



## SAFEGUARDING AND CHILD PROTECTION POLICY

### 1. Introduction

The Corporation refers to the East Surrey College Corporation, which represents the merged East Surrey and John Ruskin Colleges, also trading as Orbital South Colleges.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015.

The policy also reflects statutory guidance 'Keeping Children Safe in Education' 2020 (KCSIE), and Surrey and Croydon Safeguarding Children Partnership Procedures.

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our College to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and governors of the Orbital South Colleges group.

### 2. Purpose

The Corporation recognises that it has an explicit duty to safeguard and protect children, young people and adults at risk from abuse as defined in the following: Children Act 2004, Section 175 of the Education Act 2002, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education September 2020 [KCSIE], What To Do If You're Worried A Child Is Being Abused 2015, the Prevent Duty March 2015, Disqualification under the Childcare Act 2006 (updated 2019), FGM Act 2003 Mandatory Reporting Guidance 2016 (updated 22/01/2020), Information Sharing Advice for Practitioners' guidance 2018, Surrey and Croydon Children Missing from Education, SCC Touch and the use of physical intervention when working with children and young people, The Equality Act 2010, Coronavirus (COVID-19): safeguarding in schools, Colleges and other providers (May 2020), and Surrey and Croydon Safeguarding Children Partnership protocols, guidance and procedures.

**Safeguarding** looks at preventative action and covers the full range of measures in place to protect children, young people, and adults at risk from potential dangers, including the safer recruitment of staff, and is therefore a *proactive approach*.

**Child, young person, and adult at risk Protection** looks at recognising abuse or neglect and acting on it, so is a *reactive approach*.

The term "safeguarding" is defined by the Children's Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2004) as:

'Organisations working with children, young people and adults at risk take all reasonable measures to ensure that the risks of harm to the individual's welfare are minimised; where there are concerns about children, young people, and adults at risk's welfare, and all

organisations take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies’.

- Promotes an environment in which every learner feels valued and able to communicate their wishes and feelings successfully.
- Promotes the mental and emotional wellbeing of children, young people, and adults at risk.

### 3. **Scope**

All children, young people, and adults at risk, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm, or abuse. For the purposes of this advice a child and young person is deemed to be any young person up to their 18<sup>th</sup> birthday.

The term an ‘Adult at Risk’ replaces the term ‘Vulnerable Adult’. “An ‘adult at risk’ is defined by the Department of Health as a person aged 18 years or older 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’.

The Care Act 2014 defines ‘Adult at Risk’ as:

- Having need for care and support (whether the Authority is meeting any of those needs).
- Is experiencing or is at risk of abuse or neglect.
- And because of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

#### **The Equality Act 2010**

The College Group is committed to safeguarding the protected characteristics as identified by the Equality Act 2010. These are age, disability (which includes mental health and people diagnosed as clinically obese), race, religion or belief, sex, sexual orientation, gender reassignment (people who are having or who have had a sex change, transvestites and transgender people), marriage and civil partnerships and pregnancy and maternity.

#### **Respecting the rights of children, young people, and adults at risk**

The College Group recognises the expectation that all children, young people, and adults at risk have rights that need to be respected as identified by the Human Rights Act. The College Group will commit to meet these rights by:

- Keeping children, young people, and adults at risk as fully informed as possible.
- Providing clear and detailed information.
- Explaining interventions and support in a way they can understand and in a format that is accessible to them.
- Treating children, young people, and adults at risk with dignity and respect.

All members of the College Group community, including staff paid and unpaid, College governors, students, contracted and franchised staff, are responsible for safeguarding and promoting the welfare of children, young people and adults at risk and will be made aware of the College Safeguarding and Child Protection Policy and Procedures.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children’s health

or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The learning environment will be one in which children, young people and adults at risk feel valued and respected, and are encouraged and supported through the curriculum, support, work experience and training areas to raise any concerns they have about their own safety and welfare. Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

Disclosures about abuse or neglect and allegations against persons in a position of trust made by a child, young person or adult at risk must always be taken seriously and reported in line with the College Group procedures, and with due regard to the privacy of the child, young person or adult at risk and their family.

Safeguarding children, young people and adults at risk procedures provide a clear framework for raising concerns or worries about a child, young person or adult at risk and should be read and understood by all the College Group community.

All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the College or in the community, considering contextual safeguarding, in accordance with statutory guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst the College will work openly with parents/carers as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

### **Supporting Students**

We recognise that the College Group may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

The College Group will support all students:

- We will promote a caring, safe, and positive environment within the College.
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College Group communities.
- We will ensure children are taught to understand and manage risk through personal, social, health and economic education and Relationship and Sex Education (RSE) in KS4 Delivery. This includes online and social media safety.
- We will be responding sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling, or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

- We will notify Social Care immediately if there is a significant concern.
- We will provide continuing support to a student about whom there have been concerns who leaves the College by ensuring that information is shared under confidential cover to the child's new setting and ensure the College records are forwarded as a matter of priority and within statutory timescales.

#### 4. Policy Aims

To demonstrate the College Group's commitment regarding safeguarding and child protection and to building a 'culture of safety' in which learners are protected from abuse and harm in all areas of College activity. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who encounters children and their families and carers have a role to play in safeguarding children. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, always, what is in the **best interests** of the child. The welfare of the child is paramount.

To ensure that all staff working within our College Group who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018. Applicants for posts within the setting are clearly informed that the positions are subject to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013. Candidates are informed of the need to carry out 'enhanced disclosure' checks with the Disclosure & Barring Service before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We abide by Ofsted requirements in respect of references and Disclosure & Barring Service checks for staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the child, young person or adult at risk.

We take security steps to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the children, young people, or adult at risk.

We have procedures for recording the details of visitors to the College Group.

All adults working with or on behalf of children, young people and adults at risk have a responsibility to safeguard and promote their welfare and wellbeing.

To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse. All staff will be informed of their responsibilities to be alert to the signs of abuse. Any concerns should be shared with the designated members of staff for safeguarding. All staff will be encouraged to maintain an attitude that 'it could happen here'.

The designated members of staff for safeguarding will receive training at least every two years.

All other staff who will have contact with children, young people and adults at risk will receive updating safeguarding training every year.

Staff will be provided with relevant information on a need to know basis about individual children, young people, and adults at risk to keep them vigilant to any specific needs.

When a complex safeguarding referral is identified by any staff member within the organisation, there will be an opportunity for a debrief with that member of staff to have safeguarding reflection with the Designated Safeguarding Lead.

