

## **SAFEGUARDING POLICY 2024/25 (incorporating Child Protection and Adults at Risk Procedures)**

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Responsible post holder	Deputy Principal Student Experience and Group Safeguarding
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- This policy is available online at [www.lsec.ac.uk](http://www.lsec.ac.uk)
- We will consider any request for this policy to be made available in an alternative format or language. To make a request contact: [safestudent@lsec.ac.uk](mailto:safestudent@lsec.ac.uk)
- We review our policies regularly to update them and to ensure that they are accessible and fair to all. We welcome suggestions for improving the accessibility or fairness of this policy.

All our policies are subject to equality impact assessments. We are always keen to hear from anyone who wishes to contribute to these impact assessments. To do so, please contact: [safestudent@lsec.ac.uk](mailto:safestudent@lsec.ac.uk)

## 1. Introduction, Statement of Intent and Purpose

### 1.1 Introduction

London South East Colleges has a statutory and moral duty to ensure that it safeguards and promotes the welfare of those receiving education and training at the College.

**Throughout these policies and procedures, reference is made to “children and young people” or “child protection”. These terms are used to mean those under the age of 18 including unborn children. The College recognises that some adults are also vulnerable to abuse and so the policy and procedures should be applied (with appropriate adaptations) to allegations of abuse against, and the protection of, adults at risk.** The Lord Chancellor’s Department, in 1997, defined a vulnerable adult or adult at risk as a person ‘who is, or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect him or herself, against significant harm or exploitation’.

### 1.2 Statement of Intent

The Governing Body is committed to ensuring that the College:

- provides a safe and secure environment in which children, young people and adults are able to learn.
- explores safeguarding issues within the curriculum, induction, tutorial programme and enrichment activities.
- creates and maintains a culture where students, staff, volunteers and visitors are able to raise concerns and are listened to.
- ensures that everyone is aware of their role and responsibilities with respect to safeguarding and follows the necessary process and procedure to protect young people and promote their welfare.
- identifies children and young people who may benefit from Early Help and those who are suffering, or likely to suffer, significant harm, and
- takes appropriate action to ensure that such children, young people and adults are kept safe, both at home, at the College and online in so far as this is possible and in partnership with local authority children and adult services and local police.
- provides a safe environment, prevention, response and support to ensure that students have:
  - the right to freedom from inhumane and degrading treatment
  - the right to respect private and family life including to protect individuals’ physical and psychological integrity.
  - the right to access education without discrimination.

### 1.3 Purpose

In pursuit of these aims, the Governing Body will approve and annually review policies and procedures with the purpose of:

- raising awareness of issues relating to the welfare of children, young people and adults and the promotion of a safe environment for children, young people and adults learning within the College
- highlighting specific safeguarding concerns
- aiding the identification of children and young people at risk of significant harm, and providing clear procedures for reporting concerns
- establishing procedures for reporting and dealing with allegations of abuse against members of staff
- ensuring the safer recruitment of staff

## 2 Scope

- 2.1 The terms and requirements of this policy apply to:
- all directly enrolled students, irrespective of age, the course(s) being studied or the location at which the programme is being delivered (at a college campus, on an employer's premises etc.)
  - other people (non-students) if the College receives information which means they are at risk of harm.
  - all staff employed by the College, irrespective of role, contractors and their staff, governors, volunteers and visitors to college campuses.

## 3. Relevant Legislation and Guidance

- 3.1 In developing the policies and procedures, the Governing Body will take account of guidance issued by the Department for Education and other relevant bodies. This policy and associated procedures have been developed in line with the Local Safeguarding Children Partnership Guidelines, Working Together to Safeguard Children (WTTSC) 2018 and Keeping Children Safe in Education (KCSIE) 2024.
- 3.2 The College recognises its duties under relevant legislation and guidance, as follows:

### Legislation

- Children Act 1989
- Education Act 2002
- Section 5B of the FGM Act 2003 as inserted by section 74 of the Serious Crime Act 2015
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Children and Adoption Act 2006
- Children and Young Person's Act 2008
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Human Rights Act 1998
- Data Protection Act 1998 and GDPR 2018
- Care Act 2014
- Equality Act 2010

### Guidance

- Keeping Children Safe in Education 2024
- Working Together to Safeguard Children 2018 (updated 2020)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018.
- London Safeguarding Children Procedures and Practice Guidance 2023
  
- Prevent Duty in Further Education 2019
- Guidance for safer working practice for those working with children and young people in education settings 2019.
- SEND Code of Practice: 0 to 25 years
- Supporting Pupils at School with Medical Conditions
- Meeting Digital and Technology Standards in Schools and Colleges 2023

- 3.2.1 The Education Act 2002 requires Governing Bodies of Further Education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- 3.2.2 The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children. Although social care services and the police are responsible for investigating child abuse and neglect, all those who come into contact with children and young people have a duty to promote and safeguard them.
- 3.2.3 Under the Counter-Terrorism and Security Act 2015 the College is required to have “due regard to the need to prevent people from being drawn into terrorism, violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.”
- 3.2.4 The College will refer concerns that a child or young person might be at risk of significant harm to the appropriate agencies as agreed with the Local Safeguarding Children Partnerships (LSCP) for the areas in which its students live.
- 3.2.5 The College works closely with its partner agencies across Bromley, Greenwich, Bexley and Lambeth, and beyond, reflecting the College’s catchment area. These include the local authorities, police, Local Safeguarding Children Partnership, Channel Police Practitioner (CPP) and the local Prevent Coordinators to ensure information is shared and referrals are made as appropriate.
- 3.3 All staff will have training on child protection issues, their responsibilities and College policies and procedures, with refresher training at least every year. A member of the College Senior Leadership Team will have specific responsibility for child protection. They will be assisted by other staff with responsibility for child protection.

The Governing Body will receive from the Deputy Principal Student Experience and Group Safeguarding an annual report which reviews how the duties have been discharged which includes a data summary, emerging themes, online monitoring, training and sharing good practice. The nominated safeguarding governor will sit on the Safeguarding Strategy group.

#### 4.Key definitions and concepts

- 4.1 **In Keeping Children Safe in Education 2024**, safeguarding and promoting the welfare of children is defined as:
- providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing the impairment of children’s mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes

Safeguarding and promoting the welfare of children is a broader term than child protection which refers to the process of protecting children identified as either suffering, or likely to suffer, significant harm because of abuse or neglect. It also involves measures and structures designed to prevent and respond to abuse and neglect.

- 4.2 **Keeping Children Safe in Education 2024** also sets out definitions of the four broad categories of abuse. These broad categories are a useful guide for staff who have responsibility for children and young people. The categories of abuse are listed below together with possible signs and symptoms of abuse. The signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list

and many of the signs and symptoms could fall into more than one category. Also, students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for physical activities, constant tiredness) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that young people with a disability are 3 times more likely to experience abuse or neglect than non-disabled peers.

