



**Richmond upon  
Thames College**

Policy Name: Safeguarding and Child Protection Policy

Origination date: September 2021

Last approved:

Effective date: September 2022

Policy Responsibility: Designated Safeguarding Leads at Harrow, Richmond and Uxbridge College

Approved By: Senior Leadership Team, Governors

For Action By: All staff

For Information to: All staff

## Article I. Purpose

The College is dedicated to promoting our values of trust, integrity and excellence to support our students in becoming fully rounded members of society with a strong sense of social and moral responsibility. We prepare our students for life in Modern Britain by developing an understanding of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs and this is reflected in our policies.

The College has a both statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of children<sup>1</sup> and vulnerable adults<sup>2</sup> undertaking education and training. The Safeguarding Policy is one of a range of documents that set out the safeguarding responsibilities of the college (see below). Safeguarding is closely linked to the College Prevent Action Plan in its aim to keep students safe by preventing them from being radicalised, drawn into terrorism or other forms of extremism.

The purpose of the policy:

- To provide protection for the children and vulnerable adults undertaking education and training at Richmond upon Thames College
- To prevent students from being drawn into terrorism or other forms of extremism
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a student in a vulnerable situation may be experiencing, or be at risk of, harm

This policy recognises the 2022 updated version of the Department for Education and Skills statutory guidance document “Keeping Children Safe in Education”, and the welfare of children under the provisions of the Children Act 1989, and Section 175 of The Education Act 2002. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18 and therefore should act as a reference point for all guidance.

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

Safeguarding and promoting the welfare of children covers more than child protection. The requirements for the College are for policies and procedures that cover arrangements not just for meeting the welfare and safeguarding needs of children, but also the needs of vulnerable adults and students who may be at risk of harm or abuse (e.g. forced into marriage, victims of domestic abuse), as well as ensuring appropriate practices for staff recruitment and selection and providing a safe and secure environment in which to study. Schools and colleges and their staff form part of the wider

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<sup>1</sup> For the purposes of this policy, ‘children’ refers to everyone under the age of 18.

<sup>2</sup> The Care Act 2014, which covers England, defines the person who should be subject of a safeguarding enquiry as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

safeguarding system for children. This system is described in statutory guidance [Working Together to Safeguard Children 2018](#).

The College also recognises local safeguarding arrangements as outlined by the London Safeguarding Children Partnership and works in partnership with relevant local safeguarding children partnerships in order to meet statutory responsibilities for safeguarding and promoting the welfare of children.

#### Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable adults, namely:

- Children Act 2004
- Education Act 2002 & 2011
- Equality Act 2010<sup>3</sup>
- Human Rights Act 1998<sup>4</sup>
- United Convention of the Rights of the Child 1990
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018 (including GDPR)
- Freedom of Information Act 2000
- Sexual Offences Act 2003 - Position of Trust
- Protection of Freedoms Act 2012
- Childcare (Disqualification) Regulations 2018
- Counter Terrorism and Security Act 2015

The policy also recognises Government statutory guidance including

- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education September 2022](#)
- [Prevent Duty guidance 2019](#)
- [What to do if you are worried a child is being abused](#)

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<sup>3</sup> Under the Equality Act in the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

<sup>4</sup> Under the Human Rights Act, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and
- Protocol 1, Article 2: protects the right to education. 85.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

- [Information sharing](#)
- [London child protection procedures and practice guidance](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)

All staff must read and understand Part 1 of Keeping Children Safe in Education and confirm with HR that they have done so.

## Article II. Scope

This policy applies to all staff, including senior managers, members of the Corporation, paid staff, volunteers and sessional workers, agency and supply staff, students or anyone working on behalf of the College, franchise partners and sub-contractors, and contractors on site.

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

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

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

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

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

### Section 2.01 Policy Objectives

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

- The college meets its statutory duties in regard to safeguarding, which includes its requirements stated within the Prevent Duty.
- All staff, teaching and non-teaching, are aware of the need to safeguard young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse, neglect, or vulnerability to extremism
- A safe environment exists, where staff and students treat each other with mutual respect and develop good relationships built on trust
- Children and students who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken with the aim of making sure they are kept safe, whether at College, at home or elsewhere.
- Safe recruitment practices exist in checking the suitability of staff and volunteers to work with or in proximity to children and students (other HR policies cover this in more detail).
- Staff are aware of issues relating to the welfare of children and young people.
- All relevant and related policies and procedures comply with this policy and relevant statutory duty.