To enable the College to effectively contribute to Early Help, assessments of need and support for those children.

To provide robust systems and procedures that are followed by all members of the College community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

## **5. Safe College, Safe Staff**

We will ensure that:

The College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children.

All staff receive information about the College's safeguarding arrangements, the College's safeguarding statement, Staff Code of Conduct, Safeguarding and Child Protection Policy, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education part 1 and annex A.

All staff receive safeguarding and child protection training at induction in line with advice from Surrey and Croydon Safeguarding Children Partnership which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All staff and governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Safeguarding and Child Protection Policy is made available via the College websites and that parents/carers are made aware of this policy.

We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Our lettings policy will seek to ensure the suitability of adults working with children on College sites at any time.

Community users organising activities for children are aware of the College's Safeguarding and Child Protection Policy, guidelines, and procedures.

The name of the designated members of staff for safeguarding, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the College with a statement on how to contact them.

All visitors will receive a Safeguarding leaflet that states how safeguarding concerns can be reported, explaining the College's role in referring and monitoring cases of suspected harm and abuse.

All staff will be given a copy of Part 1 and Annex A of Keeping Children Safe in Education 2020 and will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

## 6. Roles and Responsibilities

### 6.1 All College Staff:

Have a key role to play in identifying concerns early and in providing help for students.

To achieve this they will:

- Provide a safe environment in which students can learn.
- Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to.
- Ensure students know that there are adults in the College who they can approach if they are worried or have concerns.
- Be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect, or exploitation.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these students' experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action will be taken, following our procedure and College's Safeguarding and Child Protection Policy by contacting the designated safeguarding lead or a deputy.

- Plan opportunities within the curriculum for students to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a student who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.

- Be prepared to refer directly to the Multi Agency Partnership (MAP) and Children Services and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Surrey and Croydon Safeguarding Children Partnership and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to “keep a secret”. Notify the DSL or their Deputy of any child on a child protection plan or child or in need plan or Child, Looked After or a student with an EHCP who has unexplained absence.
- Have an understanding of early help and be prepared to identify and support students who may benefit from early help.
- Identify students who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the College’s support process or an early help assessment). In some circumstances it may be appropriate for a member of staff to act as the lead professional in early help cases.
- Liaise with other agencies that support students and provide early help.
- Know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the role of the DSL, the College’s Safeguarding and Child Protection Policy, and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- Be mindful that the OSC professional competencies state that staff should safeguard students’ wellbeing and maintain public trust in the profession as part of their professional duties.
- Assist the Governing Body and Principal in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

## 6.2 The Principal

In addition to the role and responsibilities of all staff the Principal will ensure that:

- The College fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.

- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes, and feelings are considered when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for students to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the public interest disclosure (whistle-blowing) procedures.
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Surrey and Croydon Safeguarding Children Partnership (SSCP) and Surrey and Croydon County Councils.
- Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency and LADO where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

### 6.3 The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in the College, this responsibility is not able to be delegated.
- Have an "it could happen here" approach to safeguarding.
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- NPCC- [Know When to call police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access/Contact (C-SPA Surrey

OR SPOC Croydon), and act as a point of contact and support for school/college staff. Requests for support should be made securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the Request for Support Form urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line). For Croydon [childreferrals@croydon.gov.uk](mailto:childreferrals@croydon.gov.uk) urgent referrals should be made by telephone 0208 255 2888 (and ask for the Duty Manager).

- Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the [Prevent Referral Process](#) and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) or [safercroydon@croydon.gov.uk](mailto:safercroydon@croydon.gov.uk) or [Channel@croydon.gov.uk](mailto:Channel@croydon.gov.uk) If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. Or use the Anti-terrorist hotline: 0800 789 321.  
The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the “case manager” and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE guidance on when a concern is raised that there is an allegation of a pupil abusing another pupil within the College. Be available during term time (during College hours) for staff in College to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the College leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole College community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of SSCP or CSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- Understand and support the College delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting students from radicalisation.
- Liaise with College staff (especially pastoral support colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP Levels of Need or the Croydon Levels of Need document to inform decision making and liaison with relevant agencies.

- Be alert to the specific needs of children in need, those with SEND and young carers.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at College; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the College student file record.
- Ensure that when a student transfers (including in-year), their child protection file is passed to the new provider as soon as possible, and within statutory timescales (separately from the main student file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a student transfers and is on a child protection plan or is a child looked after, their information is passed to the new provider immediately and that the child's social worker is informed.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parent/carer prior to the meeting.
- Report to the Collee Principal any significant issues for example, use of the SSCP or CSCP multiagency escalation procedures, enquiries under section 47 of the Children Act 1989 and police investigations.
- Ensure that the case holding Social Worker is informed of any student currently with a child protection plan who is absent without explanation.
- Ensure that all staff sign to say they have read, understood and agree to work within the College's child protection policy, staff behaviour policy (code of conduct) and Keeping 16 Children Safe in Education (KCSIE) Part 1 and annex A and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training, and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the College leadership and governors, the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the College in this.

- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Principal and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Complete the Annual Croydon Safeguarding and Child protection audit.
- Ensure that the names of the Designated Safeguarding Lead and deputies, are clearly advertised, with a statement explaining the College’s role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2020.

#### 6.4 The Deputy Designated Safeguarding Lead(s)

In addition to the role and responsibilities of all staff the Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- Carry out, in the absence of the DSL, the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all the functions above

#### 6.5 All members of The Governing Body understand and fulfil their responsibilities to ensure that:

- The College has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Policies are consistent with Surrey Safeguarding Children Partnership (SSCP) and Croydon Safeguarding Children Partnership (CSCP) and statutory requirements, are reviewed annually and that the Safeguarding and Child Protection policy is available on the College website.
- The SSCP and CSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- The College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- At least one member of the governing body has completed safer recruitment training to be repeated every five years.

- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2020) part 1 and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- All staff including temporary staff and volunteers are provided with the College's safeguarding and child protection policy and staff behaviour policy or Code of Conduct.
- The College has procedures for dealing with allegations of abuse against staff (including the Principal and CEO), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- A nominated governor for safeguarding is identified.
- A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputy(s) undertake interagency training (SSCP Foundation Modules 1&2) and also undertake DSL 'New to Role' and 'Update' training every two years as well as attending DSL network events, to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education and relationships and sex education (RSE) in KS4.
- The governors, proprietors and College will ensure application filters and monitoring systems are in place to safeguard children online.
- The College will comply with DfE and the Surrey and Croydon County Council Children Missing Education requirements.
- The College will comply with regular data returns requested by the Local Authority, regarding all students attending alternative provision and/or on a reduced or modified timetable.
- Appropriate online filtering and monitoring systems are in place.
- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Governing bodies and proprietors will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the College) are in place for all Governors.
- Any weaknesses in Safeguarding are remedied immediately.

