

Safeguarding, Child Protection and Adults at Risk Policy 2020-21

Lead Responsible:	Executive Director of Human Resources and Central Services
Approval Dates for Revisions:	
Academic Board/College Leaders	
Equality Impact Assessment	03/12/20
Governor Committee: AC/FR/AU/SG/ES	
Governing Body	
Effective Date:	01 November 2020
Annual Review Date:	31 August 2021
Original Filename:	

Contents

1.	Covid 19 and safeguarding statement.....	3
2.	Legislative Framework.....	4
3.	Purpose of the Policy.....	5
4.	Policy Statement & Scope.....	5
5.	Safeguarding Procedures and Guidance for Reporting Concerns.....	6
6.	Restraint and Reasonable Force	7
7.	Recording and Referral.....	8
8.	Supporting Students: Mental Health and Well Being.....	8
9.	Complaints and Allegations against Staff and volunteers.....	9
10.	Safer Recruitment and Staff Appointments	9
11.	Work Experience, Placements and Work Based Learning.....	10
12.	Staff Code of Conduct and Ethical Framework.....	11
13.	Information Sharing and Confidentiality	11
14.	E -Technology & E-safety	12
15.	Extended Services and Activities	12
16.	Site security, Contractors and Agency Staff	13
17.	Working in Partnership with Parents and Carers	13
18.	Monitoring and Review	14

1. Covid 19 and Safeguarding Statement

- 1.1 In light of COVID 19 and the movement across the FE sector to remote on-line learning, the College has been following the Department of Education “Coronavirus (COVID-19): safeguarding in schools, colleges and other providers” and the “Guidance for FE and Providers” on Safeguarding.
- 1.2 The College recognises there are a range of potential challenges to ensure the safety and well-being of students, who are not in a structured educational setting due to self-isolating or having some learning delivered remotely. For those young people deemed as vulnerable being in an educational setting can be an important lifeline particularly where their needs cannot be met safely at home or where they may be at risk of harm. The strategy of the College has included:
- Learning off site as a new factor in the College’s Safeguarding Risk Assessment. Protocols for online learning are included in **Appendix 12**.
 - Continuing to ensure the monitoring and engagement of vulnerable young people such as those who have a child in need/child protection plan, are a looked-after child, have an education, health and care (EHC) plan or those at risk of becoming NEET (‘not in employment, education or training’).
 - Enabling participation in education through providing financial support in the form of Free College Meals and Bursary payments.
 - E-Safety training for Staff to support their awareness and understanding of the potential dangers of on-line platforms and an on-line Safeguarding module for students that includes E-Safety.
 - Contacting at risk and vulnerable students who are self-isolating regularly. This includes weekly welfare checks through phone and video calls; and through the use of emails and text messages.
 - The Safeguarding & Welfare Teams continue to actively engage with partners through local and London wide safeguarding partnership forums to ensure our practice is informed by government guidance.
 - Continuing to provide students with useful guide and tips on maintaining good mental health, and the launch a programme of 30 minutes listening sessions for students who are struggling with motivation and isolation issues.
 - Remind staff of the need to follow the Code of Conduct when delivering online teaching and to ensure that the External Visitors guidance is followed including that a speaker must not be left unsupervised with a group of students, therefore a member of staff should be in the TEAMS on line session throughout.
- 1.3 Due to the need to maintain social distancing, the College will continue to deliver a proportion of the learning to students remotely. For many students, this will mean a transition from remote education to blended learning (for example, a combination of remote and traditional classroom, workshop or workplace learning).
- 1.4 The Safeguarding approach of the College will be updated to take account of the changing circumstances with the aim to meet the varied needs of different student groups, including the engagement and support to vulnerable students.

Legislative Framework

2. Safeguarding Young People (Children)

- 2.1 In June 2004 Section 175 of the Education Act 2002 came into force. This places an explicit responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, appropriate arrangements must be made in accordance with any guidance and legislation issued by the Secretary of State as detailed in Appendix1.
- 2.2 Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002) under this, Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. KCSIE is updated annually, this policy is in line with the September 2020 version.
- KCSIE (2020) defines safeguarding and promoting the welfare of children as: protecting children from maltreatment;
 - Preventing impairment of children's mental 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.
- 2.3 This policy and procedure has been developed in response to KCSIE and the associated Statutory legislation. The Children Act (1989) defines a child as any person under the age of 18 years. This includes all 14–16 year old children attending College campuses.

2.3 Safeguarding Adults at Risk

- 2.3.1 This policy and the associated procedures have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication "Safer Practice, Safer Learning "(2007). The guidance applies to all education providers of post-16 learning and skills.
- 2.3.2 The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 19 or above at the point of enrolment.

The term 'Adult at Risk' is used to describe a vulnerable adult.

3. Purpose of Policy

- 3.1 The College recognises its safeguarding responsibilities to all its students and staff and the purpose of this policy is to:
- Set out the framework to safeguard children, vulnerable adults and any students in order to promote their welfare and safety.
 - Outline the responsibilities within the College in relation to safeguarding children and vulnerable adults in line with current legislation, guidance and best practice.

4. Policy Statement and Scope

- 4.1 The College aims at all times to create and maintain a safe environment for all students, staff, volunteers and visitors. This policy is one of a suite of policies and procedures intended to ensure that the College fulfil their safeguarding responsibilities. This policy is consistent with all other policies adopted by the College and in particular should be read in conjunction with the policies identified in **(Appendix 1)**.
- 4.2 The College's core safeguarding standards and principles are:
- The welfare and safety of our students is paramount and this principle underpins all safeguarding work.
 - All our students have the right to access their College (on site or remotely) free from fear of harm and be protected from mistreatment, abuse and exploitation.
 - Disclosures about abuse or neglect made by students will be taken seriously and prompt actions taken to support them.
 - A commitment to the health, safety and wellbeing of students, underpinning a successful learning experience.
 - A commitment to ensure a safe and secure environment through safe recruitment practice and procedures and compliance with Health and Safety requirements.
 - A commitment to ensure that ongoing safeguarding training and support is in place for all staff across the College.
- 4.3 The College fully recognises its responsibility for safeguarding and protecting all students at each campus. The Governing Body holds responsibility for ensuring that the safety of students is at all times of paramount importance and safeguarding arrangements are effective in practice, monitored carefully and any deficiencies promptly remedied. This policy sets out the clear and consistent framework for delivering these responsibilities in line with safeguarding legislation and statutory guidance.
- 4.4 Whilst the Governing Body holds the overall statutory responsibility for the child protection and safeguarding functions of the College, the day to day operational responsibility rest with the Principal and Chief Executive. The statutory duty to ensure action to safeguard and promote the welfare of young people and adults receiving education and training within the college will be delegated to a senior manager and designated person responsible for safeguarding to lead on local arrangements.
- 4.5 This policy sets out the College's safeguarding framework, standards and commitment to ensure that all its students are protected from abuse and the risk of harm including Radicalization and Extremism as expressed in the Prevent Duty.
- 4.6 The policy is applicable to all on-site, off-site and online activities undertaken by our students whilst they are the responsibility of the college.

- 4.7 Our policy applies to all staff employed within the College regardless of contract type staff working on site employed by other services and agencies and those working with students on placements, governors, external visitors, consultants and volunteers working for each of our college's campuses.
- 4.8 The College supports the procedures set out by each local safeguarding children's board where our campuses are located.
- 4.9 The College reserves the right to refuse admission to any student who may pose a risk to other students and has appropriate student admissions procedures in place.

