

# Safeguarding Policy

Policy Author: Head of Safeguarding

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## Our Mission

To unleash potential, creating better futures for our learners, businesses and communities

## Our Vision

A **Truly Great College**, delivering inspirational learning and excellence through career focused education.

## Our Values

**Learner and customer focused** – ensuring they are at the heart of everything we do

**Respectful** – by valuing and treating all fairly and as individuals

**Passionate** – demonstrating energising, engaging and inspiring all to achieve their potential

**Collaborative** – always working together to achieve excellence and growth

**Innovative** – leading the way, seeking new ways to continually improve

**Excellent** – in learning, teaching and assessment; the key to our success



Barking & Dagenham College

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# Safeguarding Policy

## Section One – Essential contact details for professionals and parents

If you are concerned that a child, young person, or vulnerable adult is in possible IMMEDIATE danger - including risk of suicide, please contact the Emergency Services:

- Call 999 or 112 from outside the UK

### Key internal Contact Details

The safeguarding team are available weekdays 9am – 5pm during term times. Please contact Main College Reception 020 8090 3020 and ask to speak to the Safeguarding Officer on duty.

You can email the team at [safeguarding@bdc.ac.uk](mailto:safeguarding@bdc.ac.uk)

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Amy de Campos	<a href="mailto:amy.decampos@bdc.ac.uk">amy.decampos@bdc.ac.uk</a> 0203 667 0172
Deputy DSL and Safeguarding Coordinator	Michelle Coleman	<a href="mailto:michelle.coleman@bdc.ac.uk">michelle.coleman@bdc.ac.uk</a> 0203 667 0172
Deputy DSL and Care Education Coordinator	Kuburat Tijani	<a href="mailto:kuburat.tijani@bdc.ac.uk">kuburat.tijani@bdc.ac.uk</a> 0203 667 0442
Deputy DSL and Lead Counsellor	Carmel Lynch	<a href="mailto:carmel.lynch@bdc.ac.uk">carmel.lynch@bdc.ac.uk</a> 0203 667 0488
Deputy DSL and Director of IT	Andrew Keegan	<a href="mailto:andrew.keegan@bdc.ac.uk">andrew.keegan@bdc.ac.uk</a> 0203 667 0133
Deputy DSL and LRC Coordinator	Claire Cockburn	<a href="mailto:claire.cockburn@bdc.ac.uk">claire.cockburn@bdc.ac.uk</a> 0203 667 0100
Deputy DSL and Student Support & Progression Manager	Gill Yates	<a href="mailto:gill.yates@bdc.ac.uk">gill.yates@bdc.ac.uk</a>
Deputy DSL and Student Liaison Officer	Junior Grey	<a href="mailto:junior.grey@bdc.ac.uk">junior.grey@bdc.ac.uk</a> 0203 667 0406
Governor Safeguarding Leads	Carole Ditty Bal Panesar	<a href="mailto:carole.ditty@bdc.ac.uk">carole.ditty@bdc.ac.uk</a> <a href="mailto:Balbinder.panesar@bdc.ac.uk">Balbinder.panesar@bdc.ac.uk</a>

## Key External Contact Details

Service	Contact Details
Barking, Havering & Redbridge Mental Health Crisis Line	0800 995 1000
Childline	0800 1111
Samaritans	116 123
London Regional PREVENT Coordinator	Jennie Fisher <a href="mailto:jennie.fisher@education.gov.uk">jennie.fisher@education.gov.uk</a> 07880 469588
Anti-Terrorist Hotline	0800 789321
LB Barking & Dagenham Prevent Team	prevent@lbbd.gov.uk
National Prevent Line	0800 011 3764
Safer Schools Officer	PC Goldust Afriyie <a href="mailto:goldust.afriyie@met.police.uk">goldust.afriyie@met.police.uk</a> 07770 179771
Local Authority Designated Officer (LADO)	Mike Cullern <a href="mailto:mike.cullern@lbbd.gov.uk">mike.cullern@lbbd.gov.uk</a> 020 8227 3934
Barking & Dagenham Safeguarding Children Board	lscb@lbbd.gov.uk
LB Barking & Dagenham MASH	0208 227 3811
LB Havering MASH	01708 433222
LB Redbridge MASH	0208 708 3885
LB Newham MASH	0203 373 4600
LB Tower Hamlets MASH	0207 364 3444
Thurrock MASH	01375 652802
Essex MASH	0345 603 7627
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk

# Safeguarding Policy

## Section Two – Policy Statement

### 1 Introduction / Context

At Barking and Dagenham College we regard the welfare of our students as our highest priority, and are committed to protecting children and vulnerable adults from harm.

This policy acknowledges our legal safeguarding duties in respect of:

- Working with other agencies to safeguard and promote the welfare of children [The Children Act (1989) and (2004)]
- Protecting young people aged 18-25 and in receipt of an Education and Healthcare Plan from abuse and neglect [Children and Families Act (2014), SEND Code of Practice (2015), Care Act (2014)]
- Ensuring that we have effective procedures in place for reporting and managing safeguarding concerns [Education Act (2002)]
- Ensuring that staff understand their special legal position in relation to students under the age of 18 [Sexual Offences Act (2003)], and their mandatory reporting duty in relation to FGM [Serious Crime Act (2015), Working together to safeguard children (2023)]
- Working with other agencies to report allegations against staff and promote safer recruitment [Safeguarding Vulnerable Groups Act (2006)], [Working together to safeguard children (2023)]
- Protecting students from radicalisation and violent extremism [Counter-Terrorism and Security Act (2015) and CONTEST (2023)]
- Compliance with data protection law [Data Protection Act (1998), General Data Protection Regulation (GDPR) (2016)]

This policy has been developed with reference to the statutory guidance document *Keeping Children Safe in Education* (2024)

This policy applies to all educational provision offered by the college including apprenticeships and work based learning.

### 2 Principles / Purpose

2.1 . Safeguarding and promoting the welfare of children is everyone's responsibility.

- All staff should be familiar with this policy and with the procedures by which we report and manage safeguarding concerns.
- All staff should be receptive to any disclosures from students, and alert to possible signs of abuse or self-harm.
- All staff should be alert to early indicators of safeguarding concerns, such as persistent absence, and report concerns about students as soon as they emerge, so that appropriate help and support can be provided
- All staff should be familiar with the Staff Code of Conduct and demonstrate high standards in their professional behaviours.

- All staff should complete mandatory safeguarding training, and complete updates and attend additional safeguarding related training as required.
  - All staff should read and maintain a good working knowledge of *Keeping Children Safe in Education Part 1*
- 2.2 The college will allocate sufficient resources to promote the welfare and safety of its students.
- The college will appoint a Designated Safeguarding Lead (DSL) and a number of Deputies (DDSLs), who are all trained to the same standard, to ensure that our safeguarding processes are applied swiftly and effectively.
- 2.3 The college will take all reasonable steps to prevent its students from becoming terrorists or supporting terrorism:
- The college recognises the positive contribution it can make towards protecting its students from radicalisation and violent extremism. The college will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime.
  - The college will seek to ensure that all its staff and students have a clear understanding of the government's Prevent strategy, and how it affects them.
  - The college will share information to facilitate multi-agency intervention if this is deemed necessary to protect students from radicalisation and violent extremism.
  - Any Prevent concerns will be reported via the Safeguarding procedures.
- 2.4 The college will comply with all current data protection legislation.
- The college will ensure that all student data in relation to safeguarding is processed in a lawful manner.
  - The college will seek to maintain student confidentiality wherever possible, but will always prioritise the sharing of information when this is deemed necessary to keep students safe.