- The development of effective inter-agency working relationships is supported, especially with Local Authority services.
- To support the development of young people and vulnerable adults in ways that will foster security, confidence, independence and critical thinking skills and to promote these through college activity.

### Article III. Designated Safeguarding Lead (DSL)

The college's DSL will be an appropriate senior member of staff from the college senior leadership team. DSL responsibilities will be explicit in the post-holder's job description. The Governing Body will ensure the DSL has additional time, funding, training, resources and support needed to carry out the role effectively.

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

The DSL may be supported by one or more deputy designated safeguarding leads. Any deputy (or deputies) will be trained to the same standard as the DSL.

The DSL will receive training in child protection issues and Prevent awareness as required by the Local Safeguarding Children Partnership and will receive refresher training at least every 2 years.

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

The DSL is also responsible for ensuring that:

- Advice and support to staff on issues relating to safeguarding and child protection, including e-safety, is provided during term time opening hours.
- A proper record of any child protection referral, complaint or concern is maintained (even where that concern does not lead to a referral).
- Referrals are made to statutory child protection agencies without delay, and working in full cooperation with external agencies as required, i.e. through the Multi Agency Safeguarding Hub (MASH) or Channel programme where there are concerns about abuse or radicalisation, to the Disclosure and Barring Service when a person is dismissed or left due to risk/harm to a child, or to the Police where a crime has been committed
- The College liaises with local authorities and Local Safeguarding Children Partnership and other appropriate agencies.
- The College has effective record keeping and information sharing arrangements, both internally and with external partner agencies, and that information is kept confidential and stored securely.
- The DSL will promote the educational outcomes for vulnerable students, including those with a social worker, by liaising with curriculum staff to identify the challenges the student may face and the support needed.
- Staff receive appropriate safeguarding training and are aware of the College safeguarding and child protection procedures.
- The College returns an annual Section 11 Safeguarding Audit to the Local Safeguarding Children Partnership

The DSL will provide regular reports to the Governing Body of the College setting out how the College has discharged its duties.

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

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

#### Article IV. Allegations of harm or abuse against children

Abuse can happen anywhere, and at any time. A staff member may be the first person that a child or vulnerable adult has discussed the abuse with. The member of staff's response to the person at this stage is crucial.

If a member of staff is told about actual or possible abuse, it is essential that they:

- listen carefully and stay calm
- do not interview the person, merely clarify, in order to be sure that they understand what the person is telling them
- do not put words into the person's mouth or ask leading questions
- make a detailed note of the date, time, place, what the person said and did
- note down any interventions that occurred

Staff should not investigate concerns or allegations themselves but should make a written record and report concerns immediately to a designated Safeguarding Officer. See Appendix 3 for further guidance on responding to a disclosure.

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

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

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

#### Article V. Criminal Record Checks for students

Students are asked to declare any unspent criminal convictions, cautions, reprimands or final warnings, or any prosecutions pending at enrolment. This is part of the College's legal responsibility to provide a duty of care to all staff and students. The declaration of Police involvement allows the College to review the suitability of admission on an individual basis. All students making a declaration will be interviewed by a Safeguarding Officer or Director of Student Experience. Disclosures will be assessed on a case-by-case basis. Please see the Police Involvement Policy for further information.

Should the College become aware of any Police Involvement that was intentionally withheld at enrolment the College reserves the right to review this student's enrolment and if necessary suspend or withdraw the student's place at College.

For cases where a new police investigation occurs during the academic year a risk assessment will be conducted in line with the Police Involvement Policy.

If any criminal activity is suspected, the college reserves the right to involve the Police and pursue such matters through the legal process.

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

#### Article VI. Wearing of Identity Badges

In order to ensure that anyone accessing the College Campus is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided.

All teaching staff are required to check their students' ID badges are worn at the start and at the end of all teaching sessions, and all staff share in the responsibility to challenge any person on the site who is not visibly wearing their college ID badge. This includes apparent visitors, contractors, students and staff.

