

**Capel Manor
College**

Safeguarding, Child Protection and Adults at Risk Policy

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Introduction

1. This policy is written with due regard to the national guidance published by the Department for Education entitled "Keeping Children Safe in Education" (September 2018) and Working Together to Safeguard Children (February 2017) and Prevent Duty Guidance (March 2016).
2. Our policy adoption and review dates are stated on the front page of this policy. It will be reviewed annually by our Governors and the Senior Leadership Team (including the Strategic Designated Safeguarding Lead) and each time any subsequent guidance is issued by the Secretary of State.
3. Capel Manor College fully recognises its responsibility for the safeguarding and protection of students and adults at risk and for promoting the welfare of young people and Adults at Risk who are students at the College.
4. The College aims at all times to create and maintain a safe environment for all students, staff, volunteers and visitors.
5. All young people and Adults at Risk have the right to be safe from harm, abuse and exploitation.
6. The welfare of the student is paramount and this principle underpins all safeguarding work.
7. Statements about abuse or neglect made by students will be taken seriously.
8. A commitment to the Health and Wellbeing of students, which underpins a successful learning experience.
9. We acknowledge, that where we have any concerns about a student's welfare, we will take all appropriate action to address those concerns by working in full partnership with other agencies.
10. This policy applies to all governors, staff, agency workers, contractors, visitors and volunteers working for the College. All staff should understand that a range of other College policies are central to many aspects of this policy and should be read in conjunction with the following policies on:
 - a) Staff Code of Conduct
 - b) Student Code of Conduct and Disciplinary
 - c) Student Bullying and Harassment
 - d) Health and Safety
 - e) Single Equality Scheme

- f) Ethical Framework Maintaining Professional Boundaries
 - g) Confidential Reporting (Whistleblowing)
11. All staff must be clear about their own role and that of others in providing a caring and safe environment for all students and must know how they should respond to any concerns about an individual student that may arise.

Definitions

12. For the purposes of this policy the following terms have been used:
- a) a 'child' is someone who has not yet reached their 18th birthday (1989 Children Act).
 - b) an "adult at risk" is any person over the age of 18, "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
 - c) "staff" means all employees, full-time or fractional and all agency, franchise, contract and volunteer staff working at the College.
 - d) the term "student" is used in this policy to refer to anyone who is under the age of 18 or who meets the definition of an Adult at Risk.
 - e) "visitor" means any person who enters the building who is not a staff member.
 - f) "volunteer" means any person who is in unpaid employment in the College.

Other students

13. Many of our students would not be considered to be either children or vulnerable adults; however the College has a consistent commitment to their safety and wellbeing. Whilst there will usually not be a statutory responsibility to refer such matters to Social Services, the policy and procedures below should be followed with regards to identifying and reporting abuse and dealing with disclosure.
14. This information should be passed to the Student Support Manager who will consider how the College and/or external agencies can support the young person to ensure their physical and emotional wellbeing, as well as their ability to be successful on their course.

Consideration of those outside of the College

15. Throughout staff interaction with our students, especially when dealing with safeguarding and child protection matters, information may be disclosed that suggest other children or young adults are being abused or at significant risk of harm.
16. We have a responsibility, as a public body, to consider this information and whether sharing this information can help safeguard others outside of the College. Any information that suggests children or young people external to the College should also be reported to the Designated Safeguarding Lead, who will consider whether this information should be shared with other agencies and/or a referral should be made to Social Services.

Past Abuse

17. Any disclosure of past abuse should also be dealt with in accordance with this policy and associated procedures. This is to ensure that any criminal activity is dealt with appropriately and action can be taken to reduce the risk of future abuse.

Legislative Context and Framework

18. The following legislation and legal framework have been used in the preparation of this policy:
 - a) 'Safeguarding Children and Safer Recruitment in Education' (Dept for Children, Schools and Families 2010).
 - b) Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children' (Dept for Children, Schools and Families 2017).
 - c) Keeping Children safe in Education: Statutory Guidance for Schools and Colleges (Sept 2018).
 - d) Confirm the current safeguarding arrangements introduced in October 2009 continue to apply and that the College's statutory duties remain those as defined in Section 175 of the Education Act 2002.
 - e) Prevent Duty Guidance for England (2016) issued under section 29 of the Counter terrorism and security Act 2015.
 - f) Quality led requirement for Safeguarding Team and frequency of updating and our duties to Adults at Risk in accordance with the

National Framework of Standards for Safeguarding Adults, ADSS 2005.

