NEW CITY COLLEGE

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*minor adjustments made by

adding

specific reference to SEND

and 14-16 in January 2020

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In terms of this policy, 'child' or 'children' means those under the age of 18 as defined by the Children Act of 1989 and 2004 who are attending a course at the college. A 'vulnerable adult' is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or being exploited.

1. Overview

New City College recognises that it has a moral and statutory duty to safeguard the welfare of children and vulnerable adults who attend the college and prevent any possible abuse. In addition, it has a duty to put the safety and security of all members of the college at the heart of what it does. Staff & students both have a key role to play in this.
The college is committed to ensuring that it:

- Provides a safe environment in which its students can learn and its staff can work.
- Identifies students who are suffering, or who are likely to suffer, significant harm.
- Takes prompt and appropriate action to see that its students are kept safe both in and wherever possible, outside the college.
- Provides appropriate training for all staff and awareness raising for all students.

The college is committed to working closely with all external agencies involved in safeguarding, with particular reference to the Local Safeguarding Children Board, Local Authorities, Social Services and the Police. The college understands the need to co-operate fully with these bodies but accepts that it is not its responsibility to investigate allegations or suspicions of abuse.

The college shall operate in all safeguarding matters with reference and regard to the following;

- Children's Act 1989 and 2004
- Data Protection Act 1998
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Safeguarding Children & Safer Recruitment in Education DCSF 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Children and Families Act 2014
- Prevent Duty Guidance for Further Education Institutions in England and Wales - March 2016
- Vetting and Barring Guidance (ISA) – July 2016
- Children Missing Education September 2016
- Working Together to Safeguard Children February 2018
- Keeping Children Safe in Education September 2019

This policy and procedures should therefore be read in conjunction with:

- Prevent Duty Guidance for Further Education Institutions in England and Wales - March 2016
- London Safeguarding Children Procedures 5th edition 2017
- Working Together to Safeguard Children 2018
- Keeping Children Safe In Education 2019
- College IT Policy
- Student and Staff Code of Conduct
- Staff Disciplinary Policy

2. Safer Recruitment and Selection

The College pays full regard to DfE guidance on Safer Recruitment in Education. It ensures that all appropriate measures are applied in relation to everyone who works in the college e.g. support staff, volunteers and staff employed by contractors. Safer recruitment practice follows government guidelines and includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. Further:

- An Enhanced DBS Certificate (with barred list check) is obtained for **all** new appointments to the college.
- Prohibition checks are carried out for all those involved in teaching work.
- The college maintains a single central record detailing a range of checks carried out on their staff.
- All new appointments to the college who have lived outside the UK are subject to additional checks as appropriate.
- The college ensures supply staff undergo the necessary checks, depending on the agency checks conducted and the activities to be undertaken.
- Identity checks are carried out on all appointments to the college before the appointment is made.
- The selection panel will always include a member of staff who has undertaken safer recruitment training. Where there is not a panel, the person interviewing will have completed the training.

3. Existing Staff:

If there are concerns about an existing staff member's suitability to work with children, the College will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the College moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity will be carried out.

4. Safeguarding Information for Students

The college is committed to ensuring that students are aware of safeguarding issues and how they can best keep themselves safe. All students must be informed that there is a senior member of staff with responsibility for safeguarding, and other members of staff with safeguarding responsibility, and know who they are. Students are informed of whom they might talk to, both in and out of college, their right to be listened to and heard and what steps can be taken to protect them from harm. Guidance to help students know how to keep safe are to be distributed individually and placed on the college website.

5. Partnership with Parents and Carers

The college values the effective communication of its safeguarding stance to parents and carers. The full policy is placed on the college website and relevant information is passed on in communications with parents during the year.

6. SEND

Research shows that students with additional and special educational needs are more vulnerable to abuse, exploitation and other safeguarding concerns. This is because of the way that SEN effects processing, cognition and communication. Students with SEN may have greater need in the areas of

comprehension, communication, weighing up information and making judgements which can leave them open to being taken advantage of.

At New City College we take the safety of our SEN students very seriously. We actively work with them, their families and caregivers to ensure that their comprehension and communication needs are me and students feel safe. Staff use appropriate communication methods and visual resources to remove barriers to disclosure and ensure that students are able to communicate their experiences or concerns. Their main programmes are planned holistically so that alongside their academic and skills development, students also progress in their ability to advocate for themselves and communicate clearly with those around them.

7. 14-16

CHILDREN MISSING IN EDUCATION – 14-16 YEAR OLDS INCLUDING VULNERABLE CHILDREN AND Looked After Children (LAC)

A child missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. A young person (14-16) joining the College must be placed on the admission register at the beginning of the first day of attendance. The register for any young person (14-16) on joining the College must be updated at the beginning of the first day of attendance. Should the young person not arrive at College a plan needs to be put into place and if necessary the local authority should be informed. When a 14-16-year-old young person leaves the College before the completion of the programme of study the Local Authority must be informed immediately. In addition, it may be appropriate to highlight any contextual information concerning a vulnerable young person who is missing education, especially in the case of safeguarding concerns which must be reported.

8. Staff Responsibilities

- All members of staff must develop their understanding of the signs and indicators of abuse and their responsibility for referring any concerns.
- All new members of staff must receive a copy of the college safeguarding and child protection procedures as part of their college induction.
- All members of staff must read Keeping Children Safe in Education 2018, section 1, the Safeguarding Policy and Annex. The safeguarding team will support staff in understanding these key documents and implementing it in their practice.
- All members of staff will be expected to know how to access edition 5 of the London Child Protection Procedures at http://www.londoncp.co.uk/.
- All members of staff must know how to respond to a student who discloses abuse.

9. Types, Signs and Symptoms of Abuse & Neglect

See Annex B for guidance on recognising the types, signs and symptoms of abuse and neglect. This information is compulsory for all staff to read and it will also be available on the college's safeguarding site on Campus. Any queries regarding this document should be directed to the safeguarding team.

