

Subject:	HCUC Safeguarding and Child Protection Policy	
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Person responsible:	Designated Safeguarding Leads at Harrow College and Uxbridge College	
Approved by:	Senior Leadership Team, Governors	
For information / action by:	All staff	POLICY NO. S18/21

1.0 Background

This policy recognises the 2021 updated version of the Department for Education and Skills statutory guidance document “Keeping Children Safe in Education”, and the welfare of children under the provisions of the Children Act 1989, and Section 175 of The Education Act 2002. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18 and therefore should act as a reference point for all guidance.

Section 175 places a duty of care on Local Education Authorities, and on governing bodies of schools and further education institutions to make arrangements for carrying out their functions with a view to safeguarding and promoting the welfare of children.

Safeguarding and promoting the welfare of children covers more than child protection. The requirements for the College are for policies and procedures that cover arrangements not just for meeting the welfare and safeguarding needs of children, but also the needs of vulnerable adults and students who may be forced into marriage, as well as ensuring appropriate practices for staff recruitment and selection and providing a safe and secure environment in which to study. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2020 update*.

Other key documents which this policy acknowledges are: HM Government (2018) Working together to safeguard children; HM Government (2015) What to do if you’re worried a child is being abused; HM Government (2015) Information sharing; HM Government (2015) Disqualification under the Childcare Act 2006; Prevent duty guidance (2019); DfE (2018) Sexual violence and sexual harassment between children in schools and colleges. All staff must read and understand Part 1 of Keeping Children Safe in Education and confirm that they have done so.

2.0 Definitions

Children and young people – those aged under 18 years

Vulnerable adults – those aged over 18 who may be considered vulnerable to abuse. The College has a number of students that may fall into this category. An adult may be defined as vulnerable for a number of reasons. For example, they might be in receipt of ‘regulated activity’, such as care services. Regulated activity may be as a result of a disability and may include such things as the provision of assistance to make welfare decisions; or the provision of personal care.

The College is mindful of its duty to protect vulnerable adults from abuse and also protect them from exploitation. The College will endeavour to support the needs of vulnerable adults and to particularly allow their voice to be heard and to facilitate this process in the most supportive way it can. This may involve using specialists to assist the safeguarding team.

It is, however, also important to note that any adult may be a victim of abuse and the College would respond to the needs of all students who may be experiencing abuse.

3.0 Scope

The Safeguarding and Child Protection Policy applies to all College staff, students and contracted staff, whether they work or study in the main College campuses, outreach centres or other designated areas, volunteers and governors.

The policy applies to students on work experience and placement programmes and those engaged on any College organised off site activity.

The policy applies to working arrangements with other agencies to support the College's Safeguarding and Child Protection Policy, including local education authorities, schools, support agencies and employers.

The policy recognises the additional barriers that exist when dealing with signs of abuse and neglect of children who have special educational needs and/or disabilities. Staff should be aware of these students and any barriers they may face. Where it is needed specialist staff may be asked to assist in safeguarding cases for students with special educational needs and or disabilities, or those with an EHCP.

All staff who come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults.

Contextual Safeguarding: All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

4.0 Policy Objectives

The intent of the Safeguarding and Child Protection Policy is to ensure that:

HCUC meets its statutory duties in regards to safeguarding, which includes its requirements stated within the Prevent Duty.

To raise the awareness of all staff, teaching and non-teaching, of the need to safeguard young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse, neglect or vulnerability to extremism.

To promote an environment that is safe, where staff and students treat each other with mutual respect and develop good relationships built on trust.

Children and students who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken with the aim of making sure they are kept safe, both at College and at home or elsewhere.

There exist safe recruitment practices in checking the suitability of staff and volunteers to work with or in proximity to children and students. (Other HR policies cover this in more detail).

Make staff aware of issues relating to the welfare of children and young people.

All relevant and related policies and procedures comply with this policy and relevant statutory duty.

To support the development of effective inter agency working relationships, especially with Local Authority's Services.

To support young people's and vulnerable adults' development in ways that will foster security, confidence independence and critical thinking skills and to promote these through college activity.

5.0 Designated Safeguarding Lead (DSL)

There will be a Designated Safeguarding Lead (DSL) at Harrow College and Uxbridge College.

The DSL has a key duty to take lead responsibility for raising awareness amongst staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College.

The DSL will receive training in child protection issues and inter-agency working, as required by the Local Children Safeguarding Board (LSCB), and will receive refresher training at least every 2 years.

The DSL will oversee the referral of alleged harm or abuse to the relevant investigating agencies in line with LSCB procedures.

The DSL is also responsible for ensuring that:

Advice and support to staff on issues relating to safeguarding and child protection, including e-safety, is provided.

A proper record of any child protection referral, complaint or concern is maintained (even where that concern does not lead to a referral).

Making referrals to statutory child protection agencies, i.e. through the Multi Agency Safeguarding Hub (MASH) or the Police without delay, and working in full cooperation with external agencies as required.

The College liaises with local authorities and LSCB and other appropriate agencies.

The College liaises with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for their pupils.

The College liaises with Youth Offending Teams to ensure that appropriate arrangements are made.

The DSL will promote the educational outcomes for vulnerable students, including those with a social worker, by liaising with curriculum staff to identify the challenges the student may face and the support needed.

Staff receive initial safeguarding training and are aware of the College safeguarding and child protection procedures.

The College's Safeguarding Committee meets as a minimum once per term. A Safeguarding Operational Plan is prepared and reviewed annually and forms part of the College's annual Operational Plan, and is therefore subject to Senior Leadership Team's scrutiny.

The DSL will provide an annual and mid-year reports to the Governing Body of the College setting out how the College has discharged its duties.

As set out in Keeping Children Safe in Education, College Governors are responsible for ensuring:

- The College complies with its duties under the legislation
- An appropriately senior safeguarding lead is appointed
- Appropriate policies and procedures are in place, that the Safeguarding Policy is updated annually and is available to the public through being published on the college web-site
- Arrangements are in place for children who go missing from education
- The College contributes to inter-agency working in line with the statutory guidance (Working Together to Safeguard Children)
- Safeguarding arrangements take into account the procedures and practice of the relevant local authorities
- Information sharing between agencies is appropriately facilitated and promoted and is not a barrier to the promotion of welfare
- all members of staff undergo safeguarding training at induction and on a regular basis thereafter
- that opportunities exist for the expertise of staff to contribute to and shape safeguarding arrangements and policy
- appropriate filters and monitoring systems for online safety are in place, including sexting
- students are taught about safeguarding, including whilst online, through teaching and learning opportunities, as part of a broad and balanced curriculum
- the College has processes for ensuring safe recruitment and dealing with allegations of abuse against members of staff
- the student's wishes and feelings are taken into account in determining action and support
- staff have the skills, knowledge and understanding necessary to keep Looked After Young People safe, and that a Designated Member of Staff (DMS) is in place
- there is an External Speakers/Visitors Policy in place.

