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SAFEGUARDING POLICY

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Table of contents

Section	Description	Page
1.	Background	3
2.	Scope	4
3.	Monitoring and review	4
4.	Policy statement	5
5.	Compliance with safeguarding legislation	6
6.	Safeguarding roles and responsibilities	8
7.	Identification, referral and management of safeguarding concerns	11
8.	Confidentiality and information sharing	12
9.	West London College's arrangements for specific learners and circumstances 9.1 Learners aged 14-to-16-years old 9.2 Learners who are looked after or leaving care 9.3 Children missing education 9.4 Learners with a learning difficulty or disability 9.5 Learners with English as a second or foreign language 9.6 Apprentices 9.7 Learners on subcontracted programmes 9.8 Learners on work experience and placements	12
10.	Safeguarding information for learners and apprentices	16
11.	Staff training and induction	16
12.	Online safety	17
13.	Parental involvement	17
14.	Managing allegations against member of staff	18
15.	Safer recruitment	18
	Appendix 1. What do we mean by safeguarding and promoting the welfare of children?	20
	Appendix 2. Keeping Children Safe in Education (2020)	21
	Appendix 3. The college's safeguarding responsibilities	23
	Appendix 4. The college's safeguarding team and contact details	25
	Appendix 5. Contact details for safeguarding in LB Hammersmith & Fulham	26

1. Background

The Governors and staff at West London College recognise that young people and vulnerable adults have a fundamental right to be protected from abuse and exploitation and that learners cannot study effectively unless they feel and are safe. The college community has a strong focus on prioritising and promoting the safeguarding and protection of children, young people and vulnerable adults from harm.

West London College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering them support and protection. The college has a legal and moral responsibility to implement rigorous procedures, to provide a duty of care to young people and vulnerable adults, to safeguard their wellbeing and to protect them from abuse. This policy stipulates that it is the duty of **all staff** to work together to report and respond to concerns about the welfare and safety of young people and vulnerable adults. The college also recognises its duty to work with external agencies to ensure that potential risk of abuse or exploitation is properly reported and immediate action taken.

The college's safeguarding policy and practice encompasses both child and adult protection and a preventative approach to keeping learners and apprentices safe. This includes early intervention and reporting of abuse and neglect, promoting e-safety, adopting zero-tolerance towards bullying (in person or electronically), prevention of radicalisation and extremism and prioritising the safety of all members of the college community.

Safeguarding and promoting the welfare of children, young people and vulnerable adults is the process of:

- Protecting children, young people and vulnerable adults from maltreatment
- Preventing impairment of children and young people's mental and physical health or development
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children, young people and vulnerable adults to have the best life chances

Abuse (physical, emotional, sexual or neglect) is a form of maltreatment of a child, young person or vulnerable adult. An individual or individuals 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.

Please see Appendix 1 What do we mean by safeguarding and promoting the welfare of children?

This policy should be read in conjunction with West London College's:

- Attendance, Punctuality and Absence Management Policy
- Behaviour for Learning Policy
- Criminal Conviction Disclosure and Risk Assessment Policy and Procedure
- Equality, Diversity and Inclusion Policy
- Learner Code of Conduct
- Pre-employment and Safeguarding in Employment Policy
- Prevent Strategy
- Staff Code of Conduct
- Staff Disciplinary Policy

2. Scope

This policy relates to the safeguarding of all learners at West London College's Hammersmith, Ealing Green, Park Royal and Southall campuses. The policy scope includes apprentices, learners in subcontracted provision, learners on work placement, work experience and undertaking projects in the community.

The policy applies to all staff, agency staff, volunteers, governors and anyone working behalf of the college. This includes employers offering work placements, transportation companies and contractors with direct access to children, young people and vulnerable adults.

In terms of definitions:

- a *child* is defined as anyone who has not yet reached their 18th birthday.
- a *young person* is defined as between 12 and 20.
- a *vulnerable adult* or *adult at risk* is a person aged 18 or over '*who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation*' (Law Commission Report 1997).

3. Monitoring and review

This policy is fully reviewed on an annual basis by the college's senior leadership team and Safeguarding and Prevent Panel and is presented for approval by the Board of Governors. West London College consults on the policy with external partners and ensures that policy and procedure is informed by best practice and up-to-date legislation and guidance.

An annual report for governors is produced in the autumn term, detailing the range of activity in the college relating to safeguarding and Prevent. This enables the Governing Body to assure itself that the college leadership is discharging its safeguarding duties

effectively. It provides a profile of safeguarding referrals in the previous academic year to highlight the needs of the students the college supports. It also identifies areas for further improvement in the academic year ahead.

The safeguarding policy is reviewed by the Designated Safeguarding Lead and deputies on a regular basis to ensure that it remains current and incorporates all revisions made to local or national safeguarding guidance. An annual safeguarding audit is used as the basis for the college's safeguarding and Prevent planning for the year ahead.

The college operates an internal Safeguarding and Prevent panel, which is chaired by the Designated Safeguarding Lead and reports to the senior leadership team and the Governing Body. This provides opportunities to raise awareness of current local and national safeguarding priorities and monitor the effectiveness of the college's safeguarding practice and policy.