### 3 Scope / Definition of Safeguarding

- 3.1 Within the context of our Further Education setting, we have specific statutory duties to promote the welfare of certain groups of people, and protect them from harm:
- **Children** under the age of 18, and
  - **Vulnerable adults** – which will normally refer to students above the age of 18 and up to 25 years, who are in receipt of an EHC (Education, Health and Care) plan for a disability or specific learning difficulty.

We also have a specific duty of care (under KCSIE) to children who are taking part in out of school clubs and activities on our premises.

While we do not have a specific safeguarding duty of care to adults in general, we do offer support, advice and guidance to adults, and will signpost them to external services where appropriate.

- 3.2 Safeguarding concerns for children will be managed and reported according to the guidance set out in KCSIE and Working Together to Safeguard Children. Safeguarding concerns for vulnerable adults will be managed according to adult safeguarding principles and reported to Adult Services.
- 3.3 Concerns taken forward as safeguarding cases are likely to be issues where multi-agency work is required in order to protect children or vulnerable adults who are suffering or likely to suffer significant harm (whether on or off college premises). Cases are unlikely to be taken forward as safeguarding where they relate to student behavioural issues which can be addressed internally via the *Promoting Positive Student Behaviour and Disciplinary Policy*.
- 3.4 We always work on the assumption that children or vulnerable adults may be the perpetrators, as well as the victims, of abuse.
- 3.5 Students who are on work placements, and have a concern related to their workplace, should follow the local safeguarding policies and procedures of those settings.

#### **4 Management and oversight of our safeguarding processes**

- 4.1 The College operates a *Safeguarding, Prevent, Personal Development and Welfare Strategy Group (SPPDW)*, which is chaired by the Designated Safeguarding Lead and includes representation from Curriculum, Business Support, Governors and the Student Union. This group meets regularly to discuss key safeguarding and pastoral issues, review the effectiveness of the College's safeguarding strategies and practices, and monitor progress against the safeguarding action plan.
- 4.2 It is the responsibility of the Governors to:
  - Ensure that the college meets its statutory duties to promote and safeguard the welfare of its students
  - Review and approve any amendments to safeguarding policies and procedures
  - Periodically monitor the data and reporting in relation to safeguarding
  - Complete mandatory safeguarding training and any additional training that is deemed necessary for them to carry out their responsibilities in regards to safeguarding
  - Appoint a Governor Safeguarding Lead to represent the Governors at College SPPDW strategy meetings.
- 4.3 It is the responsibility of the Designated Safeguarding Lead (DSL) to:
  - Ensure the college policy and procedures are up to date and reflect current legislation and statutory guidance
  - Co-ordinate the team of Safeguarding Officers (Deputy DSLs) to ensure that procedures are followed, cases are correctly reported and followed up, and specialist staff are always available during term times to deal with safeguarding incidents.

- Act as the gatekeeper for safeguarding information requests from external agencies
  - Produce an annual self-assessment review of safeguarding practice and accompanying action plan.
  - Work with staff across the college to support the promotion of safeguarding and Prevent in the curriculum.
  - Act as the representative of the College at local Safeguarding Children Partnership Delivery Group meetings.
  - Liaise with colleagues to ensure appropriate representation at meetings with external agencies
  - Liaise with the Principal and HR team in the event that an allegation is made against a member of staff, and inform the Designated Officer for LBB, the Disclosure and Barring Service, and the Teacher Regulation Agency where appropriate.
  - Ensure that safeguarding records are kept securely for the period specified in this policy.
  - Refresh DSL training at least every two years
- 4.4 It is the responsibility of the Deputy DSLs to:
- Provide professional advice, support and guidance to staff in relation to safeguarding or Prevent.
  - Ensure that all concerns and safeguarding cases which are referred to them are correctly reported, and followed up promptly.
  - Make referrals to external agencies as required.
  - Continue to monitor cases after referral to ensure that appropriate steps are taken to keep students safe.
  - Ensure that records of safeguarding cases are stored securely.
  - Issue a privacy notice to students who are subject to our safeguarding procedures.
  - Liaise with the DSL regarding any concerns about radicalisation or any allegations made against staff.
  - Refresh DSL training at least every two years
- 4.5 It is the responsibility of the HR / Staff Development team to:
- Ensure that all staff appointments are made subject to DBS checks and best practice in Safer Recruitment.
  - Ensure that staff DBS checks are periodically renewed.
  - Ensure that all staff complete mandatory training in relation to safeguarding.
  - Ensure that all staff are given regular and appropriate training in Safeguarding and Prevent via the college Staff Learning and Development programme.
  - Ensure that correct procedures are adhered to if an allegation is made against a member of staff.

