



Safeguarding and Child Protection Policy 2022-23

Version:	1
New or Replacement:	Replacement
Approved by:	Chris Nixon, Director of Student Services and Safeguarding
Date approved:	November 2022
Effective date:	November 2022
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Responsible Committee:	SLT, Safeguarding and Prevent Panel
Corporation Committee (if applicable):	Curriculum & Quality Committee
Date of next review:	September 2023
Equality Impact Assessment Date:	N/A
Lead responsibility:	Director of Student Services and Safeguarding
Policy Category:	Student Services & Safeguarding

1. Purpose

- 1.1. The purpose of this policy is to outline West London College's principles and practice in enacting the safeguarding of students in our care. It shows compliance with current legislation (in particular *Keeping Children Safe in Education 2022*) as well the college's proactive approach to embedding safeguarding in every aspect of college culture.
- 1.2. 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.
- 1.3. 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. It is essential that everybody in the college understands their safeguarding responsibilities. 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.
- 1.4. 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 supporting learners who present with a wide range of concerns, including difficulties with emotional and mental health, abuse and bullying by their peers, sexual harassment and violence and child criminal exploitation. We are committed to ensuring that learners are safe online and aware of the risks associated with radicalisation and extremism.
- 1.5. Safeguarding and promoting the welfare of children is defined in *Keeping Children Safe in Education (2022)* as:
 - protecting children from maltreatment;
 - preventing the impairment of children's mental and physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- 1.6. 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, for example via the internet. They may be abused by an adult or adults, or another child or children. There is increased focus on the harm which can be caused through child-on-child harassment and violence of both a physical and sexual nature.
- 1.7. 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
 - Online Safety Policy
 - Prevent Strategy
 - Staff Code of Conduct
 - Staff Disciplinary Policy

2. Scope

- 2.1. This policy concerns the safeguarding of all learners at West London College. The policy scope includes onsite learners, apprentices, learners in subcontracted provision, learners on work placements / industry placement and those undertaking projects in the community.
- 2.2. The policy applies to all staff, agency staff, volunteers, governors and anyone working on behalf of the college. This includes employers offering work placements, transportation companies and contractors with direct access to children, young people and vulnerable adults.
- 2.3. According to The Children Act (1989) a child is defined as a person under the age of 18. According to The Care Act (2014) a vulnerable adult (or “adult at risk”) is defined as any person aged 18 years and over who is or may be in need of care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

3. Overarching Principles

- 3.1. The 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 culture of vigilance 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.

4. Policy Statement

- 4.1. 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.
- 4.2. 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 where necessary to refer learners to the Channel process. This priority is detailed in the college’s Prevent Strategy and Prevent Risk Assessment and Action Plan.

5. The role of college staff and governors in safeguarding

All college staff have a fundamental role to play in identifying concerns and ensuring that early help is provided for learners and apprentices. **The college promotes a clear ethos that safeguarding is everybody’s responsibility.**

5.1. *The Governing Body*

A designated governor for safeguarding is appointed and meets with the DSL on a regular basis. It is their responsibility to liaise with the Principal/CEO and DSL over matters regarding safeguarding and Prevent, to ensure that:

- the governing body complies with its duties under safeguarding and Prevent 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 and immediate action to be taken to safeguard and promote learners' and apprentices' welfare and safety.
- the safeguarding policy reflects the college's approach to child-on-child abuse, sexual harassment and abuse and serious violence.
- all staff and governors read at least Part One of Keeping Children Safe in Education guidance.
- all staff and governors undertake safeguarding and Prevent training which is updated regularly and that the DSL, 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 the college to ensure that all learners and apprentices are safe and that there are safer recruitment practices. Additionally, there must be effective processes to identify, address and record incidences of sexual harassment and violence. 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 has written recruitment and selection policies and procedures in place in its Safeguarding in Employment policy. At least one person on any appointment panel must 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). Please see section 15. 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.

5.2. *The DSL*

The Director of Student Services and Safeguarding is the senior leader responsible for 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. During term time, the DSL and/or a deputy should always be available for staff in the college to discuss any safeguarding concerns. The DSL and deputies should undergo training to provide them with the knowledge and skills required to carry out the role, which is updated every two years.