5. Safeguarding Procedure and Guidance on Reporting Concerns

- 5.1 The College has a set procedure and guidance to follow if staff receive a disclosure, are concerned a student is at risk of harm or worried about their wellbeing. These can be found in **Appendix 2, 3 and 6** of this policy and includes the identification of:
- Nominated College Strategic Safeguarding Lead who is a member of the SLT with a responsibility to ensure the College meets its statutory duty
 - Nominated College Operational Safeguarding Lead with a responsibility for safeguarding issues with the College
 - College Designated Safeguarding Officers who has day to day operation responsibility for safeguarding.
 - Safeguarding Team who ensure that safeguarding needs are met with the College.
- 5.2 All staff should know how to recognise types of abuse and neglect **Appendix 4** and what steps they should take to raise a safeguarding concern **Appendix 6** with a Designated Person at the college, how to record concerns and respond to students in need or at risk. Guidance in Managing disclosures can be found in **Appendix 2** of this policy and will be included as part of staff induction and ongoing support is available from the Designated Safeguarding Officers located on each campus **Appendix 6**.
- 5.3 The safeguarding Roles and Responsibilities of all members of staff at the college are detailed in **Appendix 7**. All Staff must ensure they read and understand the role they undertake in safeguarding Students and how the Operational Designated Safeguarding Lead at the college will deal with a concern they could raise and what happens if a referral is made to a social care agency.
- 5.4 All staff must read and understand Part 1 of 'Keeping Children Safe in Education' statutory guidance for schools and colleges. (DfE)
- 5.5 All new staff and governors are given an Executive copy of the Safeguarding, Child Protection and Adults at Risk Policy as part of the College's induction process and are expected to read and sign to confirm that they have read and will adhere to the full policy.

6. Restraint and Reasonable Force

- 6.1 Section 93 of the Education and Inspections Act 2006 enables College staff (including support staff, non-teaching staff and voluntary staff) to use such force as is reasonable in the circumstances to prevent a student from committing an offence, causing personal injury to any person (including themselves) or damage to any property or prejudicing the maintenance of good order and discipline. This includes occasions when the student is not on College premises e.g. on College visits.
- 6.2 Section 45 of the Violent Crime Reduction Act 2006 gives authorised staff the right to search students for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon. If resistance is expected the police MUST be called. Further guidance is at www.teachernet.gov.uk/whole The security staff at are trained in the use of reasonable force and restraint.
- 6.3 Guidance is given to staff on appropriate behaviour including the use of reasonable force. Further guidance to staff can be found in the Force to Control Students Policy which is informed by the DfE document 'Use of Reasonable Force' 2012.
- 6.4 There should be a rigorous recording system and procedures at the College and reporting to the Local Authority. There is a model recording form in the DCSF Guidance.
- 6.5 Parents/carers should be informed when reasonable force has been used and protocols agreed with parents/carers if use of reasonable force is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Students displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioural, emotional and social difficulties or with severe behavioural difficulties should be handled according to the guidance in www.teachernet.gov.uk/wholeschool/sen/piguide.
- 6.6 S548 Education Act 1996 states that the use of force as a punishment is unlawful. Also under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001), it is a requirement:
- Not to treat a disabled child unfavourably without justification.
 - To take reasonable steps to avoid putting disabled students at a substantial disadvantage.

7. Recording and Referral

- 7.1 Concerns and confidential comments are to be recorded in Pro Monitor.
These comments can be related to safeguarding or other issues, the safeguarding comments automatically get sent to the safeguarding team to pick up, in the same way they do if issues are reported via the safeguarding email.
- 7.2 Recording is a tool of professional accountability and is central to safeguarding and protecting students. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason, it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed.

- 6.3 If a student discloses that they have been subjected to abuse to any staff member, the staff member must follow the agreed protocol as outlined in **Appendix 2, 3 and 6**. The Designated person or a nominated officer will then respond within an hour, confirm the next steps and if necessary make a referral to the appropriate agency e.g. Children's Social Care in the student's home borough.
- 7.4 Where a student is transferring to another college or establishment, the College's Operational Designated Safeguarding Lead should liaise with the college or establishment and forward them copies of the student's safeguarding records.
- 7.5 Student's under 16 years' old who are enrolled at Schools or other organisations are, in normal circumstances, also subject to the policy of the referring organisation, however, in urgent situations the College safeguarding staff will contact external agencies without delay and then coordinate with the sending institution.

8. Supporting Students: Mental Health and Well Being

- 8.1 The College has in place pastoral support systems that reflect the governing body's legal obligation and commitment to safeguard and promote the welfare and wellbeing of all students as outlined in KCSIE 2020. The College recognises the value of early help, early intervention and coordinated support through full cooperation with interagency working arrangements.
- 8.2 The College will support students to be successful and feel confident in terms of their:
- Physical, mental health and emotional wellbeing
 - Protection from harm and neglect
 - Education, training and recreation
 - Contribution to society
 - Social and economic wellbeing
- 8.3 The College provides clear guidance on how best to meet the varied needs of different Student groups, including the engagement and support to those deemed as vulnerable.

9. Complaints and Allegations against Staff, Agency Workers and Volunteers

- 9.1 The College takes seriously all complaints made against adults in positions of trust. Procedures are in place at the College for students, parents/carers and staff to share any concern that they may have about the actions of any member of staff or volunteer to a Designated Safeguarding Officer. Allegations made against staff, agency workers and volunteers will be dealt with according to the process laid out in DFE guidance and local social care/police arrangements where each campus is located will be followed to investigate and resolve complaints without delay.

- 9.2 The College's Strategic Designated Safeguarding Lead, is the identified Designated Member for Allegations against Staff, Agency Workers and Volunteers who will deal with issues of staff (Agency or Volunteer) inappropriate conduct towards a student. They will work with the respective College's Designated Safeguarding Officer/manager to confirm the details of individual cases and to reach a decision on the way forward, including reporting the matter to the Local Authority Designated Officer. If the Chief Executive or Chair of Governors is the subject of the allegation or concern, this should also be reported Strategic Designated Safeguarding Lead (or Operational Lead) in order that they may activate the appropriate procedures.
- 9.3 Staff will not investigate cases of suspected abuse themselves. The College will cooperate fully with the Police and Children's Social Care. Please refer to the procedures detailed in **Appendix 6** and refer to the Staff Code of Conduct (**Appendix 1**).

10. Safe Recruitment and Staff Appointments

- 10.1 The College is committed to the process of maintaining a culture of safer recruitment and adopting recruitment processes that will help to deter, reject or identify unsafe adults who might abuse students or who are unsuitable to work with them. The College is committed to evidencing this practice in relation to all staff working with students.
- 10.2 All staff recruited will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate Disclosure and Barring Services (DBS), barred/prohibited persons list checks will be undertaken in accordance DfE guidance "Keeping Children Safe in Education: Statutory guidance for schools and colleges, DfE Regulated activity in relation to children and the relevant regulations and codes of practice as issued by the DBS. It is the policy of the College to undertake DBS re-checks. In line with the advice from the AOC (August 2019) this will include the introduction of annual self-declaration and a DBS re-check every 3 years. The College will continue to uphold best practice in safer recruitment as outlined in KSCIE 2020.
- 10.3 All applicants for employment are required to complete an application form which requires them to declare if they have a criminal conviction. The College reserves the right to decline any applicant who fails to answer the question. The College shall consider taking disciplinary action in accordance with the staff disciplinary procedures if it is discovered that a member of staff has provided false or incomplete information as part of the recruitment process.
- 10.4 Relevant members of staff and governors who are involved in recruitment will undertake online safer recruitment training. All recruitment panels must have at least one member who has successfully completed this training and individuals who are in charge of recruitment, will also have successfully completed this training within the past 3 years.
- 10.5 The College will only use employment agencies which can demonstrate that they have carried out pre-employment checks on their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the Local Authority's Designated Officer (LADO). Staff joining the College on a permanent or temporary basis will be given a copy of this policy. Additionally, induction briefings will include safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

- 10.6 All students and applicants for admission to a programme of study offered by the College are required to complete either an application form or an enrolment form, which requires them declare if they have a criminal conviction. As applicants are required to disclose details of criminal convictions, the College reserves the right to decline any applicant who fails to answer the question. The College shall consider taking disciplinary action in accordance with the student disciplinary procedures if it is discovered that a student has provided false or incomplete information as part of the enrolment process.
- 10.7 Where it is revealed that during a course a student has obtained a criminal record and not disclosed this, the College may consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.