## 7. Confidentiality, Sharing and Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the [Information sharing advice for safeguarding practitioners](#)

The College will refer to the guidance in the data protection: toolkit for schools - <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> which supports schools/Colleges with data protection activity, including compliance with the GDPR.

Information will be shared with staff within the College who 'need to know'.

Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm.

There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Principal or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to gain parent/carers consent to refer a child under 16 to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## 8. Child Protection Procedures

The following procedures apply to all staff working in the College and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a student is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that students with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.

3. The DSL will consider if there is a requirement for immediate intervention, however urgent attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of: Dates and times of their observations; Dates and times of any discussions in which they were involved; Any injuries Explanations given by the child / adult Rationale for decision making and action taken; Any actual words or phrases used by the child.
5. The records must be signed and dated by the author or/equivalent on electronic based records
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA or SPOC (and the police if appropriate) if there is the potential for immediate significant harm.

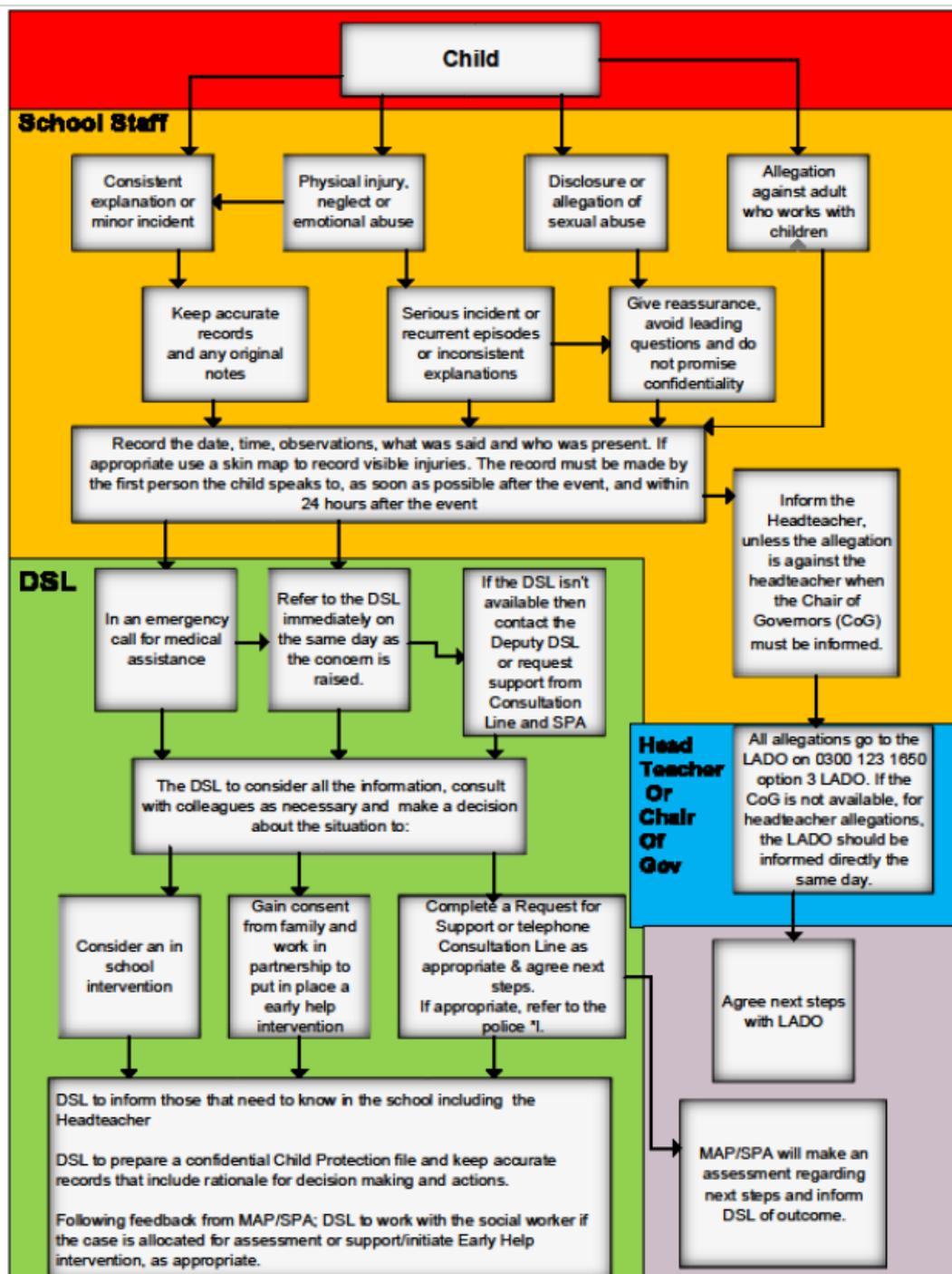
Following a report of concerns the DSL must:

1. Using the SSCP or CSCP Levels of Need, decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the C-SPA or SPOC and the police if it is appropriate.
2. Normally the College should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA or SPOC. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be considered.  
  
If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA or SPOC. By sending a Request for Support Form by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. For Croydon for urgent child protection matters requiring immediate attention: 0208 255 2888 and Email SPOC referrals to [childreferrals@croydon.gov.uk](mailto:childreferrals@croydon.gov.uk). If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken
3. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns. For Croydon if advice is required contact the SPOC Professionals Consultation Line 0208 726 6464.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or SPOC consultation line or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
6. When a student is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA or SPOC.

The DSL should seek advice about what action the C-SPA or SPOC will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

**Child Protection Procedures Flowchart**



## 9. Dealing with disclosures

### All staff

A member of staff who is approached by a student should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English.

It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable.

All staff have the right to make a referral to the C-SPA, SPOC or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the College premises at the time and have concerns about sending a student home.