6.0 Allegations of harm or abuse against children

Staff should not investigate concerns or allegations themselves, but should report them immediately to a designated Safeguarding Officer. See Appendix 2 and 3 for further guidance.

Written records of concerns about children and students will be kept, even where there is no need to refer the matter immediately.

All records will be kept securely, separate from other student files, and in locked or secure electronic file locations by a designated Safeguarding Officer.

The Schools Child Protection Officer or Children's Social Care Duty Officer or Police for the victims local authority will be notified following approval by a safeguarding officer (see Appendix 3).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point. Staff should refer to Appendix 4 in such cases. In addition, staff should be aware of the College's Public Interest Disclosure Whistleblowing Procedure to raise concerns of suspected malpractice.

7.0 Specific safeguarding issues

Concerns that a student may be forced into marriage

A distinction should be made between 'forced' and 'arranged' marriage. The Forced Marriage Unit describes the difference between a forced and an arranged marriage thus: *"There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses. In forced marriage one or both spouses do not (or, in the case of some adults with disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, sexual, financial and emotional pressure. Consent is essential to all marriages – only the spouses will know if they gave their consent freely"*.

All suspicions of forced marriage must be reported to a Safeguarding Officer; this applies even if the marriage has already taken place.

Full credence should be given to information about forced marriage supplied by third parties (e.g. a friend of the student).

The College will follow the London Child Protection Procedures and the guidance issued by the Forced Marriage Unit (Foreign & Commonwealth Office, <http://www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/>)

Concerns that a student may have gone missing

Staff should be mindful that a child going missing from an education setting is a potential indicator of abuse or neglect. Any suspicion that a child has gone missing should be reported to a safeguarding officer.

Statutory guidance on children who run away or go missing from home or care is provided in the DfE in its January 2014 publication.

When a 16 or 17 year old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation or involvement with gangs. A 16 or 17 year old who has run away may present as homeless. In this case, local authority children's services must assess their needs as for any other child. Where this assessment indicates that the child is a child in need and requires accommodation under section 20 of the Children Act 1989, they will become looked after.

The College procedure for dealing with missing children will be to immediately contact the next of kin and (if the case hasn't been reported) then contact the police and if necessary local authority will also be contacted. Children who repeatedly go missing will be subject to a risk assessment and be supported on the safeguarding register. For further information refer to: Education Statutory Guidance (2017) *Children Missing Education (2016)*.

Sexual harassment, violence and exploitation

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is important that all staff have an attitude of **'it could happen here'**. The College will investigate **all** allegations. There is a **zero tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic). The college will have a whole college approach to tackling sexual harassment and violence which includes tutorials, events, surveys, policies on conduct and disciplinary, training, and key messages.

The DfE has produced the following departmental advice: Sexual Violence and Sexual Harassment between Children in Schools and Colleges. It contains important information and guidance on responding to reports.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- consensual and non-consensual sharing of nude and semi-nude images and videos¹⁹. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence; sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. It is also important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously.

Youth produced sexual imagery (YPSI) is the sharing of sexual images of themselves and others and will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. DfE have issued guidance on Searching, screening and confiscation advice, which provides useful advice on searching electronic devices. And DfE guidance 'Sharing nudes and semi-nudes: how to respond to an incident', is very clear that staff should never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. Any incidents of YPSI should be reported to the designated safeguarding lead immediately.

Reports of sexual violence are likely to be complex and require difficult professional decisions to be made. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. If possible, reports should be made with two members of staff present, (preferably one of them being the designated safeguarding lead or Student Support manager). When there has been a report of sexual violence, the designated safeguarding lead (or Student Support manager) will make a risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. More detailed advice is available in Keeping Children safe in education which covers areas such as: immediate responses; support for victims; managing the criminal process and reporting to police and social services.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Upskirting: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Child sexual exploitation (CSE): involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying, banter and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

One way that children might end up being sexually exploited is through child trafficking. The Modern Slavery Act 2015 places a duty on authorities to report concerns relating to child trafficking. Any staff that have concerns of CSE or child trafficking should report them immediately to the designated safeguarding lead. For further information: HM Government (2011) *Safeguarding Children who may have been trafficked* (2011).

Female Genital Mutilation (FGM): A mandatory reporting duty for teachers commenced in October 2015. This means that if teachers discover that an act of FGM appears to have been carried out, they must report this to the Police. As with other concerns the College’s DSL will make this referral on behalf of all staff. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Fabricated and induced illnesses: The fabrication or induction of illness in children is a relatively rare form of child abuse. Concerns that a child’s illness may be fabricated or induced are most likely to come from health professionals. However, College staff may notice where a child is frequently

absent from College on questionable health grounds. Normal safeguarding procedures apply in these circumstances. For further information please refer to the following policy.

HM Government (2008) Safeguarding children in whom illness is fabricated or induced <https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Concerns of violent extremism

The new Counter-Terrorism and Security Act 2015 placed specific duties on FE Colleges. These are addressed in the College's separate Preventing Terrorism & Radicalisation Policy.

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a safeguarding officer. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists.
- changing their style of dress or personal appearance to accord with the group.
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

As part of the Terrorism Act 2000 – the College has an obligation to disclose information which might be of material assistance in preventing an act of terrorism to the police.

(<https://www.gov.uk/government/publications/prevent-strategy-2011>)

The College has a Preventing Terrorism and Radicalisation policy which contains more information on the specific duties for all staff and students.

Private fostering arrangements

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group. Staff should be aware that failure by a private foster carer or parent to notify a local authority of a private fostering arrangement is an offence.

Staff should notify the DSL (who will notify the local authority) of a private fostering arrangement that comes to their attention, where they are not satisfied that the local authority have been, or will be, notified of the arrangement, so that the local authority can then discharge its duty to satisfy itself that the welfare of the privately fostered child concerned is satisfactorily safeguarded and promoted.

Abuse linked to Faith, belief and culture

Child abuse may be linked to faith, belief and culture. Examples are: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create

fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list. Staff are asked to be mindful of this type of abuse and report any concerns to the College DSL.

Children in families experiencing multiple needs

Unfortunately for some children it is common to experience more than one safeguarding need. For example, a student may live in a household where there is domestic violence, drug and alcohol abuse and mental health issues. Occasionally staff may become aware of new abuses in an existing case. Staff are asked to be mindful of the negative impact this may have on these students and report any new information or concerns to the DSL.

Peer on peer abuse

This policy recognises that children and young people are capable of abusing their peers. These may include allegations of physical abuse, emotional abuse, sexual abuse and sexual exploitation (see section above on sexual harassment). Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. When an allegation is made by a student against another student, which is of a safeguarding nature, it should be reported to the designated safeguarding lead (DSL) as soon as possible. All staff, should consider the context within which such incidents and/or behaviours occur, for example, where did it occur, what are the relationships/family, peers etc.

