

**NEWHAM COLLEGE SAFEGUARDING POLICY FOR CHILDREN
AND VULNERABLE ADULTS**

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This policy is available on our college website

Contents

- 1. Introduction**
- 2. Statutory Framework**
- 3. Roles and responsibilities**
- 4. Types of abuse and specific safeguarding Issues**
- 5. College Procedures**
- 6. Continuous Professional Development**
- 7. Professional Confidentiality**
- 8. Record keeping and Information Sharing**
- 9. Interagency Working**
- 10. Allegations about members of the children's workforce**
- 11. Whistleblowing**

NEWHAM COLLEGE SAFEGUARDING POLICY FOR YOUNG PEOPLE AND VULNERABLE ADULTS

1. Introduction

*“Schools and colleges and their staff are an important part of the wider safeguarding system for young people and vulnerable adults. Safeguarding and promoting the welfare of young people and vulnerable adults is **everyone’s** responsibility. **Everyone** who comes into contact with and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means they should consider at all times, what is in the **best interests** of the child”.*

(Keeping Children Safe in Education – DfE, September 2019

To ensure that the language of this policy conforms to Newham College parlance the terms “young people” refer to students aged up to 18 and vulnerable adults.

This Safeguarding Policy is for all college staff, parents, governors, volunteers and the wider college community. It forms part of the safeguarding arrangements for our college and should be read along with the college’s Safeguarding in Employment Policy, Staff Code of Conduct and Professional Responsibility Policy, Physical Intervention Policy, Anti-Bullying Policy, Behaviour Policy, Health and Safety Policy, Educational Visit Policy, E-safety Policy, Social Media Policy and Photography Policy.

Our college is committed to safeguarding young people and vulnerable adults and to create a culture of vigilance in college. This policy should also be read in conjunction with Keeping Children Safe in Education (DfE, 2019).

Safeguarding and promoting the welfare of young people and vulnerable adults is defined as:

- Protecting young people and vulnerable adults from maltreatment
- Preventing impairment of young people and vulnerable adults health or development
- Ensuring that young people and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people and vulnerable adults to have the best outcomes

2. Statutory framework

The Education Act 2002 Section 175, places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of young people and vulnerable adults who are students of the college.

The development of appropriate procedures and the monitoring of good practice in the London Borough of Newham are the responsibilities of the Newham Safeguarding Children Board (NSCB) In Newham all professionals must work in accordance with the London Child Protection Procedures.

Our college also works in accordance with the following legislation and guidance

Keeping Children Safe in Education (DfE September 2019)

Working Together to Safeguard Children (HMG, 2018)

Education Act 2002

Counter-Terrorism and Security Act (HMG, 2015)

The Prevent duty Departmental advice for schools and childcare providers (DfE 2015)

Prevent Duty Guidance for Further Education Establishments in England and Wales (HMG 2015)

Serious Crime Act 2015 (Home Office, 2015)
Sexual Offences Act (2003)
Education (Pupil Registration) Regulations 2006
General Data Protection Regulations 2018 (GDPR)
What to do if you're worried a child is being abused (HMG, 2015)
Searching, screening and confiscation (DfE, 2018)
Children Act 1989
Children Act 2004
Children and Social Work Act 2017
Modern Slavery Act 2015
The Homelessness Reduction Act 2017
Preventing and Tackling Bullying (DfE, 2017),
Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)
Sexual violence and sexual harassment between children in schools and colleges (DfE, 2017)
Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. (DfE July 2018)
Advice on Whistleblowing in Maintained Schools (DfE 2014)
<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>

3. College roles and responsibilities

All adults working with or on behalf of young people and vulnerable adults have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key adults in colleges and in the Local Authority who have specific responsibilities under child protection procedures. The names of those in our college with these specific responsibilities are shown on the front cover sheet of this policy. All staff in our College are familiar with the Early Help and Triage Offer.