4. Policy statement

Section 175 of the Education Act (2002) requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and young people.

West London College's ethos is to provide a safe and welcoming environment for learners, staff and visitors at each of its campuses. It is committed to promoting a vigilant culture where young people and vulnerable adults can learn and be safe. The college prioritises its duty to safeguard and promote the welfare of learners and apprentices, and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency. Staff are supported to understand vulnerability and risks among the college community and how to effectively identify and report these to the safeguarding team.

In accordance with the Counter-Terrorism and Security Act (2015), there is a statutory duty on colleges to *have due regard to the need to prevent people from being drawn into terrorism*. This is known as the Prevent duty. To fulfil this duty, West London College liaises closely with the local and regional Prevent leads to receive updates regarding local concerns and to refer learners of concern to the Channel process. This priority is detailed in the college's Prevent Strategy.

The content of this Safeguarding Policy reflects the statutory requirements within DfE Keeping Children Safe in Education September 2020.

Please see Appendix 2. Keeping Children Safe in Education (2020)

Safeguarding children in education is set out in two main pieces of statutory guidance, links to the statutory safeguarding guidance are available below.

HM Working Together to Safeguard Children, published 4th July 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

DfE Keeping Children Safe in Education 2020 (KCSiE) in force from 1st September 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf

The college is committed to working in partnership with external agencies to perform its duties under the Education Act 2002, Children Act 2004, Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2020.

This policy seeks to ensure that the college undertakes its responsibilities with regard to protection of young people and vulnerable adults and will respond to concerns appropriately. The policy provides clear direction to all of the college community to ensure that any child protection concerns, referrals and monitoring of actions are handled appropriately. It establishes a framework to support staff in their practices and clarifies the college's expectations.

Further education colleges do not have a responsibility to investigate incidents of alleged abuse. However, they do have a statutory duty to assist the local authority with child protection issues. This policy is in line with current national and local policies on the protection of children, young people and vulnerable adults.

Please see Appendix 3 The college's safeguarding responsibilities.

5. Compliance with safeguarding legislation

West London College's Safeguarding Policy is informed by and meets the requirements of the following legislation:

Children's Safeguarding and Child Protection

- Keeping Children Safe in Education (KCSiE) 2020
- Guidance for Safer Working Practice in Education Settings (2020)
- Mandatory reporting of female genital mutilation: procedural information (updated 2020)
- Inspecting Safeguarding in Early Years, Education and Skills Settings (2019)
- Working together to Safeguard Children (2018)
- Information sharing: advice for practitioners providing safeguarding services (2018)
- Mental health and behaviour in schools (2018)
- Sexual violence and sexual harassment between children in schools and colleges (2018)
- Promoting the education of looked- after children and previously looked- after children: Statutory guidance for local authorities (2018)

- Children and Social Work Act 2017
- What to do if you're worried a child is being abused: advice for practitioners (2015)
- Children and Families Act 2014
- The Bichard Report 2006
- The Children Act 2004
- Education Act 2002

Adults at risk

- The Care Act 2014 – statutory guidance
- Safeguarding Vulnerable Groups Act 2006

Preventing radicalisation and extremism

- Prevent Duty Guidance for Further Education Institutions (2019)
- The Prevent Duty (2015)
- Counter Terrorism and Security Act 2015

Safer recruitment

- Sexual Offences Act 2003
- Disclosure & Barring Service 2013

To comply with safeguarding legislation, West London College will ensure that:

- There is a Designated Safeguarding Lead (DSL), who is a member of the college leadership team, and a team of Deputy Safeguarding Leads who have received appropriate training and support for this role.
- The Designated Safeguarding Lead role is written into their job description and clarifies the role and responsibilities included (as defined in KCSiE 2020 Annex B).
- There is a nominated governor responsible for safeguarding.
- There is a Designated Adviser for Looked After Children (LAC).
- Every member of staff (including temporary, supply staff and volunteers) and the governing body knows who the Designated Safeguarding Lead is, their deputies responsible for safeguarding, and their role.
- All staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead, Assistant Safeguarding Lead, Deputy Designated Safeguarding Leads or Safeguarding Officers, or to children's social care / police if a student is in immediate danger.
- All staff and volunteers are aware of pastoral support available in the college and understand their role in making referrals.
- There is a whistleblowing policy and culture where staff can raise concerns about unsafe practice, and that these concerns will be taken seriously.
- There is a clear and promoted complaints system in place for learners, apprentices, carers, families and other stakeholders.

- Parents, carers and stakeholders have an understanding of the responsibility placed on the college and staff for safeguarding by setting out its obligations in the college prospectus and on the college's website.
- Relevant agencies are notified by prior agreement for unexplained absence for a student who is subject to a Child in Need or Child Protection Plan or at risk of 'missing in education' and where no contact can be established with the learner, parent, carer or appropriate adult linked to the learner.
- Effective and robust partnership links are developed with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at Child Protection Conferences and Child in Need meetings.
- Learner concerns are documented on college's online secure system MyConcern to support early identification, referral and actions to safeguard.
- All records are kept securely using the MyConcern safeguarding system.
- College and local authority procedures are followed where an allegation is made against a member of staff or volunteer.
- Safer recruitment practices are always followed.
- Confidentiality is applied appropriately and information sharing protocols consistently adhered to.