## **5. Roles and Responsibilities**

5.1 The College has a clear structure of staff and support for safeguarding across the College. The roles and responsibilities of those staff with designated safeguarding responsibilities are defined in this policy. These staff will be provided with the resources and time required to fulfil the requirements of that role. However, it is also recognised that safeguarding is “everyone’s responsibility” and that all have a role to play in keeping children and young people safe.

### **5.2 Designated Safeguarding Lead (DSL)**

The senior member of staff with lead responsibility for safeguarding (Designated Safeguarding Lead) is the Head of Safeguarding and Wellbeing, Sandra Chick.

This person is a member of the College Management Team and reports to the Deputy Principal Student Experience and Group Safeguarding. The DSL has a key duty to take lead responsibility for raising awareness among the 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.

Nido Volans Lambeth has a dedicated DSL, Perry Vlachos, who is responsible for the safeguarding practices at the campus. The DSL for Nido Volans Lambeth will work with the College DSL to ensure that practices are standardised across all campuses.

Keeping Children Safe in Education 2024 details the key responsibilities of the DSL.

### **5.3 Deputy Designated Safeguarding Leads (DDSL)**

The Deputy Designated Safeguarding Leads are the:

- Safeguarding Managers for LSEC South (Bromley and Orpington campuses) and LSEC East (Greenwich and Bexley campuses).
- Designated Teacher for Looked After Children
- Senior Safeguarding Officers

Keeping Children Safe in Education 2024 details the key responsibilities of the DDSL. See Appendix 2 for contact details.

### **5.4 The Governing Body**

The governing body is responsible for ensuring that the College complies with its duties under the legislation.

Keeping Children Safe in Education 2024 details the key responsibilities of the governors.

### **5.5 Designated Governor**

The designated governor, Angela Hands, is responsible for liaising with the Executive Principal, Deputy Principal Student Experience and Group Safeguarding and Designated Safeguarding Lead over matters regarding child protection, including:

- ensuring that the College has policies and procedures which are consistent with the LSCP's procedures.
- ensuring the Governing Body considers the College policy on child protection and safeguarding adults at risk each year (see **Appendix 3** for Governance Structure)
- ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

To assist in these duties, the designated governor shall receive appropriate training.

Where a member of the Governing Body has a safeguarding concern or has been informed of a safeguarding concern, they should make initial contact with the Governance Professional, Jennifer Pharo, to the Corporation. The Governance Professional is a central contact for all Governors and is best placed to then make contact with the Safeguarding Leadership within the College.

## 5.6 College Safeguarding Officers

In addition to the DSL and DDSLs the College trains a number of staff including those with pastoral responsibilities to be a first point of contact for students and/or staff who have concerns about safeguarding. The HR department holds records of all staff who are trained. These Safeguarding Officers receive training in child protection issues and inter-agency working, as required by the LSCP, and receive refresher training at least every 2 years. They will report to the designated staff members (for safeguarding issues only) and will:

- be available to provide advice and support to other staff on issues relating to child protection.
- be available to listen to students studying at the College.
- lead on individual cases, including liaising with parents/carers and, where appropriate, social workers and others to safeguard young people.
- maintain proper records of any child protection referral, complaint or concern (even where that concern does not lead to a referral) ensuring that all details are recorded on the safeguarding system.
- support the provision of information to parents of children and young people within the College to promote awareness of the College's Safeguarding Policy

Safeguarding contact information is included in **Appendix Two**.

## 5.7 Subcontracted Provision and Work Experience

5.7.1 Subcontracted providers are required to have their own safeguarding policy and associated procedures, and make this available, or to adopt the LSEC Safeguarding Policy and Procedures. Providers are required to have their own DSL (and one deputy as a minimum). Learners are advised through their induction about keeping themselves safe and who to raise a safeguarding concern with.

5.7.2 All subcontracted staff should go through full pre-employment checks including DBS numbers/dates and undertake safeguarding and Prevent training which should be refreshed annually. Sub-contractor staff information should be recorded on a Single Central Record maintained by the provider and available for inspection by LSEC. The identity of sub-contractors and their staff will always be checked on arrival at the College.

5.7.3 Subcontractor safeguarding records should be maintained and stored in accordance with GDPR and best safeguarding practice.

## 5.8 Contractors/Consultants/Volunteers and Others Working at College Campuses

Non-employees undertaking work at College campus must comply with the College's Health and Safety and safeguarding requirements. This will depend on the nature, location and

duration of the work but may involve confirmation of a DBS check and other pre-employment checks, a risk assessment process, a briefing on the first day of work, inclusion in contractual terms, and participation in relevant training. All non-employees who will be unaccompanied on campus must be known and approved by HR and recorded on the Single Central Record prior to being authorised to start working on campus.

## **5.9 Visitors to College campus**

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

5.9.2 A separate statement, Code of Practice on Freedom of Speech and Expression and Visiting Speaker and Fund-Raising Guidance, covers the risk assessment of visiting speakers and other visitors to College campuses.

5.9.3 Similarly, protocols are in place for advising hirers of the College's facilities of their safeguarding responsibilities.

## **5.10 Students**

Students are responsible for complying with all College policies and procedures that are designed to keep the College a safe and secure place in which to learn. They will receive information on policies, procedures and the College's safeguarding arrangements during their induction and should raise any concern they have about the safety of themselves or others immediately.

## **5.11 Parents/Carers**

The College recognises the contribution that parents and carers can make in keeping children and young people safe. Parents/carers will be made aware of the College's Safeguarding Policy – which is publicly available on the College's website. Parents and carers will be encouraged to participate in information/parents' evenings and in discussions involving the safeguarding and well-being of their children (unless this is deemed not to be in the best interests of the child).

## **5.12 External Supervisor**

The College engages an external supervisor to support the work of the central safeguarding team. The supervisor meets the team twice termly to discuss challenging cases, provide guidance and support, act as a critical friend and help the team continue to develop reflective, professional safeguarding practice.

# **6. A Learner-Centered and Co-ordinated Approach to Safeguarding**

## **6.1 Safeguarding is everyone's responsibility**

In line with KCSIE 2024, the College supports the view that safeguarding is everyone's responsibility. All members of the College community, including staff, governors, students and contract staff, are responsible for safeguarding and promoting the welfare of children and adults at risk, and must always consider what is in their best interests. No single professional can have a full picture of a child's needs and circumstances, therefore everyone who comes into contact with them has a role to play in identifying concerns, sharing information and acting promptly.

## **6.2 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 students outside of these



environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. 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.