The DSL will provide an annual report on safeguarding to governors and update the Governing Body on mandatory training and CPD undertaken by staff. The DSL must ensure that college policy and procedure is known, understood and used appropriately by all staff. The DSL will refer to the local authority designated officer (LADO) for advice and guidance as necessary.

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

5.3. *Deputy DSLs*

A core team of Deputy DSLs (DDSLs) support the designated lead in the duties summarised above to ensure that procedures are robust and followed across the college. Deputies should be trained to the same standard as the DSL.

The team is responsible for ensuring that referrals are made to social services, the police and other external agencies in accordance with local Safeguarding Partners 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 statutory referrals made to social services and attending case conferences and strategy meetings

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

5.4. *Looked After Children Officer*

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 Officer 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.

5.5. *Heads of Curriculum and Additional Learning Support*

The college's curriculum leaders support staff in identifying and managing concerns about the wellbeing and safety of learners and bringing this to the attention of the DSL 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.

5.6. *Director of People and Organisational Development*

The Director of People and Organisational Development is responsible for delivering an effective human resources function which ensures the safe recruitment and employment of staff, DBS and barred list checks and staff mandatory training and induction. All pre-employment checks must be completed and a Single Central Record of these maintained in line with the college's Safeguarding in Employment policy. The Single Central Register is continually maintained and audited by members of the senior leadership team on a regular basis.

5.7. *College staff*

All college staff have an integral role to play in identifying concerns and ensuring that learners receive the support that they need. If young people are to receive the right help at the right time, everyone who comes into contact

with them has a role to play in identifying concerns at the earliest stage possible, sharing information and taking prompt action to prevent difficulties from escalating. 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.

Training and briefings ensure that staff are aware of the referral procedure and systems in college, who the DSL and safeguarding team are, the safeguarding policy, behaviour for learning policy and Prevent strategy. Staff are aware of particular categories of vulnerable learners and the importance of reporting instances of young people who they are unable to contact and who may have gone missing from education.

Staff training highlights the different types of abuse and safeguarding issues which young people and adults may experience. Staff know that if they have any uncertainties about a learner's wellbeing or fear that a learner is being abused, violated or exploited or is at risk, to report their concerns immediately.

6. Identification, referral and management of safeguarding concerns

- 6.1. It is imperative that there is a culture of safeguarding in which learners are able to approach staff to disclose problems which are affecting their lives. As a college we actively promote this and ensure that easily understood systems are in place for learners to both report concerns and to refer themselves for support. This is particularly important in sensitive matters, for example encouraging learners who have experienced sexual harassment, abuse or violence. All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe.
- 6.2. If a member of staff has a concern about a learner or an apprentice, they must report this immediately to their manager or a member of the safeguarding team for swift follow up. Where the concern or risk is significant, action must be taken immediately by speaking to the DSL, a DDSL or in exceptional circumstances if the DSL or DDSL is not immediately available, directly to children's social care or the police.
- 6.3. All concerns must be referred to the safeguarding team via an online secure referral process, so that they are risk assessed without delay, triaged, actions agreed and monitoring initiated. Safeguarding cases are recorded on MyConcern immediately, so that there is systematic record keeping and monitoring by the 'team around the learner'. The referrer will be kept updated about the progress of the case and may be directly involved as part of the team around the learner.
- 6.4. When the safeguarding team risk assess a referral, options will then include:
 - managing any support for the learner internally via the college's own pastoral support and wellbeing provision;
 - initiating an early help assessment with external agencies;
 - making a referral to statutory services (social services, police) as the learner may be in need or at risk of suffering significant harm,
- 6.5. If early help is appropriate, the DSL or DDSL will generally lead on liaising with other agencies and set up an inter-agency assessment as appropriate.
- 6.6. 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 Safeguarding Partners. The college works closely with social services, healthcare 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.
- 6.7. Where there are concerns about a learner's welfare and the learner is suffering or at risk of suffering from harm, it is essential that an immediate referral is made to children's or adult social care and, if appropriate, the police.
- 6.8. The safeguarding team also liaises with local authorities in a learner's home area and will follow the necessary safeguarding partners arrangements in that locality to address concerns and the need for intervention and support.