11. Work Experience, Placements and Work Based Learning

11.1 The College will ensure that:

- Risk Assessment Health and safety checks are undertaken prior to establishing work experience placements
- Employers and providers are aware of and are carrying out their responsibilities in relation to Safeguarding and the protection of Children and Adults at Risk, ensuring that providers have appropriate policies and procedures in place which are followed by all staff
- Staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement.
- Staff are appropriately trained to carry out the health and safety work placement audit.

12. Staff Code of Conduct and Ethical Framework

- 12.1 The College recognises that positive professional relationships with students will support and promote the best outcomes for them. All staff (paid, including agency and voluntary and for the purposes of this policy this also includes Apprentices but not students on work placement) are expected to adhere to the College's '**Code of conduct and Ethical Framework Policy**' (**Appendix 1**) in respect of their contact with students and their families, on site, off site and online.
- 12.2 Staff must ensure that they fully understand and maintain the professional boundaries explicit in these policies and that any relationship between a professional and a student under the age of 19 or a student who is a vulnerable adult may result in an immediate referral to the Local Authority Designate Officer (LADO). Should a personal relationship already exist when a student joins the College, the member of staff must inform their line manager so appropriate arrangements can be made to secure safe practice.
- 12.3 The College recognises that in certain disciplines contact with a student to improve their understanding of their motor skills may occur through touch. All staff tutoring these curriculum areas must ensure they have consent from the student before making contact and from the parent/guardian if the student is a child or vulnerable.

13. Information Sharing and Confidentiality

- 13.1 The College respects the right of students and families to have their personal information treated respectfully and confidentially in line with General Data Protection Regulations (2018) and local statute and guidance. Confidential Child Protection information regarding students in our College will be shared with staff on a strictly need to know basis. A member of staff will 'need to know' information when it will demonstrably benefit the student and maintain appropriately agreed confidentiality at all times.
- 13.2 All staff must be aware of their responsibility to share information with the Safeguarding Team and with other agencies in order to protect and safeguard students. This must be done in accordance with the College's Safeguarding, Child Protection Policy and Adults at Risk Policy. If there is uncertainty about the need to share information advice will be sought by the appropriate Safeguarding Team of the designated Data Protection Officer on this issue and where necessary from the appropriate local authority.
- 13.3 No one in the College may guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information. Where a student has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the student.
- 13.4 No one in the College may guarantee to a student that they will keep a secret or confidence and must always make it clear to a student in language that is appropriate, that any information which leads a member of staff to be concerned that a student is suffering or is at risk of suffering harm will be shared with the Safeguarding Team in order to take measures to safeguard the student at risk.
- 13.5 Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a student

14. E-Technology & E-Safety

- 14.1 The College has identified and appointed members of staff with the responsibility for monitoring the safe and appropriate use of E technology and to deal with any concerns about inappropriate use. **Refer to Appendix 1 - ICT Acceptable Use Policy and Protocols for On Line Learning Appendix 12.**
- 14.2 The College promotes E-safety in the delivery of the curriculum. E-safety refers to the safe use of internet and other electronic forms of communication such as e-mail, text messages, face-book and other social media platforms that can expose young people and vulnerable adults to risks. The College will support students to recognise and manage risks associated with online activity that can be harmful such as online grooming, and the inappropriate use of social media for sexting, hazing and cyber bullying and other abusive acts that intimidate, threaten or lead to physical, emotional or psychological harm of any student at the College. Students through their tutorial programme

undertake a safeguarding qualification during their first half term at the college and this includes a unit on keeping safe online.

15. Extended Services and Activities

- 15.1 The Governing Body of the College is responsible for controlling the use of the College premises both during and outside normal hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made. Where services are provided directly under the supervision and management of the College, the College's safeguarding policies and procedures will apply.
- 15.2 Where activities and services are provided separately, the Governing Body will seek assurances and evidence that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the College on these matters where appropriate. Evidence of appropriate policies and procedures must be provided to the Governing Body.
- 15.3 All staff providing services to students whether on site or in the community on behalf of the College must adhere to the College's Safeguarding, Child Protection and Adults at Risk policy.
- 15.4 Staff from partner agencies working with students off site will follow the referral procedures of their own agency and will inform the Safeguarding Team they have made a child or vulnerable adult protection referral as a matter of priority.

16. Site security, Contractors and Agency Staff

- 16.1 All students and staff should be able to feel safe when they are on the campus. All staff and students are expected to have appropriate ID at all times. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be allowed access to a site unless they are met and accompanied by a member of staff Appendix 1 Health & Safety Policy & External Visitors Guidance.
- 16.2 Regular contractors who work on site will be DBS checked as part of their service level agreement/contract and will be expected to read and sign this policy and adhere to the Staff Code of Conduct and Ethical Framework Policies. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.
- 16.3 Agency staff and those who work within the College for one or two days will be asked to provide their DBS check before they can begin work. They will be given a copy of this policy and will be asked to sign to confirm that they have read and will adhere to it.

17. Working in Partnership with Parents and Carers

- 17.1 The College is committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Staff working for the College will engender an environment which develops co-operative working relationships within which parents and carers feel respected.
- 17.2 Parents and carers will be encouraged to access the safeguarding policy, and a summary of it is included in the literature given to students and families on admission which links to the appropriate page on the College web site. The College believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that the College will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.
- 17.3 Wherever possible and appropriate the College will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care. The College will be alert to the needs of parents/carers who do not have English as their first language and use translation services as necessary.
- 17.4 There may be instances, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the College's Safeguarding Team judges that a student's wellbeing will be imperilled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser Gillick competence' and this will inform judgements and decisions.

18. Monitoring and Review

- 18.1 A full safeguarding child protection and vulnerable adult report will be submitted to the Governing Body for the College annually. This will include monitoring information in relation to staff training, number of concerns raised regarding students including e-safety, record keeping, interagency referrals and outcomes in order to measure the effectiveness of this policy and strengthen practice where needed. In addition, a termly report will be submitted to Academic Board and monthly report to the Senior Leadership Team.
- 18.2 This policy will be reviewed and updated annually by the College's Strategic Designated Safeguarding Lead and approved by the Senior Leadership Team and Academic Board. In addition, the policy will be reviewed by the Governors' every two years.

APPENDIX 1: Legal Framework, Statutory Guidance and Linked Capel Policies

The Safeguarding, Child Protection and Adults at Risk Policy and Procedures has considered and is compliant with the following legislation.

Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Inspection Act 2006
- Serious Crimes Act (2015)
- The Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- School Staffing (England) Regulations 2009 (as amended)
- Equality Act 2010
- Protection of Freedoms Act 2012 • The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Children and Families Act 2014
- Sexual Offences Act 2003
- The Education (Pupil Registration) (England) Regulations 2006 (as amended)
- Mental Capacity Act 2005
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Rehabilitation of Offenders Act 1974 and Legal Aid, Sentencing and Punishment of Offenders Act 2012)
- Data Protection legislation.

Statutory guidance:

- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018) – updated Feb 2019.
- DfE (2018) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018)
- DfE (2020) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2018) – updated September 2020.
- DfE Regulated activity in relation to children: scope (2018)
- 'Safeguarding Children and Safer Recruitment in Education' (Dept for Children, Schools and Families 2010).
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2015) 'Information sharing: advice for practitioners'
- DfE (2015) 'The Prevent duty'

- DfE (2018) 'Keeping children safe in education' September 2018
- DfE (2016) 'Disqualification under the Childcare Act 2006'
- DfE (2017) 'Child sexual exploitation'
- DfE (2017) 'Sexual violence and sexual harassment between children in schools and colleges'
- London Safeguarding Children Board multi agency procedures (version 5) 2017
- Protecting Adults at risk: London multi-agency policy and procedures for protecting adults at risk from abuse
- DfE The Designated teacher for looked-after and previously looked-after children (Statutory guidance on their roles and responsibilities) February 2018
- DfE "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers" and the "Guidance for FE and Providers" on Safeguarding May 2020.

