



**Richmond upon
Thames College**

Policy Name: Child and Vulnerable Adult Protection Policy

Policy Number/Version No: V1

Effective Date: 01 September 2020

Review Date: 31 August 2021

Policy Responsibility: Deputy Principal and CEO Curriculum and Quality

Approved By: Governors

For Action By: All College staff and students

For Information to: All College staff, students and parents/carers, visitors and contractors

Safeguarding and Child Protection Policy Statement

1. Scope and Purpose

Richmond upon Thames College is dedicated to promoting our values of honesty, integrity, mutual respect and personal accountability 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.

Richmond upon Thames College has a both statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of children and vulnerable adults undertaking education and training. The Child and Vulnerable Adult Protection 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 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.

Safeguarding is defined for the purposes of this policy as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

The College recognises that:

- The welfare of all students is paramount, as enshrined in the Children Act 1989 and Care Act 2014
- All students regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Safeguarding children, young people and vulnerable adults is everyone's responsibility and all adults in our college have a full and active part to play in protecting our students from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a young person is at risk of harm.
- Providing an environment in which young people feel safe, secure, valued and respected, promotes their health and development. Young people in our college feel confident to, and know how to approach adults if they are in difficulties.
- It is better to help children and vulnerable adults as early as possible, before issues escalate and become more damaging
- Working in partnership with children and vulnerable adults, their parents, carers and other agencies is essential in promoting children's and vulnerable adult's welfare

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 1989
- Children Act 2004
- Education Act 2002 & 2011
- 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
- Government statutory guidance
 - [Working Together to Safeguard Children July 2018](#)
 - [Keeping Children Safe in Education September 2020](#)
 - [Prevent Duty 2019](#)
 - [What to do if you are worried a child is being abused](#)
 - [Information sharing](#)
- [London child protection procedures and practice guidance](#)

¹ For the purposes of this policy, 'children' refers to everyone under the age of 18.

² 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.

We will seek to safeguard and promote the welfare of children and vulnerable adults by:

- Valuing them, listening to and respecting them
- Adopting safeguarding practices through procedures and a code of conduct for staff and volunteers
- Developing and implementing an effective e-safety strategy and related procedures
- Developing and implementing an effective Prevent strategy and related procedures
- Developing and implementing effective safeguarding strategies for remote learning
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information and good practice about child protection with students, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know and involving students and parents appropriately
- Providing effective management for staff, including agency and supply, and volunteers through supervision, support and training
- Promoting our policies and values to make it clear that ours is a tolerant and welcoming community for all learners
- Educating and supporting students to fulfil their potential and be successful in their future lives
- Fostering positive relationships with police and community partners and working in partnership to promote British values and to enable students to engage successfully with their communities and to engage with, rather than marginalise extreme political views
- Encouraging and developing learners' resilience and critical thinking skills to challenge and debate in an informed way, through our teaching, learning and assessment strategies.
- Equipping staff with the knowledge of possible signs / indicators of concern with regards to extremist opinions, how to deal with these and challenge them effectively and / or refer through key reference and support channels
- Equipping staff with the knowledge of possible signs / indicators of concern with regards to grooming and recruitment, how to deal with these and / or refer through key reference and support channels
- Facilitating staff to develop and share teaching, learning and assessment strategies around resilience, e-safety and critical thinking skills as appropriate
- Equipping staff with the skills to recognise signs/indicators of risk and harm including physical, emotional, sexual abuse, neglect and other forms of abuse.

We are committed to reviewing our policy and good practice annually.

Related Policies

- Anti-Bullying Policy
- Staff and Student E Safety Policies
- Equality, Diversity and Inclusion Policy
- Safer Recruitment and Selection Policy and Procedure
- Staff Code of Conduct
- Admissions Policy
- Tutoring Policy
- Student Substance Misuse Policy
- Mental Health Policy
- Learning Difficulty and Disability Policy
- External speaker procedure

1.1 Named staff with designated responsibility for Safeguarding, Child Protection and Prevent

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

Telephone: 0208 607 8300

Base room: G14

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	Deputy Principal and CEO (Curriculum and Quality)	Jason Jones	07415 631373
Prevent Lead	Deputy Principal and CEO (Curriculum and Quality)	Jason Jones	07415 631373
Allegations against or concerns about staff	Assistant Principal Human Resources and Organisational Development or Principal	Alison de Lord	07415 5648489
		Elaine McMahon	
Practitioners	Student Services Manager	Deborah Stephenson	07415 240800
	Safeguarding and Equalities Officer	Cait Orton	07983 523096
	Student Engagement and Welfare Team Leader	Hope Stubbings	07548 706406
	Welfare & Engagement Advisor	Nichole Anthony	07415 240776
	Welfare & Engagement Advisor	Lorna Edwards	
	Student Liaison Manager	Ged Boyer	07825 021382
	College Counsellor	Melanie Fox	Counselling@rutc.ac.uk
	Student Services Officer	Rhian Whitty	Rhian.whitty@rutc.ac.uk
Allegations against the Principal	Governor	Vincent Neate	Sarah Connerty, Interim Governance Advisor 07926516918

Safeguarding Procedures

2. Responsibilities

All members of the College community, including staff, governors, students and contract and agency/supply staff, are responsible for safeguarding and promoting the welfare of children and vulnerable adults, and must consider, at all times, what is in their best interests.