### 6.3 Students with particular vulnerabilities

The College recognises that the circumstances of specific categories of students render them particularly vulnerable to certain types of abuse. Safeguarding procedures are customised in these instances, to address these vulnerabilities and specialist safeguarding officers have been identified to offer support in these areas of provision. These categories include:

- students with Special Educational Needs and Disabilities (SEND)
- Looked After Children (LACs) / Young Care Leavers (YCLs)
- Students who are privately fostered
- students on English for Speakers of Other Languages (ESOL) courses
- students whose programmes include Work Based Learning (WBL)
- adults at risk (vulnerable adults)

Children and adults with Special Educational Needs and Disabilities are subject to additional safeguarding challenges as they may have difficulties with communication, are at higher risk of peer group isolation and may be disproportionately affected by bullying. College staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

### 6.4 Early Help

6.4.1 In line with KCSIE 2024 the College supports the view that providing early help is more effective in promoting the welfare of children than reacting to incidents as they occur. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.

6.4.2 Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child. Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children and it is stated that colleges are an important partner for the local authorities in which they operate.

6.4.3 College staff are particularly well placed to be alert to the potential need for early help for a child or young person. Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a young person who:

- is disabled or has certain health conditions and has specific additional needs.
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organized crime groups or county lines.
- is frequently missing/ goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, college and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation is at risk of being radicalised or exploited

- has a parent or carer in custody or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Genital Mutilation or Forced Marriage
- is a privately fostered child.

Students who are lesbian, gay, bi or trans (LGBTQ+) are not inherently at risk. However, people who are LGBTQ+ can be targeted by other people, sometimes students can be perceived as LGBTQ+ (whether they are or not) and just as vulnerable to harm. Risks can be compounded when there is not a trusted adult/key worker with whom they can be open with. LGBTQ+ inclusion will be featured in our tutorial and enrichment framework, and it is vital that staff provide safe spaces for students to talk and share their concerns and experiences.

If a young person is questioning their gender they should be encouraged, with their families/carers, to seek clinical help and advice. Staff should work in partnership with the young person's parents (if the student is under 18) other in exceptionally rare circumstances where involving the young person's parents would constitute a significant risk of harm to the young person.

Staff should refer to the Guidance for Schools and Colleges in relation to Gender Questioning Children when working with students who are questioning their gender.

6.4.4 College staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and work together to give children/young people the help they need. Staff receive training to develop their knowledge and skills in this area.

## **6.5 Abuse and Safeguarding Concerns:**

### 6.5.1 Abuse

To ensure that all students are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm or by failing to act to prevent harm. Abuse can also take place online and/or in conjunction with daily life. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

All staff should be aware that safeguarding incidents and poor behaviours can be associated with factors outside the college and/or can occur between students outside of college. This links closely with contextual safeguarding and specific young people being more at risk due to the circumstances which they live in.

There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

### 6.5.2 Physical Abuse

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

### 6.5.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or young person, which is intended to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age, or developmentally, inappropriate expectations being imposed on children and young people. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another or may involve serious bullying, causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and young people.

#### 6.5.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as forcing children and young people to look at pornographic material or watch sexual activities, or by encouraging them to behave in sexually inappropriate ways.

#### 6.5.5 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.

Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### 6.5.6 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. Staff are well placed however to identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where young people have suffered abuse and neglect or any other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout adolescence and into adulthood. It is vital that staff are aware of how these experiences can impact on mental health, behaviour and education. If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following normal procedures.

#### 6.5.7 Child Criminal Exploitation (including County Lines)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person or vulnerable adult into criminal activity. This may involve an exchange for something the victim needs or wants, and gives a financial or other advantage to the perpetrator or facilitator. Violence or the threat of violence is commonly used to this end.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Being absent from college
- Not taking part in education

If a member of staff suspects CCE, they should discuss this with a safeguarding officer. The DSL will refer to the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

County Lines is a term used for gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated phone lines or other forms of deal line. They target vulnerable groups of children and young people. The victims carry the drugs/ money and in return are offered, promised or given something tangible such as money, drugs or clothes or intangible such as status or protection. There is a direct link with CSE and CCE due to the imbalance of power. Victims can be coerced into county lines to prevent something negative happening to themselves or their family. The Government has now created a National Referral Mechanism (NRM) to support multi agency approach and unified approach by police forces.

#### 6.5.8 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

#### 6.5.9 So Called 'Honour Based Abuse' (HBA)

These encompass incidents or crimes which have been committed to protect or defend the honour of the family and/or community and includes FGM, forced marriages and practices such as breast ironing. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

#### 6.5.10 Female Genital Mutilation

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

The tutorial programme will cover aspects of FGM and other harmful practices, including forced marriage and honour based abuse. The college will ensure that students are taught the concepts of, and laws relating to forced marriage, honour-based violence and FGM, and how these can affect current and future relationships.

If staff have a concern regarding a girl that might be at risk of FGM they should inform a member of the safeguarding team. Since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place.

#### Mandatory Reporting of FGM:

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the college's designated safeguarding lead and involve children's social care as appropriate.

#### 6.5.11 Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the Safeguarding Team.

A safeguarding officer will:

- Speak to the student about the concerns in a secure and private place
- Refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

#### 6.5.12 Child on Child Abuse (Previously known as Peer-on-Peer Abuse)

Child-on-child abuse is when children and young people abuse other children and young people. This type of abuse can take place inside and outside of college and online, and it is important that when staff have concerns they speak to the DSL or deputies.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (previously known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where young people abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

#### 6.5.13 Sexual Violence and Harassment

Sexual violence and sexual harassment can occur:

- Between children and young people of any age and sex
- Through a group sexually assaulting or sexually harassing an individual or another group
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same college.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or

sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Incidents that occur online or out of college should be taken just as seriously and responded to in the same way as reports on college premises.

Some groups are potentially more at risk. Evidence shows that girls, students with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) students are at greater risk. Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not inevitable
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff should refer to the College's Sexual Violence and Harassment Policy for more information.

#### 6.5.14 Serious Violence

Indicators which may signal that a student is at risk from, or involved with, serious violent crime may include:

- Increased or persistent absence from college
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the student has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school or college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

#### 6.5.15 Domestic Abuse

Domestic abuse can be, but not limited to, psychological, physical, sexual, financial, or emotional. It can be single incident or a series of incidents and patterns of behaviour. Children and Young People can be victims of domestic abuse. They may hear, see or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

#### 6.5.16 Radicalisation and Extremism

Protecting students from the risk of radicalisation should be seen as part of the colleges' wider safeguarding duties and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- Radicalisation is the process of a person legitimising support of, or use of, terrorist violence.
- Extremism is vocal or active opposition to our fundamental values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism is an action that:
  - Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The college has a duty to prevent students from being drawn into terrorism. The Safeguarding Team undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify those at risk.

The college will assess the risk of students being drawn into terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with our local safeguarding partners and local police force.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Students who are susceptible to radicalisation may have low self-esteem or be victims of bullying or discrimination.

If staff are worried about a student, they should discuss their concerns with a safeguarding officer and record their concerns on CPOMS.

#### 6.5.17 Online Safety

The College recognises the importance of safeguarding students from potentially harmful and inappropriate online material and understands that technology is a significant component in many safeguarding and wellbeing issues.