3.1 The governing body

The governing body has a responsibility to ensure that the policies, procedures and professional development and training in our college are effective and comply with the statutory requirements at all times.

It ensures that all required policies relating to the protection and safeguarding of young people and vulnerable adults are in place and that the safeguarding policy reflects statutory and local guidance and is reviewed at least annually.

The governing body also ensures there are a named Designated Safeguarding Lead and Deputy Safeguarding Leads in place and that they have their safeguarding role explicitly in the job description and are trained for the role as set out in Keeping Children Safe in Education 2019.

The governing body ensures the college contributes fully to inter-agency working, in line with statutory and local guidance. It ensures that information is stored and shared appropriately and in accordance with the statutory requirements.

The governing body monitors to ensure that all staff members and volunteers undergo safeguarding training at induction and that it is then regularly updated. All staff members receive regular safeguarding updates, at least annually, to provide them with the relevant skills and up to date knowledge to keep our young people and vulnerable adults safe. The governing body will also ensure that staff have the knowledge, skills and understanding of the additional vulnerabilities of looked after and previously looked after children to keep them safe.

The governing body ensures that young people and vulnerable adults are taught to keep themselves safe, including online, ensuring that appropriate filters and monitoring systems for online usage are in place in college. Our children will be taught how to keep themselves safe through teaching and learning opportunities as part of a rich and balanced curriculum.

The governing body and college leadership team are responsible for robust safer recruitment procedures that help to deter, reject or identify people who may abuse young people and vulnerable adults. It adheres to statutory responsibilities to check adults working with young people and vulnerable adults and has recruitment and selection procedures in place (see the college's 'Safer Recruitment' policy for further information). It also ensures that volunteers are appropriately supervised in college. We will undertake a risk assessment and use our professional judgement when deciding whether to obtain an enhanced DBS certificate for any volunteer undertaking unregulated activity.

3.2 The Designated Safeguarding Lead (and Deputies)

The Designated Safeguarding Lead (DSL) in college takes the lead responsibility for managing safeguarding referrals, safeguarding training and raising awareness of all safeguarding policies and procedures in college and that everyone in college, including temporary staff, volunteers and contractors are aware of these procedures and that they are followed at all times. They are a source of advice and support to other staff on safeguarding matters and make sure that timely referrals to Newham Triage Team are made in accordance with current London Child Protection Procedures. The Designated Safeguarding Lead (DSL) works with the local authority and other agencies as required. If for any reason the Designated Safeguarding Lead is unavailable, a Deputy Designated Safeguarding Lead will act in their absence.

3.3 The Principal

The Principal works in accordance with the requirements upon all college staff. In addition, the Principal ensures that all safeguarding policies and procedures adopted by the governing body are followed by all staff. The Principal will ensure that young people and vulnerable adults are taught about safeguarding, including on-line as part of the broad and balanced curriculum.

The Principal will make sure that s/he is satisfied that any young people and vulnerable adults in the college who are placed with an alternative education or training provider can meet the needs of the young people or vulnerable adult and obtains written confirmation that the appropriate safeguarding checks have been carried out.

3.4 All college staff

Everyone at our college has a responsibility to provide a learning environment in which our young people and vulnerable adults can feel safe to learn. All staff members are prepared to identify young people and vulnerable adults who may benefit from early help and understand their role and responsibilities within this process. This includes identifying any emerging problems so appropriate support may be provided and in liaison with the Designated Safeguarding Lead (DSL) report any concerns. All staff members are aware of and follow college processes as set out in this policy and are aware of how to make a referral to the Newham Triage Team when there is a need to do so.

4. Types of abuse / specific safeguarding issues

"Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly on-line, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children"

Keeping Children Safe in Education (DfE, 2019)

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Our College is aware of the signs of abuse and neglect so we are able to identify young people and vulnerable adults who may be in need of help or protection. Within those four main types of abuse there are specific types of abuse that our college is alert to.