## 5 Record Keeping

- 5.1 All safeguarding records will be stored securely, and will only be accessible to the Safeguarding Team.



- 5.2 Students who access our services will be supplied with a privacy notice which outlines how we will process their data and what their rights are in relation to this data.
- 5.3 In accordance with good practice guidelines, and to ensure that notes and records continue to be available to support the safeguarding of children and vulnerable adults for the entire duration of their time at the college, we will keep our safeguarding records for 7 years. After 7 years, safeguarding records will be securely destroyed.

## 6 Review

This policy will be reviewed annually

## 7 Linked Policies

Prevent Policy  
Staff Code of Conduct  
Student Code of Conduct  
Promoting Positive Student Behaviour and Disciplinary Policy  
DBS Checks Policy  
Recruitment and Selection Policy  
Data Protection Policy  
Public Interest Whistleblowing Policy  
Disciplinary Procedure (staff)  
Fair Chance (Risk Assessment) Policy  
Searching, Screening and Confiscation Policy  
Freedom of Speech Policy incorporating Guest Speaker Process  
Health and Safety Policy  
Educational Visits Policy  
SEND Policy  
Work Experience Policy  
Admissions Policy  
Online Learning Protocol  
ILCT Policy

# Safeguarding Policy

## Section Three – Procedures for College staff

### 1 How students disclose

Our students will most often disclose abuse or concerns to the adults they trust and feel comfortable with. This trusted adult is most likely to be someone the student sees regularly – such as a teacher, a mentor, a learning support practitioner or a student liaison officer – however, students have also made disclosures to other business support staff or senior managers.

At induction, we tell our students that they can report safeguarding concerns to any member of staff they feel comfortable with. They do not need to seek out a specific team or individual in order to voice a concern.

The onus is on all staff members to listen to students, to understand the policy and to follow the procedure to get help for the student.

### 2 How to report a safeguarding concern

## Reporting a Safeguarding Concern



#1 – Use professional curiosity, listen carefully



#2 - Speak to the Safeguarding Officer on duty



#3 - Complete report via CPOMS

2.1 All staff are expected to help develop a “culture of vigilance” and should be alert to the different types of harm that our students might potentially be exposed to:

- Neglect (eg child or vulnerable adult is put in danger, or not supported to attend school or college, or left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care)
- Psychological or emotional abuse (eg deliberately trying to scare or humiliate a child or vulnerable adult, or isolating or ignoring them)
- Physical Abuse (eg, non-accidental injuries such as bruises, broken bones, burns or cuts, Female Genital Mutilation (FGM), Fabricated or Induced illness (FII) or other harmful practices such as breast ironing)