The colleges addresses this by:

- Having robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Educating students through the tutorial programme regarding safe and responsible use of technology including protecting private information, using social media and how to identify if material is unsafe or biased



- Establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Utilising filtering and monitoring software to respond to concerns

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

All staff as part of their induction receive training on online safety which is also embedded into other specific areas such as Prevent and Peer on Peer abuse.

All students, staff, volunteers and visitors sign the acceptable use policy when accessing the college network and systems.

Information for parents will be shared on our website regarding our approach to online safety.

**6.6 Where staff identify a cause for concern they should discuss this with a safeguarding officer.** The safeguarding officer will make a referral, if this is appropriate, to the local multi-agency safeguarding hub for the local authority area in which the child lives. Staff and students (where this is possible and appropriate) will be kept informed about the actions taken once the concerns are shared with the college safeguarding officer. The local multi-agency threshold document for the local authority area where the college is going to make referral should be consulted.

**6.6.1** If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.

A child in need is defined under section 17 of the Act as a child whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired, without the provision of additional services. A child with a disability is a child in need.

## **6.7 Procedure for Responding to Concerns and Disclosures**

**6.7.1** College staff who have regular contact with students are well placed to observe significant changes in a young person's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, young people may choose to share their concerns with staff they feel they can trust and with whom they are comfortable.

Staff need to know how to respond sensitively to a young person's concerns and who to approach for advice. Whilst College staff are not responsible for investigating abuse it is essential that any disclosures or suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on and treated seriously.

The College takes a holistic view of the welfare of its students and recognises that a wide range of contextual factors may be impacting on the wellbeing of a young person. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities (see paragraph 7.3), attendance and behaviour and learning differences. The safeguarding officer will consider the full picture in dealing with cases brought to her/his attention.

\*The following guidelines should be followed by **all** staff receiving a disclosure:

1. Stay calm and reassure the young person that they are right to tell someone of their concerns.
2. Do not promise confidentiality. Be honest - explain that you need to pass the information on and why while reassuring them that only the people who need to know will be told. The young person can accompany you if they wish.
3. Allow the student to speak in their own way and at their own pace, avoid interrupting when they are recalling significant events.
4. Do not be judgemental but make a professional assessment about the likelihood of harm occurring.
5. Do not 'interview' the young person; do not ask leading questions. Ask factual questions to gather as much information as possible and to create a full picture of what has happened so that this can be reported to a safeguarding officer.
6. Only clarify what the young person is trying to say and ascertain whether there are any immediate issues of safety for the young person or any other children.
7. Notify the Safeguarding team by recording on CPOMs noting as accurately as possible what was said using the young person's own words. Include the time, context and location of the disclosure. **If the concern is urgent verbally inform the safeguarding officer in person and record on CPOMs later.**
8. Do not investigate any suspicions, allegations or incidents of abuse, but report them within the hour (or as soon as practicable) to a safeguarding officer and pass on all written notes.
9. Do not contact the young person's parents/carers. The safeguarding officer will seek advice from a Designated Safeguarding Lead who will then contact the local authority Children's Services, local Prevent Coordinator or another agency as appropriate.
10. Where there is a concern that a young person is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's Social Care (CSC) at the appropriate local authority.
11. Where there is concern of an immediate threat to life emergency services must be contacted immediately
12. In exceptional circumstances, if the Designated Safeguarding Leads are not available advice should be sought from the duty manager or a member of the Senior Leadership Team, who will liaise with the required services as appropriate. All staff had a right and responsibility to refer concerns directly to CSC if necessary.
13. In the case of disclosure from an adult at risk, referrals will be made to appropriate adult services e.g. adult social care

### 6.7.2 Out-of-hours arrangements

During the evening opening safeguarding cover is provided by the duty manager. A concern may also be raised with the duty manager if a safeguarding officer cannot be located. A safeguarding role is included in duty management training.

### 6.7.3 The Child's/Adult's Wishes

The wishes of the child or adult about whom a concern has been raised should be listened to. Wishes should be considered unless in doing so it is not possible -with an acceptable level of certainty - to mitigate the risk of harm either to the child/adult or to someone else. The wishes of

the child/adult should be recorded as part of the records of the case.

The same principle applies to consent which should be sought before information is passed on. However, if consent is not provided information should still be shared if not doing so would result in a risk of significant harm. A decision not to comply with the child or adult's wishes should be carefully explained to them, and steps taken to reduce any resulting anxiety.

## **6.8 Data Management**

**6.8.1** As set out in the Government publication Data Protection: A Toolkit for Schools (DfE, April 2018), data protection requirements 'do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if gaining consent places a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place'.

**6.8.2** The implementation of this policy requires the processing of personal and sensitive data of students and/or members of staff. This will be done in accordance with the terms of Data Protection legislation as amended by the General Data Protection Regulations (2018) (GDPR) and as set out and interpreted in the College's data management, storage, retention and disposal policies and related statements.

**6.8.3** The main requirements under the current legislation and College policy are as follows:

- data subjects will be informed what data is being collected and for what purposes
- data will be stored safely and securely with robust access arrangements in place
- consent to share data will be requested where/when this is necessary
- data will only be shared on a need-to-know basis and using secure transfer mechanisms
- data will not be retained for any longer than is necessary
- digital and hard copy data will be securely destroyed when it is no longer needed, or the retention period has expired.

## **7. Safeguarding Records and Transfer of Safeguarding Files**

### **7.1 Recording a Safeguarding Concern**

A written record of a safeguarding concern should be made by any member of staff or volunteer and submitted to the safeguarding team through CPOMS, by email or hard copy.

**7.2** The College will keep records of all safeguarding concerns and cases including records of partnership work required in order to safeguard or protect a child or young person from risk of harm. These records will be kept away from other student records and kept secure in locked filing cabinets within the safeguarding offices (for paper files transferred to the college) or online on the safeguarding system/secure documents folder on SharePoint.

### **7.3 Transfer of Safeguarding Files**

#### **7.3.1 Transfer of safeguarding files to the College**

The College will collect details of the last school/college attended by students and, where the student is under 18, will write to the local authorities to request that any safeguarding records are transferred to the College as soon as possible by an agreed secure method. When the files are received a confirmation receipt will be sent to the former school/college. KCSIE, 2024, states that files must be received within five working days from enrolment.

### 7.3.2 Transfer of safeguarding files from the College.

When a student for whom there is a safeguarding record leaves the College, the DSL will ensure that the safeguarding record/s are transferred to the new school/college once this information is known. The following procedure should be followed:

- Tutors will collect information about the intended destination of a student under 18 transferring from the College and pass this information to MIS.
- The DSL will receive a list every month from MIS with details of young people who will be transferring from the College to a new school/college and who are known to the safeguarding team.
- for each student on the list, the DSL will confirm with the new school/ college that the transfer has, or will be, taking place and, if yes, obtain details of the DSL there
- as soon as the young person has enrolled at the new school/college, the DSL will arrange for the transfer of the file via secure means and ensure receipt is confirmed, the transfer should take place within five days of enrolment at the new provision.
- Where appropriate, the DSL will also share information with the DSL at the new school/college in advance of the student leaving e.g. where this would allow the new school/college to put relevant support in place for when the student arrives.