All visitors are required to sign-in at Reception on arrival where they will be provided with a visitor's ID and are to be collected by the person they have arrived to see. Information on the College's safeguarding arrangements are on display for visitors in reception. Identity badges also have contact information for the safeguarding team printed on the reverse.

#### Article VII. Health, Safety & Wellbeing

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

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

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

Please see the college's Mental Health policy and Admissions policy for further information.

### Article VIII. Recruitment of staff and volunteers

The College will ensure that procedures are in place to ensure that all appropriate checks are carried out on staff and volunteers who have substantial access to children and students, including DBS (enhanced) checks, and that records are kept of such checks. All interview panels will include at least one member of staff who has completed Safer Recruitment training. This process is detailed further in the Human Resources Disclosure and Barring Service Policy and Safer Recruitment & Selection Policy and Procedure.

### Article IX. Staff training and development

The College will provide safeguarding and child protection training for all staff (and Governors). The training will help staff to recognise the signs of possible harm to children and young people.

Contractors and short-term agency staff (e.g supply teachers) will be required to read the document Safeguarding for Agency Staff which is available through HR as part of the on-boarding process.

All staff will receive Level 1 safeguarding training at induction and be provided with regular updates through emails and/or meetings at least annually. Level 2 safeguarding training will also be delivered to staff and refreshed every 3-4 years (either online or face-to-face).

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

All Safeguarding Officers are trained to Level 3 Safeguarding which is refreshed every 2 years.

In addition, workshops, training, guest speakers or events on specific areas of concern in safeguarding, for example knife crime, mental health, and bullying, etc. will be delivered through the college CPD programme to allow staff to build expertise and help shape practice.

### Section 9.01 Reporting and dealing with allegations of abuse made against members of staff

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

### Article X. Online safety

Online safety can be categorised into four areas of risk which staff should be aware of:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.



- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying)
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the [Anti-Phishing Working Group](#)

Staff should be aware of these risks of online safety, and are advised to read the guidance document [Teaching Online Safety in Schools](#).

Many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. All college staff share in the responsibility to protect and educate students and staff in their use of technology and identify, intervene in, and escalate any concerns where appropriate. Any concerns about online safety should be referred to the Safeguarding team following the referral procedure in Appendix 4.

The College will work in partnership with parents and carers to reinforce the importance of children being safe online and to share information and advice for parents and carers about online safety.

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

- Staff will NOT give any student their personal mobile phone number and will only contact the student from a College landline, College mobile or College messaging facility.
- Staff members should not have personal telephone numbers of any student on their mobile phone.
- Communication by email should only be through the College's email system and personal emails must not be shared with students.
- Staff will not communicate with any current or previous students through social media platforms including messaging services such as WhatsApp.
- Online learning will only be delivered through College learning platforms, i.e. Microsoft Teams, Moodle. Staff will not use third party applications such as Zoom to communicate with students during remote learning.
- Staff will ensure that they follow the College's policy about access to and use of the internet.

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

As a safeguarding feature the College has online key word detection software to identify risk for all users that are logged in to the College network, and appropriate filtering and monitoring is in place.

## Article XI. Child-on-child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities are also three times more likely to be abused than their peers.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. If possible, reports should be made with two members of staff present, (preferably one of them being a Designated Safeguarding Lead and a written record **must** be made. When there has been a report of sexual violence, the designated safeguarding lead will make a risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. More advice is available in the government publication [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#).

Staff should be aware of the importance of:

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

#### Section 11.01 Considering confidentiality and anonymity

The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies e.g. a legal basis for doing so. The Designated Safeguarding Lead will consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care;
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim’s wishes against their duty to protect the victim and other children.

#### Article XII. Student Exceptional Travel

If a student is under 18 and needs to be provided with exceptional travel (such as a taxi or ambulance) the parent or carer must be contacted. If the parent or carer is not available to accompany the student, they must be accompanied to their home address in the taxi (unless permission is given as per below) or if an ambulance is called, to hospital by a member of staff. The staffing ratio is 2:1 for accompanying journeys.