Concerns of child criminal exploitation, or 'county lines'

Gangs are deliberately targeting vulnerable children – those who are homeless, living in care homes or trapped in poverty. These children are unsafe, unloved, or unable to cope, and the gangs take advantage of this.

These gangs groom, threaten or trick children into trafficking their drugs for them. They might threaten a young person physically, or they might threaten the young person's family members. The gangs might also offer something in return for the young person's cooperation – it could be money, food, alcohol, clothes and jewellery, or improved status – but the giving of these gifts will usually be manipulated so that the child feels they are in debt to their exploiter. Often the gangs arrange to have the young trafficker mugged so that the gang can claim the trafficker now owes them for the drugs they have lost.

They become trapped in county lines, the young people involved feel as if they have no choice but to continue doing what the gangs want.

Signs of criminal exploitation and county lines that staff should be aware of:

- Returning home late, staying out all night or going missing, attendance issues
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly dishevelled
- Having hotel cards or keys to unknown places.

Concerns of knife crime

The College recognises the dangers of knife crime among young people, particularly as it is London College. It acknowledges the 'London Knife Crime Strategy', June 2017, and specifically the sections on protecting and educating young people. It also acknowledges 'Safeguarding children and young people in education from knife crime', Ofsted 2019.

The College is committed to working and sharing information with its partners such as the local police and safer schools officers, YOT teams, LSCB, and the local authority safer neighbourhood teams, to protect and educate students. The College actively works with both Harrow and Hillingdon local authorities to understand local strategy and contribute to a multi-agency response.

The College is aware that often the most dangerous aspect for students is journeys to and from college. We recognise that there are areas locally which could be hotspots of trouble particularly in the town centres and will work with the town centre police teams, the restaurants, and shops to assist with solutions and share information.

Young people may carry knives for a number of reasons but the most common are:

- Involvement in gangs or criminal activity
- Those who carry knives for protection

The College has knife arch metal detectors and hand wands which are used as a deterrent, and intelligence-led searches are carried out when needed.

The College is committed to educating and informing its students around the dangers of knife crime and also providing support for victims and those 'at risk' of involvement. The tutorial programme will include knife crime sessions and other events such as speakers will be promoted. Students 'at risk' will be supported pastorally through the Student Support teams or with others as deemed appropriate e.g. mentors, tutors, SPA's.

All staff should report any concerns they have regarding knife crime to security and the safeguarding officers immediately.

It is a crime to threaten or cause harm to a person with a bladed weapon and it is also an offence to carry a knife in a public place (this includes schools, and will include colleges when the Offensive Weapons Bill is passed in 2019). Each case is different, and evidence of an offence is often the difference. However, it is College policy that suspicion or evidence to suggest any of this will be dealt with by the disciplinary process and police involvement is also likely in these cases as is parental involvement.

Child trafficking and modern slavery

Human trafficking, is defined in the UN Protocol (2000) as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern-day slavery, is a crime and safeguarding issue. Examples of industries and services where slavery may involve children and young people are: the sex industry, including brothels; retail: nail bars, hand car washes; factories: food packing; hospitality: fast-food outlets; domestic labour: cooking, cleaning and child minding. Additionally, victims can be forced into criminal activities such as cannabis production, theft or begging. Children and young people have an increased vulnerability to slavery, e.g. young people being moved internationally or domestically so that they can be exploited; forced labour; verbal or physical threats of violence against them as individuals or their families. Possible signs and indicators that someone is a victim of modern include:

- physical appearance: poor physical condition, malnourishment, untreated injuries, and looking neglected
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. they may not interact and be unfamiliar in their local community
- personal belongings: few possessions, wearing the same clothes each day, and no identification documents
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deportation or fear of violence on their family

Further advice can be provided directly by the modern slavery helpline on 0800 0121 700.

8.0 Children on school link programmes

The College has a duty of care towards children who are studying on a school link programme whilst on College premises. In arranging school link programmes for children of compulsory school age the College will:

- Provide schools with adequate details of provision to enable the school to obtain parental consent for their child to participate. The College will require evidence of this written consent.

- Seek to ensure that for children with special education needs (SEN), they are informed of the details of the statement that has been agreed, in order to determine the level of support needed.
- Request details from the school of any medical needs or requirements a child may have and agree with the school how the necessary support can be provided. /Continued
- Ensure that children are made aware of the general standards of safety with which all children and FE college students should comply.
- Inform the school of any safeguarding issues involving a school link student. Request safeguarding information regarding school link students from schools.
- All concerns regarding safeguarding or child protection for students on school link programmes must be referred to a College designated Safeguarding officer and to the Child Protection Officer at the school where the child is on roll (or the child's social worker if the child is not on a school roll).

9.0 Work experience, work placements, and volunteering

Paragraph 142 of Keeping Children Safe in Education, linked to above, says:

Schools and colleges do not have to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

This is reiterated in a DfE advice document about post-16 work experience, published in March '15. It explains on page 13 that, as of July 2012, work experience providers are no longer required to carry out enhanced DBS checks on staff supervising young people aged 16 to 17.

For young people intending to undertake work experience in the Health Care and Early Years Sector, they will need to have an enhanced DBS check before starting on their placement.

This guidance from the DfE also states that education or training providers must satisfy themselves that an employer has assessed the associated risks to workers under 18 on their premises and has suitable and sufficient risk management arrangements in place. Checks by education or training providers must be kept in proportion with the risk environment. For low risk environments, assurance can be gained through a conversation with the employer. A physical inspection by education providers or requiring the employer to complete lengthy forms should not take place.

Students who are placed with employers will be given clear advice about whom to contact if they are worried or uncomfortable about the surroundings, or if they suffer abuse.

For volunteering activities the following arrangements apply: if the college is the main organiser (or significant partner) of a volunteering event and the activity is part of the timetabled study period then a risk assessment of the event or activity will need to be undertaken. In this case the College's DBS policy and public liability insurance should apply.

If the College is signposting students to a volunteering opportunity which is outside of the timetabled study period, and not organised by the College, then a risk assessment will not be undertaken by the College. The College will not normally request documentation such as DBS from organisations offering volunteering opportunities. However, the College endeavours to use registered charities for its signposting. When the College is signposting to organisations that are not registered then appropriate checks for safeguarding will be made.

Please also see Appendix 6 in relation to Apprenticeships.

10. Criminal Record Checks for students

At HCUC students are asked to declare any unspent criminal convictions at enrolment.