6.9. Statutory children's social care assessments and services fall into two categories:

6.9.1. *Children in need*

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

6.9.2. *Children suffering or likely to suffer significant harm*

Local authorities, with the support of other agencies, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. This includes all forms of abuse and neglect, female genital mutilation, forced marriage and 'honour'-based abuse and extra-familial harms like radicalisation, sexual exploitation and serious violence.

6.10. *Record keeping*

Maintaining timely and detailed records is essential to effective safeguarding practice. All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded. Records should include a clear and comprehensive summary of the concerns; details of how the concerns was followed up and resolved; a note of any action taken, decisions reached and the outcome.

The college's procedure ensures that each referral initiated is recorded on the college's safeguarding system MyConcern. This is a secure recording and monitoring platform which documents and tracks safeguarding cases, ensuring that sensitive information is shared confidentially within the safeguarding team and on a need-to-know basis. Safeguarding staff are trained to use the system and update records as and when any new information is forthcoming or an action taken.

7. **Information sharing**

7.1. Sharing information is a fundamental aspect of the college's role in promoting the welfare of young people and vulnerable adults. The decisions about how much information to share, with whom and when, requires 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. 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. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping a learner safe.

7.2. 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.

7.3. 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.

7.4. 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. Fears

about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

8. West London College's arrangements for learners with additional vulnerabilities and those in specific learning contexts

Whilst all young people and adults should be protected, there are some groups who are potentially at greater risk of harm. The college ensures that there is additional support and monitoring of these learners.

8.1. 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 Officer is responsible for ensuring that these learners are clearly identified and supported both on college and through liaison with local authorities and Virtual School Headteachers. Heads of Curriculum, teachers and tutors must be aware of the needs of looked after learners and ensure that they make good progress on their programmes of learning and achieve in line with their peers.

8.2. Learners who need a social worker

Young people may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact that a child has a social worker on their admission to college or if children's social care become involved during the learner's time at college. This will subsequently inform the support and strategies implemented in college to ensure that the learner receives appropriate pastoral and learning support and that there is effective liaison with statutory services.

8.3. Learners who require mental health support

All staff should be aware of the prevalence of mental health difficulties among children, young people and adults and the need to provide appropriate early intervention and support. Poor mental health can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. The college commissions an emotional wellbeing service from MIND, which can assist learners who are experiencing stress and anxiety. This service and the safeguarding team can refer the learner to the appropriate professionals when there are concerns about their mental health. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

8.4. Children Missing in 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 requires intervention from a member of the safeguarding team, working in partnership with the police and social services. The safeguarding team will ensure that it puts in place appropriate safeguarding responses for children who go missing from education, particularly on repeat occasions, in partnership with statutory agencies, 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.

8.5. 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.

8.6. *Learners aged 14-to-16-years old*

Safeguarding issues relating to learners aged 14-to-16 attending the college's Key Stage 4 provision, are 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 may be more vulnerable than other learners due their 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 provision is overseen by an Assistant Principal who is a trained DDSL. The college has effective links with the London Borough of Ealing local authority, and as the 14-to-16 provision is contracted by Ealing, this also facilitates access to multi-agency services and support.

Primary responsibility for any school pupil attending day 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 DSL or a DDSL who will then liaise with the relevant safeguarding contact at the home school.

8.7. *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 format to promote full understanding.

8.8. *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. 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.

8.9. *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 DSL 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 which meet the statutory requirements of KCSIE
- 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

8.10. 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.

8.11. *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 (Careers and Employability) 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.

8.12. *Children who are lesbian, gay, bi, or trans (LGBT)*

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. The college has a zero tolerance for any kind of LGBT discrimination or bullying, and staff will actively challenge any unacceptable behaviours. Student tutorials will be used to ensure LGBT students are aware of their access to support and can trust their tutor to help them.

9. Child-on-child abuse, sexual harassment and violence

9.1. All staff are made aware of the importance of identifying, challenging and reporting inappropriate behaviours between learners and concerns of bullying and abuse between peers.