### **Guiding principles, the seven Rs**

#### **Receive**

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

#### **Reassure**

- Reassure, but only so far as is honest and reliable
- Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

#### **Respond**

- Respond only as far as is necessary for you to establish whether you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask why something has happened.
- Do not criticize the alleged perpetrator; the student may care about him/her, and reconciliation may be possible
- Do not ask the student to repeat it all for another member of staff.
- Explain what you must do next and whom you must talk to. Reassure the pupil that it will be a senior member of staff

#### **Record**

- If possible, make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file

- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

### **Remember**

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it

### **Review (led by DSL)**

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Principal or Safeguarding Governor of the College or may contact the C-SPA or SPOC.

Receiving a disclosure can be upsetting for the member of staff and staff will receive reassurance and in some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## **10. Safeguarding concerns and allegations against adults who work with children**

### Procedure

This procedure should be used in all cases in which it is alleged a member of staff, including supply staff or volunteer, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children

In dealing with allegations or concerns against an adult, staff must:

Report any concerns about the conduct of any member of staff or volunteer to the Principal immediately.

If an allegation is made against the Principal or CEO the concerns need to be raised with the Chair of Governor as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Principal, CEO, or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Principal, CEO, or Chair of Governors they will contact the LADO (as part of their mandatory duty) immediately and before taking any action or investigation.

For Surrey call 0300123 1650 option 3, LADO Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

For Croydon call 0208 255 2889, Email: [lado@croydon.gov.uk](mailto:lado@croydon.gov.uk)

Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the College will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police. If the matter is investigated internally, the LADO will advise the College to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2020) and the SSCP and CSCP procedures.

## 11. What is child abuse?

The following definitions are taken from Working Together to Safeguard Children HM Government (2018). In addition to these definitions, children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the SSCP Levels of Need or CSCP Levels of Need.

### Categories of abuse

**Children includes everyone under the age of 18 – a child, young person, or adult at risk**

#### 11.1 Physical abuse

This may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child, young person, or adult at risk. This also includes rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint, or inappropriate sanctions.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induce illness in a child, young person, or adult at risk.

#### 11.2 Emotional abuse

This is the persistent emotional ill treatment of a child, young person, or adult at risk, such as to cause severe and persistent effects on the child, young person, or adult at risk's emotional development. This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

It may involve conveying to a child, young person, or adult at risk that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may

feature age or developmentally inappropriate expectations being imposed on the child, young person, or adult at risk. These may include:-

- Interactions which are beyond the child, young person, or adult at risk's developmental capability.
- Over protection and limitation of exploration and learning, or preventing the child, young person, or adult at risk from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve causing the child, young person, or adult at risk to frequently feel frightened or in danger, or the exploitation or corruption of a child, young person, or adult at risk.

### **11.3 Sexual abuse**

This includes rape and sexual assault or sexual acts to which the child, young person or adult at risk has not consented, or could not consent to, or was pressured into consenting. This involves forcing or enticing a child, young person, or adult at risk to take part in sexual activities, including prostitution whether the child, young person or adult at risk is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving a child, young person or adult at risk in looking at, or in the production of, pornographic materials, or watching sexual activities, or encouraging a child, young person or adult at risk to behave in sexually inappropriate ways.

Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any long-term relationship. A relationship of trust should exist between a member of staff or a volunteer and the person for whom they are caring, it would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are caring for.

### **11.4 Harmful Sexual Behaviour**

The Brooks Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the College will work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach. The College recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

### ***Responding to reports of sexual violence and sexual harassment***

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

Anyone of any gender, can be a victim. Children making a report of sexual violence or sexual harassment including "upskirting" (which is a criminal offence) will be taken seriously, kept

safe and be well supported. If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk). If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA or SPOC securely email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or [SPOC@croydon.gov.uk](mailto:SPOC@croydon.gov.uk). The need to call the police must also be considered and in the case of rape the police must be called.

Risk Assessment:- Following a report, the DSL will make

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs, and any discipline action.
- All other children at the College.
- The victim and the alleged perpetrator sharing classes and space at College.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the College's approach to supporting and protecting students

Action: The DSL will consider:-

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options:

Manage internally

Early Help intervention Request for support to the C-SPA or SPOC or report to the police (generally in parallel with a request for support to the C-SPA or SPOC)

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on College premises and on transport where appropriate. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the College will take suitable action.

In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same College would seriously harm the education or welfare of the victim (and potentially themselves and other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the College will, if it has not already, consider any suitable sanctions considering their behaviour policy, which may include consideration of permanent exclusion.

Where the perpetrator is going to remain at the College, the Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on College premises and transport.

The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. The victim, alleged perpetrator and any other students and adults affected will receive appropriate support and safeguards on a case-by-case basis.

The College will take any disciplinary action against the alleged perpetrator in accordance with the College behaviour policy.

The College recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

### **11.5 Grooming**

Grooming is when someone builds an emotional connection with a child, young person, or adult at risk to gain their trust for the purposes of sexual abuse or exploitation. Children, young people, or adults at risk can be groomed online or in the real world by a stranger or by someone they know, for example a friend, a family member or a professional. Groomers may be male or female. They could be any age. Many children, young people or adults at risk do not understand that they have been groomed or that what has happened to them is abuse.

### **11.6 Child sexual exploitation**

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual practices. Sexual exploitation can take many forms ranging from 'consensual' relationships where sex is exchanged for affection or gifts, to serious crime by gangs and groups. What makes it exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **11.7 Neglect and acts of omission**

This is the persistent failure to meet the child, young person or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the child, young person or adult at risk's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child, young person or adult at risk is born, neglect may

involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failure to protect a child, young person or adult at risk from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child, young person, or adult at risk's basic emotional needs. It can also be neglect in accessing the appropriate support to address Special Education Needs & Disabilities (SEND). Fabricated and induced illness can also be neglect. It is important to note that neglect is rarely a stand-alone issue and will overlap with other concerns.

#### **11.8 Financial or material abuse**

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

#### **11.9 Discriminatory abuse**

The College is committed to safeguarding from discriminatory abuse, harassment, or similar treatment to those identified by the Equality Act 2010. These are age, disability (which includes mental health and people diagnosed as clinically obese), race, religion or belief, sex, sexual orientation, gender reassignment (people who are having or who have had a sex change, transvestites and transgender people), marriage and civil partnerships and pregnancy and maternity.

#### **11.10 Self-neglect**

This is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

#### **11.11 Forced marriage**

A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

#### **11.12 Domestic violence**

Domestic abuse is any incident pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

It is important to note that if a child, young person, or adult at risk is a witness of domestic violence this must be deemed as abuse. Teenage relationship abuse which includes learners under the age of 16 must be deemed as a safeguarding issue.