2.1 All staff, including agency/supply staff and volunteers

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. Staff will be trained to understand their responsibilities. All staff should be able to identify young people who may benefit from early help. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. New employees will receive initial training through the induction process.

All staff must comply with the following responsibilities:

- attend safeguarding training every three years or sooner subject to changes in the statutory guidance
- familiarise themselves with the Child Protection and Vulnerable Adult Policy and associated policies and procedures
- safeguard and promote the welfare of children and vulnerable adults
- alert a Designated Safeguarding Lead if they have concerns about a child or vulnerable adult
- ensure they follow the Staff Code of Conduct as outlined in the Staff Disciplinary Policy

All staff must read and understand Part 1 of Keeping Children Safe in Education and confirm that they have done so. If a DSL is not available any staff member who has a concern about a child's welfare should follow the referral processes set out in paragraphs 41-53 of KCSIE. Staff should expect to support social workers and other agencies following any referral.

Staff should be aware that whilst all young people may suffer abuse certain students may be at greater risk of harm due to their life circumstances. Previous experiences or mental health problems may mean they are more vulnerable to poor outcomes due to barriers to learning. Students who may be more vulnerable are:

- Young people with a social worker (Children in Need and those with Child Protection Plans)
- Young people requiring mental health support
- Young people who are looked after or who have previously been looked after
- Care Leavers
- Children with Special Educational Needs and Disabilities (SEND)

Where staff identify that a student falls into one of these categories the Designated Safeguarding Leads should be informed so that an assessment can be made and support offered to address and potential barriers.

2.2 Designated Safeguarding Leads and Officers

The College's safeguarding arrangements are overseen by the Deputy Principal and CEO (Curriculum and Quality), supported by the Head of Student Experience, Safeguarding and Equalities Officer, Student Liaison Manager and Student Engagement and Welfare Team Leader who manage operational delivery.

Designated Safeguarding Leads and Officers act as the College's source of support, advice and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend specific lead training as appropriate, liaise with the Head of Student Experience, senior staff and other College departments where necessary, and make referrals to external agencies. Other aspects of their role include:

- obtaining information from staff, volunteers, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information
- assessing information quickly and carefully and asking for further information where appropriate
- consulting with relevant local safeguarding children partnerships and adult safeguarding teams, to clarify doubts or worries and ensure consistency and integrity of local processes

- making referrals to statutory child protection agencies, i.e. through the Multi Agency Safeguarding Hub (MASH) or the Police without delay, and working in full cooperation with external agencies as required
- ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings where required, contribute to assessments and provide a report, where required, which has been shared with the parents and young person (depending on age).
- maintaining secure, confidential appropriate records of any safeguarding referral, complaint or concern (even if that concern does not lead to a referral).
- Ensure that records are kept securely for the appropriate period of time
- Indicating there is a safeguarding concern to staff on the student's Pro-monitor record using risk indicators
- 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. The Safeguarding and Equalities Officer will be the Designated Member of Staff for Care Experienced students.
- ensuring that parents of children within the College are aware of the College's Child Protection and Vulnerable Adult policy
- working with external agencies and organisations including Prevent Leads to ensure students are kept safe
- working with Human Resources to ensure that staff receive basic training in child protection issues and are aware of the College safeguarding procedures.

Additionally, the Designated Safeguarding Leads will:

- Undertake multi-agency (Level 3) safeguarding training with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually
- convene regular operational and Strategy meetings to ensure coherence, integrity and monitoring of processes relating to the safeguarding of children and vulnerable adults
- work closely with the Assistant Principal Human Resources and Operational Development to ensure that policies and procedures comply with legislation
- work with local Youth Offending Services and Probation Services to ensure that applications from offender learners are risk assessed
- Ensure that the Child Protection and Vulnerable Adult Protection Policy is presented to the Corporation for approval annually
- provide an annual report to the Corporation of the College setting out how the College has discharged its duties.
- alert the Principal and the Corporation to identified deficiencies in procedure or policy at the earliest opportunity.

The Deputy Principal and CEO (Curriculum and Quality) will retain ultimate lead responsibility for the College's arrangements and the procedures for handling individual cases.

2.3 The Principal:

The Principal is responsible for ensuring that:

- the College's Safeguarding policy and procedures are fully implemented and followed by staff
- Designated Safeguarding Lead and deputies have sufficient time, training, support and resources to carry out their roles effectively
- all staff feel able to raise concerns about the safety of children and vulnerable adults, including poor and unsafe practice
- such concerns are dealt with sensitively, effectively and in a timely manner in accordance with whistleblowing procedures
- Governors and staff receive regular safeguarding training and updates
- systems are in place for young people to express their views and give feedback which operate with the best interest of the child at heart
- Students are provided with opportunities through the curriculum to learn about safeguarding, including keeping themselves safe online
- They liaise with the local authority designated officer (LADO) within 24 hours, before taking any action and then on an ongoing basis, where an allegation is made against a member of staff or volunteer

2.4 The Governing Body:

As set out in Keeping Children Safe in Education 2020, College Governors are responsible for ensuring that:

- The College complies with its duties under the legislation
- An appropriately senior 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 web-site
- Arrangements are in place for children who go missing from education
- The College contributes to inter-agency working in line with the statutory guidance (Working Together to Safeguard Children 2018)
- 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
- that 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

2.5 Contractors working at College sites:

Contractors undertaking work at College sites are required to:

- Conform to the College's Health and Safety and Safeguarding requirements
- Agree with the College's requirements for briefing contractor's staff. This will depend on the nature, location and duration of the work
- Contractors will be given a yellow coloured lanyard

3. Safe recruitment of staff

The College adheres to its "Safer Recruitment & Selection Policy and Procedure".