9.2. Child on child abuse may include:

- bullying, including online bullying and discrimination
- abuse in intimate personal relationships between peers
- physical abuse and harm
- sexual violence and assault; this may include an online element which facilitates, encourages or threatens sexual violence
- sexual harassment, such as sexual comments, remarks, jokes and online harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nude and semi-nude images or videos
- upskirting, which involves taking a picture under a person's clothing without their permission to obtain sexual gratification

9.3. In all instances of child-on-child abuse, sexual harassment or violence, staff must report this immediately to the safeguarding team for action and investigation.

9.4. Steps will be taken to ensure that the victim is supported and listened to and, depending on the nature and seriousness of the concern, a referral made to statutory services. If the perpetrator is a learner in college, action will be taken to ensure that they cannot cause any further distress or harm, depending on the nature of the

incident(s). This may involve suspension pending investigation. For perpetrators who are not learners at college and aged under 18, a referral will be made to the relevant social care team and/or the police.

- 9.5. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they
- 9.6. Where an incident is related to jokes and comments in and around the college or in the classroom, this may also be addressed through the behaviour for learning procedure and the learner(s) involved will be required to engage in one or more sessions delivered by the pastoral team in sex and relationships education. Parents will also be notified in any instances of child on child harassment and abuse.

10. Opportunities to teach safeguarding

10.1. There are a number of ways in which learners and apprentices are taught about safeguarding, online safety, college safeguarding procedures and who to speak to:

- Information about safeguarding provision is introduced at open events
- Further information is provided upon application and enrolment at college
- Learner induction includes presentations and discussion on what safeguarding and Prevent mean, how to report concerns and contact safeguarding team members. All learners are given access to an online course handbook which also provides information on safeguarding, Prevent and how to stay safe online.
- 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. Further details are available in the college's Online Safety policy
- Tutorial and enrichment activities encompass a wide range of topics to raise awareness of physical and mental health and wellbeing, online 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.
- Learners can refer themselves to the safeguarding team via the online referral form. This is also available via a QR code on posters around the college.
- Safeguarding information and key contacts are available on the college website and on the learner portal.
- There is a specific focus on creating a safe culture in which to disclose personal and sensitive issues, particularly relating to sexual harassment, abuse and violence.
- External agencies provide workshops on key themes including 'what is consent?'; recognising and responding to sexual violence against females and males.

11. Staff training and induction

11.1. Staff, agency staff and governors, are required to complete mandatory safeguarding and Prevent training at the beginning of each academic year and 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 the signs of abuse and reporting suspected abuse. In addition:

- All staff are required to demonstrate that they have read and understood the updates to the annual guidance in Part 1 of Keeping Children Safe in Education.
- All safeguarding officers complete Level 3 training delivered by an accredited external provider or the local authority and refresh their knowledge at least every two years.

- The DSL and DDSLs 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 must undertake Safer Recruitment training.
- Staff training has been delivered in online safety and will be an ongoing feature of safeguarding upskilling.
- All training is recorded on staff training records.
- Regular safeguarding updates will be delivered at CPD dates to ensure staff's safeguarding knowledge is current and developed.

12. Online safety

12.1. Education about safe use of the internet and social media, mobile phones and other electronic communications technologies is a high priority. This involves raising awareness 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. The college's Online Safety policy details these responsibilities and provision to ensure that learners are safeguarded from potentially harmful and inappropriate and online material.

- 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 part of learners' 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 learners 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).
- Online incidents and concerns are managed in accordance with Safeguarding or disciplinary policies as appropriate.
- College systems are monitored live by the Smoothwall system which flags any concerning or inappropriate imagery or words

13. Involving parents and carers

13.1. The 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 obtains 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. Two contacts will always be sought.

14. Allegations made against staff including supply teachers, volunteers and contractors

14.1. Colleges must have processes and procedures in place to manage any safeguarding concerns about staff members, including agency staff, volunteers and contractors.