10. Procedures in the Event of a Disclosure or Suspicion of Below-Threshold Issues

- All complaints, allegations or suspicions must be taken seriously when there is a possibility that abuse or considerable harm may be involved.

- Staff should remain calm and reassuring throughout any discussions with a student who is disclosing abuse or suspected abuse or issues which may be below the threshold of the definition of abuse.

- Under no circumstances should staff promise complete confidentiality to a student who is declaring abuse or suspected abuse. The staff member should explain that if what the student wishes to say or has said relates to the student's own safety or that of another person, then the staff member will have to inform the college's designated safeguarding officer. (See Annex C – 'Safeguarding and Child Protection Procedures').

When dealing with a disclosure, the following communication and recording method should be followed

Receive

- What is said
- Accept what is said
- Listen without displaying shock or disbelief

Reassure

- The student
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them that they are not to blame – avoid criticism of the alleged perpetrator
- Do not promise that "Everything will be alright now" (it may not be)

React

- Respond to the student but do not interrogate
- Avoid leading questions but ask open ended ones
- Seek clarification from the student
- Explain the next steps.

Record

- Make notes as soon as possible – during the interview if possible
- Use the student's own words – do not assume – ask, e.g. "Please tell me what xxxx means?"
- Describe observable behaviour and appearance
- Do not destroy any original notes – these should be given to the senior manager dealing with the case

Support

- Consider what support needs the student has and make contact with the relevant staff
- Such incidents can be stressful and time-consuming. if dealing with such a situation the member of staff should feel free to speak to a manager, a member of the Senior Management Team (SMT)/Senior Leadership Team or someone from HR or indeed any colleague with whom you feel comfortable discussing the matter
- If necessary, the designated safeguarding officer will take responsibility for the matter and will

take all necessary actions.

** It is strongly recommended that during any disclosure interview you stick to the following line of questioning;

- Name and date of birth of student
- Date, time and location of incident
- Names of people present and relationship (if any) to student
- A description of the incident / events
- Finish by asking the student: is there anything else you wish to tell me?

Dealing with Confidentiality

The staff member will have to inform the college's designated safeguarding officer. However, if the member of staff feels this information should be shared with others they should seek the individual's consent.

Ensure all information shared is Necessary, Proportionate, Relevant, Accurate, Timely and Secure. Ensure any third party or hearsay information is identified and that you have consent to share it.

11. Procedures in the Event Of A Disclosure

Annex C – is the procedure to follow when a disclosure is made. Annex C includes guidance on whether the threshold for referral has been reached.

12. Role of the Designated Safeguarding Lead (DSL) and Assistant Safeguarding Lead (ASL)

The Designated Safeguarding Lead is a member of the College SMT/SLT and is the senior member of staff with overall responsibility for safeguarding in the college. There are also other members of staff dealing with safeguarding (ASL). Referrals to outside agencies should be made by the ASL (see Annex C for Safeguarding and Child Protection Procedure). However, in the event that the ASL is not present, an appropriate manager may make a referral. In very exceptional circumstances, a teaching staff member may make a referral to a relevant agency (e.g. Havering Multi Agency Safeguarding Hub (MASH)). However, this action would only be undertaken in very exceptional circumstances (see Annex C).

The ASL (or relevant person) is responsible for;

- maintaining links with local multi-agency safeguarding agencies
- providing advice, guidance and training for staff on safeguarding issues
- managing agency referrals, such as those made to Social Services and Channel
- maintaining robust records of safeguarding incidents including the actions taken and when the case has been signed off as completed
- ensuring a robust system for monitoring vulnerable students
- being the 'designated teacher' for 'looked after' and 'previously looked after' children (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order)
- holding the contact details of "looked after" students, social workers and the name of the Virtual School Head in the authority who has responsibility for each 'looked after' student.
- holding details of the local authority Personal Advisor that has been appointed to guide and support students who are care leavers and liaising with them as necessary regarding any issues of concern affecting the care leaver.
- providing an annual report to the Corporation on safeguarding issues
- ensuring the college safeguarding policy is known, understood and used appropriately
- reviewing the safeguarding policy at least annually.
- liaising with the nominated safeguarding governor

External organizations who provide services or activities on the college premises
Will be expected to submit details of their safeguarding procedures whilst on site, to the DSL or ASL. Including a policy and records of DBS checks.

13. Training

The ASL are trained to Level 3 standard as are middle managers. All staff will have a general annual basic reminder of key safeguarding issues delivered in teams, at staff conferences or online. It is the responsibility of the ASL to ensure training is delivered.

The ASL will also be responsible for ensuring there are materials aimed at raising student awareness.

14. Role of the College Governing Body

The governing body should ensure that…

- The college has a safeguarding policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request.

- The college operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.

- The college has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures

- A member of the college's Executive is designated to take lead responsibility for safeguarding issues for each of the sites.

- Staff undertake appropriate safeguarding training.

- They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements.

- A governor is nominated to be responsible for liaising with the Local Authority and / or partner agencies in the event of allegations of abuse being made against the Principal.

- They review the safeguarding policy annually.

Governors are subject to DBS checks on appointment and subsequently. Governors are required to undertake safeguarding training. Governors who come into contact with students, for example when visiting curriculum areas, may receive disclosures of abuse or suspected abuse from students. In these circumstances they should follow the safeguarding principles given above for staff, and inform a member of senior management or the campus designated safeguarding officer as soon as possible.