Capel policies and procedures that relate to this policy include:

- Student Code of Conduct and Disciplinary Policy
- Ethical Framework Policy and Procedure
- Health and Safety
- Whistle Blowing Policy
- Code of Conduct for Staff
- College's External Visitors Guidance
- Bullying and Harassment (Students)
- Equality Diversity
- Students Complaints Procedure
- Educational Visits with forms
- ICT Acceptable Use policy – (including E-Safe)
- Declaration & Barring Service
- Recruitment Policy

APPENDIX 2: SUMMARY PROCEDURE FOR REPORTING DISCLOSURES

This procedure **must** be followed whenever any member of College staff hears an allegation from a child or vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child or vulnerable adult may be abused, or where there are concerns that there has been a vocal or active expression of extremist views or behaviour:

RECEIVE

Open the conversation.

- Ask the *Safeguarding Question*. - E.g. *how are you, are you okay?*
- Set aside any judgments you may hold.
- Resist the temptation to give advice, argue or deny their feelings/experience
- Accept what you are told – you do not need to decide whether or not it is true

- Listen without interrupting, shock or disbelief.
- Encourage the student to talk.
- Ask appropriate clarifying questions

REASSURE

- The person making the disclosure
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)
- Give reassurance but don’t make promises.
- Do not ask the learner to repeat their disclosure.
- Reflect back what the learner has said using minimal prompts (Mmm, Ah, etc.).
- Silence can be supportive.
- Open body language.
- Comfortable eye contact.
- Don’t offer glib advice e.g. cheer up, things could be worse

REACT

- Do not delay in registering your suspicions or concerns
- Respond to the person making the disclosure but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- **Explain what you will do next, i.e. inform a Designated Safeguarding Officer, Director of Student Services, or HR if the concern relates to a member of staff.**

RECORD

- Make brief notes as soon as possible, possibly during the meeting.
- Include: time, date, place, the individual’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Use the words spoken by the student not your interpretations or ‘proper’ words.
- Record other non-verbal behaviour which the student might exhibit, include appearance
- Write up the notes as soon after the meeting as possible using the on-line safeguarding referral form Appendix 3.
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be asked for at a later date. Scan these and store in the student’s folder in the ‘Confidential’ area on the respective College area.
- Complete all areas of the online form with all the relevant details.
- If appropriate, use the body map sheet to indicate any areas of bruising or injuries. **Please note:** Once the online form has been submitted or the case has been passed to one of the

College's Safeguarding Officer, the member of staff does not need to take no further action unless the Safeguarding Officer requires them to.

SUPPORT

- Consider what support is needed for the person making the disclosure – you may need to give them a lot of your time or they may need to be referred
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the Designated Safeguarding Officer will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

APPENDIX 3: Safeguarding Referral Form

REPORTING ALLEGED OR SUSPECTED ABUSE OR OTHER CAUSE FOR CONCERN OF A CHILD, VULNERABLE ADULT OR OTHER STUDENT TO A DESIGNATED SAFEGUARDING OFFICER

To be completed by a member of staff who is reporting the disclosure of abuse of a learner or suspected abuse or a cause for concern under the Safeguarding Policy.

To be completed and forwarded to a Designated Officer within 24 hours of receiving the "alert".

Form Completed by		Tel no.	
Position		Date	
Sector/Service		Manager	

1. Alleged Victim or Safeguarding Cause for Concern Student

If there is more than one student, please fill in a separate sheet for each person

Surname:					
Forenames:					
ID No:					
Current Address:					
Postcode:		Tel:		Mobile:	
Date of Birth:					

Has the student consented to the referral?	Yes		No		
Has the student the capacity to consent to this?	Yes		No		Not known
Is the student aware of this referral?	Yes		No		Not known

2. Alleged Abuser or person creating the safeguarding cause for concern

If there is more than one person please give details of each

Surname:	
Forenames:	

Current Address:					
Postcode:		Tel:		Mobile:	
More than one alleged individual? (Please specify)					

3. The Abuse/Safeguarding Cause for Concern

Type of suspected safeguarding concern:

(Please tick all that apply)			
Child in Need (CIN) Plan		Forced Marriage	
Child Missing from Education		Gangs and Youth Violence	
Child Missing/Absent from Home/Care		Harmful Sexual Behaviour	
Child Protection - Emotional Abuse		Hate Incident	
Child Protection - Physical Abuse		Historical Concern	
Child Protection - Sexual Abuse		Human Trafficking	
Child Protection Plan		Mental Health	
Child Sexual Exploitation		Modern Slavery	
County Lines		Neglect	
Criminal Exploitation (Children & Adults)		Peer on Peer Abuse	
Cyber-bullying		Personal Hygiene	
Dangerous Behaviour		Self-harm	
Discrimination		Sexual Abuse	
Domestic Abuse		Sexual Violence	
Drug Misuse		Suicidal Thoughts	
Extremism & Radicalisation		Weapon(s)	
Financial/Economic or Material Abuse		Other	

Cause for concern (please specify)

--

Place where suspected safeguarding concern took place: (Please specify):

Alleged victim's own home	Alleged victim's parent's home	Residential care home
Alleged victim's relative's home	Alleged perpetrator's own home	College (give details)
Adult placement scheme	Other (please specify)	
Address where suspected safeguarding concern took place (if known)		

Are there witnesses? If yes, provide contact details.

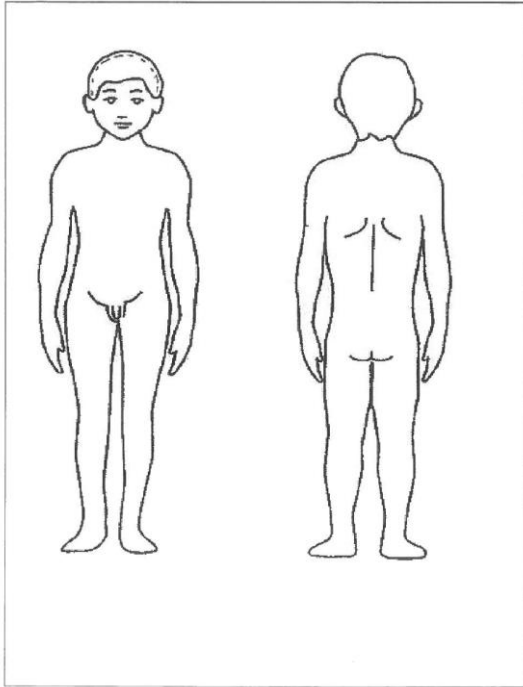
Name and address of witness		
	Tel:	Mobile:

Name and address of witness		
	Tel:	Mobile:

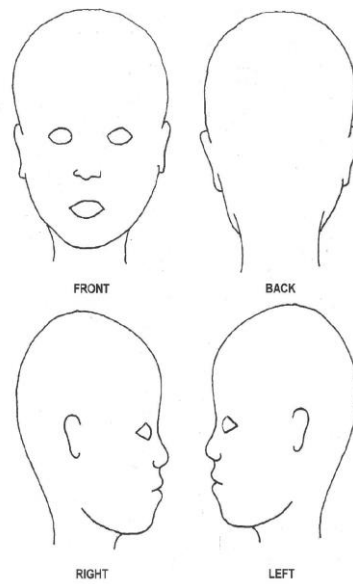
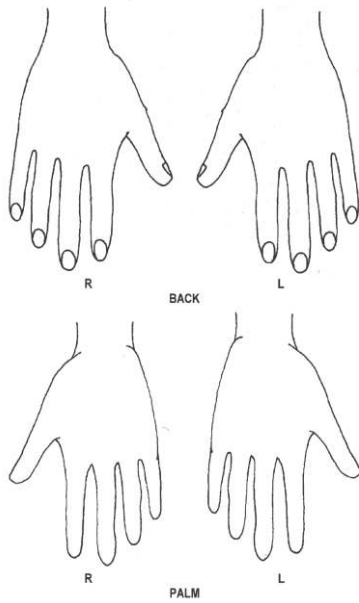
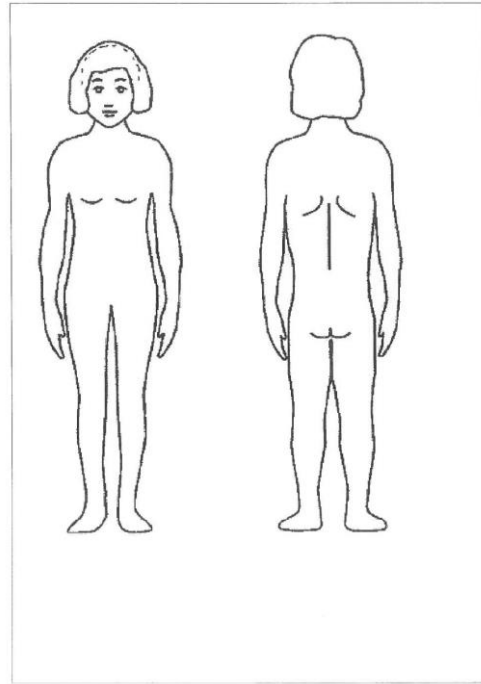
4. Additional Information: Please provide as much detail as possible about the abuse/safeguarding cause for concern you are reporting.
5. Actions taken
Have you taken any actions other than completing this form? (Please specify)