If the student is under 18 they may travel in a taxi on their own if necessary. It is good practice to alert a supporting adult (parent or adult friend) of any taxi journeys arranged by the college for a student needing exceptional travel.

All students under 18 need to be accompanied to hospital either by 2:1 staff or a parent/guardian unless permission is given by parents e.g. if the parents plan to travel directly to the hospital. If staff accompany

a student under 18 to hospital the staff must remain with the student until a parent/guardian arrives or permission is given by the parent/guardian to leave.

### Article XIII. Children with special educational needs and disabilities

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

These can include:

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

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

### Article XIV. Whistleblowing policy

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

### Article XV. Support for students and parents

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

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

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

### Article XVI. Monitoring and Review

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

### Article XVII. Appendices to the Policy

- Appendix 1 Specific Safeguarding Issues and Definitions of Abuse

- Appendix 2 Reporting and Dealing with Allegations of Abuse against members of staff
- Appendix 3 Responding to Disclosure
- Appendix 4 Referral procedure for Child Protection cases; Record keeping and sharing information
- Appendix 5 Care-experienced children
- Appendix 6 Apprenticeships
- Appendix 7 Students on school Link programmes, Work Experience Placements or Volunteering
- Appendix 8 Designated safeguarding officers RUTC (Uxbridge College, Harrow College and Richmond upon Thames College)

## Article I. APPENDIX 1 Specific Safeguarding Issues and Definitions of Abuse

Appendix 1 contains information regarding certain specific forms of abuse and safeguarding issues. This is not a definitive guide, but highlights some of the most concerning risks that may affect students at the college. Further information on other forms of harm can be found in Annex B of [Keeping Children Safe In Education](#).

## Article XVIII. Forms of abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

### Section 18.01 Physical abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

### Section 18.02 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 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

### Section 18.03 Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their colleges policy and procedures for dealing with it.

#### Section 18.04 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### Section 18.05 Child-on-child abuse

All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports. All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

#### Section 18.06 Children who are lesbian, gay, bi, trans, questioning, intersex, asexual (LGBTQIA+)

The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+.

Risks can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum in schools (non-statutory in colleges) and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. The LGBT charity Stonewall have produced a guide on [LGBTQ inclusion in Further Education](#) which provides further advice.

#### Section 18.07 Children in families experiencing multiple needs

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

## Section 18.08 Abuse linked to faith, belief and culture (so-called Honour-Based Abuse)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

## Section 18.09 Female Genital Mutilation

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. 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.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

The Home Office [FGM Fact Sheet](#) provides a useful summary of the duty.

## Section 18.10 Forced Marriage

There is a clear distinction between a forced marriage and an arranged marriage.

In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses. This is a lawful process.

In forced marriage one or both spouses do not (or, in the case of some adults with disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, sexual, financial and emotional pressure. Some perpetrators use perceived cultural practices to coerce a person into marriage. Consent is essential to all marriages – only the spouses will know if they gave their consent freely.

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

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

College staff may consult [The right to choose: government guidance on forced marriage](#) for assistance with any reports of potential or confirmed forced marriage and can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

Field Code Changed

### Section 18.11 Concerns that a student may have gone missing

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

Further guidance on children who run away or go missing from home or care is provided in [Statutory Guidance on Children Who Run Away or Go Missing from Home or Care](#).

When a 16 or 17 year old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation or involvement with gangs.

A 16 or 17 year old who has run away may present as homeless. In this case, local authority children's services must assess their needs as for any other child. Where this assessment indicates that the child is a child in need and requires accommodation under section 20 of the Children Act 1989, they will become looked after.

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

### Section 18.12 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### Section 18.13 Concerns of violent extremism

The Counter-Terrorism and Security Act 2015 places specific duties on FE Colleges in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The College's separate Preventing Terrorism & Radicalisation Policy contains more information on the specific duties for all staff and students.

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a safeguarding officer. [Educate Against Hate](#) gives a list of indicators of possible radicalisation.

Under the [Counter-Terrorism and Security Act](#) the College has an obligation to disclose information which might be of material assistance in preventing an act of terrorism to the police.