This is part of the College's legal responsibility to provide a duty of care to all staff and students. The declaration of prior convictions allows the College to review the suitability of admission on an individual basis. The College will ask all students to disclose at enrolment any unspent criminal convictions and all students making a declaration will be interviewed by a Safeguarding Officer or Head of Security. Students with convictions for minor offences will be allowed to continue with the enrolment process, while more serious concerns are referred to an internal panel (the DSL and any SLT member). See Admissions Policy for more details.

Should the College become aware of any convictions that were not disclosed at enrolment the College reserves the right to review this student's enrolment and if necessary suspend or withdraw the students place at College.

The DSL's will be responsible for cases where a new Criminal Conviction or police investigation occurs during the academic year. The DSL will be responsible for liaison with legal representatives.

If any criminal activity is suspected HCUC reserves the right to involve the police and pursue such matters through the legal process.

HCUC will co-operate and not prejudice any police enquiries. Any student involved in alleged criminal activity may be suspended until the outcome of any police enquiry is complete. HCUC reserves the right to withdraw any students whose criminal activity is deemed of such a significant nature that it may place others at risk or bring the College into disrepute. Any failure to co-operate with the police will be taken into account during the College's disciplinary procedure.

11. Support for students and parents

Students will be informed of the safeguarding practices in the college and specifically where and whom they can go to for help. Students will be made aware of possible risks to their safety, including e-safety, through induction and tutorial, and in the course of studying in the College, with the intent that they are better able to protect themselves from situations of potential harm. The tutorial scheme of work will include topics such as those included in this policy.

At times the College may promote awareness of safeguarding through external speakers or events which are used to highlight particular issues and promote understanding & debate amongst learners.

The College will ensure that parents have an understanding of the responsibility placed on the College and staff for safeguarding and child protection by placing this policy on its website and setting out its obligations in corporate publications.

12. Recruitment of staff and volunteers

The College will ensure that procedures are in place to ensure that all appropriate checks are carried out on staff and volunteers who have substantial access to children and students, including DBS (enhanced) checks), and that records are kept of such checks. This process is detailed further in the Human Resources, Disclosure and Barring Service Policy.

13. Staff training and development

The College will provide safeguarding and child protection training for all staff (and Governors).

The training will help staff to recognise the signs of possible harm to children and young people. The training will ensure staff know how to proceed when possible harm is suspected; whom to contact; and the role of the designated members of staff for child protection. Training content and delivery will be updated regularly in line with advice from partners such as the local authority & DfE.

All staff will receive safeguarding training at induction and be provided with regular updates through emails and/or meetings at least annually.

Level 2 safeguarding training will also be delivered to staff and governors and refreshed every 2 years (either online or face-to-face).

All Safeguarding Officers must attend Local authority 'Working Together' training.

In addition, specific areas of concern in safeguarding, for example: knife crime, violence and bullying, etc. may be the subject of workshops, training, guest speakers or events which will allow staff to build expertise and help shape practice through training workshops and events.

14. Reporting and dealing with allegations of abuse made against members of staff

Where there is an allegation of harm or abuse against staff, both inside and outside the work setting, the College will work to ensure allegations are dealt with quickly, fairly and consistently. Procedures under this policy apply to all staff, as well as volunteers (see procedures detailed under Appendix 2.

15. Photographs

Photographs may be taken of events and activities that occur at the College for marketing purposes. The consent of individuals will need to be sought when they are the main focus of the photograph. For under 16 year olds (and vulnerable adults) this will need to be confirmed by parents. But for large groups consent forms will not need to be sought for photographs.

16.0 Student exceptional travel

If the student is under 18 and needs to be provided with exceptional travel (such as a taxi or ambulance) the parent must be contacted. If the parent is not available to accompany the student they must be accompanied to their home address in the taxi (unless permission is given as per below) or if an ambulance is called, to hospital by a member of staff.

If the student is under 18 they may travel in a taxi on their own but their parents must be contacted first to give permission for this.

All students under 18 need to be accompanied to hospital either by a member of staff or a parent/guardian unless permission is given by parents. E.g. if the parents plan to travel directly to

the hospital. If a member of staff accompanies a student to hospital the member of staff must remain with the student until a parent/guardian arrives or permission is given by the parent/guardian to leave.

17.0 Health, Safety & Wellbeing

In line with the College's Equality and Diversity Policy and recognising the College's duties in the Equality Act 2010; the College seeks to have due regard to those students who present with issues related to their wellbeing either at the admissions phase or during their studies.

The College reserves the right to refuse entry of a student where health and safety issues may be compromised as a result of that admission.

The College has a duty of care to respond appropriately to situations where there are substantial concerns relating to a student's mental and/or physical functioning and the impact upon the individual and/or other students and staff.

The College reserves the right to suspend any student whose wellbeing is being affected (or the wellbeing of other students and staff) by signs of illness, mental health difficulties, personality or emotional disorders, and unusually disruptive behaviour. The responsibility for cases such as this will be with the DSL. If appropriate, the College may need to consider the views of representatives from the medical profession and other key workers to inform this decision (student consent will be sought, whilst noting that safeguarding our students and staff may override data protection issues).

During a period of suspension, the College will take all reasonable steps to ensure that the student concerned is able to keep up-to-date and is able to progress with their course through remote access to the College's Virtual Learning Environment and via telephone / e-mail / postal mail contact with tutors and Student Support staff. The College cannot guarantee that full access to all learning resources and services will be possible remotely.

During suspension, the Student's submitted work will be assessed as normal. A suspended student may request access to assessment opportunities within the College premises during their suspension period. In this circumstance, the DSL, will consider the risk and confirm whether permission is given or not. In either case the DSL will confirm appropriate or alternative arrangements for assessment so as to not disadvantage the student or other students, as far as is possible.

In cases where a student has been suspended decisions to continue with a suspension or move to withdrawal/exclusion will be the responsibility of the DSL. The DSL will investigate each case and make an informed decision about the appropriateness of returning to study. Where possible the investigation will include gathering information and/or a meeting with some or all of the following: the student, parent/guardian, medical professionals, tutors and key workers.

The length of suspension may vary in these cases (for example whilst a student awaits the outcome of new treatment). The DSL will make contact with the student, parents/guardians throughout the process at intervals of no more than 10 working days. Where a suspension means that a student misses too much College to be able to continue with the course the College reserves the right to withdraw the student. Right of appeal for exclusion (or suspension which leads to withdrawal) applies in the same way as it would for any other exclusion (within 10 days in writing to the CEO/Principal).

18. Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers

Staff should be aware of these barriers when dealing with a safeguarding issue and supporting children with SEN and disabilities.

19. Online safety

There is a recognition that most children are using data on their phones, on the 3G or the 4G network. In the College, this means that staff should be aware that students are accessing the internet whilst they're at College. Online safety can be categorised into three areas of risk which staff should be aware of:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Staff should be aware of these risks of online safety.