#### **11.13 Bullying and cyber bullying**

This is covered in the Student Anti Bullying Policy and could be a safeguarding issue.

### 11.14 Female Genital Mutilation (FGM)

FGM is the practice of partially or totally removing the external genitals of girls or young women for non-medical purposes. It is illegal in the UK and is a form of child abuse with long-lasting consequences.

Section 5B of the Female Genital Mutilation Action 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

### 11.15 Honour-based Abuse

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour.

Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### 11.16 A child missing from education

A child gone missing from education is a potential indicator of abuse or neglect. College staff will follow the Local Authority's procedures for dealing with children that go missing from education, particularly on repeated occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent risks of their going missing in the future. A learner who fails to attend the KS4 provision for a continuous period of 10 days or more will be a safeguarding issue and will be referred to the Local Authority. A CLA who does not attend for 48 hours without notification will be deemed a safeguarding concern.

### 11.17 Peer on peer abuse

All staff will be made aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- **bullying** (including cyberbullying);
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- **sexual violence**, such as rape, assault by penetration and sexual assault;
- **sexual harassment**, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- **upskirting**, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- **sexting** (also known as youth produced sexual imagery); and
- **initiation/hazing** type violence and rituals.

The College provides details on this in our Student Anti Bullying policy.

### 11.18 Serious violence, modern slavery and trafficked children

**Child Criminal Exploitation & Gangs Both CSE and CCE** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual, and emotional abuse or neglect.

Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence.

This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of *county lines* criminal activity.

Key identifying features of involvement in *county lines* are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual, and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL.

The College is aware there is a clear link between regular non-attendance at College and exploitation.

Staff will consider a child to be at potential risk in the case of regular non-attendance at College and make reasonable enquiries with the student and parents to assess this risk.

Other indicators, which may signal that students are at risk from, or are involved with serious violent crime.

- include increased absence from College,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing,
- or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that young people have been approached by, or are involved with, individuals associated with criminal networks or gangs.

A request for support to the C-SPA or SPOC will be made when any concern of harm to a child because of gang activity including child criminal exploitation becomes known.

Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA or SPOC. If there is concern about a child's immediate safety, the Police will be contacted on 999

## 12. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents.

It applies to children under the age of 16 years old or 18 years old if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age. The College recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases.

Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately.

However, where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA or SPOC immediately.

## 13. Safeguarding children, young people and adults at risk's mental wellbeing.

**The quality framework for mental health defines it as:**

*'The emotional and spiritual resilience which allows us to enjoy life and survive pain, disappointment and sadness. It is a positive sense of wellbeing and an underlying belief in our own, and others, dignity and worth.'*

The College endorses the 1999 Mental Health Foundation Report Bright Futures defining children, young people and adults at risk who are mentally healthy as able to:

- Develop psychologically, emotionally, intellectually, and spiritually
- Initiate, develop and sustain mutually satisfying personal relationships
- Use and enjoy solitude
- Become aware of others and empathise with them
- Play and learn
- Develop a sense of right and wrong and
- Resolve (face) problems and setbacks and learn from them

There are different types of mental health problems that children, young people, and adults at risk experience. Common examples are depression, anxiety disorders, and substance misuse problems or psychotic disorders such as bipolar disorder. Children, young people, and adults at risk are particularly vulnerable at these times.

### **Risk factors that can exacerbate mental health problems Family and home life**

Children, young people, and adults at risk are at an increased risk where there is family disruption and breakdown.

This can be expressed in several ways:

- Unclear and inconsistent discipline
- Difficulties by the family adapting to a child's, young person's, or adult at risk's needs as they become adolescents
- Parental mental illness, criminality, alcoholism, substance misuse or personality disorder
- Domestic violence or abuse
- Poverty
- Bereavement, including the loss of friendship

#### **14. Anti-Bullying/Cyberbullying**

Our College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with and analysed by the governing body.

All staff are aware that children with SEND and/or differences/ perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern.

If the anti-bullying procedures are seen to be ineffective, the Principal and the DSL will also consider child protection procedures. Pastoral education in tutorial regularly provides opportunities for students to understand bullying is wrong, its impact and how to deal with it.

#### **15. Online Safety**

The College has an online safety policy which explains how we try to keep students safe in College and how we respond to online safety incidents.

Students increasingly use electronic equipment daily to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Students are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

#### **16. Radicalisation, Extremism and Terrorism**

The Prevent Duty for England and Wales (2015) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Some students are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. This can happen both online and offline.

The College is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

The College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

College staff receive training to help identify early signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the College follows the DfE advice Promoting Fundamental British Values.

The College governors, the CEO, Principal, and the Designated Safeguarding Lead (DSL) will assess the level of risk within the College and put actions in place to reduce that risk.

The College will meet this obligation in the following ways:

#### *Partnership*

The College will have regular contact with the regional Prevent Coordinators to ensure up to date guidance on risk is provided to governors, senior leaders, and managers. The Information, Advice and Guidance will be shared with staff and learners. The Designated Safeguarding Lead will act as the single point of contact and take responsibility for the strategic and operational delivery and to ensure regular liaison with the regional Prevent Coordinators and support referrals to Channel.

#### *Prevent Action Plan*

The Designated Safeguarding Lead will notify the regional Prevent Coordinator if risk is identified at the College and work to produce a Prevent action plan to address risks identified.

#### *Prevent awareness training*

The College has a duty of care and will provide pastoral support and care to all learners through training and helping them to identify risk factors and to seek advice and guidance.

Staff and learners will be annually trained on the risks of radicalisation and British values. British values will be defined as democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. This will be linked to the

College's commitment to safeguard the nine protected characteristics defined by the Equality Act 2010.

Staff and learners will be trained to understand the factors that make young people vulnerable to being drawn into terrorism and to challenge extremist ideas. Staff will be trained to recognise this vulnerability and be aware of what action to take in response and know where to seek additional advice and guidance.

#### *e-Safety and the prevent duty*

The College provides details on how the College will safeguard internet access to ensure learners are safe from terrorist and extremist material by establishing appropriate levels of filtering and identity when this material is accessed for curriculum purposes.

#### *External and Internal Speakers and Events*

The College provides guidelines to staff about checking the content to be delivered.

#### *Data sharing protocols*

The College provides details on the Prevent duty section.

#### *Reporting concerns*

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. They should then follow the safeguarding procedures and refer cases by e-mail to:

Surrey: [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the Prevent referral process and use the Prevent referral form.