6. Safeguarding roles and responsibilities

All college staff have a fundamental role to play in identifying concerns and ensuring that early help is provided for learners and apprentices.

Please see Appendix 4 The college's safeguarding team and contact details

Specific accountabilities in the college's safeguarding arrangements are described below.

The Governing Body

A designated governor for safeguarding must be appointed. It is their responsibility to liaise with the Principal/CEO and Designated Safeguarding Lead over matters regarding safeguarding, to ensure that:

- the governing body complies with its duties under safeguarding legislation. Governors must have regard to Keeping Children Safe in Education statutory guidance, ensuring that policies, procedures and training in the college is effective and complies with the law at all times.
- policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote learners' and apprentices' welfare.
- all staff and governors read at least Part One of Keeping Children Safe in Education guidance.

- All staff undertake safeguarding and Prevent training which is updated regularly and that the Designated Safeguarding Lead, deputies and safeguarding officers receive refresher training and updating of knowledge as legislation and guidance changes.

The Governing Body must consider and approve the college's safeguarding policy and annually review its implementation.

The Chair of the Corporation is responsible for safeguarding allegations if the allegation is against the Principal and CEO. The lead safeguarding governor is responsible for liaising with the local authority in any such matters. If the college or one of its subcontractors is subject to a safeguarding investigation by the police or the local authority, the lead governor must notify the ESFA.

The judgement of the quality of leadership and management made during an Ofsted inspection includes an evaluation of the effectiveness of the safeguarding arrangements in place in the college to ensure that all learners and apprentices are safe and that there are safer recruitment practices. The further education and skills inspection handbook provides guidance on the criteria which are assessed.

Governing bodies must ensure that people who pose a risk of harm to children, young people and adults at risk are prevented from working with them through rigorous safer recruitment procedures. The college must have written recruitment and selection policies and procedures in place. At least one person on any appointment panel should have undertaken safer recruitment training.

Governing bodies and proprietors must ensure that there are procedures in place to manage allegations against members of staff and volunteers. Such allegations should be referred to the Local Authority Designated Officer (LADO). There must also be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

The Designated Safeguarding Lead

The Assistant Principal (Quality & Student Services) is the senior lead on safeguarding in the college and is a member of the senior leadership team. It is their responsibility to ensure that safeguarding practice and procedures are robust and consistent across provision. The Designated Safeguarding Lead must provide an annual report on safeguarding to governors and update the Board on mandatory training and CPD undertaken by staff. The Designated Safeguarding Lead must ensure that college policy and procedure is known, understood and used appropriately by all staff. The Designated Safeguarding Lead will refer to the Local Authority Designated Officer (LADO) for advice and guidance as necessary.

The Assistant Safeguarding Lead and Deputy Designated Safeguarding Leads

The Assistant and Deputy Designated Safeguarding Leads (DDSLs) support the Designated Lead in the duties summarised above to ensure that procedures are robust and followed across the college. The Head of Student Services plays a key role as Assistant Designated Lead, overseeing and co-ordinating the work of DDSLs. Assistant Principals (Curriculum) are trained DDSLs, responsible for oversight of safeguarding at each campus, working closely with the Designated and Assistant Leads and other DDSLs. The Head of Apprenticeships is a trained DDSL who leads on safeguarding in work-based provision.

The team is responsible for ensuring that referrals are made to social services, the police and other external agencies in accordance with Local Children's Safeguarding Board (LCSB) procedures. This involves providing advice and support to staff on learner welfare and child protection issues, taking part in inter-agency meetings and ensuring that strategies and policies are agreed and effectively implemented. Duties include:

- Providing advice, guidance and training for staff on safeguarding issues
- Maintaining effective links with local multi-agency safeguarding agencies
- Managing referrals made to social services and other external agencies
- Maintaining robust records of safeguarding incidents including the actions taken and when the case has been signed off as completed
- Ensuring a robust system for monitoring vulnerable learners and apprentices

Looked After Children Adviser

The Children and Social Work Act (2017) places responsibilities on schools and further education colleges to promote the education of children and young people who are looked after or who are care leavers. The college's Looked After Children Adviser leads on this requirement and works in partnership with local authority 'Virtual' Heads and advisers to support looked after children and care leavers. This role is responsible for:

- Keeping up-to-date with policy, national and local developments in relation to young people in care and care leavers
- Liaising with external agencies to improve the post-16 transition of young people in care and care leavers
- Ensuring that a Personal Education Plan (PEP) is in place for all young people in care or care leavers
- Overseeing the monitoring and tracking of young people in care or care leavers
- Acting as an advocate for young people in care and care leavers as required
- Ensuring that young people in care and care leavers are placed on courses suited to their academic abilities and that curriculum teams monitor their progress and achievement

Heads of Curriculum, Head of Additional Learning Support, Curriculum Managers and Key Stage 4 Co-ordinator

The college's curriculum middle leaders are trained safeguarding officers and have a responsibility to support staff in identifying and managing concerns about the wellbeing and safety of learners and bringing this to the attention of the Designated or Assistant Safeguarding Lead or a DDSL as appropriate. They are also responsible for ensuring that learners and apprentices are taught about safeguarding, including online safety and Prevent, through tutorials and teaching and learning opportunities in the curriculum.