In terms of their own use of technology, staff should be aware of the following:

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

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

As a safeguarding feature the College has online key word detection software to identify risk for all users that are logged in to the College network.

Covid 19- this policy has an annex regarding staff and students working remotely during the pandemic Covid-19. This provides advice and guidance on delivery of online lessons and communication between staff and students online.

20 Child Sexual Violence and Sexual Harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. If possible reports should be made with two members of staff present, (preferably one of them being the designated safeguarding lead or Student Support manager). When there has been a report of sexual violence, the designated safeguarding lead (or Student Support manager) will make a risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. More advice is available in the following government publication.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

21 Whistleblowing policy

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. The College's whistleblowing policy is the best way for staff to do this. The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled.

22 Wearing of Identity Badges

In order to ensure that anyone accessing the College Campus is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided. All teaching staff are required to check their students' ID badges are worn at the start and at the end of all teaching sessions.

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

23. MONITORING AND REVIEW

This policy will be reviewed annually and will be referred to in the College's corporate publications.

24. GUIDANCE ATTACHMENTS

- Appendix 1 Definitions of Abuse
- Appendix 2 Reporting and Dealing with Allegations of Abuse against members of staff
- Appendix 3 Disclosure
- Appendix 4 Referral procedure for 'serious' cases; Record keeping and sharing information
- Appendix 5 Looked After Children
- Appendix 6 Apprenticeships
- Appendix 7 Designated Safeguarding Officers HCUC (Harrow College and Uxbridge College)
- Appendix 8 Covid 19

APPENDIX 1

DEFINITIONS OF HARM OR ABUSE

The College recognises the following as definitions of abuse:

1. Physical Abuse

Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Example: a cause for concern might be Female Genital Mutilation.

On 31 October 2015, a new duty was introduced that requires health and social care professionals and teachers to report 'known' cases of FGM in girls aged under 18 to the police. FGM is an offence under the Female Genital Mutilation Act 2003. The maximum jail term is 14 years. Most FGM occurs between ages 4 – 12, however, any suspicion of this must be immediately reported to a safeguarding officer.

2. Neglect

Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs. It will result in series impairment of the child's health or development.

3. Sexual Abuse

Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.

4. Emotional Abuse

Emotional abuse occurs where there is a persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. Abuse can be entirely online or technology based and may be by an adult or another child or group of children.

APPENDIX 2 REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF

The procedures apply to all College students, contracted staff or agency staff, whether they work in the main College campuses, outreach centres or other designated areas, volunteers or governors. The word “staff” is used for ease of description. These procedures only apply to ‘current’ staff. Any allegations against a staff member who is no longer employed by the College will be referred to the police and the LADO, Local Authority Designated Officer.

Introduction

Because of their frequent contact with children and young people, staff in educational institutions may have allegations of child abuse made against them and, in rare instances, such allegations may be true. The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The College recognises that the Children Act 2004- states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

Receiving an Allegation from a Child

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines under Appendix 3 for dealing with disclosure

The allegation should be reported immediately to a designated Child Protection Officer. Where the Principal is the person against whom the allegation is made, the allegation should be reported to the Senior Staff Member with Lead Responsibility – The DSL.

The designated Child Protection Officer or the DSL should obtain written details of the allegation from the staff member who received it, that are signed and dated or receive the allegation direct from the child where no written record exists.

Record information about times, dates, locations and names of potential witnesses.

Initial Assessment by DSL

The DSL should make an initial assessment of the allegation, consulting with Human Resources and the LSCB as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LSCB.

Undertaking the Working Together to Safeguard Children guidance and DfE Guidance Keeping Children Safe in Education, the DSL will refer to the Local Authority Designated Officer for Safeguarding an allegation of abuse or maltreatment made against “a person who works with children where that person who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that is unsuitable to work with children, in connection with the person’s employment or voluntary activity.

Where there is an allegation against a member of staff it is important that the DSL investigates it and makes an initial assessment on the basis of the information received about whether the staff member should be suspended. In the event of suspension the DSL will make a decision that the allegation warrants further investigation.

Potential outcomes following an investigation by the DSL/ HR Director are that:

The allegation warrants further investigation by the appropriate authorities i.e. Social Services/Police.

The allegation represents inappropriate behaviour or poor practice by a member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter will be addressed in accordance with the College disciplinary procedure.

The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College will assist the agencies with their enquiries.

The College may decide to continue with its internal enquiries and disciplinary procedures while the formal police or social services investigations proceed as any internal enquiries shall follow the staff disciplinary procedures and the member of staff will be made aware that the College's disciplinary procedures will apply notwithstanding other investigations.

If there is an investigation by an external agency, the DSL will be involved in, and contribute to, the inter-agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance with the agency's enquiries. The DSL will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

The DSL shall:

Inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.

Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.

The HR Director shall inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the process will involve.

In the event of a serious sexual allegation the CEO shall inform the Chair of Governors of the allegation and the investigation.

The HR Director shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension will not be automatic and will depend on the seriousness of the case. In respect of staff other than the CEO, suspension can only be carried out by a senior post holder. In respect of the CEO, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Deputy Chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration may be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension will only occur for a good reason. For example:

Where a child is at risk.

Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.

Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff will be encouraged to seek advice, for example from a trade union.

Prior to making the decision to suspend, the HR Director and another SMT member will interview the member of staff.

The member of staff will be informed that an allegation has been made. The interview is not a formal disciplinary hearing, but the matter is being raised to hear what the staff member has to say about the allegation. A decision may then be taken to suspend pending further investigations.

The LSCB (LADO) will be informed of the action taken and the reasons for doing so

The interview will follow the process outlined under the College's disciplinary procedures.

The Disciplinary Investigation/ Disciplinary Hearing

The internal disciplinary investigation meeting will be conducted in accordance with the existing College disciplinary procedures.

The investigating manager may then decide to refer the matter to a disciplinary hearing if a case to answer is found following the investigation meeting.

Following a disciplinary hearing the College may be required to contact the DBS as part of its legal duty to report concerns relating to risky staff. There are two main conditions for referral to the DBS:

They have permanently removed a person from 'regulated activity' through dismissal or permanent transfer from 'regulated activity' (or would have if the person had not left, resigned, retired or been made redundant);

They believe the person has: a. Engaged in 'relevant conduct' b. Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or c. Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website, or call the helpline for advice).

Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to the LSCB in order that other agencies may act upon the information.

Following consultation the DSL or the HR Director shall:

- Inform the member of staff against whom the allegation is made both orally and in writing that no further disciplinary or child protection action will be taken.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a child other than the alleged victim, consideration will be given to informing the parents/carers of that child.
- prepare a report outlining the allegation and giving reasons for the conclusion and confirming that the above action has been taken.
- consider whether the allegation made against the member of staff was malicious. In such an event if the child is a student at the College, an investigation under the College's Student Disciplinary Procedures will be undertaken. If the false allegation was made by another staff member against a work colleague an investigation under the College's Disciplinary Procedure will be undertaken.