4. Staff development and training

All staff and workers who come into direct contact with learners must undertake initial training on the subject of safeguarding and the College's procedures and attend a refresher session at least every three years.

Within the College's Induction booklet, it is made clear that all new starters must complete the on-line Safeguarding training within 2 weeks of commencing employment and the on-line Chanel programme/ Prevent, Equality and Diversity, Health & Safety Induction and Fire Safety training within 4 weeks at the College. The induction booklet sign-posts to all relevant College policies and procedures and includes a copy of the latest available version of 'Part One: Safeguarding Information for all Staff' as appearing in Keeping Children Safe in Education 2020, and will be asked to indicate that they have read and understood its contents.

All existing staff have completed mandatory Safeguarding and Prevent training, most recently to Safeguarding Level 2, with refreshers annually during CPD days.

In addition, staff will receive regular updates via email, meetings and/or bulletins to keep their skills and knowledge up to date.

All Designated Safeguarding Leads will undertake training on inter-agency working and refresher training at least every two years, to keep their knowledge and skills up to date. The Lead Governor will also undertake inter-agency training.

5. Monitoring and review

The implementation of this policy will be monitored by the following groups and key staff:

- The College Leadership Team – via reports to CLT meetings
- Corporation – via the Annual Report
- Curriculum, Quality and Standards Committee on behalf of the Corporation
- Deputy Principal and CEO (Curriculum and Quality) – via operational meetings
- Safeguarding Team – via operational meetings and the Safeguarding Strategy Group

The policy is reviewed annually by the Corporation.

Policy review, change and approval history:

Last review: September 2020

Next review scheduled: August 2021

Safeguarding Policy: Appendix 1 - Types of Abuse and Neglect

All 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.

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 (e.g. via the internet). 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. 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 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 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.

Sexual abuse

Involves forcing or enticing a child 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.

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 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.

Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological

impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Witnessing domestic abuse is itself a form of abuse.

Additional/Specific Forms of Abuse

Peer on Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not be limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should also be aware that behaviour linked to such as drug taking, alcohol abuse, truanting and sexting put children in danger. The College deals with peer-on-peer abuse with the same importance as other safeguarding issues by drawing on, for example, the Anti-Bullying Policy and Student Disciplinary Procedures as necessary.

Cyber-Bullying

"Cyber-bullying" is when a child is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another child using the Internet, interactive and digital technologies or mobile phones. It has to have a minor on both sides, or at least have been instigated by a minor against another minor. Once adults become involved, it is plain and simple cyber-harassment or cyber-stalking.

Child on child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate

Staff should refer to: Sexual Violence and sexual harassment between children in schools and colleges (DfE, May 2018) for further advice and guidance

Youth produced sexual imagery (Sexting)

Youth produced sexual imagery (YPSI) is the sharing of sexual images of themselves and others and will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Serious Violence

All staff should be aware of indicators, which may signal that students are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children

have been approached by, or are involved with, individuals associated with criminal networks or gangs. Staff should refer to statutory guidance and: Preventing Youth Violence and Gang Involvement (Home Office 2015) for advice.

Abuse of Trust

All staff need to know that inappropriate behaviour with or towards children is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for a person over 18 (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if he/she does not teach the child.

Forced Marriage

A forced marriage takes place when the bride, groom or both do not want to get married but are forced to by others, usually their families. People forced into marriage may be tricked into going abroad, physically threatened and/or emotionally blackmailed to do so.

Female Genital Mutilation (FGM)

Female genital mutilation comprises of all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons. There are 4 types of FGM, ranging from a symbolic prick to the vagina to the fairly extensive removal and narrowing of the vagina opening.

Honour based abuse

Honour based abuse, including 'honour killings', is a type of abuse that is carried out in communities that have strong perceptions of 'honour' and 'shame'. Individuals may be seen to bring shame onto the family if they behave, or it is rumoured that they have behaved, in a way which the family or community disapproves of. This may include having a 'non-arranged' relationship, having a relationship with someone of a different faith, dressing inappropriately, refusing an arranged marriage, leaving a marriage or being gay.

The concept of honour and shame leads families to perpetrate honour based violence such as keeping victims locked in the house, sending them abroad, forced marriage, assaults and ultimately murdering them - which is called honour killing. Speaking out against honour based violence is extremely difficult as the perpetrators are more often than not the victim's extended family and loved ones, who they do not wish to feel the force of the law.

Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. (please see Appendix 7)

Financial abuse

Money can be a very powerful method for a perpetrator to exert control. But what is financial abuse. Financial abuse may include: Taking money from the person; not allowing them access to shared money; making them account for everything spent; making them beg for money; causing them to lose, or forcing them to give up, employment; forcing them to commit crimes for money; not allowing them to buy necessities, for themselves or their children, including sufficient food; withholding of child maintenance. Financial abuse can also be when the perpetrator is spending money needed to maintain the home on themselves and may continue after a relationship has ended.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- young people who appear with unexplained gifts or new possessions;

- young people who associate with other young people involved in exploitation;
- young people who suffer from changes in emotional well-being;
- young people who misuse drugs and alcohol;
- young people who go missing for periods of time or regularly come home late; and who regularly miss school or education or do not take part in education.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. Further guidance can be found at Home Office (2018) *Criminal Exploitation of Children and Young Adults: County Lines*

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

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 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 slavery helpline on 0800 0121 700.