## 8. Reporting and Dealing with Allegations of Abuse Against Members of Staff

KCSIE 2024 names the Principal as the main contact for leading processes for allegations of abuse against members of staff. The CEO delegates this responsibility to the Executive Principal, Chief People Officer, Director of HR and the Deputy Principal Student Experience and Group Safeguarding. All are senior members of staff and will keep the CEO informed of all allegations and the progress of investigations.

The Head of Safeguarding, DSL, may be consulted with on matters of allegations of abuse against members of staff.

8.1 This procedure applies to all staff, including agency staff, employed by or working on behalf of LSEC. HR to maintain records of current and previous staff.

8.1.1 In rare instances, staff working in education have been responsible for abusing children or adults at risk. Alternatively, because of their frequent contact with children and young people, staff may have allegations of abuse made against them. The College recognises that an allegation of 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. Guidance on the conduct of staff appears in **Appendix 1**.

8.1.2 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.

8.1.3 In the event of an allegation being made against the CEO/ Executive Principal, the Chair of Governors will raise this with the DSL. The purpose of an initial discussion is to consider the nature, content and context of the allegation and agree a course of action. The Chair of Governors will oversee the liaison between agencies such as the police and local authority children's services in connection with allegations against the Principal. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

## 8.2 Receiving an Allegation about a Member of Staff from a Child or Adult at Risk

- 8.2.1 The allegation should be reported immediately to either the Executive Principal, Chief People Officer, Deputy Principal Student Experience and Group Safeguarding or Director of HR who will coordinate the following:
- obtaining written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL/HR.
  - recording information about times, dates, locations and names of potential witnesses.

### **8.3 Initial Assessment**

- 8.3.1 Lead Senior staff member should make an initial assessment of the allegation, consulting with HR as well as the Local Authority Designated Officer (LADO) 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 LADO.
- 8.3.2 The College is not to investigate the allegation without being advised by the LADO that an internal investigation is appropriate. The initial assessment should be on the basis of the information received and to determine whether or not the allegation warrants further investigation.
- 8.3.3 Possible outcomes of the initial assessment are:
- The allegation meets the harm threshold (see section 9.4)
  - The allegation/concern does not meet the harm threshold and will be dealt with in line with College staff disciplinary procedures.
  - the allegation can be shown to be false because the facts alleged could not possibly be true.

### **8.4 Allegations that may meet the harm threshold**

- 8.4.1 The procedures appearing below for the management of allegations apply to all cases in which it is alleged that a teacher or other member of staff (including volunteers) in the College has:
- behaved in a way that has harmed a child or adult at risk, or may have done so;
  - possibly committed a criminal offence against or related to a child or adult at risk;
  - behaved towards a child or adult at risk in a way that indicates she or he would pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This relates to members of staff who are currently working in the College regardless of whether the College is where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

- 8.4.2 This includes behaviour that may have happened outside of college and that may make an individual unsuitable to work with children, this is referred to as transferable risk.
- 8.4.3 Allegations that may meet the threshold of risk will be referred to the LADO and the Deputy Principal Safeguarding/DSL/HR will take instruction and advice on how to proceed whilst also ensuring:
- The welfare of the child is considered, supported and not at further risk.
  - The person subject to the allegation is supported as appropriate with consultation with the LADO.

### **8.5 Enquiries and Investigations**

- 8.5.1 Child protection enquiries by social care or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to 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 should assist agencies with their enquiries.
- 8.5.2 The College shall hold in abeyance its internal enquiries while any formal police or local authority social care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall comply with existing staff disciplinary procedures.
- 8.5.3 If there is an investigation by an external agency, for example the police, the Deputy Principal Student Experience and Group Safeguarding and/or the Director of HR should normally be involved in, and contribute to, the inter-agency strategy discussions. They are responsible for ensuring that the College gives every assistance to the agency's enquiries. They 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. HR shall advise the member of staff that they should consult with a representative such as a trade union.
- 8.5.4 Unless there are objections from the police or other investigating agency, the Deputy Principal Student Experience and Group Safeguarding/DSL/HR shall:
- ensure that the parents/carers of the child or adult at risk making the allegation have been informed that the allegation has been made and what the likely process will involve.
  - inform the child/children, adult at risk or parents/carers making the allegation that the investigation is taking place and what the likely process will involve
  - inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
  - inform the Chair of Governors and/or the designated governor of the allegation and the investigation.
- 8.5.5 Written records will be kept of the action taken in connection with the allegation.

## **8.6 Suspension of Staff**

- 8.6.1 Suspension should not be automatic but may be considered at any stage of the investigation and should remain under review: All options to avoid suspension should be considered prior to taking that step. The possible risk of harm to children or adults at risk posed by an accused person should be evaluated and managed in respect of the child/ren or adults at risk involved in the allegations.

The appropriate section of the College Staff Disciplinary Policy and Procedure should be followed. The Principal and HR shall consider carefully who is informed of the suspension and investigation. The LADO and external investigating agencies should be consulted.

- 8.6.2 If there is no option but to suspend the member of staff, they should be given appropriate support during the period of suspension. The decision to suspend is a neutral act and is taken to safeguard students, the staff member and other members of staff whilst under investigation. They should also be provided with information on progress and developments in the case at regular intervals.

## **8.7 The Disciplinary Investigation**

- 8.7.1 The disciplinary investigation should be conducted in accordance with the Staff Disciplinary Policy and Procedure following advice provided by a senior member of the HR team.

## **8.8 Resignations and dismissals**

- 8.8.1 If, during the course of an investigation relating to an allegation of abuse, an employee tenders their resignation, or ceases to provide their services, the College will continue to investigate

and conclude the allegation in accordance with these procedures as outlined in KCSIE 2024. Every effort will be made to reach a conclusion in cases relating to the welfare of children or adults at risk, including those where the person concerned refuses to co-operate with the process.

8.8.2 If the College dismisses or ceases to use the services of a member of staff because of serious misconduct or might have dismissed them if they had not resigned, the College must still consider whether a referral to the Disclosure and Barring Service is warranted. If the criteria for a referral are met, it is not appropriate to reach a settlement/compromise agreement.

## **8.9 Unsubstantiated or malicious allegations**

8.9.1 If the allegation is found to be unsubstantiated, the DSL will refer the matter to children/s or adult social care so that it can be determined whether the child or adult at risk needs support services or may have been abused by someone else.

8.9.2 If a report is shown to be deliberately invented or malicious, the college will consider whether any disciplinary action is appropriate against the individual who made it in accordance with our behaviour policy.