Allegations against the CEO

The Chair of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the CEO of the college.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file or in student records if it refers to a student.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the College's statutory duty to inform the National College for Teaching and Leadership and the IFL.

APPENDIX 3

DISCLOSURE

Children and young people have a right to expect the College to provide a safe and secure environment and a fundamental right to be protected from harm.

Harm is any behaviour that endangers the well-being of a child or young person and includes:

- Sexual abuse
- Domestic violence
- Child pornography or prostitution
- Neglect

If a child or young person discloses a Child Protection issue it is essential as a member of College staff that you:

Listen carefully but do not question or interview	It is not the role of the College to investigate allegations of harm or abuse unless it involves an employee of the College. Disclosure gives the opportunity to gather information to assist in making an informed decision on any further appropriate action or referral to external agencies. Do not ask questions or interview – inexperience can result in unintentional leading questions which could negate some of the information gathered.
Do not make judgements	It is important to remain neutral in your approach and make no judgements on the situation or information given.
Reassure	The child or young person is likely to be emotional / angry / distressed / detached / reluctant at the point of disclosure. Quietly reassure that, following this disclosure you will be able to get them the help they need to taking the issue forward.
Keep accurate notes	Keep brief accurate notes during the meeting. Try to record any names or relationships disclosed and be specific on the language used. Notes are confidential and should be given to the designated College Safeguarding Officer afterwards. No reference should be added to the student file. All notes should be signed and dated by the member of staff (it is not necessary to ask the student to sign the notes).
Refer	All concerns must be reported to a College designated Safeguarding Officer

In addition, you **MUST** tell the child or young person that you have to pass this information on to the College Safeguarding Officer.

APPENDIX 4

REFERRAL PROCEDURE FOR 'SERIOUS' CASES

- All reports of Child Protection issues must be referred to the designated Safeguarding Officer as soon as possible after disclosure has been made.
 - All referrals should be clearly identified or marked 'Safeguarding Issue' and can be made by telephone, e-mail or any other appropriate method. The following procedures refer to safeguarding concerns a student may have about themselves, another student, parents or guardians or any other adults (not including staff which are dealt with in Appendix 2).
 - Once the initial referral has been made the designated College Safeguarding Officer will talk to the child or young person and others involved then make a decision regarding further appropriate action.
 - The safeguarding officer will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect them. Students will be supported to express their views and give feedback on the service wherever possible.
 - If an allegation has been made by one student against another then an investigation will be conducted. The Designated Lead for Safeguarding will oversee any investigations of this nature and reserves the right to suspend students where necessary during an investigation.
 - The College's responsibility is not confined to the protection of College students. If any member of staff is made aware of any harm to any child, a referral to the designated Safeguarding Officer should be made.
 - For those issues, which require a serious safeguarding response; (e.g. referral to the Police, the local authority, social services) examples include: serious domestic violence; threat of forced marriage; sexual assaults; serious incidents involving mental health issues; witness protection; (this list is not exhaustive). In these cases, the DSL (Lead responsible person), Student Support Manager and Senior Student Support Officer will decide (independently in an emergency, or more usually, through agreement) if the threshold has been met to contact an external agency. Other designated Safeguarding Officers may contact external agencies with the permission of one of the 3 staff listed above or independently in an emergency.
 - Safeguarding referrals will be made to external agencies such as: Local authority Child protection officer.
 - Police; Social Services; Mental Health e.g. CPN's (community psychiatric nurses if contact details are known). In certain circumstances the College's Head of Security may be asked to make referrals to the Police. The lead person with responsibility for Safeguarding is to be made aware of all referrals to external agencies.
 - If an Inter-agency referral form (previously Common Assessment Framework, CAF) is required this will be completed by the DSL, or a Safeguarding Officer. Forms are available on the local authority websites:
<https://hillingdonsafeguardingpartnership.org.uk/professionals/useful-guidance/mash/>
<https://www.harrowscb.co.uk/report-a-concern/general-referral-form-for-practitioners/>
- Parents will be contacted (for under 18 year olds and over 18 if genuine concern of mental well-being, or vulnerable person) unless to do so would put the student 'at risk' of harm.
- Student Services officers will provide feedback, where appropriate, on outcomes of cases for staff and students. They will support case conference or core group meeting requests from local authorities and contribute to any Personal Education Plans as requested. All serious cases will be recorded on the College's Safeguarding register. In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children. In these cases Student Support staff will also attend meetings whenever possible and provide advice and guidance to assist staff with these decisions.

Please see list of contact numbers below.

Only to be used by designated Safeguarding Officers unless extremely urgent:

LB Hillingdon Child Protection Officer	01895 5566644
LB Harrow MASH / LADO / Golden number	0208 901 2690
Forced Marriage Unit	0207 008 0151
Prevent: Anti-Terrorist hotline	0800 789 321
LADO Hillingdon	01895 250 975
LADO Harrow	020 8736 6435
Domestic violence team Hillingdon	0208 246 1745
Harrow Duty team	0208 901 2690
	0208 424 0999
Ealing Emergency Duty team (24 hrs)	0208 825 8000
Mead House Community Mental Health team	01895 558 270
Pembroke Centre	01895 622 424
Harrow/Hillingdon Early Intervention Service	01895 627 760
CFACS (Child, Family & Adolescent Consultation Service)	01895 256 521
Police Insp (insp Uxb Town Centre)	0207 161 8170
Brent Children's social care	0208 937 4300
Hillingdon 16+ Duty	01895 277 637
Hillingdon CAMHS	01895 256 521
Southall Black Sisters	0208 571 0800
Harrow Prevent Coordinator Samia Malik	0208 420 9385
Brent Prevent Coordinator Kibibi Octave	0208 937 4225
Hillingdon Prevent co-ordinator Fiona Gibbs	01895 277 035

In extreme circumstances (e.g. where there is a suicidal threat) the police or an ambulance will be called immediately on the 999-emergency number.

1.0 Confidentiality & Sharing Information

Once disclosure and referral have been made the incident should be considered confidential. The situation should not be discussed with any other member of staff (with the exception of the designated Safeguarding Officer), student or outsider.

Do not engage the student in any further discussion. If the child or young person tries to instigate further discussion, he/she should be referred to the designated Safeguarding Officer.

All information regarding child protection issues will be kept, under lock and key, or secure electronic file, by the College Safeguarding Officer.

The College is obliged to work and share information with external agencies charged with the protection of children and young people. This includes Social Services, the police, local schools, LSCB etc. based on the 'need to know' principle.

The College also has representation on the Local Safeguarding Children Board and the LSCB Education sub-committee.

The college commits to share information with Social Services and allow access to students on-site if required.