4.1 Peer on peer abuse

Our college may be the only stable, secure and safe place in the lives of young people and vulnerable adults at risk of, or who have suffered harm. However, on occasions their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people and vulnerable adults.

Peer on peer abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, on-line abuse, upskirting, initiation/hazing type violence and rituals, 'sexting' or sexually harmful behaviour. We do not tolerate any harmful behaviour in college and will take swift action to intervene where this occurs. We use the curriculum and tutorials to help young people and vulnerable adults understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our college understands the different gender issues that can be prevalent when dealing with peer on peer abuse.

4.2 Sexual Violence and Harassment

Sexual violence and harassment can occur between young people and vulnerable adults of any age individually or in groups. Young people and vulnerable adults who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood will adversely affect their educational attainment. Our college takes all victims seriously and they will be offered the appropriate support.

Our college will ensure that sexual violence and sexual harassment is not acceptable in any circumstances. We do not accept that it is 'just part of growing up' or a joke. Our college will manage such incidences in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other safeguarding concern we will follow the same procedures.

4.3 Young people and vulnerable adults missing from education

All young people and vulnerable adults regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our college recognises that a young person and vulnerable adult missing education is a potential indicator of abuse or neglect and will follow the college procedures for unauthorised absence and for young people and vulnerable adults missing education. The young person or parent/carer should always inform us of the reason for any absence

Our College will inform the local authority of any young people or vulnerable adults who fail to attend regularly or have been absent without college permission for a continuous period of 10 days or more in line with the requirements for Children Missing Education.

4.4 Sexual Exploitation of young people and vulnerable adults

Sexual Exploitation of young people and vulnerable adults is a type of abuse, which can happen to boys and girls from any background or community.

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

The Department of Education (DfE, 2017)

It is understood that a significant number of young people and vulnerable adults who are victims of sexual exploitation go missing from home, care and education at some point. Our college is alert to the signs and indicators of a young people or vulnerable adult becoming at risk of, or subject to, sexual exploitation and will take appropriate action to respond to any concerns. The Designated Safeguarding Lead (DSL) will lead on any concerns and work with other agencies as appropriate.

4.5 Criminal Exploitation including County Lines

Criminal exploitation of young people and vulnerable adults is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs, weapons and money for them. Key to identifying potential involvement may be 'missing episodes' when the victim may have been trafficked for the purpose of transporting drugs, weapons or money. Our college will consider a referral using the Newham pathways or a direct referral using the National Referral mechanism for human trafficking.

4.6 Female Genital Mutilation (FGM)

Female Genital Mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of abuse.

From October 2015, the Serious Crime Act 2015 (Home Office, 2015) placed a duty on teachers to notify the police of any known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our college will operate in accordance with the statutory requirements relating to FGM in line with the London Child Protection Procedures.

4.7 Forced marriage

A forced marriage is one that is entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

4.8 Prevention of radicalisation

Young people and vulnerable adults can be vulnerable to extremist ideology and extremism. Protecting children from this risk is similar to protecting them from other forms of harm and abuse. The [Counter-Terrorism and Security Act \(HMG, 2015\) Section 26](#) places a duty on colleges in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the PREVENT duty.

It requires colleges to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of students and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;
- be safe spaces in which young people and vulnerable adults can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to radicalisation and being drawn into terrorism. All staff members understand how to identify those who may benefit from this support and are aware of relevant agencies to contact in circumstances where an individual demonstrates indicators of concern, as well as how to make a referral using the Newham referral pathways.

4.9 Self-Harm and Suicide Risk

Mental health is the concern of the whole community and we recognise that colleges play a key part in this. Our college wants to develop and protect the emotional wellbeing and resilience of all young people and vulnerable adults and staff. We understand that there are risk factors which increase someone’s vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual’s life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised that young people and vulnerable adults that may be suffering from mental ill-health and are at risk of self-harm or suicide may present in college as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the well-being of our students. It is equally important that parents share any concerns about the well-being of their young people and vulnerable adults with college, so appropriate support and interventions can be identified and implemented.