8.9.3 In consultation with the Executive Principal and Deputy Principal Safeguarding, HR will:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- 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 to be given to informing the parents/carers of that child
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

## **8.10 Low Level Concerns**

8.10.1 We encourage an open and transparent culture where all concerns about an adult working with students which do not meet threshold are dealt with promptly and appropriately.

8.10.2 A low-level concern is described in KCSIE 2024. It does not mean it is insignificant – it is any concern no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or it is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with students
- Having favourites
- Taking photographs of students on their mobile phone contrary to college policy
- Engaging with a student on a one-to-one basis in a secluded area
- Humiliating students

8.10.3 Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organization; or as a result of vetting checks undertaken.

- 8.10.4 Low-level concerns can be self-referrals if staff are aware of a situation that should be noted and reviewed.
- 8.10.5 If a member of staff has any concerns, no matter how minor, they should be shared directly with either the Principal, Deputy Principal Student Experience and Group Safeguarding, Chief People Officer or Director of HR. A low-level concern form should be completed and shared to keep a record (Appendix 4).
- 8.10.6 Low-level concerns can be shared anonymously and where possible anonymity will be preserved.
- 8.10.7 Following receiving a low-level concern form the senior lead will review and assess the concern and speak to any staff members. If assessed as meeting LADO threshold then LADO processes will commence. Outcome of low-level concern could be:
- No Further Action
  - Organisational learning/culture development
  - Training
  - Disciplinary (in line with Disciplinary Policy)
- 8.10.8 Low-level concerns regarding agency staff and contractors should be referred to their employers.
- 8.10.9 Records will be kept for the duration of the staff member's employment with LSEC.
- 8.10.10 Information will not be shared on references unless it has met the threshold of harm for LADO.

## **8.11 Confidentiality**

- 8.11.1 It is essential that when an allegation is made, the College makes every effort to keep confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where the material would identify the teacher as the subject of the allegation).
- 8.11.2 The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so.
- 8.11.3 Senior case leads should take advice from, for example, police and children's social care to agree the following:
- who needs to know and, importantly, exactly what information can be shared;
  - how to manage speculation, leaks and gossip;
  - what, if any, information can be reasonably given to the wider community to reduce speculation; and
  - how to manage press interest if, and when, it should arise.

## **8.12 On concluding a case**

- 8.12.1 If the accused member of staff leaves the employment of the College a decision must be made about whether to make a referral to the DBS.



8.12.2 Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Director of HR should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Senior Case Leads should also consider how the person's contact with the child or adult at risk who made the allegation can best be managed.

### 8.13 Records

8.13.1 Documents relating to an investigation should be 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.

8.13.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College's statutory duty to inform the DBS.

### 8.14 Monitoring Effectiveness

8.14.1 Where an allegation has been made against a member of staff, the DSL should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the LSCP. Consideration should also be given to the training needs of staff.

## 9. Recruitment and Selection

9.1 The College has an established recruitment and selection policy and HR process that seek to identify individuals who are unsuitable to work with children.

9.2 The College will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with children, young people and adults at risk. The process ensures compliance with guidance issued by the Department of Education, Ofsted, UK employment legislation and appropriate professional bodies e.g. CIPD.

9.3 In line with KCSIE 2024 HR will conduct online searches for any shortlisted candidates. Any relevant information will be shared with the recruiting manager to be explored at the interview. Record of discussion to be recorded on interview template. Potential areas of concern (list not exhaustive):

- Discriminatory posts, language or sharing of discriminatory information.
- Inappropriate images of children or vulnerable adults
- Posts or information shared of a violent and aggressive nature.
- Content that may demonstrate that they pose a transferable risk or are inappropriate to work with children and vulnerable adults.

9.4 All College staff must have a current DBS check. The detailed requirements for DBS checking operated by Human Resources are contained in the DBS Disclosure and Storage Policy and Procedure and cover the DBS requirements applicable to directly employed staff, agency staff, contractors, non-employees (including volunteers), governors and visitors. A risk-based approach is taken to volunteers and other non-employees depending on the frequency of contact with students, level of supervision by the College and nature of the activities engaged in. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

9.5 KCSIE requires for a DBS to only be completed on entry to employment however best practice is the implementation of regular DBS renewals for all members of staff. By August 2023 all staff

will have a new DBS check if their previous check was over 5 years old and by September 2025, all staff will have a new DBS check if their previous DBS is more than 3 years old. Thereafter, all staff will have a new DBS check every three years.

- 9.6 Staff who work in Group wide roles will be risk assessed to identify if their role requires them to update their DBS every three years in line with the London South East Academies Trust Safeguarding Policy.
- 9.7 No member of staff should undertake regulated activity without a DBS check. If not received before the first day of work at a College campus, then a current DBS through a previous employer is acceptable for a period of up to three months and a risk assessment will be undertaken. 'Current' means that the check was completed within the last three years.

## **10 Staff Code of Conduct and Sharing Personal Circumstances**

Staff are expected to read, understand and adhere to the staff code of conduct, reviewing expectations at a minimum at the beginning of every academic year.

As well as safer recruitment checks, it is a requirement for all staff to share if their personal circumstances change that may affect their work and suitability to work with children and vulnerable adults. This includes (but not exhausted to):

- Subject to a police investigation or new criminal conviction
- Open to a section 47 investigation or children in their personal care are open to Child in Need or Child Protection Plan
- A personal situation which may result in their circumstances being a transferable risk to the students they are working with.

Following a member of staff informing Director of HR and/or Deputy Principal Student Experience and Group Safeguarding they will review, and risk assess the potential risk in consultation with the Executive Principal, Chief People Officer, Designated Safeguarding Lead and/or relevant Assistant Principal if required.

## **11. Training Requirements**

- 11.1 New staff will be issued with this policy as part of their induction and prior to taking up post at the College. Additionally, all new staff will be provided with a copy of the latest version of Part One and Annex A of KCSIE 2024 and will be required to undertake a short assessment (with a pass rate of 80%) to check their understanding.
- 11.2 All new staff will be required to undertake specified, online initial awareness raising activities covering safeguarding and the Prevent Duty and confirm that they have done so prior to taking up post and must attend a face-to-face session prior to first day. In exceptional circumstances if this is not possible a risk assessment must take place and training must commence in the first week of employment.
- 11.3 All staff must attend annual refresher safeguarding and Prevent training. In addition, staff will receive updates via email, meetings or bulletins to keep their skills and knowledge up to date.
- 11.4 Compliance with attendance at mandatory training within agreed timescales for both new starters and existing staff is monitored and, in the case of non-compliance, is followed up with managers to ensure that understanding of all staff remains current. Compliance data are reported to the Governing Body via the Annual and Mid-Year Reports.

- 11.5 Training is also a requirement for governors, other regular volunteers/visitors, contractors and external support workers. College training opportunities are also available to some partner organisations e.g. those delivering sub-contracted provision.
- 11.6 All Governors and Trustees will receive safeguarding, including child protection, as part of their induction to their position.
- 11.7 All training is recorded on the Single Central Record (SRC), the centrally held list of all current staff, together with a record of their DBS status, that reference checks have been carried out and that the staff code of conduct has been signed.