Croydon: [safercroydon@croydon.gov.uk](mailto:safercroydon@croydon.gov.uk) or [Channel@croydon.gov.uk](mailto:Channel@croydon.gov.uk) outlining reasons for the concern.

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 (or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey). Or use the Anti-terrorist hotline: 0800 789 321.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

#### *Indicators of vulnerability to radicalisation*

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff can recognise those vulnerabilities.

*Indicators of vulnerability include:*

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice or a feeling of failure;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors in all the above could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance The Prevent Duty can be accessed via the link at the end of this policy.

#### **17. Contextual safeguarding**

All staff, but especially the designated safeguarding lead (and deputy) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

#### **18. Child, young person, or adult at risk in care or care leaver**

Children, young people, or adults at risk in care are two to three times more likely to have an emotional disorder. They are more likely to take greater risks for example using alcohol, smoking, drugs, and early sexual activity.

### *Children Looked After*

The most common reason for children becoming looked after is because of abuse and neglect. The College ensures that staff have the necessary skills and understanding to keep looked after children safe.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher and governor for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the Head of the Virtual School.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Headteacher to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the College and meet the needs of the child within their personal education plan.

## **19. Early Help**

All College staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

All staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

## **20. Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a student is at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in de-escalation techniques or 'CPI' (Crisis Prevention Institute) techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a student may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the College will consider the risks, given the additional vulnerabilities of these children.

Surrey County Council guidance Touch and the use of restrictive Physical Intervention When Working with Children and Young People provides further detailed information.

## **21. Public Interest Disclosure (Whistle-blowing)**

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the College's safeguarding arrangements.

If it becomes necessary to consult outside the College, they should:

(a) speak in the first instance to the LADO in accordance with the Public Interest Disclosure Policy.

(b) staff are encouraged to use an external, independent, and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180. The website link is as follows:

<https://secure.ethicspoint.eu/domain/media/en/gui/107090/index.html>

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school/College.

Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistle-blowing regarding the CEO, Principal should be made to the Chair of the Governing Body whose contact details are available to staff.

## **22. Learners accessing alternative provision**

Where learners are accessing the College as part of the day release programme any safeguarding concerns will be reported to a member of the College's safeguarding team.

This team will liaise closely with the Designated Safeguarding Lead from the young person's mainstream school, who will take the lead on the safeguarding case.

## **23. Work experience or placement or apprenticeship aged 16-18**

There are occasions when children, young people and adults at risk are placed in settings outside the College. Children, young people, and adults at risk are more vulnerable to abuse or harm in these situations than in short term placements, and therefore children, young people and adults at risk protection arrangements are a relevant concern for longer term placements. Additional safeguards will be necessary for placements when one or more of the following conditions apply.

The placement is:

- For more than one day per week.
- For longer than one term in any academic year.
- Aimed at those who may be vulnerable, e.g. those who have special needs or are young (aged under 16).
- One where the workplace supervisor or a colleague will have substantial unsupervised access to the child, young person, or adult at risk, because of the nature of the business (i.e. micro business, sole trader, or journeyman).
- One which has a residential component.

All learning providers working with children, young people and adults at risk therefore have a duty of care to ensure safeguarding policies and procedures are in place and followed by their employees and volunteers.

To do this we will ensure that we:

- Create and maintain an environment in which children, young people and adults at risk feel secure, are encouraged to talk, and are listened to.
- Include curriculum activities and opportunities to enable learners the opportunity to attain skills and attitudes, to help them resist abuse in their own lives and to prepare for the responsibilities in their adult lives, including parenthood.
- Communicate a clear model of management of suspected or disclosed abuse.

### ***Strategic responsibilities for safeguarding learners who attend work experience or placements***

If any of the above conditions apply, the following safeguards should be in place at a strategic level.

Staff who arrange, vet, or monitor work placements will have had training in safeguarding.

Training organisations or employers taking responsibility for a child, young person, or an adult at risk on a long-term placement will be asked to make a commitment to safeguarding their welfare by endorsing an agreed policy or statement of principles.

Any person whose normal duties will include regularly caring for, training, looking after or supervising a child, young person or adult at risk in the workplace should be vetted and subject to DBS Disclosures to ensure he/she is not disqualified from working with children, young people or adults at risk, or otherwise unsuitable to be responsible for them.

This should not include people who will have contact with the child, young person, or adult at risk simply because he/she will be in the same location, or as part of their work. It is intended to apply to people who are specifically designated to have responsibility for looking after, supervising, or directly training a child, young person, or adult at risk throughout the placement.

DBS Disclosures and Barred List checks will be arranged by the College.

That person will also be given basic safeguarding training to be aware of their responsibilities. They should be given details of a person to contact if there are any concerns about a learner for whom they are responsible.

The learners who are placed in these settings will also be given clear advice about who to contact if they are worried or uncomfortable about their surroundings or if they suffer abuse.

They will have a continuing point of regular contact within College and be given opportunities to raise any concerns they may have.

If a concern is raised regarding a child, young person or adult at risk who is on a long term placement, then the normal College safeguarding procedures will apply.

In some cases it is also important to ensure that the learner concerned is suitable for the placement (for example, when placing children, young people, or adults at risk in environments involving them working with younger children). In these circumstances DBS Disclosures may be required.

**24. Monitoring**

This Policy will be reviewed annually and monitored in accordance with College monitoring procedures.

**25. Access to Policy**

This Policy is available on the College Intranet and Websites.

**26. Training and Guidance**

Questions about this Policy and/or Procedure, and requests for training, guidance, or information on this Policy and/or Procedure, should be directed to the Executive Director of Human Resources and Professional Development.

**27. Mechanisms for Feedback**

Constructive comment on the continued improvement of this Policy is welcomed and should be forwarded to the Executive Director of Human Resources and Professional Development.