The Human Resources Team

This team is responsible for the safe recruitment and employment of staff, DBS and barred list checks and staff mandatory training and induction. They must ensure that all recruitment checks are completed and a Single Central Record of these maintained.

7. Identification, referral and management of safeguarding concerns

All college staff have an integral role to play in identifying concerns and ensuring that learners receive the support that they need. A culture of vigilance is promoted to encourage staff to be aware of and report changes in learners' behaviour, absenteeism and/or disclosures which are cause for concern.

When a member of staff has a concern about a learner or an apprentice, they should in the first instance report this to their manager or a member of the safeguarding team. The concern must be recorded on MyConcern immediately, so that the learner is identified on the college's safeguarding system and actions can be taken, recorded and monitored.

Once a concern is identified, this will be risk assessed without delay by the Designated or Assistant Safeguarding Lead or a DDSL to determine what further steps are required.

Where it is determined that further advice, guidance or support is required from external agencies, the safeguarding team will follow the procedures set out by the Local Children's Safeguarding Partnership. The college works closely with social services, health and the police in the London Borough of Hammersmith and Fulham, which is part of a tri-borough safeguarding partnership which also includes Kensington and Chelsea and Westminster.

The safeguarding team also liaises with local authorities in a learner's home area and will follow the necessary safeguarding partnership arrangements in that locality to address concerns and the need for intervention and support.

Please see Appendix 5 Contact details for safeguarding in LB Hammersmith and Fulham

8. Confidentiality and information sharing

Sharing information is a fundamental aspect of the college's role in working with young people and vulnerable adults. The decisions about how much information to share, with whom and when, require careful consideration as this can have a profound impact on the outcome of safeguarding individuals at risk of harm. It is widely recognised that poor or non-existent information sharing has been identified as a repeated factor in Serious Case Reviews (SCRs) carried out following the death or serious injury of a child.

The college has due regard to the General Data Protection Regulation (GDPR), the Data Protection Act (2018) and adheres to Government advice in *Information sharing: advice for practitioners providing safeguarding services* (2018). This clarifies that:

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

At West London College, information sharing practice is based on the above guidance and *the seven golden rules to sharing information*. This means ensuring that the information staff share is *necessary, proportionate, relevant, adequate, accurate, timely and secure*. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child, young person or adult at risk.

If a staff member has a concern about the welfare or safety of a learner or apprentice, they must discuss this immediately with a member of the safeguarding team and/or their manager and record it on the college's secure safeguarding system MyConcern.

Where possible, consent should be sought from the learner, apprentice or their parent/carer if they are aged under 18 to share information with external agencies where this is considered necessary in delivering interventions and support. However, information can be shared legally **without consent** in the safeguarding of children and vulnerable adults where consent is not obtained or to seek it could put the child or individual at risk.

Maintaining timely and detailed records is essential to effective safeguarding practice. The college has implemented MyConcern, a secure recording and monitoring platform which all staff are required to use for documenting safeguarding cases and ensuring that they are updated. The Assistant Safeguarding Lead and DDSLs play a lead role in oversight of MyConcern, to ensure that record keeping is robust and actions are followed up. System access levels ensure that information relating to child protection and sensitive safeguarding issues is held confidentially and shared only on a need to know basis.

9. Arrangements for specific learners and circumstances

9.1 Learners aged 14-to-16-years old

Safeguarding issues relating to learners aged 14-to-16 attending West London College as their main educational provider, will be addressed by the college's safeguarding team

following the same guidelines and procedures as other learners. There is a particular duty of care as these learners are more vulnerable than other learners by virtue of their younger age.

All 14-to-16-year olds studying at Southall campus wear a specific lanyard that distinguishes them from other college learners. They have a dedicated area for their lessons and do not study alongside older learners. The KS4 Co-ordinator is a trained safeguarding officer and the provision is overseen by an Assistant Principal who is a trained Deputy Safeguarding Lead. The college has effective links with the London Borough of Ealing Safeguarding Partnership, and as the 14-to-16 provision is contracted by LB Ealing, this also facilitates access to multi-agency services and support.

Primary responsibility for any school pupil attending link programmes at a West London College campus lies with the home school. Any incidents or issues with the safeguarding of a young person should be referred to the college's safeguarding officer who will then liaise with the relevant safeguarding contact at the home school.

9.2 Learners who are looked after or leaving care

The college's safeguarding practice recognises that children and young people who are looked after or leaving care are a priority. There may be additional risks and vulnerabilities which are associated with their histories and lives.