The designated Safeguarding Officer is in regular contact the London Borough of Harrow and Hillingdon Children's Safeguarding Officers and seeks advice as appropriate.

The College has developed systems to ensure effective communication between local agencies.

Note: 'confidentiality' is often misunderstood. An over emphasis on confidentiality can leave young people in danger of harm. If something is confidential, this does not mean that it cannot be shared. However, it is important to:

- share only what it is necessary to share to protect a child or young person
- record what you shared, and with whom
- record your reasons for sharing.

2.0 Record keeping

The Data Protection Act says, 'Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.' (Source: [Information Commissioner's Office](#))

There are a number of reasons that records of safeguarding need to be kept after a student has left the College. One significant reason is that a student may return to the College at some time in the future and the records may contain information that would still be relevant. Another reason might be that the College is asked to contribute to a serious case review for a student that was previously with the College. Therefore, not keeping any copies can often seem counter-intuitive. The Data Protection Act allows organisations to set their own retention policy which must explain why and for how long the information will be kept.

To this end the College will commit to removing safeguarding files 7 years after the student has left, but also affords the DSL discretion to keep any files for longer if necessary for reasons such as those stated above.

APPENDIX 5 Looked After Children

In UK law, children in care are referred to as '*looked after children*'. A child is 'looked after' if they are in the care of the local authority for more than 24 hours. Legally, this could be when they are:

- living in accommodation provided by the local authority with the parents' agreement
- the subject of an interim or full care order or, in Scotland, a permanence order
- the subject of an emergency legal order to remove them from immediate danger
- serving time in a secure children's home, secure training centre or young offender institution
- unaccompanied asylum seeking children
- They might have been placed in care voluntarily by parents struggling to cope

A child will stop being 'looked after' when they are either adopted, returned home or turn 18. The local authority will continue to support children leaving care at 18 until they reach 21.

The term '*care leaver*' refers to a young person under the age of 25 who is currently or has been in public care for a minimum of three months, since the age of 14, and was in care on their 16th birthday.

The Children Act 2004 places a duty to safeguard looked after children, to promote their educational achievements and to ensure that they are able to "achieve to and reach their full potential". The Guidance sets out six key principles:

- prioritising education
- having high expectations
- inclusion – changing and challenging attitudes
- achieving continuity and stability
- early intervention – priority action and
- listening to young people

The college vision for Looked After Children and Care Leavers is to provide them with the necessary support, guidance and opportunity in order to achieve and progress to further/higher education and/or training or employment as well as preparation for wider life experiences in modern Britain.

We acknowledge that Looked after Children (LAC) and Care Leavers (CL) often have additional barriers to their educational success and progression.

The College recognises the national underachievement of these minority groups in comparison to their peers. We also recognise that all Looked after Children and Care Leavers can: be especially vulnerable, be at risk of early withdrawal, face different issues and require different levels of support.

The College is committed to:

- Ensuring LAC and CL students are appropriately supported and aware of the financial support they can receive such as the vulnerable bursary fund.
- Making appropriate staff aware of who our LAC and CL are and the barriers they may face in their education.
- Making College staff aware of the possible indicators of risk of early withdrawal or difficulties in meeting course and / or College requirements.
- Contributing to Personal Education Plans (PEPS) and Care Plans in liaison with Local Authority colleagues.
- Clarifying the support and advocacy available in College and through external agencies.
- Developing close relationships and collaborative work to promote the learning and wellbeing of individual students, both in and out of college.

Responsibilities of the Designated Support Officer for LAC

Be an advocate for Looked After Children, Care Leavers.

Liaise closely with each curriculum area and other colleagues in support and curriculum to:

- ensure a smooth and welcoming induction for the students.
- note any specific requirements are logged, including care status.
- ensure PEPs are completed on request.
- ensure if the LAC or LC is “At Risk” of leaving the course early due to poor attendance or behaviour, that they will be supported in any formal process to confirm appropriate flexibility has been applied.
- ensure accurate and timely data is provided to the Student Support Manager to support the collection of full retention, success and progression data.
- co-ordinate support for the identified students and liaise with other professionals as necessary.
- ensure appropriate staff receive relevant information
- ensure confidentiality for individual students and only share personal information on a need to know basis.
- provide information to assist planning/review meetings and ensure attendance as far as possible.
- encourage identified students to participate in progression opportunities (such as UCAS applications) and planned extra-curricular supportive activities.
- seek urgent meetings with relevant parties if the student is experiencing difficulties and/or is at risk of early withdrawal.
- to meet with the students in these cohorts to discuss how we can best support them while they are with us.

Responsibilities of All Staff:

- have high aspirations and celebrate the educational and personal achievement of Looked After and Care Leavers.
- respond appropriately to requests for information to support the completion of PEPs and other documentation needed as part of review meetings.
- liaise with the relevant staff if an identified student is experiencing difficulty or at risk of early withdrawal.

APPENDIX 6 Apprenticeships

For apprentices at the College the employer has the primary responsibility for the health and safety of the apprentice and should be managing any significant risks. As the training provider, the College takes reasonable steps to satisfy itself that the employer is doing this.

These steps are highlighted below:

Pre-placement Health & Safety/Risk assessment checks of employers prior to placement of learners on apprenticeships is conducted.

Verifying workplace's valid Employer Liability Insurance

Implementing an 'action plan' if a learner is placed with employer in a high risk placement.

Quarterly audits to ensure health and safety checks are in place

Ensuring employers are aware of their contractual duty to fulfil their responsibilities for safeguarding in accordance with relevant legislation and to inform the College of any concerns regarding student safeguarding (including absences).

For learners the following is provided to make them aware of safeguarding:

A learner Induction – with focus on 'Prevent', Safeguarding, E&D, H&S in the Workplace etc.

Specific training on certain equipment, such as 'high risk' machinery may be conducted in workshops, however, it remains the responsibility of the employer to ensure safe practice and appropriate training in the workplace.

Learners are issued with 'Safe Learner Cards' – identifying the point of contact for learner and referral routes if learners perceive they are vulnerable/at risk.

In addition, progress reviews provide an opportunity for apprentices and employers to reflect on any safeguarding issues (alongside H&S and E&D good practice). Issues in relation to safeguarding, H&S or E&D concerns within the work place which are identified during a progress review or standard assessment will be reported to the relevant staff member within the college.

For further information please refer to the policy: Procedures for the Management of Work Based Learning.



1.0 UXBRIDGE COLLEGE

Designated senior staff member for Child Protection

The Designated Safeguarding Lead (DSL) with lead responsibility for child protection and safeguarding issues is Gavin Hughes, Director Curriculum SEND Safeguarding and Prevent, Uxbridge Campus, telephone: 01895 853545, email: ghughes@uxbridgecollege.ac.uk.