Where there are concerns that a young people or vulnerable adult may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a young people or vulnerable adult discloses self-harm or is found to be self-harming the Designated Safeguarding Lead (DSL) or relevant key person will take the time to establish any underlying concerns.

5. Procedures

All staff members have a duty to identify and respond to suspected and actual abuse or disclosures of harm. Any member of staff, volunteer or visitor to our college who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the Designated Safeguarding Lead (DSL) or, in their absence, the Deputy Designated Safeguarding Lead.

All action is taken in accordance with the following guidance;

- Newham Safeguarding Children Board guidelines – Pan-London Child Protection Procedures
- Keeping Children Safe in Education (DfE, 2019)
- Working Together to Safeguard Children (DfE, 2018)
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

Any staff member or visitor to the college will refer concerns to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead. Where there is risk of immediate harm, concerns will be referred by telephone using the Newham Referral Pathways or the Police. Less urgent concerns or requests for support will be referred via the Newham Referral Pathways for consideration of Early Help support as appropriate. Where appropriate the college will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the Newham Triage team or the Police in making decisions about when it is appropriate to share information with parents or carers.

If a member of staff continues to have concerns about a young people or vulnerable adult and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for re-consideration of the case with the Designated Safeguarding Lead (DSL) who will escalate the concern as appropriate.

If, for any reason, the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in the college to ensure that all staff members have unfettered access to safeguarding support, should it be required. Any individual may refer using the Newham Referral Pathway where there is suspected or actual risk of harm to a young people and vulnerable adult.

When new staff, volunteers or regular visitors join our college they are informed of the safeguarding arrangements in place, the name of the Designated Safeguarding Lead (DSL) and deputy and how to share concerns with them.

6. Training

The Designated Safeguarding Lead (DSL) and deputies undertake safeguarding training appropriate to the role at every two years as a minimum. The Principal, all staff members and governors receive appropriate safeguarding training that is regularly updated. In addition, all staff members receive safeguarding updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard young people and vulnerable adults effectively. A record of any safeguarding training undertaken is kept for all staff and governors.

The college ensures that the Designated Safeguarding Lead (DSL) and deputies also undertake training in inter-agency working and other matters as appropriate.

7. Professional confidentiality

Confidentiality is an issue that needs to be discussed and fully understood by all those working with young people and vulnerable adults particularly in the context of safeguarding. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents / carers or students) or promise to keep a secret. In accordance with statutory requirements, where there is a safeguarding concern, this must be reported to the Designated Safeguarding Lead (DSL) or deputy and may require further referral and subsequent investigation by appropriate authorities.

Information on individual safeguarding cases may be shared by the Designated Safeguarding Lead (DSL) or deputy with other relevant staff members. This will be on a 'need to know' basis only and where it is in the young people or vulnerable adult's best interests to do so.

8. Records and information sharing

Where there are concerns about the safety of a young people or vulnerable adult, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst practitioners must have due regard for the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) it is not a barrier to sharing information. Our college is confident of the processing conditions that allow us to store and share information for safeguarding purposes. This allows us to share information without consent, if it is not possible to gain consent or if to gain consent would place a young people or vulnerable adult at risk.

Well-kept records are essential to good safeguarding practice. Our college is clear about the need to record any concern held about young people and vulnerable adults within our college, the status of such records and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible, noting what was said or seen, if appropriate, using a body map to record, with the date, time and location. All records will be dated and signed, with the name printed and will include the action taken. This is then presented to the Designated Safeguarding Lead (DSL) or deputy, who will decide on the appropriate action and record it accordingly.

Any records related to safeguarding are kept in a safeguarding database which is password protected All safeguarding records are stored securely and confidentially.

Where a young person or vulnerable adult transfers from our college to another college or educational setting, their safeguarding records will be forwarded to the new educational setting. These will be marked 'Confidential' and for the attention of the receiving institution's Designated Safeguarding Lead (DSL) with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new institution and then destroy any copies held in our college.