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.

Safeguarding Policy: Appendix 2 - Possible Signs & 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 & symptoms of can be found in Part A, Chapter 1. Section 1.1 of London Child Protection Procedures (2016). Also Students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for physical activities, constant tiredness) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that disabled young people are 3 times more likely to experience abuse or neglect than non-disabled peers.

Physical Abuse

- Unexplained and so called “accidental” injuries, burns or bruising
- Improbable excuses or refusal to explain injuries
- Refusal to undress for physical activities
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted

Emotional Abuse

- Physical, mental and emotional development delays
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual attention seeking behaviour
- Extremes of passivity or aggression

Sexual Abuse

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Itchy or pain in the genital area
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Neglect

- Constant hunger
- Poor personal hygiene, poor state of clothing
- Constant tiredness
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Stealing food/money
- Poor college attendance
- Compulsive attention seeking

Safeguarding Policy: Appendix 3 - Protecting Students from Abuse

Procedures

The College follows the London Child Protection Procedures as operated by the relevant Local Safeguarding Children Boards and takes account of guidance issued by the Department for Education to:

- Ensure the College has a designated senior person for child protection who has received appropriate training and support for this role. This will be a senior manager of the College.
- Ensure there is a nominated governor responsible for child protection.
- Ensure every member of staff (including temporary and supply staff and volunteers) and the Corporation knows the name of the designated senior person responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse including extremism and radicalisation and responsibility for referring any concerns to the designated senior person or the nominated person responsible for child protection.
- Ensure that parents have an understanding of the responsibility placed on the College and staff for child protection by publicising these obligations.
- Notify children's social care if there is an unexplained absence of a child who has a child protection plan.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences and local networks.
- Keep written chronological records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, separate from the main Student file, and in secure locations.
- Follow local authority procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

Detailed advice for the guidance of College staff appears as Appendix 4.

Forms of Abuse

The statutory guidance for schools and colleges defines four types of abuse: physical, emotional, sexual and neglect.

These and additional definitions of different aspects of safeguarding are defined in Appendix 1 and a list of the signs and symptoms of abuse appears as Appendix 2 to this policy.

Dealing with a disclosure of abuse

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 child, merely clarify, in order to be sure that they understand what the child is telling them
- do not put words into the person's mouth
- 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 report them immediately to a Designated Safeguarding Officer. A reporting procedure appears at Appendix 4 and detailed procedures for the management of disclosures/allegations appears as Appendix 5.

However, please note that anybody can make a referral directly to children's or adult services, especially if there is a risk of immediate serious harm to a child or vulnerable adult, including when they feel that their concerns are not being adequately addressed.

Contacting a Designated Safeguarding Officer

Anyone who suspects that abuse is taking place inside or outside the College setting, or to whom a student discloses issues relating to safeguarding, should contact one of the Designated Safeguarding Officers immediately. Contact information can be found on the staff VLE, is available at Reception and on the rear of all college ID cards.

All staff to whom a learner discloses issues that may be related to safeguarding must keep written records of concerns. Such records will be retained or saved electronically, securely and separate from the main student files.

The Designated Safeguarding Leads will develop effective links with relevant agencies and co-operate as required with any enquires regarding child or vulnerable adult protection matters, including contributing to case conferences.

What to do if you witness abuse

If a member of staff directly witnesses abuse any immediate action should be determined by the circumstances, the possible consequences on any delay whilst assistance is requested and the need for the member of staff to have due regard for their own safety.

When the incident concludes the member of staff should stay with the 'victim' until he/she can be left in the care of another responsible adult and the incident should then be immediately reported to a Safeguarding Officer, or Security or the line manager, as appropriate. Notes of the incident should be made, dated and signed. See the Safeguarding Reporting Procedure appearing as Appendix 4.

Online Safety Including Use of social media and technology

The College understands that the use of technology has become a significant component of many safeguarding issues. In child sexual exploitation, radicalisation and sexual predation, for instance, technology often provides the platform that facilitates harm.

There are three areas of risk:

- Content – being exposed to illegal, inappropriate or harmful material
- Contact – being subject to harmful online interaction with other users
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm

The College will have appropriate filters and monitoring systems in place. This will be informed by age and access considerations and responsibilities under the Prevent Duty whilst being mindful that 'over-blocking' does not lead to unreasonable restrictions that may impact on teaching and learning.

The College's Strategic plan commits the College to using social media as a learning tool. In doing so it is the duty of staff responsible for setting up these initiatives to ensure that students are given access to information which will help them to protect their identities whilst online. This will be through the tutorial and enrichment programmes.

Staff must be aware of the conditions of use of College and personal IT facilities as set out in the E-Safety Policy.

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 on their mobile phone 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 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.

Tackling female genital mutilation and sexual exploitation

Female genital mutilation or FGM is a severe form of violence against women and girls. It is abuse and therefore a safeguarding matter. FGM is an offence under the Female Genital Mutilation Act 2003 and since October 2015 there has been a statutory duty to report actual or suspected cases.

