

Safeguarding Procedures and Practice Notes

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Safeguarding Procedures

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1) Current Safeguarding Officers and Contact Details

Designated Safeguarding Lead

Amy de Campos x7172

SGO Contact information

Amy de Campos	020 3667 0172 or x 7172 or Teams	Safeguarding Office, C2
Andrew Keegan	X 7133 or work mobile 07940479061 or Teams	T117, Rush Green
Gill Yates	X 7051 Or Teams	B114, Rush Green
Claire Cockburn	x 7100 or x 7106 or Teams	LRC, Rush Green
Carmel Lynch	X 7488 or Teams	B116, Rush Green
Junior Grey	x 7406 or via Security radio or Teams	B115, Rush Green
Kuburat Tijani	x 7442 or Teams	B114, Rush Green
Chenelle Barber	X 7401 Or Teams	B115, Rush Green
Chloe Goater	X 7090 Or Teams	B115
Alexander Whitmarsh	x7218 or Teams	B115, Rush Green

Link to the rota of daytime availability of SGOs:

https://docs.google.com/document/d/17c_KNLauDcT2SCEfIECmbcxQRDWNWYD57hWQZBy059k/edit?usp=sharing

For safeguarding concerns at Barking sites, please refer to the general rota or contact the local Duty Manager for assistance with urgent issues.

2) Reporting a concern – all staff

All staff should complete mandatory safeguarding training and read and maintain a good working knowledge of *Keeping Children Safe in Education* (Part 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 (e.g. Child 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)
- Emotional abuse (e.g. deliberately trying to scare or humiliate a child or isolating or ignoring them)
- Physical Abuse (e.g., non-accidental injuries such as bruises, broken bones, burns or cuts, Female Genital Mutilation (FGM), Fabricated or Induced illness (FII))
- Sexual abuse (e.g. Contact or non-contact abuse, Child Sexual Exploitation (CSE), grooming, online abuse)
- Criminal grooming or exploitation (CCE)
- Domestic Violence / Domestic Abuse (including being the witness to domestic violence involving others)
- Forced Marriage and Honour Based Abuse
- Radicalisation
- Self-harm (e.g. cutting, burning, bruising, scratching, hair-pulling, poisoning and overdosing, suicide attempt)
- Financial abuse

A concern may come to the attention of a member of staff via a disclosure from the student. We encourage students to speak to any member of staff with whom they feel comfortable. In such cases, the member of staff should:

- Listen carefully to the student and maintain a neutral demeanour.
- 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 SGO on duty as soon as possible so that details are easily recalled and action can be taken quickly.

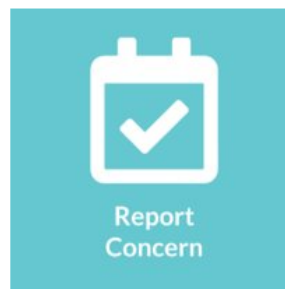
Concerns should be reported via the following process:



#1 – Use professional curiosity, listen carefully



#2 - Speak to the SGO on duty



#3 - Complete report via Infopoint

The Safeguarding Officer (SGO) will decide whether this is a safeguarding case, and what actions need to be taken next. The SGO will then feedback to the member of staff.

Out of Hours reporting

Reporting a concern out of hours

Our safeguarding rota operates from 9am-5pm, Monday to Friday, during term times.

If you have a safeguarding concern outside of these times, and you cannot speak to a Safeguarding Officer or Duty Manager immediately, you 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**, please speak to a Safeguarding Officer as soon as reasonably possible to report your concern.

3) Following up a Concern – Safeguarding Officers

3.1 Referrals to external agencies

On receiving a concern from a member of staff, the Safeguarding Officer will discuss the report with the referring person and decide if it is necessary complete the Multi Agency referral Form (MARF) to refer the matter to the Local Authority Children's Services and/or the Police. Usually, for students who are able to make sensible choices and decisions, information will not be passed on to external authorities unless the student agrees or **unless there is a risk of significant harm to self or others**. For children under 18, safeguarding information can be shared on a legal basis, so consent is not always required. If 18 or over, the Safeguarding Officer should have a

detailed conversation with the young person to ascertain their wishes and agree what actions will be taken next.

When deciding whether a referral is necessary, 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 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.

3.2 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/carer of the student.

3.3 Looked After Children

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

3.4 Records

The SGO should complete a record on CPOMS and attach electronic copies of any referral paperwork.

3.5 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 SGO 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.

3.6 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. 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 harm.

3.7 Prevent

The college regards concerns relating to potential radicalisation or violent extremism as safeguarding concerns. These will be reported as per our normal safeguarding reporting process.

Safeguarding Officers will refer all Prevent concerns to the DSL, who will liaise with Police / the Local Authority Prevent Co-Ordinator as necessary to discuss the case and decide the best course of action.

3.8 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 electronically. SGOs should not retain hard copies of documentation or notes.

4) Allegations against a member of staff

- 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 adults at risk 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 DSL, Executive Director HR or Principal and CEO as soon as possible.
 - 4.4. If the allegation meets any of the criteria set out in *Keeping Children Safe In Education* for LADO referral, the DSL and Executive Director HR will ensure that it is reported to the Local Authority on the same day.
 - 4.5. It is not necessary to make a referral to Social Services where an allegation can be shown beyond doubt to be demonstrably false. It is also not necessary to make a referral to Social Services where the allegation 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. The DSL will inform the Designated Officer at LBBB and police as appropriate.
 - 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 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 will require either personal or professional support or both.
- 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 Executive Director 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, a referral to the DBS should be made by the DSL or Executive Director HR.