15. Dealing with Allegations of Abuse: Peer-on-Peer Abuse

The college recognises that students are vulnerable to abuse by their peers. There are many forms of peer on peer abuse. It can be physical, emotional, sexual and/or financial and can impact any young person, although the characteristics/experiences of some can be exploited by their peers, making them more vulnerable to abuse than others.
Clearly, peer on peer abuse should never be tolerated or passed off as "banter" or "part of growing up" and such abuse is subject to the same child protection procedures as abuse by adults. While bullying, fighting and harassment between young people are not generally seen as child protection issues, a student's behaviour may be regarded as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

Examples of peer on peer abuse that may be regarded as safeguarding concerns include, but are not limited to, [cyber]bullying, gender based violence, sexual assaults and 'sexting' (for further information, see Annex B).

In any form of peer on peer abuse, if the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

The College procedures to minimise the risk of peer on peer abuse include:

- Vigilance – staff and students have a clear method of making referrals

- Referrals – where concerns about students are raised by staff or other students, these are fully investigated. Where necessary, the college Disciplinary procedure is enacted.

Further details are identified in the Anti-Bullying and Harassment Policy, and Student Disciplinary Procedure.

Staff should not therefore dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.

All staff should

- Be vigilant to peer on peer abuse and be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- Be aware of the added vulnerability of young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children or young people.
- Be aware that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to others.
- Be aware of appropriate actions. Where concerns have been raised regarding [on-line] bullying, fighting and harassment, staff should follow the disciplinary procedures identified in the college's Anti Bullying and Harassment Policy. However, where there are concerns raised or disclosures of abuse (such as, but not limited to, gender-based violence, sexual assaults and 'sexting'), staff should follow the Child Protection Procedure (see Annex C).

16. Dealing with Allegations of Abuse: Students with SEND

Young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

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

In addition to the points raised above, addressing these additional challenges should be undertaken with the support of the SEND staff.

17. Dealing with Allegations of Abuse: Against Members of Staff

Should an allegation regarding the points below be made against a member or volunteer who has for example

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they are unsuitable to work with children

then the following procedures must be enacted;

- The member of staff or person receiving the allegation, or having the concern, will immediately inform the appropriate senior leader.

- The appropriate senior leader on all such occasions will discuss immediately, on the same working day, the content of the allegation with the Local Authority Designated Officer, before taking any further action.
- If the allegation made to a member of staff concerns the senior post holders in the College, the member of staff will immediately inform the Chair of Governors who will consult with the Local Authority Designated Officer (LADO). This must be done on the same working day. If the Chair of Governors is not available, the member of staff must make direct contact with the LADO.
- The LADO will advise on the process to manage the allegation. The appropriate senior leader will take the steps necessary to ensure the safety of the child/adult in question and any other person who is considered at risk (in conjunction with the DSL and/or ASL)

NB: Where a member of staff or volunteer is deemed a serious and immediate risk to themselves or others, the Police will be informed.

18. Enquiries & Investigations

Child protection enquiries by the relevant local authority Duty and Referral Team or the Police are not to be confused with internal disciplinary enquiries by the college. In addition, the college may be able to use the outcome of external agency enquiries as part of its own procedures.

The college should hold in abeyance its own internal enquiries while any Duty & Referral Team, LADO and/or Police investigation proceeds; to do otherwise may prejudice the investigation. Any subsequent internal enquiries should conform to existing staff disciplinary procedures.

If there is an investigation by the Police, the designated senior leader should normally be involved in, and contribute to, the inter-agency strategy discussions. The designated senior leader, is 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. The designated senior leader shall advise the member of staff that s/he should consult with a representative, for example, a trade union.

N.B: If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and college staff are entitled to use 'reasonable force' to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

(see below for further details)

https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

In the event of an investigation against a senior post holder, the designated Governor is 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 senior post holder. The designated Governor shall advise the senior post holder that s/he should consult with a representative, for example, a trade union.

Subject to consultation with the Police and other external agencies, an appropriate member of SMT/SLT (or designated Governor) should:

- Inform the member of staff against whom the allegation has been made of the fact that the investigation is taking place and what the likely process will involve;

- Inform the student making the allegation that the investigation is taking place and what the likely process will involve;

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

- Inform the Chair of Corporation (and/or the designated Governor) of the allegation and the investigation.

An appropriate member of the leadership team or senior designated person (or designated Governor) should keep a written record of the action taken in connection with the allegation if found to be true. This record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Media attention during an investigation of an allegation can add to the problems for the member of staff and may even hinder an investigation. The college should manage all media relations sensitively and appropriately. Any briefings to staff and governors should emphasise the need to avoid media coverage. Staff have some protection under the Human Rights Act 2000 with its commitment to protect "privacy". Advising the member of staff of any early indications of media interest and or coverage is essential.

19. Suspension of Staff

The LADO should be consulted regarding any suspension.

Suspension should not be automatic. In respect of staff other than senior post holders, suspension should be carried out with agreement of the Local Principal. In respect of the Principal, suspension can only be carried out by the Chair of Corporation (or in his absence the Deputy Chair).

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for the purpose of raising a serious matter which may lead to suspension and further investigation. The outcome of any investigation will be recorded on the relevant individual staff file, as well as any action taken.

During the interview the member of staff should be given as much information as possible and in particular, the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to provide the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response although that adjournment may be brief.

If suspension is considered is necessary, the senior leader should inform the member of staff that he/she is suspended from duty. Written confirmation of the suspension, with reasons, should be dispatched as soon as possible and ideally within one working day.

If the Chair or Deputy Chair of Corporation considers that suspension of the CEO and Group Principal is necessary, s/he should be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, should be dispatched as soon as possible and ideally within one working day.

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

Suspension should only occur for a good reason (such as those 'allegations' identified in point 13 above). Suspension may also occur where the member of staff is at risk. For example, if s/he is at risk of further allegations.