All suspected cases will be referred as part of the College's existing safeguarding obligations. Any girl or woman presenting with FGM is considered to be a potential victim of crime and will be referred to the Police and relevant support services.

We are committed to protecting our students from sexual predators and paedophiles. Where there is evidence or suspicion of any student being involved in sexual exploitation this matter will be reported to the Police and relevant support services.

Tacking Youth Produced Sexual Imagery (sexting)

Richmond upon Thames College will work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident. All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns, as although staff may feel it is not serious enough to warrant a report the DSL may hold other information which makes it more significant.

If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (it should be confiscated). This is consistent with DfE advice searching, screening and confiscation: advice for headteachers, school staff and governing bodies (DfE January 2018). The DSL will make a judgement about whether a reported YPSI incident is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Consideration should be given as to whether the sharing of the indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming. Staff should not view youth produced sexual imagery or copy, print or share it. DSL's will follow AfC guidance in relation to viewing images.

Further advice can be found in DfE 'Sexting in schools and colleges: responding to incidents and safeguarding young people' (UK Council for Child Internet Safety 2016)

Arrangements for 14-16 year old students

14-16 year old students may be studying at the College on specific provision for that age range.

The college will ensure that there is a Designated Safeguarding Officer with responsibilities for this cohort. The safeguarding of this cohort will be reviewed termly. See Appendix 4 for procedures.

Arrangements for Apprentices

The College will work closely with Employers and Apprentices to ensure learners are kept safe from abuse and understand who to contact if they have any concerns. See Appendix 4 for procedures.

Looked After Young People

The College works with a number of local authorities in monitoring, tracking and safeguarding Looked After Young People attending the College.

The College will ensure that appropriate staff have the information they need in relation to a child's looked after status and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and levels of authority delegated to the carer by the authority looking after him/her.

The Designated Safeguarding Lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Preventing radicalisation and gang recruitment

The College follows the statutory guidance and its responsibilities with regard to Section 26 of the Counter-Terrorism and Security Act 2015 and the 'Prevent' Duty and has due regard for the need to prevent people from being drawn into terrorism, and extremism.

In order to fulfil its responsibilities, the College will:

- Work with local and national agencies
- Train staff in being able to identify and report concerns about extremism, radicalisation and potential terrorism recruitment.
- Maintain strong links with the Prevent Coordinators of the local Police and have regular meetings with their school/college link representatives.
- Promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- Refer students who may be at risk, through the College's internal safeguarding referral process or directly to the local Police Prevent Coordinator who can support a "Channel" referral.
- Work closely with the Youth Offending Services and Police to identify known gang members who may attend College and protect others from being recruited or who may be seeking help to escape from and/or report gang activity.

Information relating to the identification and management of 'Prevent' concerns appears as Appendix 7.

Children missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

The College's cross-college tutorial staff, Head of School or Deputy Head of School ensure that learners not attending for any reason are followed up.

The Safeguarding Designated Leads will routinely liaise with education services and refer any persistent non-attendance as well as any in-year withdrawals due to non-attendance, so that if there are any undisclosed safeguarding or child protection issues these can be acted upon by the relevant borough children's services.

Risk assessing and supporting offender learners

The College asks students enrolling on courses to declare whether they have unspent criminal convictions. The risk assessment process covers those learners who have declared convictions or are referred either via the Youth Offending Service (YOS), Probation Service or equivalent, or other relevant Police authority, and is set out in the Criminal Conviction Disclosure Policy.

It includes learners who require a DBS as part of their course and for whom a conviction is disclosed.

Visitors to College Sites

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

Staff are required to complete an External Visiting Speakers form to cover the risk assessment of visiting speakers and other visitors to College sites.

Inter-Agency Working

The College will allow access to children's and adult's social care from the host authority and, where appropriate,

from a placing authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment relating to the person's circumstances or risk of abuse.

College arrangements take into account the procedures and practice of the local authorities it works with as part of the inter-agency safeguarding procedures set up by the local safeguarding children's board.

The College recognises the importance of information sharing between professionals and local agencies and that data protection fears should not be a barrier to information sharing as the safety of the child or vulnerable adult should be of the utmost importance.

Safeguarding Policy: Appendix 4: Safeguarding Reporting Procedure

If a student says they want to discuss something serious with you but seeks assurance that you will keep it confidential:

You should explain that you cannot promise complete confidentiality in all circumstances as there are some things, such as child protection matters, that you have to report to others.

If the student then decides they do not wish to tell you more:

If the student does not wish to continue, they should be encouraged to access support. This could be from a member of the Safeguarding team or the College Counsellor.

If you are left feeling worried or seriously concerned about the student, you should report this to a member of the Safeguarding Team.

You should:

- Write down what the student told you as soon as you can, using the student's own words, including the time, the setting and names of those present and give this immediately to a member of the Safeguarding Team. This should include the basic facts of the allegation, information about any visible injuries, the student's preferred course of action and their contact details. (Please use the safeguarding pro forma which can be found on Moodle)
- This written account should be signed, timed and dated
- Inform the student that you must pass the information on, but that only those who need to know will be told. Assure them that they will be kept informed of developments
- Inform the student that a member of the Safeguarding Team will make contact with them

If the disclosure is made by a parent/guardian/carer, you should follow the same procedure and refer them to a member of the Safeguarding Team.