4.12 If there is a concern about the behaviour of the DSL or the Executive Director HR this should be referred to the Principal and CEO.

4.13 If there is a concern about the behaviour of the Principal and CEO, this should be referred to the Chair of the Corporation.

5) Information Requests

The College is fully committed to working together with external agencies to safeguard the wellbeing of our students, and will comply with all legitimate requests for information.

- External agencies who require information about a student or students should complete the BDC Information Request form, including known student details, the purpose of the request, whether the request can be shared with the subject, and agreement to process the data in accordance with data protection law and GDPR principles.

- The DSL will consider all requests for information, and make decisions on a case by case basis.
- If the request is granted, the DSL will provide the information to the external agency and may request information from curriculum teams.
- Unless there is a compelling reason not to (eg prevention of a crime or putting the student at risk), the DSL will inform the subject that a data request has been made in respect to them.
- Records of information requests will be stored in the SGOs secure area on the G Drive.

6) Ex-Offender Risk Management

- Applications to study at the college from ex-offenders are welcomed and disclosure will be made at the point of application or during the Admission interview.
- Where a disclosure is made, risks will be assessed and managed via the college Fair Chance Process
- The college reserves the right to reject applications or withdraw offers to learners where it identifies safeguarding risks that cannot be securely managed
- Ex-offenders applying to be college staff will disclose relevant information on their DBS at the application stage, and a risk assessment will be undertaken by the HR team in conjunction with the DSL [refer to college DBS Policy].

7) Subcontracted Partners

- 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*.
- If partners have a concern about a learner funded via the College, they should follow their own procedures to act on the concern without delay.
- The partner will inform the college about the concern as soon as reasonably practicable. This may be done by calling the Main Switchboard and asking to speak to the Safeguarding Officer on duty.

8) SEND learners

- The Colleges acknowledges that children with disabilities are more likely than other children to be abused or neglected. We are also aware that young people with disability may find it more difficult to express their concerns or disclose abuse. When dealing with safeguarding concerns related to SEND learners, we will always be mindful of this vulnerability, listen to the child's

voice and non-verbal communication, and be respectful of their views and wishes.

- We will work with local Childrens Services or Adult / Disability Services as appropriate to support and safeguard our SEND learners.
- Adults age 18-25 with an Education and Health Care plan have the same rights to privacy as other adult learners, and a detailed discussion should take place in respect of the learners wishes before any external referrals are made.

9) Sexual Harassment and Sexual Violence

- 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 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 receive appropriate internal and/or external support.

10) Online Safety

- The college uses multiple web filters (Fortinet, Impero, & enforced 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 scheme.
- Students will be supported to report any threatening, abusive or offensive online content, and have content removed.

11) Mental Health and Wellbeing

- Mental Health and Wellbeing concerns are relatively 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.

- 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
- Wellbeing issues that give rise to a significant risk of harm to the learner will be reported via our Safeguarding procedures
- Any risks associated with Mental Health and Wellbeing will be managed according to our Student Wellbeing Policy.

12) Remote Learning

- Staff need to be especially sensitive to possible safeguarding problems when working remotely with young people. Students may feel less confident about making a disclosure when at a distance from their teacher, Learning Mentor or LSP.
- If staff have a concern about a student because of something observed or disclosed during online learning, they will contact a Safeguarding Officer (SGO) immediately. Staff can identify the on duty SGO by looking at the live [rota](#) in the [SG area of Staff InfoPoint](#). The Safeguarding Officers can be contacted by phone or Microsoft Teams. The staff member should then record the details of the concern using CPOMS.

12) Extra-curricular Activities, Trips and Clubs

- The college occasionally sets up activities for students and non-students outside of normal operational hours, eg sports clubs, competitions, social events or Saturday Clubs. The organisers of such activities must ensure that Safeguarding matters are given due consideration from the earliest stages of planning, and that appropriate arrangements are put in place to keep children safe. For example, if an activity is taking place outside of the hours covered by the safeguarding rota, ensuring that a Duty Manager is available to deal with any urgent incidents or queries.
- All extra-curricular activities and trips should be risk assessed in advance by the organisers. The Health & Safety, and Safeguarding Teams are happy to offer advice, guidance and feedback to event organisers on how to complete an effective risk assessment and manage / minimise risk.
- The college may rent its premises to external clubs and organisations who provide activities for children, eg sports clubs or theatre companies. The college's general Safeguarding Policy will not apply to such activities – however, external organisations are expected to have their own Safeguarding policies and procedures in place to manage risks and follow up concerns. In each case, the college manager responsible for liaising with the external organisation will check that an appropriate policy is in place as part of its due diligence process, before the activity commences. The Health and Safety

Team and DSL can advise and support the manager in checking that arrangements are appropriate.

- If the college receives an allegation relating to any staff involved in the running of childrens clubs or activities on its premises, the DSL should be informed and advice sought from the LADO.

13) Related Policies and Procedures

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