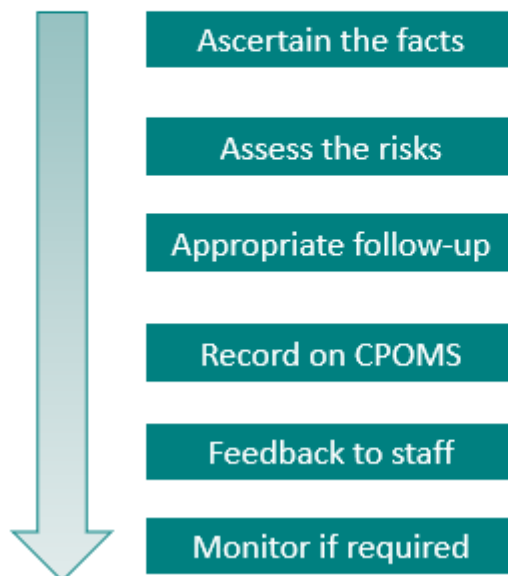
- Sexual abuse (eg Contact or non-contact abuse, Child Sexual Exploitation (CSE), grooming, online abuse)
  - Criminal grooming or exploitation (CCE) (eg coercing or grooming a child or vulnerable adult into committing crimes such as theft, violent offences, holding weapons, money laundering or begging)
  - Domestic Violence / Domestic Abuse (including being the witness to domestic violence involving others)
  - Forced Marriage and Honour Based Abuse (abuse inflicted upon individuals who are perceived to have broken the “honour” code of a particular community)
  - Radicalisation (any “Prevent” concern related to students being drawn into violent extremism or supporting terrorism should be reported via the standard college Safeguarding process)
  - Self-harm (eg cutting, burning, bruising, scratching, hair-pulling, poisoning and overdosing, suicide attempt)
  - Financial abuse (eg financial exploitation of a vulnerable person, coercing someone into debt, or controlling someone’s access to money or property)
- 2.2 Staff are encouraged to exercise their **professional curiosity** – if they notice something unusual or worrying about a student, it is absolutely fine to speak to them about their concerns and find out more information.
- 2.3 If a student makes a disclosure, the member of staff should:
- Listen carefully to the student and maintain a neutral demeanour.
  - Ask clarifying questions where necessary, to check that they have understood the content and context of the disclosure
  - Reassure the student that they've done the right thing in deciding to speak to someone.
  - Explain what will happen next, and never promise to keep the disclosure a secret.
  - Report the incident to the Safeguarding Officer on duty as soon as possible so that details are easily recalled and action can be taken quickly. This should be done in person or by phone / Teams call so that a professional discussion can take place. Emails should only be used in exceptional circumstances.
  - Record the concern or incident on CPOMS, using the student’s own words and phrases where possible, and indicating any actions that have already been taken to keep the student safe.
- 2.4 Safeguarding Rota
- During term times, a rota operates to ensure a named Safeguarding Officer is always available for staff to speak to. All our Safeguarding Officers are trained Deputy DSLs.
  - The safeguarding rota can be found on the staff intranet site - <https://infopoint.bdc.ac.uk/>
  - If staff are unable to access the rota, they can contact the Safeguarding Officer on Duty via Reception Desk, or the Learner Support Zone.
  - In the rare event that the Duty Safeguarding Officer is not contactable within 20 minutes, staff should contact the DSL by Teams or on 0203 667 0172.
- 2.5 Out of Hours reporting
- Our safeguarding rota operates from 9am-5pm, Monday to Friday, during term times.

- If staff have a safeguarding concern outside of these times, and cannot speak to a Safeguarding Officer or Duty Manager immediately, they will need to consider whether the situation is an emergency.  
***Is a child or young person at imminent risk of harm?***
- In an **emergency** ring the police on 101 or 999. If in doubt, always err on the side of caution.
- If the situation is not an emergency, the staff member should speak to a Safeguarding Officer as soon as reasonably possible to report the concern.

### 3 Procedures for Safeguarding Officers

- 3.1 The Safeguarding Officer will need to discuss the concern with the referring member of staff and then make a decision as to next steps:

## The role of the SGO



- 3.2 When deciding whether it is necessary to refer the matter to the Local Authority Children's or Adults Services and/or the Police, the Safeguarding Officer should not hesitate to take advice from Social Services who are best equipped to assess the situation. It is advisable in the first instance to call the MASH Team / Triage Team of the Local Borough where the student is resident (contact numbers can be found on the Local Authority's website). If the Duty Social Worker recommends referral, a completed MARF (Multi Agency referral Form) should be submitted as soon as possible.