Individual staff should never deal with disclosures in isolation and should always refer to a member of the Safeguarding Team who has responsibility for child/vulnerable adult protection. The Designated Safeguarding Lead will usually decide whether to make a referral to Social Services or the Police, but it is important to note, any member of staff can refer their concerns directly. Please note: should any member of staff refer directly, they MUST at the earliest opportunity discuss the referral with the Designated Safeguarding Lead.

No member of staff should give a student their personal phone numbers, email address, home address or make contact via social media.

Once a referral is made to a member of the Safeguarding Team they will undertake the following: -

The member of the Safeguarding Team will make an initial assessment of the allegation; consult with the staff involved and the Designated Safeguarding Lead as appropriate. This will usually involve speaking to the student at the earliest opportunity.

A first priority is to ensure that the student is not in any immediate danger. Designated staff will seek medical attention if the student is suffering from a serious injury.

The student will be asked to repeat the disclosure they have made. A written account will be made of the disclosure and context and the student will be asked to sign it.

If the disclosure meets the threshold for referral, the Designated Safeguarding Lead will support the student in contacting Social Services/ the Police Child Abuse Investigation Team/ the Forced Marriage Unit/ the NSPCC and/or College Counsellors, or any other agencies as necessary.

When a student is not sure about taking the allegation forward, the Designated Safeguarding Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.

Following consultation, the Designated Safeguarding Lead will ask for the student's views, to check if it is clear that they can understand the significance and consequences of a referral to an external agency. However, it remains the responsibility of the Designated Safeguarding Lead to take whatever action is necessary to ensure the student's safety and that of any other children or vulnerable adults who may also be at risk. This may on occasion involve a referral against the wishes of the student involved.

Where appropriate, concerns may be discussed with a parent or guardian unless this may, either by delay or the behavioural response it may prompt, place the student at risk of further harm. The student's view will also be considered in deciding whether to contact their parent/guardian. A written record will be made of any discussion with parents or guardians.

In the event of a referral, the Designated Safeguarding Lead should inform the student of the proposed action and the reasons for the decision. Ideally this should happen before the appropriate agency is informed, unless doing so would place the student at greater risk of further harm.

The Designated Safeguarding Lead should contact Children or Adult Social Care of the appropriate local authority by telephone, in the first instance, and record the date and time this took place. The Designated Safeguarding Lead will agree with the recipient of the referral what the student and parents will be told, by whom and when. The Designated Safeguarding Lead will make a confirmation of the referral in writing within 48 hours.

All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential in a securely locked location and in accordance with the General Data Protection Regulations and the Data Protection Act 2018. However, where the police are involved then such records may need to be disclosed.

A Designated Safeguarding Lead will be the College contact if Social Services or the Police require further information about the student, and if necessary, represent the College at multi-agency strategy discussions or protection conferences. Other members of the Safeguarding Team may also represent the College at external meetings if appropriate.

There may be instances where more than one member of the Safeguarding Team will be involved in a particular disclosure. On occasion they may work collaboratively to deal with a case.

14-16 year-old students

- School will provide the college with information about each student to help assess any support needs
- Support meeting or Risk assessment meetings will be carried out by College with Parent/School/Student if necessary
- Students will be provided with a light blue coloured lanyard
- Groups will be allocated to a Welfare and Engagement Advisor (WEA) who will provide pastoral support
- Induction will be provided by the WEA and the teachers
- Registers will be taken and any absences will be communicated to the school by 10am by the WEA
- If a student does not arrive for lesson teachers will inform the WEA and if the student is not located on college premises within 30 minutes then the school will be notified
- In the event of students breaking college rules, the college will follow the college Disciplinary Policy and the school will be notified.
- In the case where the college need to report and deal with a concern or disclosure of abuse the colleges the colleges the Designated Safeguarding Lead will contact the schools Designated Person.

Apprentices

- Employers will be visited by the college Health and Safety Compliance Advisor who will carry out a Health and Safety audit/inspection and risk assessment if required
- Employers will provide a name and contact details of the Designated Person and provided with the name and contact details of the college Designated Person
- Employers will be provided with the relevant college policies and procedures and agree that they have understood them
- Apprentices will be given an induction where staying safe and Prevent are included
- Apprentices will be given the contact details of the college Designated Person and Welfare team

Safeguarding Policy: Appendix 5 - Procedure for Managing Allegations against a Member of Staff

Allegations of abuse against College staff

Any allegation made against a member of staff can be very damaging, irrespective of the outcome of any investigation. Guidance on the appropriate conduct of College staff appears as Appendix 6.

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.

Receiving and recording allegations

A member of staff who receives an allegation about another member of staff from a child or vulnerable adult should follow the guidelines in Appendix 5 for reporting a disclosure.

The allegation should be reported immediately to the Assistant Principal of HR and OD, Deputy Principal and CEO (Curriculum and Quality) or to the Principal, unless the Assistant Principal of HR and OD, Deputy Principal and CEO (Curriculum and Quality) or the Principal is the person against whom the allegation is made, in which case the report should be made to the Chair of the Corporation. The Assistant Principal of HR and OD, Deputy Principal and CEO (Curriculum and Quality) or Principal may delegate responsibility to a Designated Safeguarding Lead who should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Designated Safeguarding Lead
- Record information about times, dates, locations and names of potential witnesses.
- Carry out an initial assessment of the allegation (after consulting with the appropriate Safeguarding Children Board and/or Local Authority Designated Officer (LADO)
- Where the allegation is considered to be either a potential criminal act or indicates that the person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the relevant Safeguarding Children Board

It is important that the Assistant Principal of HR and OD, Deputy Principal and CEO (Curriculum and Quality) or the Principal does not investigate the allegation. The initial assessment should be on the basis of the information received and should result in a decision whether or not the allegation warrants further investigation.