KCSIE (2022) identifies two levels of concern, which the college's policy will address:

1. Allegations that may meet the harms threshold

2 Allegations/concerns that do not meet the harms threshold. These are referred to as 'low level concerns'

14.2. *Allegations that may meet the harms threshold*

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 may pose a risk of harm to children/vulnerable adults.
- behaved towards a child/vulnerable adult in a way that indicates that they may be unsuitable to work with children/vulnerable adults.

The following procedures must be followed in order to look after the welfare of the learner involved and to investigate and support the person who is subject of the allegation:

The member of staff or person receiving the allegation, or having the concern, must immediately inform the DSL or the Director of People and Organisational Development.

Where it is identified that a learner has been harmed or that there may be immediate risk of harm, or if the situation is an emergency, the college's safeguarding referral procedure should be followed and immediate contact made with children's social care and as appropriate with the police. The necessary steps must be quickly taken to ensure the safety of the child/vulnerable adult in question and any other individual(s) considered at risk.

The DSL, Director of People and Organisational Development 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 LADO will advise on the process to manage the allegation. The tri-borough Safeguarding Partners website has a detailed procedure for reporting allegations and concerns, which is supported by a LADO referrals indicator matrix. A 'case manager' in the college will be appointed to lead the investigation. This will be a member of the college's senior leadership team. Where the principal is the subject of an allegation, the chair of governors will be required to investigate.

The DSL and senior leadership team should ensure they understand the local authority arrangements for managing allegations and the information the LADO will require when an allegation is made. This is provided in the procedural guidance provided by the LADO service.

Where it is clear that an investigation by the police or children's social care is not necessary, the LADO should discuss the next steps with the case manager.

14.3. *No further action*

Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned and by whom.

14.4. *Further enquiries*

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and

guidance to colleges when considering allegations against staff. Their role is not to investigate, but to ensure that an appropriate investigation is carried out by the college.

14.5. *Suspension*

Suspension should not be an automatic response when an allegation is reported. The case manager must consider carefully whether the circumstances warrant suspension from college or until the allegation is resolved.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for this course of action. Where it has been deemed appropriate to suspend the individual, written confirmation should be given within one working day, giving as much relevant detail for the reason. Permission for suspension can only come from the DSL and Director of People and Organisational Development. The principal must also be informed.

14.6. *Confidentiality and information sharing*

During the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is subject of the allegation and about the alleged victim.

The college must make every effort to maintain confidentiality while an allegation is being investigated or considered.

14.7. *Allegation outcomes*

The definitions used when the college determines the outcome of an allegation are as follows:

- Substantiated
- Malicious
- False
- Unsubstantiated
- Unfounded

The options following on from the investigation outcome will range from taking no further action to dismissal. If the allegation is substantiated and the person is dismissed, resigns or the college ceases to use a contracted service, there is a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

14.8. *Concerns that do not meet the harm threshold*

As part of the college's approach to safeguarding, it is necessary to promote an open and transparent culture in which all concerns about adults working in or on behalf of the college are dealt with promptly and appropriately.

14.9. *Low Level Concerns*

A low level concern is any concern, no matter how small or one which causes a sense of unease or doubt. KCSIE provides examples of such behaviour to include:

- being over-friendly with learners
- having favourites
- taking photographs of young people on their mobile phone
- engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

It is imperative that any such concerns, which do not meet the harm threshold are shared with the DSL, recorded in writing and dealt with appropriately. The record should include details of the concern, the context in which the concern arose, and action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. This may move the concern to meeting the harms threshold or disciplinary action.

15. Safer recruitment

- 15.1. 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.
- 15.2. 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.
- 15.3. 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'.
- 15.4. 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 is reviewed regularly to ensure that it is being kept accurately.
- 15.5. 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.
- 15.6. Details of the college's safer recruitment policy and procedure are available in the Safeguarding in Employment policy.