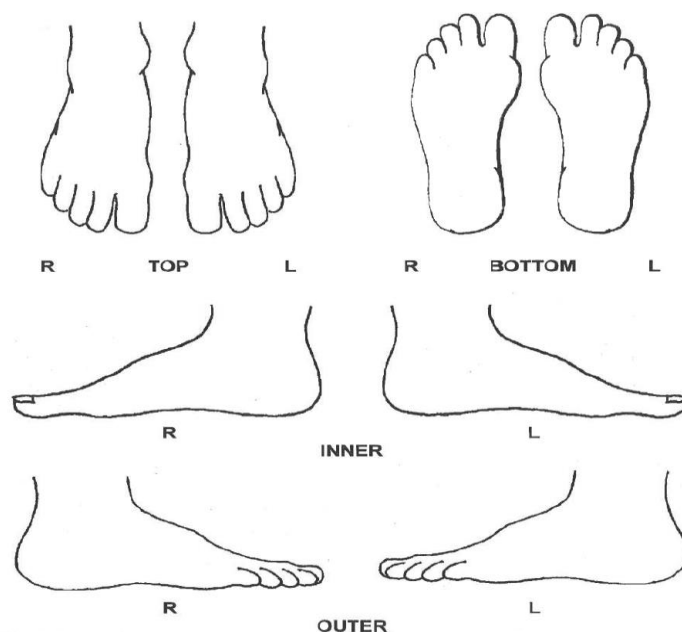
If appropriate please use a body map.

Male Body Map



Female Body Map





Checklist for DSL (to be printed on back of concern form)

- ✓ Student clearly identified?
- ✓ Name, designation and signature of the person completing the record populated?
- ✓ Date and time of any incidents or when a concern was observed?
- ✓ Date and time of written record?
- ✓ Distinguish between fact, opinion and hearsay
- ✓ Concern described in sufficient detail, i.e. no further clarification necessary?
- ✓ Student's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
- ✓ Record free of jargon?
- ✓ Written in a professional manner without stereotyping or discrimination?
- ✓ The record includes an attached completed body map (if relevant) to show any visible injuries

APPENDIX 4: Types of Abuse and Neglect

Physical abuse: is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children

frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Neglect and Acts of Omission: is when a vulnerable adult or child does not have their basic needs met, such as adequate food or warmth or help with personal hygiene. It may also include inadequate shelter including exclusion from home or abandonment, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. Signs might include deteriorating health, appearance or mood.

Psychological Abuse: such as threats of harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion.

Discriminatory Abuse: this includes any sort of abuse based on a vulnerable adults or child's race, gender or impairment such as their mental or physical health

Institutional Abuse: this is poor professional practice in an institution designed to safeguard both children and adults, including neglect, and can take the form of isolated incidents right through to ill treatment or gross misconduct.

Financial or Material Abuse: this is when a child/vulnerable adult are exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

Peer on Peer Violence: Staff must be aware of peer on peer abuse and how this can manifest itself through bullying, sexual harassment/violence, up skirting, sexting and many other forms. Staff must be familiar with their respective Learning and behaviour policy which addresses the factors associated with Peer on Peer abuse. Upskirting refers to a form of peer on peer abuse, 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.

Radicalisation, Extremism and Terrorism: in respect of safeguarding individuals from radicalisation, the College works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for students through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them

becoming further radicalized and possibly entering the criminal justice system because of their actions. It is recognized that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Extremism: The Government has defined extremism in the Prevent strategy 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 the armed forces”

Safeguarding issues may also be recognised in the specific circumstances identified below:

- Child pornography and the Internet
- Forced marriage of a child
- Young carers
- Looked after children and children living away from home
- Pregnancy of a child
- Self-harming and suicidal behaviour
- Bullying
- Radicalisation/extremism

This list is not exhaustive.

APPENDIX 5: Safeguarding and Guidance for Remote Teaching and Learning

WHAT ARE THE SIGNS TO LOOK FOR?

- **Poor attendance** – learners are expected to attend their online lessons and/or produce assessments. Poor attendance to online learning can look like:
 - Learner isn't logging on Teams/Google Classroom
 - Learner isn't replying to emails/texts from the teaching and pastoral team - Learner isn't engaging with the work set by teaching team.
- **Hostile home environment** – to allow us to check on our learners' wellbeing appropriately, video calls or phone calls are essential. Staff should look out for:
 - Busy background noise i.e. Shouting, screaming, crowd noises.
 - Student refusing to answer phone calls or video calls – can be a sign of feeling unsafe with family/carers around.

- **Poor mental health and wellbeing** – although we are missing essential cues from face-to-face interactions, mental health struggles can be spotted in: - Student sound as if woken up by phone call, regardless of time of the day
 - Student isn't keeping in touch with friends and family regularly
 - Student gets overwhelmed by assignments and miss deadlines often
 - Student missing appointments for 1:1 with teaching/pastoral team regularly

GOOD PRACTICE TO SAFEGUARDING:

- **Attendance** – staff should attend appointments and classes on time to keep the students engaged.
- **Work/Home environment** – lessons should take place in a quiet room, ideally with bare walls. Avoid interruptions from family members, and family photos on walls, as it can trigger strong emotions in some of our learners.
- **Online interactions** – staff must **never** share their personal details with students - Always use college/work email to make contact with students and external agencies - Use Teams or Google Meetup to call students.
 - If using personal phone to make calls, set phone on Hidden caller ID.
- **External Speakers**
 - Staff must ensure they follow the External Visitors Guidance when inviting external speakers to talk with students on line.
 - Under no circumstances should a speaker be left unsupervised with a group of students
 - Staff must ensure that the session is recorded
- **Report any safeguarding concern to Safeguarding Officer as promptly as possible.**
Give as much detail as possible, asking yourself the following questions:
 - **What are we worried about?**
 - **What is working well?**
 - **What needs to happen?**

If you think that a student is a high risk of harm, **get in touch directly with the safeguarding team using the Safeguarding Hunt group on 429: 01992 707027 or email at safeguarding@capel.ac.uk**

APPENDIX 6: How to Report a Concern

How to Report a Concern

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that the steps below are followed:

NAME	CAMPUS	TEL	ROLE
Matthew Watson	Gunnersbury Park	Ext 1512 / 07834 788 800	Designated Safeguarding Officer
Jaimie Squillino	Enfield	Ext 1172 / 07894 169292	Designated Safeguarding Officer and Student Mentor
Caroline Howard	Enfield	Ext 1172 / 07894 169293	Designated Safeguarding Officer and Student Mentor
Jo Lam	Enfield	Ext 1302 / 07526326870	Designated Safeguarding Officer
Luiza Negura	Enfield	Ext 1392 / 07917081836	Designated Safeguarding Officer and Counsellor
Sarah Jane McClelland	Crystal Palace	Ext 1606 / 07545208893	Designated Safeguarding Officer and Counsellor
Junaina Pirbhai	Crystal Palace and Gunnersbury Park	07593962633	Designated Safeguarding Officer and Student Mentor
Andrew Smith	Crystal Palace	Ext 1601 / 07713568029	Designated Safeguarding Officer
Angela Squillace	Brooks Farm	07973844943	Designated Safeguarding Officer
Janet Foster	Mottingham	Ext 1805 020 8676 0870	Designated Safeguarding Officer and Student Support Officer
Marc Owen	Mottingham	07485 304027	Designated Safeguarding Officer and Counsellor
Glynis Maynard	Regents Park	Ext 1401 / 07872062026	Designated Safeguarding Officer
Cynthia Amos	Enfield	Ext 1332 / 07973844744	Designated Safeguarding Officer Wellbeing
Ellen Luke McDonald	Enfield	Ext 1339/ 07738832321	Operational Designated Safeguarding Lead
Christine Bianchin	Enfield	Ext 1103/ 07545 208 892	Strategic Designated Safeguarding Lead

- Immediately contact a member of the safeguarding team on 01992 707027 or (dial extension 429 from a college phone) or the dial the campus Designated Safeguarding Officer leaving your name and contact details, availability, the nature of your concern and if appropriate the date you were notified of the concern.
- Complete a referral form and send it to area Designated Safeguarding Officer who will triage your raised concern. They will carry out any further investigations before entering the concern on MyConcern and where appropriate will refer the case for internal support or to an external agency.
- It is important to report any concern immediately.

Please note:

- The Safeguarding Team line operates between 08:30 – 17:00. After 17:00 all messages left will be actioned the following day
- In case of an emergency in out of office hours call the emergency services (999) and also report the matter via the Safeguarding Line on 01992 707027.

Keeping You Safe

All staff must observe appropriate professional boundaries with all students at all times in accordance with the Colleges Code of Conduct and Ethical Framework policies. It is compulsory for all staff to confirm they have read, understood and agree to abide by the contents of the agreement. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students, give them gifts, provide a lift, touch without consent and should behave in a way which is professionally appropriate at all times. Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.
- Staff must immediately report the inappropriate conduct or behaviour of a member of staff (or volunteer) towards a student to the **Strategic Designated Safeguarding Lead for Allegations against Staff and Volunteers**
- Action will be taken by the College should any staff member behave in a way which indicates that Appropriate boundaries have not been observed.

General Guidance

Although it may be tempting, no member of staff should ever guarantee to a student that they can keep a concern raised as confidential. If there is any suggestion that the student may be suffering or at risk of suffering harm it must be made clear to the student that the appropriate Centre based Safeguarding Officers will be contacted in order to keep them safe.

If a student discloses that they are being physically or sexually abused or exploited it is important for staff to ask questions for clarification only. This is to avoid asking questions to generate a particular answer.

All staff are expected to be familiar with the following protocol for inviting external speakers, groups or organisations to speak to Students either on site or remotely.

- Organiser (e.g. Lecturer) must read the External Visitor's Guidance and complete an External Visitor's Risk Assessment

APPENDIX 7: Roles and Responsibilities

Safeguarding is everyone's responsibility and all staff carry out safeguarding roles and responsibilities. This appendix sets out the statutory roles and responsibilities of staff that hold specific safeguarding responsibilities reflected in their job descriptions and for which they are accountable.

All Staff

- Fully comply with the requirements of the College's safer recruitment training.
- Safeguard students' wellbeing and maintain public trust in the College and in the teaching profession as part of the professional standards for teaching.
- Adhere to the College's Safeguarding, Child Protection and Adults at Risk Policy and ensure that they understand the reporting procedures in the college.
- Ensure they complete Safeguarding Induction training and ongoing training events, briefing and workshops that they are requested to attend.
- Comply with the College's staff Code of Conduct and Ethical Framework policies at all times that makes clear the appropriate boundaries for communicating with students and their families.
- Remain vigilant and report any safeguarding concerns **immediately** following the procedures in place at the college.
- Report any concerns immediately to the **Designated Safeguarding Officer and for Allegations against Staff to the Executive Director of Human Resources and Central Support** regarding inappropriate behaviour or conduct of a member of staff to a student.
- Do not promote any form of extremist or radical view that endorses or support the use of violent or non-violent acts.

Principal and Chief Executive Officer (Principal)

- The Principal is responsible for ensuring that the Safeguarding, Child Protection and Adults at Risk policy and procedures adopted by the Governing Body are effectively implemented, followed by all staff and monitored for quality assurance in each of the colleges.
- It is the Principal's responsibility to allocate sufficient resources and time to enable the College's Strategic Safeguarding Lead and the Operational Safeguarding Leads to effectively carry out their lead responsibilities and ensure that relevant staff are able to attend strategy discussions, child protection, child in need conferences and other interagency meetings and to contribute fully to the assessment of students.
- The Principal is responsible for ensuring that all staff are confident in their safeguarding role and able to raise concerns about poor or unsafe practice regarding students, and that concerns will be addressed sensitively and in a timely manner in accordance with the College's Whistle Blowing policy. We recognise that it is not the responsibility of students to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the Principal who will deal with the concerns appropriately.

Strategic Designated Safeguarding Lead

The Strategic Safeguarding Lead will ensure the College meets its statutory duty by:

- Ensuring the College safeguarding and child protection and adults at risk policies are up to date and consistent with the appropriate laws and regulations and that policies are reviewed annually.
- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College.
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College.
- Ensuring all staff receive appropriate safeguarding training at induction and refresher safeguarding training.
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Ensuring that College staff receive appropriate safeguarding training and appropriate training is provided for Governors.
- Ensuring that safeguarding issues are brought to the attention of the governing body as required.

Operational Designated Safeguarding Lead

This person will be responsible for:

- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College.
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College.
- Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Providing the Strategic Designated Safeguarding Lead and SLT with reports on safeguarding alerts and cases as required.
- Providing a termly Safeguarding Report to the respective College Education Board and the Training Board.
- ensuring all staff receive appropriate safeguarding training at induction and on an annual basis refresher safeguarding training
- Ensuring the College offers a safe environment for staff and students to learn and work
- Ensuring that safeguarding issues are brought to the attention of the Group Nominated Safeguarding Lead.

- Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children.
- Ensuring College Procedures as outlined in Part 2 of the Policy are reviewed each term and updated to reflect any changes of staff including Local Authority contacts.

Designated Safeguarding Officers

These posts will act as the first line source of support and guidance on all matters of child protection and safeguarding within the College at each Campus.

Staff must report any concerns to a Designated Safeguarding Officer (DSO). Staff are also able to discuss safeguarding, child protection and adults at risk issues with a DSO.

They are responsible for:

- Ensuring there is a system for monitoring and recording concerns about students at an early stage which is implemented across the College and adhered to by all staff.
- Managing child protection concerns and making referrals to Children's Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate.
- Attending and providing reports to 'child in need' meetings, child protection conferences and core meetings and contributing to child protection and 'child in need' plans.
- Monitoring the attendance and progress of students who are the subject of 'child in need' or child protection plans and implementing the College part of the plan.
- Informing Children's Social Care of any proposed change of College of a child who is subject to a 'child in need' or child protection plan and alerting them if a child who is subject to a protection plan is absent from College without reasonable justification.
- Ensuring that relevant information about students is shared with staff on a 'need to know basis'.
- Maintaining accurate child protection records which are held securely and confidentially.
- Ensuring all staff are aware of the need to record concerns about students and enabling them to do this as part of a College wide process, such as in tutorial records, individual/personal learning plans. These would include bullying and racial issues.
- Ensuring complete and accurate records are forwarded to receiving Colleges, such as tutorial records and the individual/personal learning plan.
- Ensuring students, parents and carers have access to the Colleges safeguarding policies and procedures.
- Having a working knowledge of the role and function of the appropriate Safeguarding Children Board.
- Training for staff with designated child protection and safeguarding responsibility occurs every year.
- Undertaking the role of LAC Designated Teacher, as outlined in the revised DfE (2018)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf

APPENDIX 8: Supporting Students

The College recognises that a student who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. The College also recognises that a student may feel helpless and humiliated and may blame themselves for what has or is happening to them. The college helps to provide a vital source of stability in the life of a student who has been abused or is at risk of harm. The College recognises that the behaviour of a student in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

The College also acknowledge that young people/adults at risk who are affected by abuse or neglect, may demonstrate their needs and distress through their words, actions, behaviour, demeanour, academic work or other young people. The College has a strong commitment to an anti-bullying and harassment policy and will consider all coercive acts and inappropriate child-on-child/student-on-student behaviour and unlawful sexual activity within a Child Protection context.

