



Richmond upon Thames College

Policy Name: Child and Vulnerable Adult Protection Policy

Policy Number/Version No: V1

Effective Date: 01 September 2019

Review Date: 31 August 2020

Policy Responsibility: Assistant Principal Student Experience

Approved By: Governors

For Action By: All College staff and students

For Information to: All College staff, students and parents/carers, visitor 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. 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 staff, students or anyone working on behalf of the College, franchise partners and sub-contractors, and contractors on site.

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
- 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 their 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 & 2004
- Education Act 2002 & 2011
- United Convention of the Rights of the Child 1990
- Care Act 2014
- Children and Social Work Act 2017
- 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 Sep 2019
 - Prevent Duty 2015
 - Criminal Exploitation of children and vulnerable adults: County Lines Sep 2018

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

² Vulnerable Adults relates to The Care Act 2014, which covers England, defining 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
- 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 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 students' 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 physical, emotional, sexual abuse and neglect

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

Related Policies

- Anti-Bullying Policy
- E Safety Policy
- Equality and Diversity Policy Statement
- Safer Recruitment and Selection Policy and Procedure
- Staff Code of Conduct
- Admissions Policy
- Tutoring Policy
- Substance Misuse Policy
- Learning Difficulty and Disability Policy

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: C15

Names and personal 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	Assistant Principal Student Experience	Sharon Cousins	115
Prevent Lead	Assistant Principal Student Experience	Sharon Cousins	115
Allegations against or concerns about staff	Assistant Principal Human Resources and Organisational Development or Principal	Alison de Lord	475
		Jason Jones	246
Practitioners	Head of Student Services	Deborah Stephenson	151
	Safeguarding and Equalities Officer	Cait Orton	150
	Student Engagement Team Leader	Hope Stubbings	299
	Welfare & Engagement Advisor	Nichole Anthony	
	Welfare & Engagement Advisor	Hazel Coppin	110
	Welfare & Engagement Advisor	Dezrika Ramsey	
	Community Liaison Manager	Ged Boyer	161
	College Counsellor	Lynn Bannister	226
	Student Services Officer	Rhian Whitty	311
Allegations against the Principal	Governor	Sally Newton	Natalie Breeze, Head of Governance Ext 242

Safeguarding Procedures

2. Responsibilities

All members of the College community, including staff, governors, students and contract 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 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. 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 and Vulnerable Adult Protection Policy and associated procedures
- safeguard and promote the welfare of children and vulnerable adults
- alert a Safeguarding Officer 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 when starting employment and when they are notified of updates by HR. 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 22-33 of KCSIE. Staff should expect to support social workers and other agencies following any referral.

2.2 Designated Safeguarding Leads and Officers

The College's safeguarding arrangements are overseen by the Assistant Principal Student Experience, supported by the Head of Student Services, Safeguarding and Equalities Officer and Community Liaison Manager 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 Services, 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 boards 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
- maintaining appropriate records of any safeguarding referral, complaint or concern (even if that concern does not lead to a referral).
- 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:

- 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 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 Assistant Principal Student Experience 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 Officers have sufficient time and resources to carry out their roles
- all staff feel able to raise concerns about the safety of children and vulnerable adults
- such concerns are dealt with sensitively, effectively and in a timely manner
- Governors and staff receive regular safeguarding training and updates

2.4 The Governing Body:

As set out in Keeping Children Safe in Education 2019, 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
- 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 students 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 2019, 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 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
- Assistant Principal Student Experience – 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 2019

Next review scheduled: August 2020

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.

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, sexual harassment, upskirting, sexting and initiation/hazing type violence and rituals. Staff should also be aware that behaviour linked to such as drug taking, alcohol abuse, truancy 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.

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.

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.

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.

Honour based violence

Honour based violence, 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.

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.

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 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.

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 (2018). 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 and is available at Reception.

All staff to whom a student 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.

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 or Head of Schools 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 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

- Schools 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 Safeguarding and Equalities Officer 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.

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, Assistant Principal Student Experience or to the Principal, unless the Assistant Principal of HR and OD, Assistant Principal Student Experience 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, Assistant Principal Student Experience 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, Assistant Principal Student Experience 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 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 and to speak directly to the Assistant Principal of HR and OD, Assistant Principal Student Experience or the Principal.

What Happens Next?

- Taking into account all the information available, the Principal, Assistant Principal HR & OD or Assistant Principal Student Experience 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.

The person making the allegation (and if under 18, their parents) should be informed of the outcome of the investigation and proceedings.

The Principal should give consideration to what information should be made available to the general population of the College.

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 Board 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 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).

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
- engage in rough, physical games including horseplay with students.
- do things of a personal nature for student's 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 - Prevent

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.

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.

This raises the question of what will those signs of radicalisation look like: They will look a lot like troubling behaviour:

Emotional – angry, mood swings, new found arrogance

Verbal – expressing opinions that are at odds with generally shared values

Physical – appearance (tattoos), change in routine.

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 Head of Student Services or the Assistant Principal Student Experience.

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 Director 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 Services.

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 Safeguarding Officer. You should not approach the person about whom you have the concern.
3. The Safeguarding Officer will conduct a risk assessment and collect whatever additional information they need but the potential victim of radicalisation will not be contacted at this stage.
4. If they conclude that the risk is credible they will raise this with a senior member of staff. If the potential victim is an employee of the college, the Director or Human Resources and Organisational Development will also be consulted.
5. If it is concluded that the matter is to be reported externally, the local Prevent Coordinator will be contacted for advice in the first instance.
6. 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*
7. Having referred a concern to the 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.

*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.