Aims

19. The purpose of this policy is to:

- a) Raise the awareness of all staff of the need to safeguard students and of their responsibilities in identifying concerns and reporting them as a matter of priority
- b) Provide a framework to support staff in identifying concerns that a student may be suffering or at risk of suffering harm or abuse thereby enabling them to report those concerns without delay.
- c) Promote and maintain an environment where students feel secure and are listened to.
- d) Promote an environment where students and staff treat each other with mutual respect and develop positive relationships which are built on trust.
- e) Ensure that the College has sufficient Designated Members of Staff for Safeguarding to enable one of them to be available or contactable at all times during the College day.
- f) Enable and support good levels of communication between staff to ensure that relevant information about students is disseminated and shared with appropriate staff on a 'need to know' basis.
- g) Ensure that all members of staff have the appropriate level of training on safeguarding and that this is refreshed annually. Develop and promote effective working relationships with partner agencies, including Children's Social Care, the Police Child Abuse Investigation Team and local authorities (or relevant managing body).
- h) Provide a systematic means of recording and monitoring students who are thought be at risk of harm or who are subject to child protection plans.
- i) Provide structured procedures within the College which will be followed by all staff when there are concerns about a student who is potentially deemed at risk.

- j) Ensure that all adults working with students in the College have undergone appropriate safer recruitment vetting and checks as to their suitability to work with students in line with national guidance.
- k) Ensure that procedures are followed where an allegation is made against a member of staff or volunteer in accordance with part 4 of “Keeping Children Safe in Education” and with the involvement of the Local Authority Designated Officer (LADO).
- l) To support young people's and Adults at Risk' development in ways that will foster security, confidence and independence and to promote this through the curriculum, the tutorial programme, enrichment activities and the student engagement.

Statutory Responsibilities

- 20. The Principal and Chief Executive of the College holds responsibility for ensuring that the safety of the students is at all times of paramount importance and recognises the contribution the College makes in safeguarding and protecting students.
- 21. The Principal and Chief Executive is responsible for ensuring that any deficiencies or weaknesses in the College's arrangements for safeguarding and promoting the welfare of students are addressed and remedied without delay.
- 22. All staff including teaching and non-teaching staff, temporary and agency staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with students on placements have a statutory responsibility to safeguard and promote the welfare of students and must be fully conversant with and adhere to this policy and Keeping Children Safe in Education (Sept 2018). All staff must sign to say that they have read, understood it and will adhere to it.
- 23. For the purposes of this document, the term 'staff' will apply to those listed above. Because of their day to day contact with students, staff at the College are well placed to observe possible signs of harm or abuse.
- 24. It is neither the role nor responsibility of those working with students at the College to assess, diagnose or investigate whether a student is at risk of or is suffering harm. It is the responsibility of all staff to be aware of the need to report any concerns about a student to the Designated Safeguarding Officer. A comprehensive list of safeguarding staff will be published on the College's intranet.

Roles and Responsibilities

25. The roles and responsibilities for safeguarding are defined in Annex B of the Keeping children safe in education and Part four: Allegations of abuse made against teachers and other staff.

All Staff

26. Safeguarding is everyone's responsibility.
27. All Staff are responsible for:
- a) Adhering to the College's Safeguarding, Child Protection and Adults at Risk Policy.
 - b) Complying with the College's staff code of conduct.
 - c) Complying with the College's Ethical Framework Policy.
 - d) Reporting any Safeguarding, Child Protection and Adults at Risk concerns immediately via individual College's Safeguarding referral system.
 - e) Reporting any concerns immediately to the Director of HR, regarding the inappropriate behaviour or conduct of a member of staff towards a student.
 - f) Not promoting any form of extremist or radical view that endorses or supports the use of violent or non-violent acts.
 - g) Making clear the appropriate boundaries when communicating with students.

The Governing Body

28. The Governing Body for the College has a statutory obligation for ensuring the Safeguarding of Children and Adults at Risk and are responsible for:
- a) Ensuring that robust Safeguarding, Child Protection and Adults at Risk policies and procedures are in place.
 - b) For monitoring the service and receiving annual reports.
 - c) Undertaking Safeguarding, Child Protection and Adults at Risk training and annual refresher training including the Prevent Duty training.