Where a member of staff is suspended, the CEO and Group Principal, Local Principal or an appropriate member of the SMT/SLT should ensure that:

- The Chair of Corporation is informed of the suspension in writing.
- Senior Staff who need to know the reason for the suspension are informed.
- The Corporation receives a report that a member of staff has been suspended pending investigation.
- A senior member of staff is a named representative to keep the member of staff who is the subject of the allegation informed of the progress of the case (ensuring any legal proceedings are not compromised). The representative should also consider what other support is appropriate for the individual. This may include support via occupational health for example.
- The parents/carers of the student making the allegation have been informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegations of the suspension.

Where the senior post holder has been suspended, the Chair or Deputy Chair of Corporation will need to take action to address the management of the College.

The suspension should remain under review in accordance with the college's Disciplinary Procedure for Staff.

Depending upon the nature of the allegation, the CEO and Group Principal, Local Principal or an appropriate member of the SMT/SLT should consider whether a statement to the general population of the college should be made, following advice, taking due regard of the need to avoid unwelcome publicity. Any statement should only be made after taking legal, human resources and public relations advice.

20. The Disciplinary Investigation (in the case of a single agency investigation)

The disciplinary investigation should be conducted in accordance with the existing Disciplinary Policy for Staff. The member of staff should be informed of the disciplinary charge against him/her and his/her entitlement to be accompanied or represented by a trade union representative or work colleague. Where the member of staff has been suspended and no disciplinary action is to be taken the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling. The student making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended). The CEO and Group Principal, Local Principal or an appropriate member of the SMT/SLT should give consideration to what information should be made available to the general population of the College.

21. Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Authority Duty & Referral Team in order that other agencies may act upon the information. Following discussions with the LADO and in consultation with the Designated Safeguarding Lead, Assistant Safeguarding Lead and/or the designated Governor, the CEO and Group Principal or Local Principal should:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection 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.

- Consider informing the parents of the young person where the allegation was made by a student other than the alleged victim.

- Prepare a report outlining the allegation giving reasons for the conclusion that the allegation has no foundation. The report should confirm that the above actions have been taken. Where allegations are found to be with 'malicious' intent, records of the allegation will be removed from the staff member/volunteer's personnel file. Any personal targets resulting from the process can be added to the staff member's file.

- Consider initiating disciplinary proceedings against the student(s) making the false allegation in line with the Anti- Bullying and Harassment Policy. Police may be asked to consider if action might be appropriate against the person responsible for the allegation, even if he or she is not a student of the College.

22. Reporting to the ESFA

Where NCC or one of its subcontractors, is subject to an investigation by the local authority or the Police, the Chair of Governors, Principal or DSL will email the ESFA directly at Enquiries.EFA@education.gov.uk. In this instance, the ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the Police.

23. Records

It is important that all documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. All information obtained whilst implementing any part of this procedure will be kept strictly confidential and in accordance with Data Protection legislation on the understanding that should the Police be involved then such records may need to be disclosed by law. If a member of staff resigns before the disciplinary process is completed, he/she should be informed about the college's statutory duty to inform the Secretary of State for Education (NCTL) under the Vetting & Barring Scheme.

24. Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Principal (or Designated Governor in the event of the allegation being made against the Principal), together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from the case that could lead to the improvement of the college's procedures and/or policies. Consideration should also be given to the training needs of staff.

25. Equalities Impact

This policy is annually reviewed by the DSL, SMT/SLT and Corporation. Safeguarding processes and/or updates are provided to the SMT/SLT team half termly and to the Governors at least twice per year.

26. Key Safeguarding Contacts:

Strategic Lead: Paul Wakeling

1. Epping Campus – Lead Safeguarding Officer: Kerry Green

Phil Hall
Ashley Miller
Rachelle Romeo
Deborah Woodall
Victoria Tilehurst
Chesney Simon-Ismael

Kieran Amos

2. Hackney Campus – Lead Safeguarding Officer: Miranda Gaye

Hushna Utim
Francine Corbin
Shuja Ullah
Susan Clark (only on campus one day a week but can be contacted for referrals)
Peter Armah (Executive Safeguarding Committee only – not to appear on the poster)

Mary Sergeant
Cornelius Ademule
Andrew Jordan
Matt Brooks
Pamela Frost

3. Redbridge Campus – Lead Safeguarding Officer: Aaron Balfourth

Ashley Garner
Cara Lynch
Adnan Bukhari
Siobhan Fitsiou
Narzny Khan
Theresa Raffin
Sarah Wall

Bobbi Ehsan
Silvia Faja

4. **Tower Campus - Lead Safeguarding Officer: Christina Ajagbe**

Poplar
Christina Ajagbe
Rachel McLeod

Luthfa Begum
Louise Workman-Dent
Nick Steward*

Jorge Castillo
Fiona Matthews

Arbour

Rabia Khanom
Steve Jinman
Philip Martinez
Nick Steward*
Marie Bootman (Arbour)
Sulliman Peerbacos (Arbour)

*Arbour on a Thursday and Poplar on a Wednesday only

5. Havering Colleges – Designated Safeguarding Lead: Paul Nutter

Ian Budge
Mark Smithers
Jade Blackburn (Staff)

Havering Colleges Sixth Form

Rebecca Harris

Havering Colleges Ardleigh Green

Sandra Shepherd

Havering Colleges Quarles

Sandra Shepherd

Havering Colleges Rainham

Sandra Shepherd

Safeguarding Arrangements 2019-20

Designated Safeguarding Officer

Paul Wakeling

↑

Safeguarding Executive

Paul Wakeling Principal Havering Colleges, Group Deputy Principal NCC & Chair of NCC Safeguarding Executive

Peter Armah - Group Director HR **Georgina Creighton** - Group Director IT Services **Nick Steward** - Senior Student Support Manager

Miranda Gay – Hackney **Aaron Balfourth** – Redbridge **Christina Ajagbe** – Tower Hamlets **Kerry Green** – Epping **Paul Nutter** – Havering

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Campus Safeguarding Leads

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Campus Safeguarding Teams

Hackney **Redbridge** **Tower Hamlets** **Epping Forest** **Havering Colleges**

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Campus staff complete the on line Safeguarding and Prevent Concern Report Form

Ref to Faculty Leader (FL) or member of Safeguarding Team

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.

