhanced Check (or an Enhanced DBS check) do so every three years.

DBS Clearances approaching expiry are monitored by the DBS Administrator, who loads renewal details onto the Online DBS system so that the employee can complete the online renewal application. This must be done 60 to 90 days in advance of the current Disclosure's expiry date to ensure that the new Disclosure is received before the current one expires.

The college will always ensure that the procedures outlined in Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).

If an allegation is made or information is received about any member of staff, agency staff or volunteer who works with young people and vulnerable adults has:

- behaved in a way that has harmed a young person or vulnerable adults or may have harmed a; young people or vulnerable adult
- possibly committed a criminal offence against or related to a young people or vulnerable adult
- behaved towards a young people or vulnerable adult in a way that indicates they may pose a risk of harm to them
- behaved in a way that indicates they may not be suitable to work with children

The member of staff receiving the information should inform the HOESW (Lead DSL) immediately who will liaise with the Deputy Principal for Curriculum and Quality, Director for Human Resources and Organisational Change and the LADO. The HOESW (Lead DSL) will take advice from the LADO within one working day. These concerns do not need to relate directly to a young person or vulnerable adult. All concerns where an incident outside of college which did not

involve learners but could have an impact on their suitability to work with learners should be reported, for example an incident of domestic abuse. The college will not undertake any further investigation or action before seeking advice from the LADO.

Should an allegation be made against the Director of Human Resources and Organisational Development or HOESW (Lead DSL) this will be reported to the Deputy Principal for Curriculum and Quality. In the event they are not contactable the same day, the information will be passed to the Principal. The Principal or Deputy Principal for Curriculum and Quality will seek advice from the LADO within one working day. Once advice has been given the college will identify an investigating officer who will follow the college procedures for investigations. Should the allegation be in regard to a member of staff from an agency then it is for the agency to investigate and work with the College to come to a conclusion. This is because agencies do not have the direct access to learners or other college staff so they will not be able to collect the facts or liaise with the LADO. Should the allegation be made about the Principal or Deputy Principals/Exec Director for Business Skills Solutions then the HOESW will contact both the Safeguarding Governor and LADO.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared with the HOESW (Lead DSL) who will inform the LADO as a precaution and record on the low-level concerns log.

Any member of staff or volunteer who does not feel confident to raise their concerns within the college should contact the Newham LADO directly.

The college has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a young people or vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person from regulated activity. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

11. Whistleblowing

Whistleblowing is defined as '*making a disclosure in the public interest*' and occurs when a staff member (or member of the wider college community) raises a concern about danger or illegality that affects others, for example learners in the college or members of the public.

All staff members are made aware of the duty to raise concerns about the attitude or actions of staff in line with the college's separate Code of Conduct and Whistleblowing policy.

The college wants everyone to feel able to report any safeguarding concerns. However, for members of staff who feel unable to raise these concerns internally, they can contact the NSPCC whistleblowing helpline on: 0800 028 0285 or email: help@nspcc.org.uk

Parents or others in the wider college community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: help@nspcc.org.uk

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the learner and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority Children's and Young Peoples social care may be appropriate.