16. Relevant Legislation / Regulation

- 16.1. This policy is underpinned by two key pieces of statutory guidance:
 - *Keeping Children Safe in Education (KCSiE), September 2022*
 - *Working Together to Safeguard Children, July 2018*
- 16.2. 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 2022.
- 16.3. The policy is informed by and meets the requirements of the following:

Children's Safeguarding and Child Protection

- *Keeping Children Safe in Education 2022 (now incorporating guidance previously contained in withdrawn Sexual Violence and Sexual Harassment Between Children in Schools and Colleges)*
- *Guidance for Safer Working Practice in Education Settings 2022*
- *Inspecting Safeguarding in Early Years, Education and Skills Settings 2022*
- *Working together to Safeguard Children (2018)*
- *Mental health and behaviour in schools (2018)*
- *Children and Social Work Act 2017*
- *Children and Families Act 2014*
- *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 2021*
- *The Prevent Duty (2015) updated April 2021*
- *Counter Terrorism and Security Act 2015*

Safer recruitment

- *Sexual Offences Act 2003*
- *Disclosure & Barring Service 2013*

17. Related Documents

17.1. The following related documents are relevant to this policy / procedure:

- Behaviour for Learning Policy
- Online safety policy
- Prevent Risk Assessment / Action Plan
- Staff Code of Conduct
- EDI Policy
- Criminal Convictions Procedure

18. Accountability

18.1. The Designated Safeguarding Lead is responsible for the drafting and implementation of this policy.

18.2. He or she is also responsible for ensuring that this document is reviewed and updated **at least annually as per legislation** and is the first contact point for managers seeking advice and guidance about the Safeguarding Policy or making enquiries about its interpretation.

18.3. All managers are responsible for ensuring that they and their team members follow the requirements set out in this document.

18.4. All employees are responsible for adhering to the requirements set out in this document.

19. Equality, Diversity & Inclusion

19.1. The College has paid due regard to equality considerations during the preparation and implementation of this Policy.

19.2. These considerations included the potential for any differential negative effect on the grounds of age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage or civil partnership.

19.3. The College's judgement is that there is no such negative effect on those grounds and, consequently, no potential breach of the Equality Act 2010.

19.4. The operation of this Policy and Procedure will be monitored by the Executive Director of People and Organisational Development in order to establish that no unlawful discrimination is taking place and to identify opportunities for the College to enhance equality of opportunity and fair treatment.

20. Review

- 20.1. This document will be reviewed by October 2023
- 20.2. The DSL will undertake this review, taking into account the outcomes of the monitoring process, legislative changes and developments in good practice.
- 20.3. As part of the review, the DSL will seek and consider the views of the College's employees and, where appropriate, of the recognised trade unions.
- 20.4. The outcome of the review will be reported to the Senior Leadership Team.
- 20.5. 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 also identifies areas for further improvement in the next academic year.
- 20.6. A Safeguarding and Prevent Action Plan is used as the basis for developing the college's practice and provision on a continuous basis.

21. Policy Category

Category [select ONE only]	<input type="checkbox"/> Business Development, Marketing and Subcontracting <input type="checkbox"/> Corporation <input type="checkbox"/> Data Protection <input type="checkbox"/> Equality & Diversity <input type="checkbox"/> Estates / Facilities <input type="checkbox"/> Executive Support, Administration and Reception <input type="checkbox"/> Finance <input type="checkbox"/> Health and Safety <input type="checkbox"/> International <input type="checkbox"/> IT Services <input type="checkbox"/> Management Information Systems <input type="checkbox"/> People and Organisational Development <input type="checkbox"/> Quality <input checked="" type="checkbox"/> Student Services & Safeguarding
Audience [select ALL that apply]	<input type="checkbox"/> Employees <input type="checkbox"/> Governors <input type="checkbox"/> Learners <input type="checkbox"/> Partners <input type="checkbox"/> Suppliers

Appendix 1. Safeguarding: what college staff should look out for (KCSIE 2022)

Early help

College staff should be particularly alert to the potential need for early help for a learner who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs, whether or not they have a statutory EHCP;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Abuse and neglect

All staff should be aware of indicators of abuse and neglect and raise concerns with the DSL when they are unsure. Staff should be aware that safeguarding incidents can be associated with factors outside the college and home environment and learners can be at risk of 'extra-familial' harms. These include sexual exploitation, criminal exploitation, sexual abuse, serious violence and county lines. Abuse can take place online or through technology.

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child or young person by inflicting harm or failing to act to prevent harm. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, throwing, poisoning, burning or scalding, drowning suffocating or otherwise causing physical harm.