A dedicated Looked After Children Adviser is responsible for ensuring that these learners are clearly identified and supported both on college and through liaison with local authorities. Heads of Curriculum, teachers and tutors must be aware of the needs of looked after learners and ensure that they make good progression through their programmes of learning.

9.3 Children missing education

The college is committed to ensuring that all learners, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. The college recognises its duty to establish, as far as possible, the reasons why learners are missing from their programme. When a 16- or 17-year old runs away or goes missing, they are potentially at risk of serious harm, for example sexual exploitation, involvement with gangs or radicalisation. Every missing episode will require intervention from college safeguarding staff, working in partnership with the police and social services. The safeguarding team will ensure that it puts in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

9.4 Learners with a learning difficulty or disability

Learners with learning difficulties and/or disabilities face additional vulnerabilities and safeguarding challenges. The college will ensure that learners who have a learning difficulty or disability and their parents/carers are made fully aware of safeguarding procedures during the transition to college, at application, enrolment and induction. Information is delivered and adapted so that it is accessible and meets individual needs.

The college's Inclusive Learning curriculum area has a trained DDSL and safeguarding officer, who work closely with the Designated and Assistant Leads to deliver a highly responsive service to learners. Staff who work with learners with learning disabilities and difficulties receive additional training to enable them to support the particular challenges experienced by learners with additional appropriately.

9.5 Learners with English as a Second Language (ESOL) or Foreign Language (EFL)

The college ensures that for learners where English is not their first language, information on safeguarding and Prevent is provided in an accessible, visual format to promote full understanding.

There is a particular emphasis on providing additional information and support for international learners from overseas who are studying language courses at the college. This includes access to an emergency out-of-hours safeguarding contact and details of external agencies that learners can approach in the event of a difficulty or concern whilst they are living in London.

9.6 Apprentices

All learners on work-based programmes receive an induction, which includes raising awareness of the college's commitment to safeguarding and preventing radicalisation and extremism. The Head of Apprenticeships is a trained DDSL for apprentices and work-based learning and part of the college's safeguarding team, to ensure that there is consistent practice and procedure across the organisation. Apprentices' understanding of safeguarding, preventing extremism and radicalisation and safe working practices, is discussed and checked at each review by their Skills Trainer. The opportunity to discuss any concerns is provided. Apprentices are signposted to information about safeguarding in the college and workplace and given details of who to contact if they have a concern.

Prior to work-related activities commencing, the college carries out the following checks:

- Pre-placement health and safety checks of employers' premises and health and safety management, including insurance details
- Employers are made aware of the relevant college policies
- The requirements for DBS checks are assessed and relevant processes undertaken as required.

9.7 Learners on programmes in subcontracted provision

All learners on courses delivered by a subcontracted college partner receive details of the support services offered and contact details of the college's Designated Safeguarding Lead and safeguarding team.

The college carries out thorough due diligence for all new subcontractor partners, prior to any contract commencement. This includes:

- Ensuring that the provider has a robust safeguarding policy and procedures in place
- Completion of a training facility health and safety check list
- Completion of a risk assessment of the premises
- Checking and copying of insurance documents
- Checks to ensure that the partner does not have any links with extremist organisations or organisations that would not adhere to the guidelines contained in this policy
- Completion of a statement of good standard confirming compliance with the college's Safeguarding Policy and Prevent Strategy

Subcontractors are required to ensure that:

- All staff who are in contact with learners under the age of 18 are DBS checked and details monitored and updated as necessary
- All learners receive induction in safeguarding and preventing radicalisation and extremism
- All delivery staff complete safeguarding and Prevent training

The understanding of all aspects of safeguarding, including preventing radicalisation and extremism and safe working practices, is checked at each partner review. An annual review of the partner's Safeguarding Policy and Prevent Strategy is undertaken.

9.8 Learners on work experience and placement

The college has a work experience policy in place which sets out the requirements for the health, safety, welfare and safeguarding of learners who attend work experience and placements with employers. The Student Services Manager who leads the work experience team is a trained DDSL. Any concerns which arise for learners in the work place, relating to their own wellbeing or about professional behaviour of a staff member, should be reported to their tutor or a member of the safeguarding team. If an employer has a concern about the welfare, wellbeing or safety of a learner on placement with them, they should contact the work experience co-ordinator to report this.

10. Safeguarding information for learners and apprentices

There are a number of ways in which learners and apprentices are advised about college procedures in relation to safeguarding and who to contact:

- Information about safeguarding is provided in the course handbook and at open events
- Further information is provided upon application and enrolment at college
- Induction includes presentations and discussion on what safeguarding means, how to report concerns and contact safeguarding team members.
- Learners are provided with guidelines about keeping themselves safe online as part of their induction into using the college's IT network and this also forms a part of the induction and tutorial programme.
- Tutorial and enrichment activities encompass a wide range of topics to raise awareness of physical and mental health and wellbeing, E-safety, anti-bullying, drugs and alcohol, the dangers of being drawn into extremism and radicalisation. risks in the community and how to stay safe.
- Student Services staff provide access to information, advice and guidance, pastoral and wellbeing support for all learners.
- Learners are encouraged to build effective relationships with their tutors to discuss any issues of concern. Posters are displayed around the college campuses providing details of the safeguarding team.
- Safeguarding information and key contacts are available on the college website and on the learner portal.