The College's aim is to support students by:

- Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviours in accordance with our Student Code of Conduct; all allegations of bullying must be recorded.
- Promoting a caring and safe environment for all our students.
- Providing an environment where students are able to make positive relationships with staff and are better able to talk to staff about their lives; in so doing staff 'hear the voice of the child'.
- Providing opportunities through the curriculum for students to learn strategies to protect themselves, ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. e.g. through awareness raising activities and workshops including sexual health and relationship education, anti-bullying, drug and alcohol support, gang prevention and health and wellbeing.
- Working in partnership with other services involved in safeguarding students and notifying Children's Social Care or the Adults at Risk Team as soon as there are significant concerns about a student.

Safeguarding is promoted through a students' course (tutorial, enrichment and curriculum) and students are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for students is available through a range of student support services. These aims are underpinned by the College's Policies detailed in **Appendix 1**.

The College will also be vigilant to the attendance and particular needs of students who might be at risk due to:

- Female genital mutilation (FGM)
- Forced marriage
- Radicalisation
- Involvement in gang activity
- Relationship abuse
- Sexual exploitation and bullying linked to race, gender or sexual orientation.
- Risk of offending
- Homelessness

- Refugee/asylum seeker status
- The effects of substance abuse within the family
- Being Children in care
- Child criminal exploitation
- Mental health
- Honour based abuse
- Requiring a social worker

Please refer to **Appendix 9** Local and National Safeguarding Priorities **Appendix 10:** The Prevent Duty/Radicalisation.

All staff will be made aware of children missing from education and how this can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff will be made aware of their College's unauthorised absence and children missing from education procedures.

Students with Learning Difficulties and/or Disabilities and those with medical needs. Research suggests that students with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated or may not understand that they are being abused.

The College acknowledges the legal obligation to support students with medical needs and will work with students, parents and the health authorities to implement health care plans that support the attendance, inclusion and attainment of students with acute or chronic medical conditions.

Staff who work with students in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern that should be shared immediately with the Colleges Designated Safeguarding Officers or in their absence another member of the safeguarding team.

If a student has particular needs which require intimate care or the administration of medication, a meeting will be held with the student, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The student's wishes and feelings will be taken in to account and respected throughout this process.

Students aged under 16 who are taken to **Hospital** must be accompanied by a member of staff. The member of staff must make direct contact with the parent /carer/relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/carer/relative arrives. If a student age 16-18 is taken to hospital, the member of staff must make direct contact with the parent carer/relative to make them aware of the situation. As a general rule the member of staff is not required to accompany the student in the ambulance, where parent/carer/ relative has been made aware of the situation.

Where the student is over 18 and is a vulnerable adult the member of staff must also make direct contact with the parent /carer/ relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/relative arrives.

In all cases, an appropriate Designated Safeguarding Officer or in their absence a Designated Lead should be made aware as soon possible of the situation.

Staff must report any students who are living alone or without parental or guardian support to the Safeguarding team.

If a member of staff becomes aware of a student under the age of 18 who is 'privately fostered' and are cared for by someone other than a parent or close relative (e.g. step parents, siblings, siblings of a parent and grandparents) for 28 days or more must make a referral to the appropriate Designated Safeguarding Officer or in their absence a Designated Lead who will notify Children's Social Care if:

- They become aware of a private fostering arrangement which is not likely to be notified to the local authority
- They have doubts about whether a child's carers are actually their parents, and there is evidence to support these doubts, including concerns about the child's welfare

Further information about private fostering arrangements can be found at www.baaf.org

The College acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education **Appendix 10**. The College works to ensure that all students are given every opportunity to achieve their chosen qualification.

APPENDIX 9: Local and National Priorities

It is acknowledged that due to COVID 19 some of the areas below have become more prominent such as Child Sexual Exploitation (CSE), due to remote online learning that has been taking place outside a structured and supervised learning setting and Domestic Violence, due to learning taking place at home. The College has in place (See 1.1) a range of initiatives to help students who may be experiencing any of the vulnerabilities outlined.

Modern Day Slavery

Modern Day Slavery is a crime and a violation of a person's fundamental human rights. This can be done through bullying, harassment and coercing a person into doing something they do not want to do. Modern Day Slavery, takes on various forms such as forced labour, human trafficking, and is closely linked to Gangs, Children Missing in Education, Child Criminal Exploitation and Child Sexual Exploitation. Colleges have had a duty since November 2015 to report anyone they believe is a suspected victim of slavery or human trafficking.

Trafficked and Exploited Students

A trafficked student is coerced or deceived by the adult who brings them into the country.

Trafficked students are denied their human rights and are forced into exploitation e.g. domestic servitude, forced marriage, criminal activity, begging, benefit fraud, acting as a drug mule, sweatshop or restaurant work. Students

may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes. Recognition of trafficked and exploited students will normally rely on a combination of general signs of abuse and neglect and issues concerned with the student's immigration status. These students may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent, presenting with a history of missing links and unexplained moves. Staff should make a referral to their Safeguarding Team if they suspect a student is a victim of modern slavery or human trafficking.

Children Missing in Education

Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at the College including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

The College will support students by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some students run away because they feel there is no other option. Students need to know where they can access help if they are thinking of running away and what alternatives are open to them. As a College we are well placed to advise young people about the dangers of running away and to point them to available support. If staff become aware of a young runaway, they should inform their Safeguarding Team.

Honour-based Abuse (HBA) including Forced Marriage and Female Genital Mutilation

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Forced Marriage

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A student who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the student themselves, or the student's peer group, a relative or member of the student's local community or from another professional.

Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, child abuse or neglect, family/young person conflict, a student absent from the College or a missing/runaway. Forced marriage may involve the student being taken out of the country for the ceremony, is likely to involve non-consensual and or under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Young men as well as women are victims of forced marriage. Honour based abuse is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic abuse and is often a conspiracy of family members and associates meaning victims are a risk from their parents and families.

Staff should respond to suspicions of a forced marriage or honour based abuse by making a referral to their respective Safeguarding Team. Staff should not treat any allegations of forced marriage or honour based abuse as a domestic issue and send the student back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage.

For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement.

Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 020 70080151 and the Honour Based Violence Helpline 0800 599 9247.

Female Genital Mutilation

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003. Despite the harm it causes, FGM practicing communities consider it acceptable to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is thought to be 6 - 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of students at Capel is such that they are not necessarily in the 'high risk' category for FGM, a student may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

Staff should be alert to the following indicators:

- The family comes from a community that is known to practice FGM
- A student may talk about a long holiday to a country where the practice is prevalent.
- A student may confide that she or a sister or family member is to have a 'special procedure' or to attend a special occasion
- A student may request help from a teacher or another adult
- Any female student born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk. Any information or concern about a student or member of her family being at risk of FGM must be reported to Safeguarding Team and will be treated as an immediate child protection referral to the student's home borough.

Domestic Abuse:

Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Forced marriage, 'honour based abuse' and female genital mutilation are included in this definition.

It is important to note that the definition includes young people aged 16 or over, therefore staff must be vigilant to domestic violence within young people's relationships and refer this as a child protection concern to the CPVA.

Living with domestic violence is a form of emotional abuse and is included in the definition of emotional abuse as, 'seeing or hearing the ill treatment of another'. If staff are aware that a student is witnessing, hearing, living with or experiencing domestic violence, they should inform a Safeguarding Officer or in their absence a Designated Lead, who will in turn refer the matter to or to Children's Social Care for the borough in which the student lives.