Emotional abuse: the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on their emotional development. For example, conveying to a child that they are worthless, unloved or inadequate.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Sexual abuse can take place online and technology can be used to facilitate offline abuse. The sexual abuse of children by other children is a specific safeguarding issue, known as child-on-child abuse, and all staff should be aware of it and the college's procedure for dealing with it.

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.

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

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children and young people at risk of harm.

Child Criminal Exploitation (CCE)

This is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants, for financial reward and/or through violence or threat of violence. Specific forms of CCE include children and young people being forced or manipulated into transporting drugs or money through county lines, shoplifting, pickpocketing or threatening/committing serious violence to others.

Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through sharing videos or images on social media. CSE can include 16 and 17 year olds who can legally consent to have sex. Some may not realise they are being exploited and believe they are in a genuine romantic relationship.

Female Genital Mutilation (FGM)

All staff should speak to the DSL if they have any concerns about a child or young person at risk of female genital mutilation. This may be alerted by a planned/extended visit to the child or young person's country of origin. There is a specific legal duty on teachers. If a teacher, in the course of their work, discovers that an act of FGM has been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health Concerns

All staff should be aware that mental health problems can, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to identify concerns about a young person's mental health and emotional wellbeing and to refer them to the safeguarding team for early intervention or higher levels of support from appropriately trained professionals.

Child-on-child abuse

All staff should be aware that children and young people can abuse their peers, and that this can happen inside and outside of college and online. It is important that all staff understand the importance of challenging inappropriate behaviours between peers, to ensure that unacceptable behaviours which create an unsafe environment are eradicated.

Serious violence

All staff should be aware of the indicators which may signal children and young people are at risk from, or are involved with serious violent crime. These may include increased absence from college, poor attitudes and behaviour, a change in friendships with older individuals or groups, a decline in performance, signs of self-harm or signs of assault or unexplained injuries.

Contextual safeguarding

All staff should understand and be aware that children and young people can experience significant harm beyond their families. Contextual safeguarding recognises that the different relationships that young people form in their neighbourhoods, college and online, can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. All staff, but in particular the DSL, should consider whether children and young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms include sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Appendix 2. The college's safeguarding team and contact details

Name	Role		Contact Details	
Christopher Nixon	DSL	Director of Student Services and Safeguarding	07776 202409	c.nixon@wlc.ac.uk
Daniel Bristow-Bailey	DDSL	Student Services Manager (Safeguarding & Wellbeing)	020 7565 1283	d.bristow-bailey@wlc.ac.uk
Kerri Ryan	DDSL	Student Services Manager (Careers & Employability)	020 7565 1283	k.ryan@wlc.ac.uk

<https://www.wlc.ac.uk/your-college/safeguarding>

Appendix 3. West London College’s Safeguarding Referral Procedure

Safeguarding is everybody’s responsibility

1. A member of staff has a concern about a learner who is or may be vulnerable
2. A member of staff has a concern about a learner who is / has been absent / who they are unable to make contact with or who has gone missing
3. A learner is having personal/family/emotional difficulties or there are concerns in the community
4. A learner raises a concern about another learner’s safety/wellbeing
5. A parent / carer / external agency raises concern about a learner

There are many forms of vulnerability, please see the college’s Safeguarding Policy or

Member of staff should alert their manager and/or contact a member of the Safeguarding Team in person or by phone with details of the concern. An online referral should also be made at www.wlc.ac.uk/your-college/safeguarding



Member of safeguarding team risk assesses and triages the referral for further action, follow-up and monitoring. Feedback is provided to referrer.

Safeguarding team assessment – Student Services support

Where the concern or difficulty reported relates to advice, finance, college support service, tutor or manager to refer to Student Services team for follow-up

Safeguarding team assessment – safeguarding support needed

Where the DDSL/DDSL has concerns about the health, wellbeing and/or safety of the learner, they will (a) make direct contact the learner / parent where possible (b) report the concern to an

Co-ordinate early help or refer to statutory social care services / police

MyConcern

Details of the referral will be completed on MyConcern with follow up and monitoring