#### Section 18.14 Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

#### Section 18.15 Child criminal exploitation, or 'county lines'

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Children of any age and sex can be criminally exploited, but the indicators may not be the same and professionals should be mindful that girls are at risk of criminal exploitation too.

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

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing

#### Section 18.16 Serious Youth Violence

The College recognises the dangers of knife crime among young people, particularly as it is London College. It acknowledges the [London Knife Crime Strategy](#) and specifically the sections on protecting and educating young people. It also acknowledges the Ofsted report [Safeguarding children and young people in education from knife crime](#)

## Section 18.17

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

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

- Involvement in gangs or criminal activity
- Those who carry knives for protection
- The College has knife arch metal detectors and hand wands which are used as a deterrent, and intelligence-led searches are carried out when needed.

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

All staff should report any concerns they have regarding the carrying of any offensive weapon or bladed article to security and the safeguarding officers immediately. The College's Screening and Searching for Prohibited Items policy explains the college's protocols for screening and searching for such items in further detail.

It is a crime to threaten or cause harm to a person with a bladed weapon and it is also an offence to carry a knife in a public place, including school and colleges. It is College policy that suspicion or evidence to suggest involvement in serious youth violence will be dealt with by the disciplinary process and police involvement is also likely.

## Section 18.18 Child trafficking and modern slavery

Human trafficking is defined in the UN Protocol (2000) as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern-day slavery, is a crime and safeguarding issue. Examples of industries and services where slavery may involve children and young people are: the sex industry, including brothels; retail: nail bars, hand car washes; factories: food packing; hospitality: fast-food outlets; domestic labour: cooking, cleaning and child minding. Additionally, victims can be forced into criminal activities such as cannabis production, theft or begging.

Children and young people have an increased vulnerability to slavery, e.g. young people being moved internationally or domestically so that they can be exploited; forced labour; verbal or physical threats of violence against them as individuals or their families. Possible signs and indicators that someone is a victim of modern day slavery include:

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

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

## Article XIX. APPENDIX 2

### **ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF**

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

The policy should be followed where it is alleged that anyone working in the college, including supply and agency teachers and volunteers has:

- Behaved in a way that has harmed a child/young person, or may have harmed them
- Possibly committed a criminal offence against or related to a child/young person
- Behaved towards a child/children/young person in a way that indicates he or she may pose a risk of harm to children: or
- Behaved or may behave in a way that may indicate they may not be suitable to work with children/young people.

This policy should be used alongside the Staff Code of Conduct which includes, amongst other things, information about managing low- level concerns, allegations against staff and whistleblowing.

#### **Introduction**

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

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

#### **Receiving an Allegation from a Child**

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

The allegation should be reported immediately to the Designated Safeguarding Lead or deputies, or the Assistant Principal HR & OD. Where the Principal is the person against whom the allegation is made, the allegation should be reported to the Designated Safeguarding Lead or Chair of Governors.

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

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

#### **Initial Assessment by DSL**

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

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

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

- The allegation warrants further investigation by the appropriate authorities i.e. Social Services/Police.
- The allegation represents inappropriate behaviour or poor practice by a member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter will be addressed in accordance with the College disciplinary procedure.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

### **Enquiries and Investigations**

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

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

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

The DSL shall:

- Inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.
- The HR Director shall inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the process will involve.
- In the event of a serious sexual allegation the CEO and Principal shall inform the Chair of Governors of the allegation and the investigation.
- The HR Director shall keep a written record of the action taken in connection with the allegation.

### **Suspension of Staff**

Suspension will not be automatic and will depend on the seriousness of the case. In respect of staff other than the CEO, suspension can only be carried out by a senior post holder. In respect of the CEO

and Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Deputy Chair).

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

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

- Where a child is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

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

Prior to making the decision to suspend, the HR Director and another SLT member may interview the member of staff if appropriate to the investigation.

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

The LADO will be informed of the action taken and the reasons for doing so.