In certain cases the allegation may represent inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm/risk to the child or vulnerable adult. In such cases the matter should be addressed in accordance with the College Staff Disciplinary Procedures. In other cases the allegation may be able to be shown to be false because the facts alleged could not possibly be true (see Unsubstantiated, Malicious or False Allegations below).

Receiving an allegation

i) Where a student makes an allegation to a member of staff

- Listen carefully to the student
- Ask them to explain or say more if you are not clear, but do not ask leading questions or offer alternative suggestions. (Remember who, where, when, what, how, why). If possible and with the agreement of the student, arrange for another member of staff to be present when taking a report from a student.
- Do not attempt to investigate the allegation yourself.

- Do not promise that you can keep confidential what the student has disclosed as you may have an obligation to report what they tell you. Write down as much detail as you can. All records of concerns and actions taken should be recorded and stored securely and confidentially. Share with colleagues only on a need to know basis.

ii) Where a parent makes an allegation

- Listen carefully to the parent
- Ask them to explain or say more if you are not clear (remember who, where, when, what, how, why). Do not attempt to investigate the allegation yourself.
- Inform the parent that allegations are taken seriously and will always be investigated.
- Remind the parent that the College has a child protection policy and procedures to investigate allegations.
- Write down as much detail as you can. All records of concerns and actions taken should be recorded and stored securely and confidentially. Share with colleagues only on a need to know basis.

iii) Where another member of staff makes an allegation

- Remind the member of staff that they should not discuss the allegation with other members of staff.

What Happens Next?

- Taking into account all the information available, the Principal, Assistant Principal HR & OD or Deputy Principal and CEO (Curriculum and Quality) will decide on the next steps.

Enquiries and Investigations

Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Principal or Designated Safeguarding Lead should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal or Designated Safeguarding Lead is responsible for ensuring that the College assists with 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 member of staff will be advised of their right to consult with a representative, (eg trade union representative).

Subject to agreement from the police or other investigating agency, the Principal or Designated Safeguarding Lead shall:

- Depending on their age, ensure that the parents/carers of the person making the allegation have been informed that the allegation has been made
- inform the person making the allegation, or their parent/carer, that the investigation is taking place and what the likely process will involve
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- inform the Chair of the Corporation of the allegation and the investigation.

The Assistant Principal of HR and OD or Principal shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic and may be considered at any stage of the investigation. Any decision to suspend a member of staff will be carried out in line with the College's Staff Disciplinary Policy.

The Principal (or Chair of the Corporation) shall consider carefully who is informed of the suspension and investigation. The Safeguarding Children Board and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the College's Staff Disciplinary procedures.

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with College's Staff Disciplinary Policy.

'Parents or carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence' KCSIE 2020.

The Principal should give consideration to what information should be made available to the general population of the College. Prior to this happening the case manager should take advice from the designated officer(s), police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Unsubstantiated, malicious or false allegations

False, malicious or unsubstantiated allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Safeguarding Children Partnership in order that other agencies may act upon the information.

In consultation with the Assistant Principal of Human Resources and Organisational Development, the Principal shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken,
- give consideration to offering counselling/support,
- inform the parents/carers of the alleged victim of the outcome, where the victim is under 18,
- where the allegation was made by a person other than the alleged victim, consideration to be given to informing him/her or the parents/carers of that person, unless doing so would put the person at further risk,
- prepare a report outlining the allegation and giving reasons for the conclusion that it was either unsubstantiated, malicious or false and confirming that the above action had been taken.

Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, the College is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

Duty to refer to the Disclosure and Barring Service

If the College believes a person has "caused harm or poses a future risk of harm to vulnerable groups, including children" a referral about the person should be made to the Disclosure and Barring Service (DBS).

The Home Office further states that "an employer or volunteer manager is breaking the law if they knowingly employ someone in a regulated activity with a group from which they are barred from working". In addition, a "barred person" is breaking the law if they seek, offer or engage in regulated activity with a group from which they are barred from working, whether paid or voluntary.

There is an additional responsibility for the College if they are referring a teacher to the DBS. The College "should also consider referring the case to the Teaching Agency" who are responsible for regulating teachers in cases of "serious misconduct".

Full details of the process relating to staff DBS checks can be found in the College's DBS Disclosure and Storage Policy and Procedures.

Support for staff

The College is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with one of the Designated Safeguarding Officers or with a trained counsellor. Staff wishing to be referred for counselling should contact the Employee Assistance Programme (EAP) 08000 856 148.

Safeguarding Policy: Appendix 6 - Guidance on the conduct of College Staff

The College recognises that it is not practical to provide definitive instructions that would apply to all situations at all times when staff come into contact with children or vulnerable adults and to guarantee the protection of all involved.

Set out below are the standards of behaviour required of staff in order to fulfil their roles within the College. This code should assist in the protection of children, vulnerable adults and members of staff.