If a child or vulnerable adult is at risk of serious harm, prompt action is absolutely essential, and the SGO should make the referral to external services on the same day of receiving the concern.

Prevent referrals should be discussed with the Local Area Prevent Co-Ordinator in the first instance, who will advise whether a referral to Police and the local Prevent Team should be made (contact details can be found in Part One).

### 3.3 Students aged under 18 and parental involvement

The student's parent or carer should be informed of safeguarding issues, unless there is reason to believe that this would put the student at further risk of harm. The Safeguarding Officer should discuss with the Social Services Department or the Police what further action will be taken to involve the parents/guardian/carers of the student.

### 3.4 Adults with Special Educational Needs (SEN)

Adults with learning disabilities have the same rights to privacy as any other adult learners, and a detailed discussion should take place with the learner in respect of their wishes, and understanding of the risks and consequences, before any external referrals are made. In deciding the best way to support the adult, the Safeguarding Officer should consider the adult social care principles laid out in the Care Act (2014): Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability.

### 3.5 Looked After Children

The Safeguarding Officer should ensure that the student's Social Worker is informed of the issue, as well as the immediate carer or key-worker.

### 3.6 Records

The SGO should complete a report on CPOMS and attach electronic copies of any referral paperwork or supporting evidence. All further updates and monitoring notes should be attached to this record.

### 3.7 Follow up

Social Services or the Police will decide if and how to take the matter further. However, the referring Safeguarding Officer should find out what has been done if no feedback is given within 2 days.

The Safeguarding Officer should provide feedback to the reporting member of staff on what has happened. This does not need to be detailed, but should inform the member of staff if the matter has been referred to external agencies, and any measures that have been put in place to protect the learner.

The SGO will make referrals to internal pastoral support services as necessary.

### 3.8 Child on Child (Peer on Peer) abuse

As per our policy statement, the college is aware that children and vulnerable adults may be the perpetrators as well as the victims of abuse. If the alleged abuser is a student of the college, the Safeguarding Officer will inform the relevant Curriculum Manager so that the Promoting Positive Student Behaviour and Disciplinary Policy can be applied. Internal disciplinary investigation may proceed while Police investigations are still ongoing, except where Police advise against this. The college may take safeguarding measures to protect both parties while an investigation is

conducted, which may include suspension or a remote learning plan to prevent further harms.

### 3.9 Privacy and Data Protection

The Safeguarding Officer will provide the student with a copy of the Safeguarding Privacy Notice, to ensure that the student is clear about how their data will be used, and their rights in relation to data protection law.

All SGO records and notes should be stored on our secure online system (CPOMS). SGOs should not retain hard copies of documentation or notes.

## 4 Allegations against a member of staff or volunteer

- 4.1 Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with children and vulnerable adults remain, and are seen to remain, entirely proper and professional. All staff should follow the guidelines about professional conduct in the Staff Code of Conduct.
- 4.2 Staff need to be aware that they are in a 'position of trust' in relation to students under 18 years old, and that sexual relationships with students under 18 are therefore prohibited by the Sexual Offences Act (2003).
- 4.3 Any allegation or suspicion of abuse by a member of staff must be reported to the Designated Safeguarding Lead (DSL) as soon as possible. The Director of HR and Principal and CEO should also be informed of the allegation. If the member of staff is employed via a recruitment agency, the agency safeguarding or compliance lead should be informed.
- 4.4 If there is a concern about the behaviour of the DSL or the Director of HR this should be referred to the Principal and CEO. If there is a concern about the behaviour of the Principal and CEO, this should be referred to the Chair of the Corporation.
- 4.5 If the allegation meets any of the criteria set out in *Keeping Children Safe In Education* for Local Authority referral, the DSL will ensure that it is reported to the Local Authority Designated Officer (LADO) on the same day.
- 4.6 It is not necessary to make a referral to the Local Authority where an allegation can be shown beyond doubt to be demonstrably false or is judged to be of a trivial nature.
- 4.6 Any "low level" concerns about staff conduct, which do not meet the criteria for LADO referral, should be addressed formally via a management conversation with the member of staff, and recorded by the HR team.
- 4.7. The Principal and CEO, in consultation with the Executive Director HR, must ensure that such steps that s/he considers necessary are taken to ensure the safety of the student who has made the allegation and any other vulnerable adult or child or student who might be at risk. These steps may include suspending the accused member of staff.
- 4.8. Staff Suspension is deemed a neutral act - safeguarding both the child/vulnerable adult making the allegation and the member of staff. Suspension is recommended in the following circumstances:
  - A person would be at risk