### **The Disciplinary Investigation/ Disciplinary Hearing**

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

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

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

They have permanently removed a person from [regulated activity](#) (which includes teaching, training or instruction, care or supervision of children) through dismissal or permanent transfer from regulated activity (or would have if the person had not left, resigned, retired or been made redundant);

They believe the person has:

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

Should an investigation regarding a member of teaching staff result in dismissal (or the teacher leaves) because of serious misconduct, the College must consider whether to refer the case to the Secretary of

State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

#### **Allegations without foundation**

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

Following consultation, the DSL or the HR Director shall:

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

#### **Allegations against the CEO**

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

#### **Records**

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

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

## Article XX. APPENDIX 3 DISCLOSURE

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

Harm is any behaviour that endangers the well-being of a child or young person and includes (but is not limited to):

- Sexual abuse
- Domestic violence
- Child pornography or prostitution
- Neglect
- Sexual and Criminal Exploitation
- Child-on-child abuse

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

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

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



## Article XXI. APPENDIX 4

### Referral procedure for Child Protection cases

- All reports of Child Protection issues must be referred to the Safeguarding Team as soon as possible after disclosure has been made.
- All referrals should be clearly identified or marked 'Safeguarding' and can be made by email to [safeguarding@rutc.ac.uk](mailto:safeguarding@rutc.ac.uk), by phone on extension 300, or in person to a member of the Safeguarding team. The following procedures refer to safeguarding concerns a student may have about themselves, another student, parents or guardians or any other adults (not including staff which are dealt with in Appendix 2).
- Once the initial referral has been made the designated College Safeguarding Officer will talk to the child or young person and others involved then make a decision regarding further appropriate action.
- The safeguarding officer will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect them. Students will be supported to express their views and give feedback on the service wherever possible.
- If an allegation has been made by one student against another then an investigation will be conducted. The Safeguarding team will oversee any investigations of this nature and reserve the right to suspend students where necessary during an investigation.
- The College's responsibility is not confined to the protection of College students. If any member of staff is made aware of any harm to any child, a referral to the Safeguarding Team should be made.
- In cases which require an external referral (e.g. referral to the Police, the local authority, social services) the DSL or deputies will complete a referral, during which consent will be obtained from both the student and the parent (unless to do so would put the student at increased risk of harm). Students over the age of 18 may decline to consent for parents to be contacted, but this consent may be overruled where to maintain confidentiality would put the student at increased risk of harm (e.g. for students presenting as actively suicidal).
- Student Services officers will provide feedback, where appropriate, on outcomes of cases for staff and students. They will support case conference or core group meeting requests from local authorities and contribute to any Personal Education Plans as requested. All cases will be recorded on the College's Safeguarding register. In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children. In these cases Safeguarding staff will also attend meetings whenever possible and provide advice and guidance to assist staff with these decisions.

### Confidentiality & Sharing Information

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 the 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 (DPA) and UK General Data Protection Regulation (UK GDPR).

Once disclosure and referral have been made the incident should be considered confidential. Staff should only share information without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child in a timely manner.

All information regarding child protection issues will be kept confidential and stored securely.

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

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

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

### **Record keeping**

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

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

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

## Article XXII. APPENDIX 5 Care-experienced children

The College adopts the term 'Care-Experienced' to refer to any student who has experiences of care, including Looked After Children/ Children in Care (the two terms are inter-changeable), Care Leavers, and Previously Looked After Children.

In UK law a child is 'looked after' if they are in the care of the local authority for more than 24 hours.

- The child's parents might have agreed to this – for example, if they are too unwell to look after their child or if their child has a disability and needs respite care.
- The child could be an unaccompanied asylum seeker, with no responsible adult to care for them.
- Children's services may have intervened because they felt the child was at significant risk of harm. If this is the case the child is usually the subject of a court-made legal order.

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

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

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

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

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

We acknowledge that Care-Experienced students often have additional barriers to their educational success and progression.

The College recognises the national underachievement of this group in comparison to their peers. We also recognise that all Care-Experienced students can be especially vulnerable to abuse and exploitation, be at risk of early withdrawal, face different issues and require different levels of support.

### **The College is committed to:**

- Appointing a Designated Member of Staff for Care-Experienced students who has appropriate authority, knowledge and experience to promote the educational achievement of Care-Experienced students.
- Ensuring Care-Experienced students are appropriately supported and aware of the financial support they can receive such as the vulnerable bursary fund.

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

#### **Responsibilities of the Designated Support Officer for Care-Experienced students**

Be an advocate for Looked After Children, Care Leavers.