11. Staff training and induction

Staff, agency staff and governors, must complete mandatory safeguarding training at the beginning of each academic year or as part of their induction, to ensure that they are aware of their safeguarding responsibilities and of the college's policy and procedures. The training includes recognising signs of abuse and reporting suspected abuse.

- All staff are required to demonstrate that they have read and understood the updates to the annual guidance in Part I of Keeping Children Safe in Education.
- All safeguarding officers must complete Level 3 training delivered by an accredited external provider or the local authority and refresh their knowledge at least every two years.
- The Designated and Assistant Safeguarding Leads and DDSLs must have designated lead refresher training every two years and ensure that they keep fully apprised of changes to safeguarding legislation and guidance.
- Staff who are involved in recruitment should receive Safer Recruitment training.
- All training is recorded on staff training records.

12. Online safety

Education about safe use of the internet and social media, the use of mobile phones and other electronic communications technologies is a high priority. This involves awareness raising among all members of the college's community on risks and responsibilities and is part of the 'duty of care', which applies to everyone working with young people and vulnerable adults.

- All members of staff are made aware of the importance of safe online practices in the learning environment in order to educate and protect the young people and vulnerable adults in their care.
- Online safety is a part of student induction and is also referenced in the Learner Handbook. Safe and responsible use of the internet and technology must be reinforced across the curriculum and subject areas. Learners are advised never to give out personal details of any kind which may identify them and / or their location.
- Particular attention to online safety education is given where students are considered to be vulnerable. A member of the safeguarding team must be informed of any e-safety concerns, and any incidents which relate to Child Protection or vulnerable adult concerns will then be escalated appropriately.
- Material that the college believes is illegal will be reported to appropriate agencies such as Internet Watch Foundation (IWF), the Metropolitan Police or CEOP (Child Exploitation & Online Protection Centre).
- Staff must record online incidents and concerns on MyConcern and manage them in accordance with Safeguarding or disciplinary policies as appropriate.

13. Parental involvement

West London College is committed to ensuring that all parents/carers of learners aged under 18 understand the college's responsibility to safeguard and promote the welfare of children and young people.

- Parents/carers are informed about the college's safeguarding policy and procedure at open events and when learners start their courses at college. It is stated that staff will need to share information if there are concerns about a child's welfare.
- The learner's tutor, Head of Curriculum or member of the safeguarding team will contact parents/carers to discuss any concerns which arise about the learner's wellbeing. Parental consent will not be sought if this risks placing the learner at harm.
- The college will obtain up-to-date and accurate information in order to keep learners and apprentices safe including (i) names and contact details of the person(s) with whom the learner resides (ii) names and contact details of the person(s) with parental responsibility, if different from (i) (iii) emergency contact details.

14. Managing allegations against members of staff

Should an allegation be made against a member of staff or volunteer who has, for example:

- Behaved in a way that has harmed a child/vulnerable adult or may have harmed a child/vulnerable adult.
- Possibly committed a criminal offence against or related to a child/vulnerable adult.
- Behaved towards a child/vulnerable adult in a way that indicates that they are unsuitable to work with children/vulnerable adults.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The following procedures must be followed:

- The member of staff or person receiving the allegation, or having the concern, must immediately inform the Designated Safeguarding Lead, Director of HR or an appropriate member of the senior leadership team.
- The Designated Safeguarding Lead, Director of HR or appropriate senior leader on all such occasions will discuss immediately, on the same working day, the content of the allegation with the Local Authority Designated Officer (LADO), before taking any further action.
- The tri-borough Local Children's Safeguarding Partnership has a detailed procedure for reporting allegations and concerns, which is supported by a LADO referrals indicator matrix.
- The LADO will advise on the process to manage the allegation. The Designated Safeguarding Lead, Director of HR or appropriate senior leader will take the steps necessary to ensure the safety of the child/vulnerable adult in question and any other individual(s) considered at risk.

15. Safer recruitment

Safer Recruitment is one of the most important aspects of safeguarding children, young people and vulnerable adults. The governing body must ensure that there are effective systems in place to recruit new staff, including agency staff and volunteers. Safer Recruitment is not only about vetting people before they start, but to also ensure that the staff code of conduct is strong to identify inappropriate behaviour in appointed staff.

West London College is committed to promoting a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might harm children or vulnerable adults. At least one person on every interview panel must have completed 'Safer Recruitment' training.

Governors should ensure that there are effective processes in place for arranging checks, including DBS, identity, right to work in the UK and any required overseas police checks, often called a 'Certificate of Good Conduct'.

The governing body must reassure itself that all appropriate suitability checks have been undertaken and that the college maintains a Single Central Record (SCR), detailing the range of checks it has carried out on its staff. The SCR should be reviewed to ensure that it is being kept accurately.