Gang Violence and Gang Grooming

(Adapted from "Safeguarding children affected by gang activity and/or serious Youth violence" – London safeguarding children's board section 14.5) www.londonscb.gov.uk

As part of the teaching and tutorial process staff are well placed to pick up signs of antisocial behaviours, aggression, and bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators. Poor academic achievement is one of the most consistently reported risk factors found to increase the likelihood of violent behaviour and crime. If necessary, work collaboratively with external bodies such as Reality around Gangs.

Child Criminal Exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Child Sexual Exploitation (CSE)

‘Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them sexual activities. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also occur through the use of technology, without the child’s immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social /economic and/or emotional vulnerability.’

Sexual exploitation may be organised or opportunistic. It may take place when a student is groomed using technology or is encouraged to think that they are entering into a relationship. It may be linked to gang membership. Boys as well as girls are sexually exploited. Young people are vulnerable to sexual exploitation in many

ways and the vigilance of staff is key in identifying possible signs or indicators. The Rochdale Serious Case Review into the sexual exploitation of a group of young people highlighted the importance of FE Groups in identifying and meeting the needs of vulnerable young people who might be at risk of this form of abuse.

The CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Staff must be vigilant to any signs or concerns that a student may be sexually exploited and report concerns as a matter of urgency.

APPENDIX 10: The Prevent Duty

Under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), Schools and Colleges have a statutory to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups. This is known as the Prevent duty and is seen as part of College's wider safeguarding obligations to protect children and vulnerable adult.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into radicalisation and extremism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The College will fulfil its obligations under the 'Counter Terrorism and Security Act' (2015), to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups through positive curriculum delivery building self-esteem and self-belief. **In addition, we will:**

- Train staff to recognise radicalisation and extremism
- Refer vulnerable people to 'Channel' risk assessment Panels
- Prohibit extremist speakers and events
- Manage access to extremist material
- Have regard to published DfE advice

Staff have a responsibility to familiarise themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College.

The College recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The College will continue to empower its students to create communities that are resilient to extremism and protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgment and discuss with other colleagues if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages.
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism they should discuss this immediately with the Safeguarding Team.

APPENDIX 11: Young Carers

The College works to ensure that all students are given every opportunity to achieve their chosen qualification. The College acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education. It is acknowledged that due to COVID there has been an increase in Young Carers taking on more responsibilities in looking after parent (s) and siblings. While at the same time there has been an increase in those who have become a young carer due to the loss of a parent as a result of COVID 19. The College has in place a range of initiatives to help students who may become a carer.

What are young carers?

Young carers are children or young people under 18 who are responsible on a regular basis for a family member who has an illness or a disability. Whilst within many families, children and young people helping out around the house is seen as a normal part of family life, young carers have added responsibilities which may include sole or main responsibility for:

- Emotional and physical support for the family member
- Carrying out their personal care (bathing, dressing and feeding)
- Administering medication
- Taking to medical appointments
- Looking after younger siblings
- Financial support to the family

How can you identify a young carer?

- The student seems tired and lacks concentration
- Illness or disability in the family
- Frequent lateness or absence
- Poor academic achievements, failure to complete assignments on time
- Isolation or difficulty in forming friendships

- Failure to engage in enrichment activities outside of college
- Behavioural problems
- Victims of bullying
- Parents not engaging with the college, e.g. attending meetings
- Unusual levels of maturity and responsibility

It is important to note that the above includes **possible** indicators that a student might be young carer.

The College's Approach

- Caring responsibilities can significantly impact upon a child's health and development.
- The College's Designated Safeguarding Officer will let all new students know who they are and what they can do to help.
- Young carers will be put in touch with the local Young Carers Service/ Local Authority Children and Families Services and families of any other support services.
- The College will liaise directly with parents who have mobility and communication difficulties, to provide information on meetings concerning their 16-18-year-old child.
- In the event that a member of staff has a safeguarding concern about a young carer, the concern must be immediately reported to the Safeguarding Team.
- The College will respect the rights of young carers' privacy, only sharing information about the young person and their family on a need to know basis.

APPENDIX 12: Protocols for On Line Learning

Online Protocols - Staff

Staff using online technologies for teaching and learning and communication must ensure the following:

1. College policies apply including Safeguarding, Staff Code of Conduct, Ethical Framework and the Student Code of Conduct
2. College staff take part in training/coaching and have the use of Help Guides to ensure the agreed platform is used effectively and safely when setting up and delivery lessons/meetings
3. Staff should maintain professional boundaries and avoid disclosure of personal information
4. Meetings should only be held during normal teaching hours and according to the normally timetabled sessions
5. Staff must dress appropriately for the online lesson
6. When recording or live streaming lessons, make sure staff are in a neutral area where nothing personal or inappropriate can be seen or heard in the background.
7. Staff should consider their location carefully to minimise disruption and consider what is in the background (it is best to blur the background so that your private home is not shared and it is essential when teaching under 19s)

8. Record any live classes and share on Moodle so students unable to attend can catch up.
9. Prior agreement for recording lessons must be obtained prior to recording. Where recordings are made, they should not be uploaded to social media or shared with third parties (exception is Teacher Training partners)
10. The online teaching platform must not be used by the parties for any other purpose than teaching & communication with students/parents/guardians or to carry out other work related duties
11. Images/film/personal details of young people will be stored in accordance with organisational privacy policies and the Data Protection Act.
12. Online 1:1's/tutorials must be planned and communicated with the student and their parent/guardian (for under 18's) before the event and information added to ProMonitor in Student Meetings as Online Tutorial
13. On Line lessons must only use College email addresses
14. If parents do not give permission students will join session with no camera

Section Two

Online Protocols – Students

1. Where possible all students should set up the home computer in a quiet space,
2. Under 19 students to set up the home computer in a quiet yet shared space, or at least a space that can be monitored by parents/guardians
3. Student must dress appropriately for the online lesson
4. On Line lesson must only use College email addresses
5. When you log onto the College eLearning platform (MS TEAMS, Google or Moodle) on or off site, you are agreeing to The College ICT Acceptable Use policy and statement when you enrol. This is set out in the Student Handbook. Please be aware that the safe use of ICT is monitored on college equipment for all learners' safety.
6. We ask that you do not disclose your location online and not to give away personal details for example in a chat facility – whilst your teacher will explain the importance of this to you, it is to safeguard you.
7. Where lessons are recorded, they must not be shared with third parties or uploaded to social media without consent and organisational approval.
8. There is to be no live streaming of on line lessons
9. Do not take photos of others while you are engaged in learning including using photos online in any context unless directed by your teacher.
10. Do not share the online lesson meeting links with anyone

11. Students know how to report if they have an issue or a concern about the sessions
12. The online learning platform must not be used by the parties for any other purpose than learning e.g. sharing photos or general messaging.
13. Please keep password login safe and do not disclose them to anyone.
14. Always conduct yourself in a professional manner
15. Respecting others' work and property online.
16. Any defamatory, offensive or illegal material aired online by the Student, or inappropriate behaviour by the Student, will result in disciplinary and intervention as detailed in the Student Code of Conduct.

Section Three

For students under 19 years of age

Process sending Permission Request

1. This must be sent out prior to using 2-way web cam for teaching & learning
2. Teacher to email Permission Request to parent/guardian
3. Parent/guardian to email response back to Teacher which can be accepted as agreement
4. Teacher to add a note to ProMonitor

Parent/Guardian Permission for On Line Learning

Dear Parent/Guardian,

The college has put a number of interventions and safeguards in place to protect your daughter/son when learning on line.

The College requests that you provide permission for your daughter/son to take part in on line learning using two-way web cam functionality.

Student name	
Vocational School or Course name	
<p><i>Please sign to give consent for:</i></p> <ul style="list-style-type: none"> • <i>Home devices can be used for on line learning</i> 	

- *Recording of sessions and for the college to store recordings on college only systems for this academic year.*
- *Any Safeguarding concerns to follow the Student Safeguarding process*

I give consent for my daughter/son to take part in two-way on line learning

Parent/guardian name	
Parent/guardian signature	
Date	