## **12. Whistleblowing**

- 12.1 As stated in KCSIE 2024 '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. Appropriate whistleblowing procedures should be in place for such concerns to be raised with the College's Senior Leadership Team'.
- 12.2 If a member of staff, governor, volunteer or visitor has concerns about how a potential or actual safeguarding case is being managed, these should be raised with the central safeguarding team in the first instance. If the person raising the concern is not satisfied with the response and believes there are significant failings in the College's arrangements, then the College's Complaint Policy (which is available on SharePoint) should be consulted. This sets out how to raise a concern firstly within the College and, if necessary, outside the College.
- 12.3 KCSIE 2024 publicises the NSPCC's reporting abuse dedicated helpline. This is independent of the College and 'available 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 by their school or college'. Staff can call 0800 028 0285 – line is available 8:00 AM to 8:00PM Monday-Friday and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **13. Complaints**

- 13.1 Complaints about the handling of safeguarding issues should be sent to the DSL. If the complaint is about the DSL, it will be dealt with via the College's complaints procedure.

## **14. Policy Review**

- 14.1 The effectiveness of this policy will be kept under continuous review in the light of experience and best practice. This will involve consultation with staff, managers, students when appropriate and the Safeguarding Steering Group

The Policy will be subject to annual approval by the College's Governing Body or as necessary substantive changes are required in-year.

## Appendix 1: Staff Code of Conduct

### STAFF CODE OF CONDUCT

London South East Colleges is a key public sector employer in the community and has a responsibility to set standards of excellence in all its operations. High standards of behaviour are vital in the provision of a service that is as public and visible as education.

London South East Colleges expects all its staff to adhere to the following Code of Conduct. It recognises that most of its staff see these standards already as implicit in their professional approach to work. However, breaches of these standards will be dealt with under the College's Disciplinary Policy and Procedure.

- A. To fully comply with all of the College's Policies and Procedures and in particular in relation to the Data Protection Act e.g. unauthorised disclosure of information, Safeguarding, Health and Safety and Equality and Diversity where individuals could be found personally liable by a court of law including Civil and Criminal courts and employment tribunal.
- B. To act professionally at all times including compliance with the College's requirements necessary to achieve the strategic priority of attaining 'Outstanding' status with Ofsted.
- C. To comply with all reasonable management instructions.
- D. To work in a careful, attentive and competent manner, meeting required work and/or professional standards.
- E. To attend work on time and at all agreed working hours, and to notify any absence in accordance with Absence Reporting Procedures, which form part of the College's Management of Sickness Absence Policy and Procedure and Special Leave Policy and Procedure.
- F. When submitting claims for remuneration, expenses or other allowances, these must be true and accurate to the best of the claimant's knowledge.
- G. To take reasonable care to avoid loss of College funds or damage to equipment.
- H. To respect College property, including College's intellectual property and to take care of the working environment.
- I. When using any College's electronic systems and forms e.g. E-mail, telephones, voicemail, College intranet, social media, post and noticeboards in an appropriate manner and for authorised purposes only.
- J. To declare any vested or personal interests which may influence work decisions or be considered to have the potential to do so if known to others.
- K. To maintain appropriate relationships with students, colleagues and management at all times and including outside of normal College operating times.
- L. To be good ambassadors and role models of the College with excellent customer service skills, in all dealings with colleagues, external organisations, stakeholders and agencies.
- M. Employees are individually responsible for their general presentation, which includes wearing clothing that is appropriate to working in a College i.e. smart/professional and complies with our Health and Safety Policies and Procedures. The College does not have a dress code that restricts an employee's clothing or appearance on the basis of gender.

Employee signature:

Date:

Print Name:

## Appendix 2 Contact Information

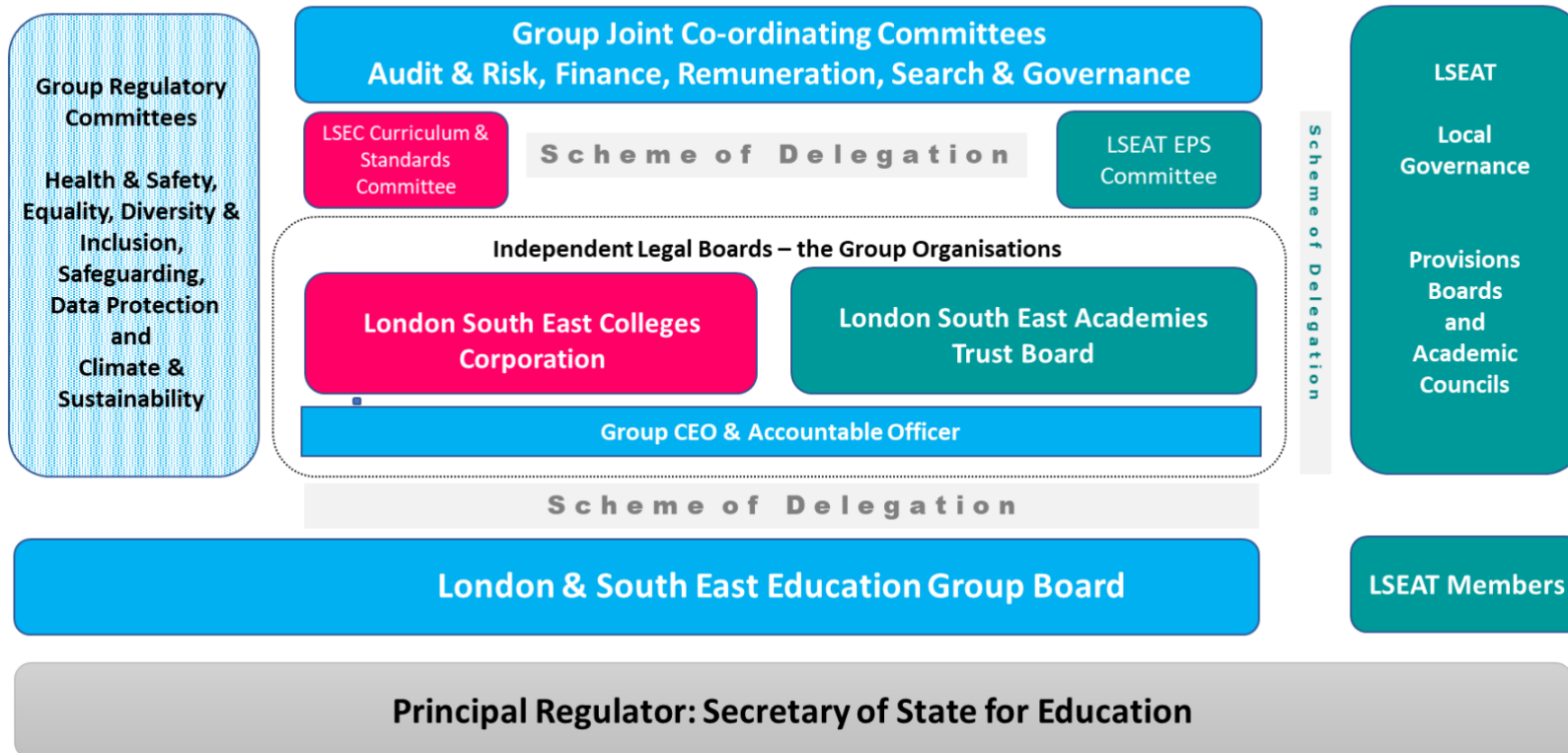
<b>Deputy Principal Student Experience and Group Safeguarding (Strategic responsibility of safeguarding policy, process and practice)</b>	
<b>BETH MOORE</b> <a href="mailto:beth.moore@lsec.ac.uk">beth.moore@lsec.ac.uk</a> / 07498 539276	
<b>Head of Safeguarding and Wellbeing, Designated Safeguarding Lead</b> Responsible for overseeing, developing and monitoring arrangements across all aspects of the College's safeguarding provision/Designated Safeguarding Lead	
<b>SANDRA CHICK</b> <a href="mailto:sandra.chick@lsec.ac.uk">sandra.chick@lsec.ac.uk</a> / 07413 408852	
<b>Designated Safeguarding Lead Nido Volans Lambeth</b> Responsible for the safeguarding at Nido Volans Lambeth campus and works closely with College DSL.	
<b>PERRY VLACHOS</b> <a href="mailto:perry.vlachos@lsec.ac.uk">perry.vlachos@lsec.ac.uk</a> / 020 7326 5890	
<b>SAFEGUARDING MANAGERS &amp; SENIOR SAFEGUARDING OFFICERS:</b> Responsible for the implementation of safeguarding arrangements at the allocated campus / Contribution to duty rotas / Personal caseload / External referral / Provide advice to Safeguarding Officers	
<b>CARALYN BETTS (Bromley campuses)</b> <a href="mailto:caralyn.betts@lsec.ac.uk">caralyn.betts@lsec.ac.uk</a> / 020 3954 4999 / 07413 408715	
<b>SARAH ELKINS (Bromley campuses)</b> <a href="mailto:sarah.elkins@lsec.ac.uk">sarah.elkins@lsec.ac.uk</a> / 020 3954 4465 / 07413 408498	
<b>CARLA CAMPBELL (Bromley campuses)</b> <a href="mailto:carla.campbell@lsec.ac.uk">carla.campbell@lsec.ac.uk</a> / 020 3954 4464 / 07961 664238	
<b>STEPHEN CARNEY (Greenwich and Bexley campuses)</b> <a href="mailto:stephen.carney@lsec.ac.uk">stephen.carney@lsec.ac.uk</a> / 020 3954 4177 / 07413 408770	
<b>VANESSA WHITE (Bexley campuses)</b> <a href="mailto:vanessa.white@lsec.ac.uk">vanessa.white@lsec.ac.uk</a> / 020 3954 5080 / 07535 594647	
<b>LEAD GOVERNORS for SAFEGUARDING:</b> Provides scrutiny and challenge/Attends Steering Group meetings / Represents safeguarding during Corporation business	
<b>ANGELA HANDS (Lead governor for London South East Colleges)</b> Can be contacted via the Clerk to the Corporation. Contact Jane Innes for advice	
<b>JACKY TIOTTO (Lead governor for London and South East Education Group)</b> Can be contacted via the Clerk to the Corporation. Contact Jane Innes for advice.	
<b>LOCAL SAFEGUARDING CHILDREN PARTNERSHIPS/BOARDS AND LOCAL AUTHORITY DESIGNATED OFFICERS:</b> The LSCP and/or LADO should be contacted for advice or to report an allegation against a member of staff. This would generally be by a College DSL, but all staff have the right to raise concerns directly with the LADO, especially regarding possible failings in the College's safeguarding procedures, but only after internal whistleblowing processes have been followed.	
<b>Bexley</b>	LADO – <a href="mailto:LADO@bexley.gov.uk">LADO@bexley.gov.uk</a> / 020 3045 3436 Edward Snelgar
<b>Bromley</b>	LADO – Gemma Taylor Bromley LCSP / 020 8461 7775 / <a href="mailto:lado@bromley.gov.uk">lado@bromley.gov.uk</a>
<b>Greenwich</b>	LADO – Sharon Pearson / 020 8921 3930 / <a href="mailto:Childrens-LADO@royalgreenwich.gov.uk">Childrens-LADO@royalgreenwich.gov.uk</a>
<b>Lambeth</b>	LADO – Andrew Zachariades <a href="mailto:020 7926 4679">020 7926 4679</a> / <a href="mailto:LADO@lambeth.gov.uk">LADO@lambeth.gov.uk</a>
<b>PREVENT</b> The Department for Education has a dedicated telephone helpline (0207 340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>	

<b>LOCAL MULTI-AGENCY SAFEGUARDING HUBS (MASH):</b> To be contacted for advice and when making referrals to Social Care	
<b>Bexley</b>	Children's Social Care / 020 3045 5440 Email: <a href="mailto:childrensocialcare.admin@bexley.gov.uk">childrensocialcare.admin@bexley.gov.uk</a>
<b>Bromley</b>	Children's Referral and Assessment Team / 020 8461 7373 or 7309 Email: <a href="mailto:mash@bromley.gov.uk">mash@bromley.gov.uk</a>
<b>Greenwich</b>	Children's Services / 020 8921 3172 Email: <a href="mailto:mash-referrals@royalgreenwich.gov.uk">mash-referrals@royalgreenwich.gov.uk</a>

## Appendix 3 Governance Structure

The Lead Governor for Safeguarding for LSEEG, in addition to the Lead Governor for Safeguarding for LSEC, has oversight of all safeguarding matters.

### A Social Enterprise Organisation Governance Structure 2021



## Appendix Four Low Level Concerns Form

### Low Level Concern Recording Form

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that:

- is inconsistent with LSEC staff code of conduct, including inappropriate conduct outside of work, and/or
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO (but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary).

<b>Your Name (optional)</b>	
<b>Your Role (optional)</b>	
<b>Date and Time completing the form</b>	
<b>Name of person(s) who the concern is about</b>	
<b>Details of your concern</b>	Why does this behaviour/incident worry you? How many times has it happened? Has anyone else witnessed this? Does the behaviour breach staff code of conduct and how? Have you spoken to them about it? Date and times of concerns.



Completed by Executive Principal/ Deputy Principal Student Experience and Group Safeguarding/ Head of Safeguarding/ Chief People Officer / Director of HR (delete as appropriate)

<b>Name</b>	
<b>Role</b>	
<b>Consultation with LADO</b>	Yes/No (rationale if no) Record summary of LADO conversation
<b>Conversation with staff member</b>	
<b>Actions and Outcomes</b>	