Where a student joins our college, we will request all safeguarding records from the previous educational establishment if none are received.

9. Interagency working

Colleges often hold crucial information and as such our college is an essential partner in strategy discussions, safeguarding conferences and core groups. Our college will be pro-active and prioritise inter-agency working to contribute to safeguarding young people and vulnerable adults. It is the responsibility of the Designated Safeguarding Lead (DSL) to ensure that the college is represented at and a report is submitted to any young people and vulnerable adults' protection conference or core group meeting. Where possible and appropriate, any report will be shared in advance with the parent(s) and/or carer(s). Whoever represents the college will be fully briefed on any issues or concerns the college has and will be prepared to contribute to the discussions at the meeting(s).

If a young people or vulnerable adult is subject to a child protection or a child in need plan, the Designated Safeguarding Lead (DSL) will ensure the young people or vulnerable adult is monitored regarding their college attendance, emotional well-being, academic progress, welfare and presentation. The Designated Safeguarding Lead (DSL) will ensure the college prioritises attendance at core group meetings and provide appropriate information to contribute to the plan at these meetings. Any concerns about the child protection plan and/or the young people or vulnerable adult's welfare will be discussed and recorded at the core group meeting, unless to do so would place them at further risk of significant harm. In this case the Designated Safeguarding Lead (DSL) will inform the young people or vulnerable adult's key worker immediately and then record that they have done so and the actions agreed.

10. Allegations about members of the workforce

The aim of our college is to provide a safe and supportive environment that secures the well-being and best learning outcomes for young people and vulnerable adults. All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Code of Conduct and Professional Behaviour policy. We do, however, recognise that sometimes allegations of abuse are made and when they occur they are distressing and difficult for all. We also understand that some allegations are genuine and that there are adults who deliberately seek to harm or abuse young people and vulnerable adults. Our college takes all possible steps to safeguard our young people and vulnerable adults and ensure that the adults in our college are safe to work with children.

We will always ensure that the procedures outlined in Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO) by telephone 0203 373803 or email nick.pratt@newham.gov.uk

If an allegation is made or information is received about any member of staff or volunteer who works with young people and vulnerable adults has:

- behaved in a way that has harmed a young person or vulnerable adults or may have harmed a ; young people or vulnerable adult
- Possibly committed a criminal offence against or related to a young people or vulnerable adult
- behaved towards a young people or vulnerable adult in a way that indicates they may pose a risk of harm to them

The member of staff receiving the information should inform the Director of Human Resources & Legal Services (and Deputy Designated Safeguarding Lead) immediately. This includes concerns relating to agency and supply staff. In addition, staff should also alert the Director of Human Resources & Legal Services if an individual has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to relate directly to a young person or vulnerable adult.

Should an allegation be made against the Director of Human Resources & Legal Services, this will be reported to the Principal. In the event the Principal is not contactable the same day, the information must be passed to the Deputy CEO. The Principal or Deputy CEO will seek advice from the LADO within one working day. No member of staff will undertake further investigations before seeking advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns within the college should contact the LADO directly. Please refer to section 12 of this policy.

The college has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a young people or vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person from regulated activity. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

11. Whistleblowing

Whistleblowing is defined as '*making a disclosure in the public interest*' and occurs when a worker (or member of the wider college community) raises a concern about danger or illegality that affects others, for example students in the college or members of the public.

All staff members are made aware of the duty to raise concerns about the attitude or actions of staff in line with the college's Code of Conduct and Whistleblowing policy.

We want everyone to feel able to report any safeguarding concerns. More information is available called Advice for Whistleblowing in Maintained Schools (DfE 2014). However, for members of staff who feel unable to raise these concerns internally, they can contact the NSPCC whistleblowing helpline on: 0800 028 0285 or email: help@nspcc.org.uk

Parents or others in the wider college community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: help@nspcc.org.uk