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

3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's 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

5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

7. **All** staff have a responsibility to provide a safe environment in which children can learn and **all** staff should be prepared to identify children who may benefit from early

help.[3] 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.

8. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 22-33. Staff should expect to support social workers and other agencies following any referral.

9. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

10. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

11. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.[4]

What school and college staff need to know

12. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include:

- the child protection policy;
- the behaviour policy;[5]
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

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[3] Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children.
[4] The Teachers' Standards apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.
[5] All schools are required to have a behaviour policy (full details are here). If a college chooses to have a behaviour policy it should be provided to staff as described above.

13. **All** staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

14. **All** staff should be aware of their local early help[6] process and understand their role in it.

15. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.[7]

16. **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

What school and college staff should look out for

17. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

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

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[6] Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children.
[7] More information on statutory assessments is included at paragraph 28. Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children.

- has returned home to their family from care
- is a privately fostered child

18. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, and examples of safeguarding issues are described in paragraphs 41-51.

19. Departmental advice What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

20. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

21. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

What school and college staff should do if they have concerns about a child

22. If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 13 for a flow chart setting out the process for staff when they have concerns about a child.

23. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

24. Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes;

- an early help assessment;[8] or

[8] Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of Working Together to Safeguard Children.

- a referral for statutory services,[9] for example as the child might be in need, is in need or suffering or likely to suffer harm.

25. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

26. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Early help

27. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

[9] Chapter 1 of Working Together to Safeguard Children sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47.
Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Statutory assessments

28. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

29. The online tool Report Child Abuse to Your Local Council directs to the relevant local children's social care contact number.

What will the local authority do?

30. Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17 of the Children Act 1989
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

31. The referrer should follow up if this information is not forthcoming.

32. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

33. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Female Genital Mutilation mandatory reporting duty for teachers

34. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.**[10] If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. **See Annex A** for further details.

Record keeping

35. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

36. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.[11] Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

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[10] Under Section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

[11] An analysis of serious case reviews can be found at Serious case reviews, 2011 to 2014.

What school and college staff should do if they have concerns about another staff member who may pose a risk of harm to children

37. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (Further details can be found in Part four of this guidance).

What school or college staff should do if they have concerns about safeguarding practices within the school or college

38. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

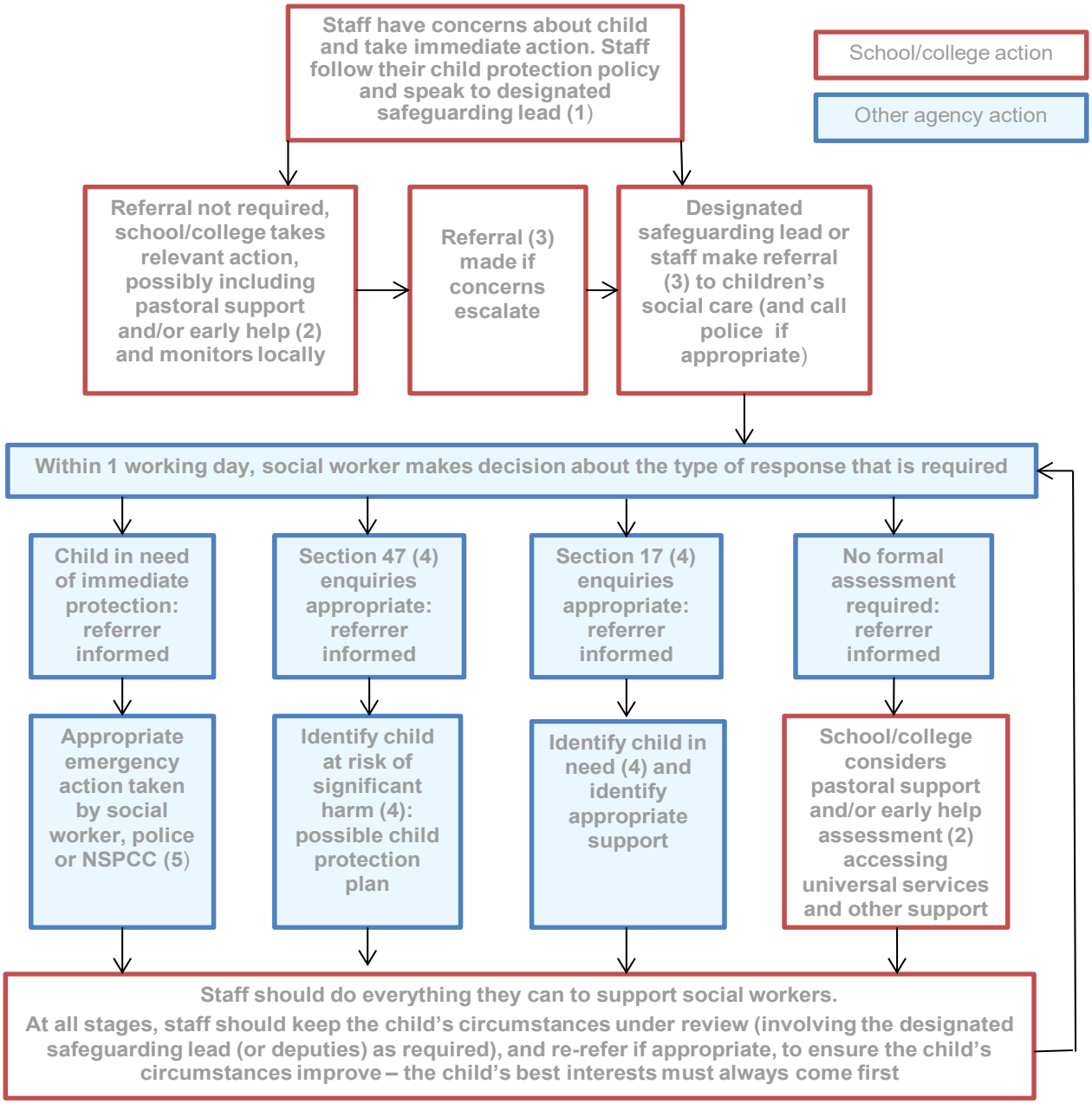
39. Appropriate whistleblowing procedures, should be put in place for such concerns to be raised with the school's or college's senior leadership team.

40. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk[12]

[12] Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Indicators of abuse and neglect

41. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

42. **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

44. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

45. **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 48).

46. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues

47. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

48. **All** staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

49. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

50. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: Contextual Safeguarding.

51. **Annex A** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

Annex B – Types, Signs and Symptoms of Abuse & Neglect

Types of Abuse & Neglect:

These definitions are from "Working Together" (March 2015) and "Keeping Children Safe in Education" (September 2018).

Abuse:

A form of maltreatment of a child/young adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse:

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse:

The persistent emotional maltreatment of a child/vulnerable young adult, such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying / online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse:

Involves forcing or enticing a child/ vulnerable young adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexting:

Sexting is an increasingly common activity among children and young people, where they share inappropriate or explicit images online. This can include sharing indecent images of themselves or others via mobile phones, webcams, social media and instant messaging. Although viewed by many young people as 'normal' and part of 'flirting' or showing confidence through their 'selfies', by sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with permission. There is an increased risk of blackmail, bullying, emotional distress and unwanted attention. Whilst it is usually more common with teenagers, sexting behaviour can impact on younger children, for example, risk taking behaviour or as result of natural curiosity.

Neglect:

The persistent failure to meet a child's/ vulnerable young adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/ vulnerable young adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child/ vulnerable young adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's / vulnerable young adult 'basic emotional needs.

Child Sexual Exploitation (CSE):

Involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. CSE does not always involve physical contact and can happen online. Children who are victims of CSE may often go missing from home, care and education at some stage.

'Honour-Based' Violence:

These are 'crimes which have been committed to protect or defend the honour of the family and/or the community' and includes practises such as breast ironing, forced marriage and FGM. All forms of so-called HBV are abuse and should be escalated as such (KCSE 2018, p.79).

Forced Marriage:

The difference between a forced marriage and an arranged marriage is important to understand. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. Forced marriage is illegal and there are clear Government guidelines on what to do if this is suspected.

If a female Asian student suddenly leaves college or indicates unhappiness at a planned marriage, this must be reported immediately. ***All such cases have to be referred to the Designated Safeguarding Lead (DSL) or ASL and to no-one else.***

Female Genital Mutilation (FGM):

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Any staff member who receives a disclosure from a student that they have been the subject of FGM now has a duty to report the matter to the Police directly. The member of staff must first inform the DSL/Deputy SO, then contact the police.
Concerns about FGM should be taken to the DSL, rather than the police. Under no circumstances should staff physically examine students.

Prevent, Radicalisation and Extremism:

The Prevent Strategy was launched by the Government in 2007 and seeks to stop people becoming terrorists or supporting terrorism. It is also aimed at those in danger of being radicalised either from a religious or political perspective. It is the preventative strand of the Government's counter-terrorism strategy, CONTEST.
The objectives of the Prevent Strategy are to;

- Respond to the ideological challenge of terrorism and the threat from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice & support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

If there are concerns that a student is becoming radicalised or involved in an organisation which could ultimately harm the student and the community, this needs to be reported to the DSL immediately. The college has appropriate links with the borough 'Prevent' Coordinator in instances where referrals are necessary.

Note:
Forms of abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Possible Signs and Symptoms of Abuse

The following 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. Guidance on recognising signs and& symptoms of can be found in Working Together to Safeguard Children 2015. Further, students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for P.E., constant tiredness) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that disabled children are 3 times more likely to experience abuse or neglect than non-disabled peers.

Physical Abuse:

- Unexplained injuries, bites, bruises or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss the causes of injuries
- Untreated injuries
- Disclosure of punishment which appears excessive
- Withdrawal from physical contact/aggressive behaviour
- Arms and& legs kept covered in hot weather (excluding for reasons of cultural dress)
- Fear of returning home
- Fear of medical help
- Self-destructive tendency
- Running away

Emotional Abuse:

- Physical, mental, emotional or developmental lag
- Domestic violence
- Disclosure of punishment which appears excessive
- Over-reaction to making mistakes or fear of punishment
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug or solvent abuse
- Running away
- Compulsive stealing, scavenging

Sexual Abuse:

- Sudden changes in behaviour
- Displays of affection which are inappropriate
- Alleged promiscuity or sexualised behaviour
- Fear of undressing
- Regression to younger behaviour
- Inappropriate internet use and possible 'grooming' concerns
- Genital itching or other genital/anal pain/injury
- Distrust of familiar adult

- Unexplained gifts of money, mobile phones etc.
- Depression and withdrawal
- Apparent secrecy about social activities or the identity of "special friends"
- Wetting or soiling, day and night
- Sleep disturbances or nightmares
- Chronic illness, especially throat infections and sexually transmitted disease

Sexting:

- If a young person feels they don't fit in - often join in because a young person feels that 'everyone else is doing it'
- If in need of attention or if low in self esteem
- Eagerness to explore sexual identity and sexual feelings
- Difficulties in saying 'no' to people, especially if others are persistent.

Neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems or unmet special needs
- Low self-esteem
- Neurotic behaviour
- Poor social relationships
- Deterioration in school performance
- Running away
- Compulsive stealing or scavenging

Child sexual exploitation (CSE):

An imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff should be aware of the key indicators of children/ vulnerable young adult being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing college or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and vulnerable adults who are victims of sexual exploitation do not recognise themselves as such.