- The allegation is so serious that summary dismissal for gross misconduct is possible
- It is necessary to allow unimpeded investigation.

If suspension is to take place, this should be in line with college Staff Disciplinary Policy.

4.9 At an early stage, staff subject to an allegation should seek advice and support from their professional association or trade union. The matter should remain confidential and information should be disclosed on a need to know basis only. Members of staff may also seek guidance from HR, if required.

4.10 Managing the aftermath of unfounded and unsubstantiated allegations:

- Where it is subsequently found that an allegation was made maliciously, the college will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology subject to agreement about future behaviour or other such sanctions the college may deem appropriate.
- Despite the distress caused, children/adults at risk who make false allegations may still be entitled to continue to receive full access to the curriculum. The circumstances of each case will be reviewed on an individual basis.
- Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the vulnerable child/adult consideration should be given to the child/vulnerable adult studying elsewhere. Permanent exclusion should be considered only as a last resort.
- Staff who have been subject to false or unsubstantiated allegations may require personal or professional support – they should be signposted to the college's Employee Assistance Provider.
- If investigations have revealed any competency issues then, following disciplinary or capability procedures, support mechanisms or other professional support may be offered e.g. training.
- Support and reassurance may also be necessary for other staff and students. If needed, this will be arranged via the Director of HR and/or the DSL.

4.11 Where an investigation had been completed and has concluded that the member of staff has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child, the DSL or Director of HR should make referrals to the Disclosure and Barring Service and Teacher Regulation Agency. If a member of staff has been employed through a recruitment agency the agency will usually be responsible for making this referral.

## 5 Whistleblowing

5.1 All staff should feel able to raise concerns about poor or unsafe practices. Any concerns about how an actual or potential safeguarding case is being managed should be raised with the DSL in the first instance. If the person raising the concern is not satisfied with the response, they should raise the matter with the Director of Student Welfare & Support. The College has a Whistleblowing Policy which can be consulted, and the NSPCC has a Whistleblowing Advice Line which offers advice and support to professionals with concerns.



## 6 Ex-Offender Risk Management

- 6.1 Applications to study at the college from ex-offenders are welcomed and disclosures will be made at the point of application. Where a disclosure is made, risks will be assessed and managed via the college Fair Chance / risk assessment process. The college reserves the right to reject applications or withdraw offers to learners where it identifies safeguarding risks that cannot be securely managed.
- 6.2 Ex-offenders applying to be college staff will disclose relevant information at the application stage, in addition to completing an enhanced DBS check. A risk assessment will be undertaken by the HR team in conjunction with the DSL [refer to college DBS Policy].
- 6.3 Some of our qualifications require an Enhanced Disclosure and Barring Service check (DBS). In this circumstance, students must disclose any spent convictions that would appear on a DBS. The onus is on the student to establish, before enrolment, if they will be able to work in the type of sector connected to their chosen course.