**28. References**

Attendance and Punctuality Procedure  
College Charter  
Continuing Professional Development Policy  
Data Protection Policy  
Disclosure and Barring Service Check Policy  
Drugs and Alcohol Policy  
Equality Scheme and Objectives  
Educational Visits and Off Site Activities Procedure and Flow Chart  
Health and Safety Policy  
Staff Disciplinary Policy and Procedure  
Wellbeing and Resilience at Work Policy  
Student Disciplinary Policy and Procedure  
Student Voice Policy  
Student and Staff Codes of Conduct – including IT Codes of Conduct  
Work Experience Toolkit and Flowchart  
The Channel Process within FE Colleges Prevent Strategy  
Public Interest Disclosure Policy

**29. Further information**

None

- |                         |                                |                               |
|-------------------------|--------------------------------|-------------------------------|
| <b>30. Produced by:</b> | JRC and ESC DSLs               | <b>Date:</b> November 2020    |
| <b>31. Approved by:</b> | Directorate                    | <b>Date:</b> 11 November 2020 |
| <b>32. Approved by:</b> | Learning and Quality Committee | <b>Date:</b> 19 November 2020 |

OSC83

33. **Approved by:** Corporation Board

**Date:** 10 December 2020

34. **Next review date:** November 2021

35. **Policy Code:** OSC83

*See following pages for:*

*A Safeguarding Statement*

*B Key Contacts*

*C Terminology*

*D Additional Resources*

**Covid-19 Addendum**

## A. Safeguarding Statement

We are committed to building a 'culture of safety' in which learners are protected from abuse and harm in all areas of College activity. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who encounters children and their families and carers have a role to play in safeguarding children. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, always, what is in the **best interests** of the child. All staff will be encouraged to maintain an attitude that "it could happen here"

## B. Key Contacts

### ESC College:

#### **Principal**

Name: Jayne Dickinson  
Contact details: 01737 788415

#### **Designated Safeguarding Lead**

Name: Frances Harris  
Contact details: 01737 788417

#### **Deputy Designated Safeguarding Lead (DDSL)**

Name: Maisie Coutet  
Contact details: 07525 909364

#### **Deputy Designated Safeguarding Lead (DDSL)**

Name: Claire Frank  
Contact details: 01737 788361

#### **Designated teacher for Children who are looked after and DDSL**

Name: James Gottshalk  
Contact details: 07834 448033

#### **Nominated governor for safeguarding**

Name: Liz Rushton  
Contact details: 01737 788334

### John Ruskin College:

#### **Principal**

Name: Kevin Standish  
Contact details: 020 8651 7628

#### **Designated Safeguarding Lead**

Name: Tracy Andrews  
Contact details: 020 8651 7628

#### **Deputy Designated Safeguarding Lead**

Name:  
Contact details:

#### **Designated LAC teacher**

Name: Tracy Andrews  
Contact details: 020 8651 7628

**Nominated governor for safeguarding:**

Name: Liz Rushton  
Contact details: 01737 788334

***Surrey County Council***

**Local Authority Designated Officer (LADO):**

LADO:  
Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)  
[Partnership.team@surreycc.gov.uk](mailto:Partnership.team@surreycc.gov.uk)  
Tel: 0300 123 1650, option 3

**C-SPA (Children's Single Point of Access)**

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888

C-SPA Professionals Consultation Line: Tel: 0300 470 9100

Email C-SPA referrals to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**Surrey Safeguarding Children Board (SSCB)**

Website: <https://www.surreyscp.org.uk/>  
Email: [partnership.team@surreycc.gov.uk](mailto:partnership.team@surreycc.gov.uk)  
Tel: 01372 833 330

***London Borough of Croydon***

**Local Authority Designated Officer (LADO):**

[lado@croydon.gov.uk](mailto:lado@croydon.gov.uk)

LADO: Steve Hall  
Email: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)  
Tel: 0208 255 2889                      Mob: 07825 830328

Assistant LADO: Jane Parr  
Email: [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)  
Tel: 0208 726 6000 (Ext. 84343)                      Mob: 07985 590505

**SPOC (Single Point of Contact):**

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888

SPOC Professionals Consultation Line                      Tel: 0208 726 6464

Email SPOC referrals to: [childreferrals@croydon.gov.uk](mailto:childreferrals@croydon.gov.uk)

Manager: Jenny Houghton (Service Leader, Children & Families))

Email: [Jennifer.houghton@croydon.gov.uk](mailto:Jennifer.houghton@croydon.gov.uk)

### **Croydon Safeguarding Children Board (CSCB)**

Website: [croydonlcsb.org.uk](http://croydonlcsb.org.uk)

[Safeguarding learning & development](#)

Email: [safeguardingchildrenboard@croydon.gov.uk](mailto:safeguardingchildrenboard@croydon.gov.uk)

Tel: 0208 604 7275

## **C: Terminology**

**Safeguarding and promoting the welfare of children** is defined as:

- protecting children from maltreatment;
- preventing impairment of children's 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;
- Preventing impairment of children's mental or physical health or development.

**Child Protection is a part of safeguarding and promoting welfare.** It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Early Help** means providing support as soon as any needs emerge or are identified at any point in a child's life.

**Staff** refers to all those working for or on behalf of the College, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren) includes everyone under the age of 18.** Overall, this will apply to students at our Colleges; however, the policy will extend to visiting children and students from other establishments

**'Adult at Risk' replaces the term 'Vulnerable Adult'.** An 'adult at risk' is defined by the Department of Health as a person aged 18 years or older 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'.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

**MAP** refers to the Surrey Multi-Agency Partnership.

**C-SPA** refers to the Surrey Council's Children's Single Point of Access and the Child Protection Consultation Line

**SPOC** refers to the Croydon Council's Children's Single Point of Access and the Child Protection Consultation Line

## **D: Additional resources**

[Surrey County Council Education Safeguarding Team](#)

[Croydon Safeguarding Children Partnership](#)

[Surrey Safeguarding Children Partnership](#)

NSPCC: <http://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/pages/home.aspx>

CEOP Thinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

County Lines guidance [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

Sexual violence: [Sexual violence and sexual harassment between children in schools and colleges \(May 2018\) - DfE guidance](#)

[Child sexual exploitation – DfE guidance](#)

The Prevent Duty: [DfE guidance: The Prevent duty \(June 2015\)](#)

FGM: [HM Government: Multi-agency statutory guidance on female genital mutilation](#)

Forced Marriage: Foreign and Commonwealth Office’s Forced Marriage, telephone 0207 008 0151; email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)  
[Forced marriage - FCO Guidance](#)