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

- ensure a smooth and welcoming induction for the students.
- note any specific requirements are logged, including care status.
- ensure PEPs are completed on request.
- ensure if Care-Experienced students are at risk of leaving the course early due to poor attendance or behaviour, that they will be supported in any formal process to confirm appropriate flexibility has been applied.
- ensure accurate and timely data is provided to the Board of Governors to support the collection of full retention, success and progression data.
- co-ordinate support for the identified students and liaise with other professionals as necessary.
- ensure appropriate staff receive relevant information
- ensure confidentiality for individual students and only share personal information on a need-to-know basis.
- provide information to assist planning/review meetings and ensure attendance as far as possible.
- encourage identified students to participate in progression opportunities (such as UCAS applications) and planned extra-curricular activities.
- seek urgent meetings with relevant parties if the student is experiencing difficulties and/or is at risk of early withdrawal.
- to work directly with Care-Experienced students to support them during their education at the College.

#### **Responsibilities of All Staff:**

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

## Article XXIII. APPENDIX 6 Apprenticeships

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

This includes:

- Pre-placement Health & Safety/Risk assessment checks of employers prior to placement of learners on apprenticeships is conducted.
- Verifying workplace's valid Employer Liability Insurance
- Implementing an 'action plan' if a learner is placed with employer in a high-risk placement.
- Quarterly audits to ensure health and safety checks are in place
- Ensuring employers are aware of their contractual duty to fulfil their responsibilities for safeguarding in accordance with relevant legislation and to inform the College of any concerns regarding student safeguarding (including absences).

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

- A learner Induction with focus on Prevent, Safeguarding, Equality, Diversity and Inclusion, H&S in the Workplace etc.
- Specific training on certain equipment, such as high risk machinery may be conducted in workshops, however it remains the responsibility of the employer to ensure safe practice and appropriate training in the workplace.
- Learners are issued with information of who to contact both at the place of employment and the College should they have any concerns for their own safety/ wellbeing.

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

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

## Article XXIV. APPENDIX 7 Students on school Link programmes, Work Experience Placements or Volunteering

### Children on school link programmes

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

- Provide schools with adequate details of provision to enable the school to obtain parental consent for their child to participate. The College will require evidence of this written consent.
- Seek to ensure that for children with special education needs (SEN), the college is informed of the details of the statement that has been agreed, in order to determine the level of support needed.
- Request details from the school of any medical needs or requirements a child may have and agree with the school how the necessary support can be provided.
- Ensure that children are made aware of the general standards of safety with which all children and FE college students should comply.
- Inform the school of any safeguarding issues involving a school link student. Request safeguarding information regarding school link students from schools.

All concerns regarding safeguarding or child protection for students on school link programmes must be referred to a College designated Safeguarding officer and to the Child Protection Officer at the school where the child is on roll (or the child's social worker if the child is not on a school roll).

### 1. Work experience, work placements, and volunteering

The colleges will ensure that work experience placement providers have policies and procedures in place to protect children from harm.

Colleges are not able to request that an employer obtains an enhanced DBS for staff supervising children aged 16 or 17 on work experience<sup>5</sup>. The college will, however, conduct assessments of associated risks to workers under 18 while on work experience placement in proportion to the risk of the placement environment.

For students aged 16 or over on work experience in settings considered to be regulated activity with children, a DBC enhanced check should be requested for the student in question by the employer.

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

For volunteering activity where the college is the main organiser and the volunteering is part of timetabled study then a risk assessment of the event or activity will need to be undertaken. In this case the College's DBS policy and public liability insurance would apply.

Please also see Appendix 6 in relation to Apprenticeships.