## 7 Subcontracted Partners

- 7.1 All partners who deliver training or education on behalf of the College will ensure that they follow the statutory guidance in the current version of *Keeping Children Safe in Education*. Partner safeguarding policies and procedures must be checked prior to any contracts being agreed, as part of due diligence.
- 7.2 The college sometimes works with other providers to deliver education and training in the community. Where such provision is taking place off-site, the partner should follow their own safeguarding procedures to act on the concern without delay. The partner will then inform the college about the concern as soon as reasonably practicable [refer to contact details in Part One].
- 7.3 The college sometimes asks external organisations to deliver training or mentoring support to our students on-site, as part of regulated activity. All individuals involved in delivering such provision should be subject to full HR checks for volunteers. Where Subcontracted Partners are operating on our site, they should follow the college's Safeguarding Procedures to report concerns to the College's Safeguarding Team as soon as possible [refer to contact details in Part One].

## 8 Special Educational Needs and Disabilities

- 8.1 Children and young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the person's disability without further exploration;



- the increased risk of abuse due to the vulnerability of the students and/or the assumption they will not be able to communicate the abuse clearly or credibly or be believed
  - being more prone to peer group isolation and mental health issues;
  - the potential for students 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.
- 8.2 The Safeguarding Team will address these additional challenges with the support of the SEND staff, and liaise with local Children’s Services or Adult / Disability Services as appropriate to support and safeguard our SEND learners.

## 9 Sexual Harassment and Sexual Violence

9.1 The College acknowledges that sexual harassment and sexual violence is a widespread problem that impacts many members of our community, and that such incidents are generally under-reported.

- We will consistently address abusive behaviour, harassment and sexualised “banter” via our Promoting Positive Student Behaviour and Disciplinary Policy.
- We will educate our students on the importance of healthy relationships and respect, and create an environment where young people feel confident that their concerns will be taken seriously and dealt with effectively.
- We will ensure that all victims are taken seriously and will receive appropriate internal and/or external support.

## 10 Online Safety

- The college uses multiple web filters (Fortinet, Impero, & browser “safe search” modes) to monitor ILCT usage and prevent students from accessing harmful sites using our networks.
- Guidelines for acceptable online behaviour are included in our ILCT Policy, Student Code of Conduct and Online Learning Protocol.
- Any reports of online bullying or online abuse will be addressed via our Promoting Positive Student Behaviour and Disciplinary Policy and / or Safeguarding procedures.
- Students will learn about e-safety and various forms of online abuse via our tutorial and enrichment schemes.
- Students are encouraged to report any threatening, abusive or offensive online content. Where sexual images of students have been shared, students will be supported to access “Report Remove” to get this content removed.  
<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/>

## **11 Mental Health and Wellbeing**

- 11.1 Mental Health and Wellbeing concerns are common amongst our students, and it is important that staff flag up any concerns for their learners at an early stage so that support can be put in place. Staff should record any concerns about learner wellbeing using CPOMS.
- 11.2 Wellbeing issues that give rise to a significant risk of harm to the learner (eg suicidal ideation, self-harm) will be reported via our Safeguarding procedures
- 11.3 More details about how the college promotes mental health and wellbeing can be found in our Wellbeing and Mental Health Statement of Intent and Student Wellbeing Policy. Any risks associated with Mental Health and Wellbeing will be managed according to our Student Wellbeing Policy.

## **12 On-site Children's Clubs and Sporting Activities**

- 12.1 Outside of normal operational hours, the College sometimes rents its facilities to children's clubs and sports organisations. The safeguarding policies and procedures of these clubs and organisations should be checked prior to any hire arrangements being finalised. Any safeguarding concerns should be reported according to the club or organisation's procedures.
- 12.2 If the college is made aware that an allegation has been raised in respect of the behaviour of any on-site sports coach or supervising adult towards a child, the DSL will inform the Local Authority Designated Officer (LADO).

## **13 Children Missing from Education**

- 13.1 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation.
- 13.2 The College will monitor attendance carefully and address poor or irregular attendance via the measures set out in the Attendance Policy.
- 13.3 The Safeguarding Team will report poor attendance to any external agencies currently working with our students. The Safeguarding Team will also look at attendance when considering the risk profile for any individual learner. However, it should be noted that Local Authorities will not usually conduct assessments for children of post-compulsory school age based on attendance alone, without any other specific safety concerns being raised.