The main types of child sexual exploitation are;

1. **Inappropriate relationships:**

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

2. **Boyfriend model:**

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

3. **Organised exploitation and trafficking:**

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Female Genital Mutilation (FGM):

Risk factors of FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin (especially before the summer holidays)
- parents or students who wish to withdraw from discussion about FGM
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- reluctance to undergo normal medical examinations.

- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

Prevent, Radicalisation and Extremism:

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside college
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Other Safeguarding Issues May Include:

- Faith abuse
- Gangs and youth violence
- Gender-based violence / violence against women and girls (VAWG)
- Hate
- Mental health
- Private fostering
- Trafficking

Should you have genuine concerns about these or any other safeguarding issue, please contact an FL or the ASL/DSL.

Reporting Structure for Safeguarding Concerns at Havering College Sixth Form

Safeguarding involves protecting children and young people from maltreatment and taking all steps available to ensure children and young people grow up in circumstances consistent with the provision of safe and effective care.

For the purpose of this document, safeguarding relates to issues involving abuse, severe mental health problems, radicalisation, significant housing or financial issues, criminality or other serious non-curricular concerns. E.g. where a student discloses abuse or there are serious concerns about the health, safety and well-being of a student, the following procedure must be enacted.

If a member of staff has a safeguarding concern regarding a student or a student reports a safeguarding concern to a member of staff - follow this process.

Is this a Safeguarding Issue? → Is the health, safety or well-being of the young person potentially at risk? → Or, is the young person showing early signs of abuse and/or neglect, their needs are not clear, not known or not being met? → If so, it *may* be a safeguarding issue.

If you think it is a safeguarding issue,

- Liaise with student's coach (if appropriate)
- Does the student currently have or need support from an external agency?
- Discuss with your LM and or a Faculty Leader (FL)
- Record on Promonitor (under Confidential Comments) your actions.
- Complete a Safeguarding referral form*[1]

***[1]Completed forms to be emailed to safeguarding@havering-sfc.ac.uk or given in person to Rebecca Harris (Safeguarding Officer), Ian Budge (Assistant Principal) or Paul Nutter (Deputy Principal) – Do not leave on desks or in pigeon holes.**

If the concern raised is not a safeguarding issue, but pastoral or welfare based

Refer to the Coach for additional support*[2]

Updates to be recorded on Promonitor

***[2]Coach can seek advice from:**

Faculty Leaders
Safeguarding site on staff portal
Havering Multi-Agency Safeguarding Partnership Website
The Zone
Lorraine Barnett (College Domestic Violence Champion)
Lesley Bryan (room S7)
Rebecca Harris (Safeguarding Officer, room D20)

Note: If there are any changes in circumstances that raise concerns, the above process may need to start again.

NEW CITY COLLEGE

COVID-19

Guidance for Safeguarding and Child Protection at New City College During COVID-19

1. **Key Contacts**
2. **Context**
3. **Vulnerable students**
4. **Reporting a concern**
5. **New staff or volunteers**
6. **Peer on peer abuse**
7. **Online safety**
8. **Mental Health**
9. **Parents and carers**
10. **Supporting students regarding COVD-19**

NEW CITY COLLEGE

1. Key Contacts

The key Safeguarding contacts for all of our campuses are

For Students

College	Phone	Email
Tower, Hackney, Redbridge and Epping	0208 502 8778	Safeguarding@ncclondon.ac.uk
Havering Sixth Form	01708 514 499	safeguarding@havering-sfc.ac.uk
Havering FE	01708 462 718	safeguarding@havering-college.ac.uk

Police - non-emergency - 101
Childline – 0800 1111
Online support - Themix.org.uk – support for under 25s

For Staff

College	Safe Guarding Lead	Number	Email
Tower	Christina Ajagbe	0207 5107655	Christina.Ajagbe@NCCLondon.ac.uk
Hackney	Miranda Gaye	02076139023	Miranda.Gay@NCCLondon.ac.uk
Redbridge	Aaron Balfourth	02030053600	Aaron.Balfourth@NCCLondon.ac.uk
Epping	Kerry Green	0208 5028781	Kerry.Green@NCCLondon.ac.uk
Havering FE	Sandra Shepherd	01708 462 718	sshepherd@havering-college.ac.uk paulnutter@havering-sfc.ac.uk
Havering Sixth Form	Rebecca Harris	01708 514 499	rebeccaharris@havering-sfc.ac.uk paulnutter@havering-sfc.ac.uk

2. Context

There have been significant changes within New City College and within the UK in response to the outbreak of COVID-19.

This guidance sets out some of the adjustments New City College is making in line with the changed arrangements in the college and following advice from government and local agencies.

The current position is that, following the Government announcement, the majority of our college sites are closed and timetables have been postponed. Vulnerable learners are still attending in small numbers at Tower Hamlets: Poplar and Ardleigh Green.

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

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

3. **Vulnerable students**

Vulnerable students include those who have an allocated social worker and those children and young people with education, health and care plans (EHCPs).

Those who have a social worker include students who have a Child Protection Plan and those who are looked after by the Local Authority. A student may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability. Students in receipt of bursary and free school meals will still receive these paid directly to them via a bank transfer. The College will also be setting up an additional hardship fund to support learners in need.

New City College will continue to work with and support student's social workers to help protect vulnerable students.

We have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker, Looked After Children and those with an EHCP.

For students subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker: contact will be made by the safeguarding team twice weekly with these students in agreement with the family and social worker. Where families have requested this to be once per week, this has been discussed and agreed with the allocated social worker.

For students who are Looked after Children and recent Care Leavers: contact will be made by the College twice weekly as agreed with the student, carer and social worker.