Designated Staff Members for Safeguarding (Safeguarding Officers)

The designated members of staff for safeguarding are:

Gavin Hughes, Director - SEND, Safeguarding and Prevent, Room E105, Uxbridge, Telephone: 01895 853545, email: ghughes@uxbridgecollege.ac.uk

Sharon Bell, Student Support Manager, Room A011, the Mall, Uxbridge/Hayes, Telephone: 01895 853380, email: sbell@uxbridgecollege.ac.uk

Kiran Rami, Head of Guidance and Information Services, Information Centre, Uxbridge/Hayes, Telephone: 01895 853328, email: krami@uxbridgecollege.ac.uk

Sharon McCann, Senior Student Support Officer, Room A011, UC Mall Uxbridge/Hayes, Telephone: 01895 853431, email: smccann@uxbridgecollege.ac.uk

Liam Plumridge, Section Manager Business Uxbridge College
Telephone: 01895 853591 | lplumridge@uxbridgecollege.ac.uk

Shelley Cawley Learning Resource Centre Manager Uxbridge/Hayes
Telephone: 01895 471137 | scawley@uxbridgecollege.ac.uk

2.0 HARROW COLLEGE

Designated senior staff member for Child Protection

The Designated Safeguarding Lead (DSL) with lead responsibility for child protection and safeguarding issues is Lee Janaway, Head of Guidance, Student Services and Designated Safeguarding Lead, Telephone 0208 909 6135, Email: ljanaway@hcuc.harrow.ac.uk

Designated Staff Members for Safeguarding (Safeguarding Officers)

The designated members of staff for safeguarding are:

Lee Janaway, Head of Guidance, Student Services and Designated Safeguarding Lead
Telephone: 0208 909 6135, Email: ljanaway@hcuc.harrow.ac.uk

Joanne Whitehead, Student Support Manager,
Telephone: 0208 909 6327, Email: jwhitehead@hcuc.harrow.ac.uk

Sandie Petrie, Student Support Officer
Telephone: 0208 909 6000, Email: spetrie@hcuc.harrow.ac.uk

Mary-Ann Allison, Administrator – English, Maths and ESOL
Telephone: 0208 909 6414, Email: mallison@hcuc.harrow.ac.uk

Tracey Critchley, Coordinator for the Deaf and Hard of Hearing, Additional Learning Support Team
Telephone: 0208 909 6117, Email: tcritchley@hcuc.harrow.ac.uk

Terri Jenner, Specialist Medical Co-ordinator,
Telephone: 0208 909 6320, Email: tjenner@hcuc.harrow.ac.uk

Christina Quinlan, Health & Social Care Administrator
Telephone: 0208 909 6125, Email: cquinlan@hcuc.harrow.ac.uk

Appropriate training and support will be provided to enable the designated staff for all colleges to fulfil their role:

- Report to the senior member of staff with lead responsibility.
- Will know how to make an appropriate referral.
- Will be available to provide advice & support to other staff on issues relating to child protection.
- Have particular responsibility to be available to listen to children and young people studying at the College.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in safeguarding issues and inter-agency working, as required by the LSCB and will receive refresher training at least every 3 years.
- In addition to working with the designated safeguarding officers all staff members should be aware that they may be asked to support social workers to take decisions about individual children.

Annex to HCUC Safeguarding and Child Protection Policy

Response to COVID-19

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19.

This annex sets out some of the adjustments HCUC is making in line with the changed arrangements in the college and following advice from government <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers> and local agencies.

Despite the changes, the College's Safeguarding Policy is fundamentally the same: the welfare of children and young people always comes first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access on line resources). Staff may be aware of the mental health of both students and their parents or carers, and should refer to safeguarding about any emerging concerns.

Local authorities are working closely with the College at this time to continue to support vulnerable learners. Further information can be found on their respective websites <https://hillingdonlscb.org.uk/> and <https://www.harrowscb.co.uk/>

In line with government and local authority requests, we have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker and those with an EHCP.

For students subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker: contact will be made by the safeguarding team with these students and liaison will continue with social workers where needed.

For students who are Looked after Children and recent Care Leavers: contact will be made by the LAC Support Team, weekly where needed and contact will be maintained with Social Workers and Virtual School Leads.

For students with an EHCP: Support staff and Learning Support Advisors will maintain regular contact as agreed with student and parents / carers. Support can be delivered through individual arrangements based on curriculum activity.

For students on the edge of social care involvement or pending allocation of a social worker, or identified as high risk: contact will be made by the safeguarding team weekly or as needed.

NB Contact will be made remotely through email, telephone calls/Skype or other appropriate methods.

Reporting arrangements:

The College arrangements continue in line with our Safeguarding Policy.

We will be operating during normal business hours. Out of hours contact can be had in emergencies with the designated safeguarding leads.

We have confirmed the arrangements to contact the LADO at the local authority remain unchanged.

Staff will continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Normal safeguarding procedures apply for referrals to Children's Services. This contact will go through a member of the safeguarding team (listed above) who will follow appropriate measures in seeking the appropriate and necessary support. Should a child or young person be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure.

Allegations or concerns about staff

With such different arrangements in place, young people could be at greater risk of on line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Any agency staff or volunteers working with students during college closure will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

New staff or volunteers

All new starters will be employed using the safer recruitment policies at the College and complete online safeguarding and prevent training. They must be aware of the college Safeguarding and Child Protection Policy, the Whistleblowing Policy and the staff Code of Conduct. They will need to know who to contact if worried about a child or young person and become familiar with the child protection procedure.

All new starters or volunteers need to confirm that they have read Part I and Annex A of Keeping Children Safe in Education.

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, and similar.

Risk online

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff should be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place. The College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium.

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for online working have been issued.

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

Students accessing remote learning have guidance on keeping safe online and know how to raise concerns with the college, Childline, the UK Safer Internet Centre and CEOP.

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>

Mental Health

Restrictions to movement and contact with other people means pupils are more likely to be at risk of mental health problems. The Department for Education have produced guidance to support parents: <https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

The following organisation also provides support for students and this is available through the College App:

www.kooth.com – *Free online emotional wellbeing and counselling with self-help articles*

Also:

<https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing>

<https://www.mind.org.uk/information-support/helping-someone-else/>

Calm Harm App – A phone app providing help for those who use self-harm as a coping strategy; <https://calmharm.co.uk/>

Each College's Mental Health Student Support Officer will be in regular contact with students who have previously been identified as having mental health concerns and available for students.

Parents and Carers

Parents and carers are advised to be aware about keeping students safe online with peers, the College, other education offers they may access and the wider internet community. The College will be asking students to communicate in new ways: including the sites students will be asked to access and set out who from the college (if anyone) their student is going to be interacting with online. Parents have been offered the following links:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online o UK Safer Internet Centre - advice for parents and carers

Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.