These guidelines also apply to agency and supply staff, volunteers who work in an unpaid capacity, visitors, contractors and so on.

Staff must:

- implement this protocol at all times.
- be aware of the potential risks at all times.
- take all reasonable protective measures when interviewing students (such as, ask another person to be present and sit in a room where it is possible to be observed).

As outlined in the Staff Code of Conduct staff must never:

- engage in a personal relationship with a student, beyond that appropriate for a normal teacher/ student relationship.
- allow or engage in inappropriate touching of any kind. The main principles of touch are: touch should always be in response to the student's need; touch should always be appropriate to the age and stage of development of the student; touch should always be with a student's permission
- Buy lunch/food or lend money to students. If there are financial concerns they should be referred to Student Services and normal welfare protocols will be followed.
- engage in rough, physical games including horseplay with students.
- do things of a personal nature for students that they can do for themselves or that their parent can do for them.
- physically restrain a student unless the restraint is to prevent physical injury of the student/other young people/visitors/staff or yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a student.
- have a student on their own in a vehicle. Where circumstances require the transportation of a student in a vehicle, another member of staff/ volunteer must travel in the vehicle. Also it is essential that there is adequate insurance for the vehicle to cover transporting students as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a student on their own, it is essential that another teacher and the parent is notified immediately
- take a student to the toilet unless another adult is present or has been made aware (this may include a parent, group leader) or as set out in the student's personal plan.
- spend time alone with a student on his/her own outside of the normal tutorial / classroom situation. If you find you are in a situation where you are alone with a student, make sure that you can be clearly observed by others.
- Engage with a student by personal electronic means, e.g. Facebook, e-mail, text. Where such contact is professionally necessary, College systems should be used.

Safeguarding Policy: Appendix 7 – Radicalisation and Extremism - Prevent

Protecting children from the risk of radicalisation is part of Richmond-upon Thames College's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services ('specified authorities') to have 'due regard to the need to prevent people from being drawn into terrorism'.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The government defines extremism as vocal or active opposition to the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those of different faiths and beliefs.

Richmond upon Thames College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to far right/neo Nazi/white supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist animal rights movements.

Detecting Radicalisation and Extremism - There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. Young people are often questioning their identity which means they can be vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of "Duty" (belonging to a specific group), "Status" (need for reputation) and "Spiritual Rewards" (test of faith) as a way of drawing them in.

All staff should be aware of what the potential signs of radicalisation look like including: They will look a lot like troubling behaviour:

Emotional – angry, mood swings, new found disrespectful attitude to others, withdrawal, isolation

Verbal – talking as if from a scripted speech, a reluctance/inability to discuss their views

Physical – appearance (tattoos), change in routine.

Changes in friendship groups

Increased secrecy, especially around internet use

What to do if you believe someone to be at risk of radicalisation?

The College will adopt the ethos of "Notice, Check, Share" where there are concerns that an individual may be vulnerable.

Notice – Recognition of any changes in behaviour or appearance.

Check – Speak with someone you trust like a tutor or manager and see what they recommend but trust your instinct if you are still concerned.

Share – Speak to one of the named contacts to report your concerns. Remember trust your instinct.

a) If you are a student and concerned about another student, please “Check” with your tutor in the first instance and “Share” with the Safeguarding Team in Student Services.

b) If you are a student and are concerned about a member of staff, or a person who is not a member of the College e.g. guest speakers, please “Check” with the Safeguarding Team in Student Services and “Share” with the ALS and Head of Student Experience or the Deputy Principal and CEO (Curriculum and Quality).

c) If you are a member of staff and are concerned about a student, please “Check” and “Share” with the Safeguarding Team in Student Services.

d) If you are a member of staff and are concerned about another member of staff please “Check” with your Line Manager and “Share” with the Assistant Principal of Human Resources and Organisational Development.

e) If you are a member of staff and are concerned about a person who is not a member of the College, e.g. guest speaker, please “Check” and “Share” with the Head of Student Experience.

Referral Protocol

1. Any member of staff may have suspicions that a student or colleague is vulnerable to radicalisation. Concerns may be based on appearance, opinions expressed, language used or changes in any of these over time.
2. Such concerns should be raised with a Designated Safeguarding Lead. You should not approach the person about whom you have the concern.
3. The Designated Safeguarding Lead will conduct a risk assessment and collect whatever additional information they need but the potential victim of radicalisation will not be contacted at this time
4. The Designated Safeguarding Lead will then follow normal safeguarding procedures, which may involve contact the Single Point of Access for consultation and further advice and/or making appropriate referrals to the police PREVENT team and Channel programme for any student whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that the young person receives appropriate support.
5. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
6. If the potential victim is an employee of the college, the Assistant Principal for Human Resources and Organisational Development will be consulted.
7. Having referred a concern to the SPA/Prevent Coordinator (stage 5) the College will act under the Coordinator’s advice and will only approach the subject of the concern if requested to do so.

Possible outcomes would be:

- The matter is not to be taken further
- A background investigation will be undertaken by the Police, and in some cases
- The matter will be referred to the local Channel Panel*

The College expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that use or hire college premises to behave in accordance with the college’s staff code of conduct. We will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at college events and, when necessary, will make appropriate referrals in respect of any such adult.

*Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Each panel meeting is chaired by the local authority and brings together a range of multi-agency partners to collectively assess the risk. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person concerned.