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

For students on the edge of social care involvement or pending allocation of a social worker or identified as high risk: contact will be made by the safeguarding team once per week for a welfare check. The Progress Coach/Coach/Tutor will also be contacting students to ensure the necessary level of support is offered.

Contact will usually be made remotely through telephone calls or other appropriate methods as well as the offer of them attending at Tower Hamlets (Poplar) or Ardleigh Green

14-16 students are being treated as vulnerable students. We are reporting any attendance to the Local Authority daily and those that are distance or online learning are being contacted twice weekly. Free school meals are being provided via vouchers that are issued on a two-weekly basis.

4. Reporting a concern

Staff should continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any learner, whether in college or not.

College	Safe Guarding Lead	Number	Email
Tower	Christina Ajagbe	0207 5107655	Christina.Ajagbe@NCCLondon.ac.uk
Hackney	Miranda Gaye	02076139023	Miranda.Gay@NCCLondon.ac.uk
Redbridge	Aaron Balfourth	02030053600	Aaron.Balfourth@NCCLondon.ac.uk
Epping	Kerry Green	0208 5028781	Kerry.Green@NCCLondon.ac.uk
Havering FE	Sandra Shepherd	01708 462 718	sshepherd@havering-college.ac.uk paulnutter@havering-sfc.ac.uk
Havering Sixth Form	Rebecca Harris	01708 514 499	rebeccaharris@havering-sfc.ac.uk paulnutter@havering-sfc.ac.uk

COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team who will follow appropriate measures in seeking the appropriate and necessary support.

5. New staff or volunteers

All new starters must have an online induction. They must read the college Safeguarding and Child Protection Policy. All new starters or volunteers need to confirm that they have read Part I and Annex A of Keeping Children Safe in Education.

6. Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim measure and similar. When making contact with these families our staff may ask about relationships between students.

7. Online safety

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for online working have been issued (appendix 1).

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

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

Staff can access further guidance here:

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

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

8. Mental Health

Restrictions to movement and contact with other people means students could be more likely to be at risk of mental health problems. The Department for Education have produced guidance to support parents:

https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak

9. Parents and Carers

Students should be engaged in online and/or distance learning.

Parents and carers will receive information about keeping students safe online with peers, the College, other education offers they may access and the wider internet community.

10. Supporting students regarding COVD-19

With a student community of over 20,000, it is a sad fact that some students will be personally affected by illness of those close to them, and in some cases, will be bereaved as a result of covid-related illness.

We of course need to offer our support to any student in this situation as we would with any other loss. While students are not in college to access our support services face to face, our safeguarding team, counsellors and mental health professionals are offering support by phone. If you become aware of any student who is affected in this way, please let the relevant Principal and Safeguarding Lead know immediately (Tower - Christina Ajagbe, Hackney - Miranda Gay, Epping - Kerry Green, Redbridge - Aaron Balfourth, Havering - Paul Nutter). It will then be recorded on the safeguarding log by the Safeguarding Lead and support will be provided.

Ian Budge, Paul Wakeling and the NCC Safeguarding Executive
3rd April 2020

Appendix 1

Online Learning

Staff should use college endorsed systems for online learning.
Staff should not give students their personal number or personal email.

If staff have to use their own phone to contact a student they should conceal their number by using no caller id in their settings or dialing 141 before the main number.

Video conferencing, webinars

Staff may be using video technology to interact with students e.g. Teams and Zoom embedded within Teams.

- Staff should avoid video 1:1s, audio calls are ok but groups only for video,
- Staff should use a college phone or device if they have one, these are monitored.
- Staff should use college software (Teams, Zoom within Teams)
- Staff and students must wear suitable clothing, as should anyone else in the households.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background. Teams has a blur background function.
- Live classes should be kept to a reasonable length of time, young people will also have to respond to their families during this time.
- Language must be professional and appropriate, including any family members in the background.

Chat Rooms and Forums

- Chat rooms and forums in our VLEs or in Teams are very useful for teaching and learning. Staff must monitor these to ensure that comments are appropriate.

Other considerations

- We also need to remember that **not every family is able to afford** the required technology and even if they do, there may not be enough to go around the siblings. Families living in poor housing conditions may have no broadband. The gap between the haves and the have-nots will be noticeable with remote learning. Staff will need to be sensitive to this, college has provided IT equipment where possible for students (these devices are monitored), but staff will need to consider other ways than just video to communicate.
- It is likely that children will be using the internet more than ever in an enforced college closure or period of self-isolation, so **safer internet messages are particularly important.**
- An unknown number of people, including our students, **might well be ill.**
- Children with **autism spectrum** and other learning needs may well find it difficult to accept that work should be done at home - they find ordinary homework difficult to accept. Their levels of anxiety will be higher than usual.
- **Mental Health and counselling services** can still be accessed by students. Students can be advised that for Tower, Hackney, Redbridge and Epping they should call 0208 8502 8778, for Havering Sixth Form they should call 01708

514 499, for Havering College – Ardleigh Green, Quarles and Rainham they should call 01708 462 718

- There are **online resources to support student mental health at** https://www.bacp.co.uk/news/news-from-bacp/2020/13-march-coronavirus- self-isolation-how-to-look-after-your-mental-health-and-wellbeing-if-you-re-self-isolating/

  and

- https://www.bacp.co.uk/news/news-from-bacp/2020/28-february-coronavirus-anxiety-how-to-cope-if-you-re-feeling-anxious-about-the- outbreak/
- Students may talk to you about free school meals, bursary or other welfare concerns. In addition to the safeguarding and counselling numbers above colleges will endeavour to resolve other student queries. Staff can send queries to the appropriate member of staff or students can contact the colleges directly via switchboard or usual email addresses.

Advice may change overtime, currently we do not know how long we will be working in this manner. Updates will be emailed to staff and made available on intranets.

Paul Wakeling
20 March 2020