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<sup>5</sup> Section 332

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)



## 1.0 UXBRIDGE COLLEGE

### Designated senior staff member for Child Protection

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

### Designated Staff Members for Safeguarding (Safeguarding Officers)

The designated members of staff for safeguarding are:

**Gavin Hughes**, Director of Curriculum, SEND, Safeguarding and Prevent, Room E105, Uxbridge, Telephone: 01895 853545, email: [ghughes@uxbridgecollege.ac.uk](mailto:ghughes@uxbridgecollege.ac.uk)

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

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

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

**Liam Plumridge**, Section Manager Business Uxbridge College  
Telephone: 01895 853591 | [lplumridge@uxbridgecollege.ac.uk](mailto:lplumridge@uxbridgecollege.ac.uk)

**Shelley Cawley** Learning Resource Centre Manager Uxbridge/Hayes  
Telephone: 01895 471137 | [scawley@uxbridgecollege.ac.uk](mailto:scawley@uxbridgecollege.ac.uk)





## 2.0 HARROW COLLEGE

### Designated senior staff member for Child Protection

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

### Designated Staff Members for Safeguarding (Safeguarding Officers)

The designated members of staff for safeguarding are:

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

**Joanne Whitehead**, Student Support Manager,  
Telephone: 0208 909 6327, Email: [jwhitehead@hcuc.harrow.ac.uk](mailto:jwhitehead@hcuc.harrow.ac.uk)

**Sandie Petrie**, Student Support Officer  
Telephone: 0208 909 6000, Email: [spetrie@hcuc.harrow.ac.uk](mailto:spetrie@hcuc.harrow.ac.uk)

**Mary-Ann Allison**, Skills Centre Department Administrator  
Telephone: 0208 909 6414, Email: [mallison@hcuc.harrow.ac.uk](mailto:mallison@hcuc.harrow.ac.uk)

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

**Adebayo Bright**, Behaviour and Rehab Assistant,  
Telephone: 0208 909 6302, Email: [abright@hcuc.harrow.ac.uk](mailto:abright@hcuc.harrow.ac.uk)

**Christina Quinlan**, Heath & Social Care Administrator  
Telephone: 0208 909 6125, Email: [cquinlan@hcuc.harrow.ac.uk](mailto:cquinlan@hcuc.harrow.ac.uk)

### 3.0 RICHMOND UPON THAMES COLLEGE

#### Designated senior staff member for Child Protection

The Designated Safeguarding Lead (DSL) with lead responsibility for child protection and safeguarding issues is Rachel Scarborough, Director of Student Experience, Telephone 0208 607 8300, Email: [safeguarding@rutc.ac.uk](mailto:safeguarding@rutc.ac.uk)

All designated staff (with the exception of the Designated Corporation Member for Safeguarding) can be contacted on the College's dedicated safeguarding email and the telephone line as below:

**Email: [safeguarding@rutc.ac.uk](mailto:safeguarding@rutc.ac.uk)**

**Telephone: 0208 607 8300**

**Base room: G31**

Names and individual contact details of Designated Officers, including the Designated Corporation Member for Safeguarding, are given below:

Designation	Post Held	Name	Telephone/ Contact
Lead Designated Safeguarding Person and Child Protection Manager	Director of Student Experience	Rachel Scarborough	0208 607 8300
Prevent Lead	Director of Student Experience	Rachel Scarborough	0208 607 8300
Allegations against or concerns about staff	Assistant Principal HR & OD	Alison de Lord	07415 5648489
	Acting Principal & CEO	Jason Jones	07415 631373
Practitioners	Safeguarding Team Leader	Cait Orton	020 8607 8150
	Student Engagement and Equality Lead	Beth Pattison	020 8607 8214
	Welfare & Engagement Advisor	Megan Ball	
	Welfare & Engagement Advisor	Lorna Edwards	
	Welfare & Engagement Advisor	Simon Walker	
	Student Liaison Manager	Michael Clifford	020 8607 8044
	Attendance, Engagement and Outreach Lead	Tina Ball	0208 607 8005

	College Counsellor	Melanie Fox	Counselling@rutc.ac.uk
Allegations against the Principal	Governor	Vincent Neate	Sarah Connerty, Interim Governance Advisor 07926516918  Ext 242

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

- Report to the senior member of staff with lead responsibility.
- Will know how to make an appropriate referral.
- Will be available to provide advice & support to other staff on issues relating to child protection.
- Have particular responsibility to be available to listen to children and young people studying at the College.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in safeguarding issues and inter-agency working, as required by the LSCP and will receive refresher training at least every 2 years.
- In addition to working with the designated safeguarding officers all staff members should be aware that they may be asked to support social workers to take decisions about individual children.