When making appointments, the mechanisms must be in place within the college to check that any person employed to teach has the required teaching qualifications and has successfully completed any statutory induction required.

Details of the college's safer recruitment policy and procedure are available in the Pre-employment and Safeguarding in Employment Policy

Appendix 1 What do we mean by safeguarding and promoting the welfare of children?

Safeguarding and promoting the welfare of children means:

- 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
- Taking action to enable all children to have the best outcomes

Safeguarding is not just about protecting children and young people from deliberate harm. It also relates to the broader aspects of care and education including:

- Learners' health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of learners with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of learners with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.
- Appropriate arrangements to ensure college security, taking into account the local context.
- Keeping learners safe from risks, harm and exploitation: KCSiE 2020 Annex A.

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse and emotional abuse.
- Contextualised abuse.
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
- Peer on Peer abuse.
- Racist, disability- based, homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation, human trafficking, modern slavery or exploitation.
- The impact of new technologies, including 'sexting' and accessing pornography.
- Child on Child Sexual Violence and Sexual Harassment (defined in KCSiE 2020 Part Five pages 69 to 77).
- Issues which may be specific to a local area or population, for example gang activity, knife crime, youth violence, criminal child exploitation (CCE) and County Lines.
- Family circumstances which present challenges for the student, such as drug and alcohol misuse, adult mental health issues.
- Risk of or from serious violence and violent crime (KCSiE 2020 paragraphs 31 & 32).
- Particular issues affecting students including domestic abuse and violence, female genital mutilation and honour-based abuse and forced marriage.
- 'Upskirting'- The Voyeurism (Offences) Act, which is commonly known as Upskirting Act, came into force on 12th April 2019. Upskirting is a criminal offence and reportable by all staff (KCSiE 2020, Annex A page 94)

Appendix 2. Keeping Children Safe in Education (KCSiE) September 2020

KCSiE 2020 sets out what colleges should and must do to safeguard children and young people. The guidance in KCSiE 2020 has been further strengthened to make clear the roles and responsibilities of all staff but particularly those with Designated Safeguarding Lead (DSL) responsibilities and Governing bodies.

The Designated Safeguarding Lead has a responsibility to ensure members of the Senior Leadership Team, staff and governors read and understand the content of DfE KCSiE2020, and ensure the college's safeguarding arrangements are compliant with all statutory requirements. It reinforces that all staff must read and understand KCSiE 2020 Part One Annex A, which contains important additional information about specific forms of abuse and safeguarding issues, and be conversant with Part Five Child on Child Sexual Violence and Sexual Harassment.

DfE KCSiE Part Two: The Management of Safeguarding: *Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.*

This includes individual schools and colleges having an effective Child Protection Policy. The Child Protection Policy should describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners. It should be updated annually (as a minimum) and be available publicly either via the school or college website or by other means.

(KCSiE 2020 paragraphs 62 and 63).

Safeguarding and promoting the welfare of children covers more than child protection. The requirements for the College are for policies and procedures that cover arrangements not just for meeting the welfare and safeguarding needs of children, but also the needs of adults at risk and young people, as well as ensuring appropriate practices for staff recruitment and selection and providing a safe and secure environment in which to study. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2020.

In September 2020 the revised *Keeping Children Safe In Education* came into force. The DfE KCSiE makes changes in three circumstances:

- The legislation to reflect the mandatory Relationship Education, Relationship and Sex Education and Health Education from September 2020.
- Included helpful additional information that will support schools and colleges protect children e.g. mental health, domestic abuse, child criminal and sexual exploitation and county lines.

- Important clarifications which will help schools, colleges and alternative education providers better understand the KCSiE 2020 guidance.

Key changes to KCSiE 2020: a table of changes is included at Annex H of KCSiE
Greater emphasis on mental health
Greater emphasis on children with a social worker
Keeping children safe online includes when online at home
Inclusion of 'transferable risk' in relation to allegations
Inclusion of 'safeguarding concern' as well as allegation
Reference to colleges leading on investigations into supply staff
Terminology change: Honour based abuse
Terminology change: Peer on peer or child on child abuse
Changes to reflect the confirmation of the guidance issued by the Department for Education (DfE 2019) about Relationships Education, Relationships and Sex Education (RSE) and Health Education including flexibility in the discharge of their duties.

Appendix 3. The college's safeguarding responsibilities

As a general principle, the college has a statutory responsibility to:

- At all times, and by all means, seek to create a safe environment for the entire college community. This includes using appropriate filters and monitoring systems to ensure maximum levels of online safety.
- Acknowledge that abuse may take many forms, for example; physical, sexual, financial and material, emotional, neglect, 'Missing', sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others.
- Operate the policy to encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable.
- Comply with statutory safeguarding legislation including the Prevent duty.
- Work with external agencies, in particular, the Local Children's Safeguarding Partnership and the Local Authority Designated Officer (LADO), whilst always placing the welfare of the individual at the centre of any action taken.
- Comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Independent Safeguarding Authority and 'Keeping Children Safe in Education' September 2020.
- Ensure that any safeguarding concern is swiftly referred as appropriate, non-emergency referrals to be communicated to partner agencies within one working day of disclosure.
- Comply with 'safer recruitment' procedures and undertake Disclosure and Barring Checks (DBS), to ensure that all employees and workers under terms of engagement are suitable to work at the college.
- Develop and implement procedures for identifying, reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service.
- Ensure employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to apprentices and learners in the workplace.
- Educate and support learners in staying safe and being healthy, including study programme learners, apprentices and work-based learners.
- Ensure that any child, young person or individual with additional needs going missing either from education, home or care home, particularly if repeated, is reported to the appropriate authority. All relevant staff are asked to complete registers and follow up unauthorised absences following the college's Attendance, Punctuality and Absence Management Policy.
- Learners who are absent, abscond or go missing during the college day can be vulnerable and at potential risk. Staff will follow the college's procedures for dealing with learners who are absent/ go missing, particularly on repeated occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future.

- Consult with learners in developing safeguarding policies and procedures.
- Encourage an atmosphere in which learners find trained staff approachable to enable communication of any problems which may be affecting their lives.
- Provide opportunities for learners in need of additional support to identify themselves through the process of applications and enrolment. Learners with identified support needs will be monitored through Additional Learning Support (ALS).
- Provide appropriate mandatory training and development in accordance with the requirements of the staff development programme and induction, raising awareness of all staff and governors of the need to safeguard children, young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse.
- Provide environments where everyone feels valued, safe and respected where individuals are encouraged to talk and are listened to. This will be achieved by the regular promotion of the college values and embedding these together with British values across every area of college activity.

Appendix 4. The college's safeguarding team and contact details

Name	Role		Contact details
Sara Woodward	DSL	Assistant Principal QSS	07500 100073 s.woodward@wlc.ac.uk
Charles Nelson	DDSL	Assistant Principal Hammersmith	07768 710936 c.nelson@wlc.ac.uk
Tracy Round-Turner	DDSL	Assistant Principal Ealing Green	07768 485723 t.round-turner@wlc.ac.uk
Dean Vaughan	DDSL	Assistant Principal Southall & Park Royal	07584 205208 d.vaughan@wlc.ac.uk
Sue Jenkins	DDSL	Head of Inclusive Learning	07833 083963 s.jenkins@wlc.ac.uk
Judi Hobson	DDSL	Head of Apprenticeships	07956 969807 j.hobson@wlc.ac.uk
Gary Fisher	DDSL	LAC Co-ordinator	07824 383638 g.fisher@wlc.ac.uk
Benson Chinenzura	DDSL	Student Services Manager	020 7565 1283 b.chinenzura@wlc.ac.uk
Kerri Ryan	DDSL	Student Services Manager (including work experience)	020 7565 1283 k.ryan@wlc.ac.uk

Appendix 5. Contact details for safeguarding in LB Hammersmith and Fulham

Safeguarding contacts in LB of Hammersmith & Fulham

Consultation and Advice about a child/young person resident in Hammersmith and Fulham

For a discussion about any concerns you have regarding a child, please contact our Initial Contact and Advice Team (ICAT) where you will get straight through to a Social Worker on tel: 020 8753 6610 (Out of hours – 020 8748 8588)

For case consultations please contact the Child Protection Advisers:

Tricia Hunte
Charlotte Holt
Piyush Bhattacharya

Telephone: 020 8753 5125

Megan Brown

Safer Organisations (incorporates LADO) and Safeguarding in Education Manager

Telephone: 020 8753 5125

Mobile: 07776 673 020

Email: megan.brown@lbhf.gov.uk

For LADO consultations and referrals please contact the duty Child Protection Adviser on:

Telephone: 020 8753 5125

email: LADO@lbhf.gov.uk

If you cannot reach a duty CP Adviser you can reach:

Named LADO

Megan Brown

Safer Organisations (incorporates LADO) and Safeguarding in Education Manager

Telephone: 020 8753 5125

Email: megan.brown@lbhf.gov.uk

CSE Lead

Emily Harcombe

Family Support and Child Protection Advisor (Monday to Wednesday only)

Telephone: 020 8753 6918

Mobile: 07467 734 648

Email: emily.harcombe@lbhf.gov.uk

Tri-borough FGM

Rochelle-Ann Naidoo

Tri-borough Senior Practitioner

Telephone: 020 7641 1610

Email: rnaidoo@westminster.gov.uk

Bi-borough PREVENT

Contact the local team on:

Telephone: 020 8753 5727

Email: prevent@lbhf.gov.uk

Tri-borough Multi-Agency Safeguarding Hub (MASH)

Karen Duncan

Tri-borough MASH Business Support Officer

Telephone: 020 7641 3991

Email: kduncan1@westminster.gov.uk

Hammersmith and Fulham School Admissions, Attendance, Child employment, Elective home education and children missing education (ACE) Team

Elizabeth (Liz) Spearman

Hammersmith and Fulham Head of ACE and Admissions

Telephone: 020 8753 6231

Email: elizabeth.spearman@lbhf.gov.uk

In an emergency call the police on 999.