## Child protection and safeguarding: COVID-19 addendum

### Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL) at ESC	Gwen Hurrion	07825 521744 <a href="mailto:ghurrion@esc.ac.uk">ghurrion@esc.ac.uk</a>
Designated safeguarding lead (DSL) at JRC	Tracy Andrews	07866 763028 <a href="mailto:Tracy.andrews@johnruskin.ac.uk">Tracy.andrews@johnruskin.ac.uk</a>
Other contactable DSL(s) and/or deputy DSL(s):	Maisie Coutet	07525 909364 <a href="mailto:mcoutet@esc.ac.uk">mcoutet@esc.ac.uk</a> 07834 338 033
	James Gottshalk	<a href="mailto:jgottshalk@esc.ac.uk">jgottshalk@esc.ac.uk</a>
	Frances Harris	07889 804451 <a href="mailto:fharris@esc.ac.uk">fharris@esc.ac.uk</a>
	Rebecca Taylor	07921 688063 <a href="mailto:rtaylor@esc.ac.uk">rtaylor@esc.ac.uk</a>
Designated member of senior leadership team if DSL	Kevin Standish	07867 467486 <a href="mailto:Kevin.standish@johnruskin.ac.uk">Kevin.standish@johnruskin.ac.uk</a> <a href="mailto:kstandish@esc.ac.uk">kstandish@esc.ac.uk</a>
Local authority designated officer (LADO)		<a href="mailto:lado@croydon.gov.uk">lado@croydon.gov.uk</a> <a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>
Safeguarding governor	Liz Rushton	

### 1. Scope and definitions

This addendum applies during the period of College closure due to COVID-19, and reflects updated advice from our local authority (LA) Surrey CC and Croydon Council.

It sets out changes to our normal safeguarding policy in light of the Department for Education's guidance [Coronavirus: safeguarding in schools, colleges and other providers](#), and should be read in conjunction with that policy.

Unless covered here, our normal child protection policy continues to apply.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

- Have a social worker, including children:
- With a child protection plan
- Assessed as being in need
- Looked after by the local authority
- Have an education, health and care (EHC) plan#

### 2. Core safeguarding principles

We will still have regard to the statutory safeguarding guidance, [Keeping Children Safe in Education](#).

Although we are operating in a different way to normal, we are still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that unsuitable people don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online

### **3. Reporting concerns**

All staff and volunteers must continue to act on any concerns they have about a student immediately. It is still vitally important to do this, both for children still attending school and those at home. As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

### **4. DSL (and deputy) arrangements**

We aim to have a trained DSL or deputy DSL available wherever possible. Details of all important contacts are listed in the 'Important contacts' section at the start of this addendum.

If our DSL (or deputy) can't be in College, they can be contacted using their mobile number or email address.

We will keep all school staff and volunteers informed by email as to who will be the DSL (or deputy) on any given day, and how to contact them.

We will ensure that DSLs (and deputies), wherever their location, know who the most vulnerable children in our Colleges are.

On occasions where there is no DSL or deputy on site, a senior leader will take responsibility for co-ordinating safeguarding. The senior leader will be responsible for liaising with the off-site DSL (or deputy) to make sure they (the senior leader) can:

- Identify the most vulnerable students in College
- Update and manage access to safeguarding files, where necessary
- Liaise with social workers where they need access to children in need (CIN) and/or to carry out statutory assessments

### **5. Working with other agencies**

We will continue to work with children's social care, and with virtual school heads for looked-after and previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

Local authorities about children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

## 6. Monitoring attendance

As most students will not be attending College during this period of College closure, we will not be completing our usual attendance registers or following our usual procedures to follow up on non-attendance.

The exception to this is where any child we expect to attend school during the closure doesn't attend, or stops attending. In these cases, we will:

- Follow up on their absence with their parents or carers,
- Notify their social worker, where they have one

We are using the Department for Education's daily online attendance form to keep an accurate record of who is attending school.

We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible.

## 7. Peer-on-peer abuse

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.

Staff should continue to act on any concerns they have immediately – about both children attending school and those at home.

## 8. Concerns about a staff member or volunteer

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education.

Staff should continue to act on any concerns they have immediately – whether those concerns are about staff/volunteers working on site or remotely.

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

## 9. Support for children who aren't 'vulnerable' but where we have concerns

We have the option to offer places in College to students who don't meet the Department for Education's definition of 'vulnerable', but who we have safeguarding concerns about. We will work with parents/carers to do this. If these students will not be attending College, we will put a contact plan in place, as explained in section 10 below.

## 10. Contact plans

We have contact plans for students with a social worker and students who we have safeguarding concerns about, for circumstances where:

- They won't be attending College (for example where the College, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or
- They would usually attend but have to self-isolate

Each student has an individual plan which sets out:

- How often the College will make contact – this will be at least once a week
- Which staff member(s) will make contact – as far as possible, this will be staff who know the family well
- How staff will make contact – this will be over the phone, doorstep visits, or a combination of both

If we can't make contact, we will contact children's social care or the police.

## **11. Safeguarding all children**

Staff and volunteers are aware that this difficult time potentially puts all students at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on students' mental health that are also safeguarding concerns, and act on concerns immediately in line with the procedures set out in section 3 above.

For children at home, they will look out for signs like:

- Not completing assigned work or logging on to College systems
- No contact from children or families
- Seeming more withdrawn during any class check-ins or video calls

Students are likely to be spending more time online during this period – see section 12 below for our approach to online safety both in and outside College.

See section 13 below for information on how we will support pupils' mental health.

## **12. Online safety**

### **12.1 In College**

We will continue to have appropriate filtering and monitoring systems in place in College.

### **12.2 Outside school**

Where staff are interacting with children online, they will continue to follow our existing IT code of conduct

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

We will make sure children know how to report any concerns they have back to our College and signpost them to other sources of support too.

### **12.3 Working with parents and carers**

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our College is asking students to do online
- Know where else they can go for support to keep their children safe online

## **13. Mental health**

Where possible, we will continue to offer our current support for pupil mental health for all students. We will also signpost all students, parents and staff to other resources to support good mental health at this time.

When setting expectations for students learning remotely and not attending college, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

## **14. Staff recruitment, training and induction**

### **14.1 Recruiting new staff and volunteers**

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers are safe to work with children.

We will continue to follow our safer recruitment procedures, and part 3 of Keeping Children Safe in Education.

In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our College.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

#### **14.2 Safeguarding induction and training**

We will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our children protection policy (and this addendum)
- Keeping Children Safe in Education part 1

#### **14.3 Keeping records of who's on site**

We will keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them.

We will continue to keep our single central record up to date.

### **15. Monitoring arrangements**

This policy will be reviewed as guidance from the LA or DfE is updated.

### **16. Links with other policies**

This policy links to the following policies and procedures:

- Safeguarding and Child protection Policy
- Staff Disciplinary Policy
- Staff IT Usage Policy
- Student ICT Code of Conduct
- Health and Safety policy

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