The Principal and Chief Executive

29. The CEO is responsible for ensuring that the Safeguarding policy and procedures and all linked safeguarding policies adopted by the Governing Body are fully implemented and followed by all staff.
30. It is the CEO's responsibility to allocate sufficient resources and time to enable the responsibilities of the designated lead member of staff for safeguarding (the Strategic Designated Safeguarding Lead (DSL)) to be discharged fully and to ensure that relevant staff are able to attend strategy discussions, child protection conferences and other inter-agency meetings and to contribute fully to the assessment of students.
31. The CEO is responsible for ensuring that all staff feel 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 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 CEO who will deal with the concerns appropriately.

The Strategic Designated Safeguarding Lead (DSL)

32. Will be a member of the Senior Leadership Team (SLT).
33. The Strategic Designated Safeguarding Lead (DSL) will ensure the College meets its statutory duty by:
 - a) Seek to ensure the College safeguarding, 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.
 - b) Seek to ensure that all staff are appropriately trained and undertaking regular training reviews Seek to ensure that 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.
 - c) Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
 - d) Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
 - e) Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children.

- f) Ensuring that safeguarding issues are brought to the attention of the Governing Body as required.
- g) Ensuring appropriate persons involved in safeguarding are adequately appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College.
- h) Ensuring that all staff receive safeguarding training at induction and refresher training as appropriate.
- i) Referring cases where a person is dismissed or left due to risk/harm to the Disclosure and Barring Service as required.

The Operational Designated Safeguarding Lead

34. The Operational Designated Safeguarding Lead (ODSL) will support the DSL by:
- a) Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College.
 - b) Attending and providing reports to 'child in need' meetings, child protection conferences and core group meetings and contributing to child protection and 'child in need' plans.
 - c) 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.
 - d) 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.
 - e) Ensuring College staff receive appropriate annual safeguarding training updates and act as a source of support and expertise to the College.
 - f) Informing Children's Social Care of any proposed change 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.
 - g) Referring cases of suspected abuse to the local authority children's care as required in consultation with the DSL.

- h) Making referrals to local authority children's social care or Channel programme where there is a radicalisation concern as required in consultation with the DSL.
- i) Referring cases where a crime may have been committed to the Police as required in consultation with the DSL.
- j) Liaising with the DSL and Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- k) Liaising with the "case manager" and the designated safeguarding officers at the local authority for child protection concerns in cases which concern a staff member.
- l) Liaising with staff, especially pastoral staff, IT technicians and the named person with oversight for SEN in the College on matters of safety and safeguarding, including on-line and digital safety and when deciding whether to make a referral by liaising with relevant external agencies.
- m) Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- n) Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- o) Providing the DSL with reports on safeguarding alerts and cases as required.
- p) Ensuring that safeguarding issues are brought to the attention of the DSL.
- q) Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children.
- r) Referring cases of suspected abuse to the local authority children's care as required.
- s) Supporting staff who make referrals to local authority children's social care.
- t) Referring cases to the Channel programme where there is a radicalisation concern as required.
- u) Supporting staff who make referrals to the Channel programme.

- v) Liaising with staff, especially pastoral staff, IT technicians and the named person with oversight for SEN in the College on matters of safety and safeguarding, including on-line and digital safety and when deciding whether to make a referral by liaising with relevant external agencies.
- w) Attending and providing reports to 'child in need' meetings, child protection conferences and core group meetings and contributing to child protection and 'child in need' plans.
- x) 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.
- y) Informing Children's Social Care of any proposed change 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.

Designated Safeguarding Officers

- 35. These posts will act as a first line source of support and guidance on all matters of child protection and safeguarding within the College at each centre.
- 36. 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 DSOs.
- 37. The DSO is responsible for:
 - a) Assessing any urgent social, emotional and physical needs of the student.
 - b) Considering whether the student has suffered, or is likely to suffer significant harm in conjunction with the DDSL.
 - c) Checking whether the student is known to the College as currently subject to a Child Protection Plan or having been previously subject to a Plan.
 - d) Confirming whether any previous concerns have been raised by staff.
 - e) Considering whether the matter should be discussed with the student's parents/guardians or whether to do so may put the student at further risk of harm because of delay or the parent's possible actions or reactions.

- f) Ensuring that the system for monitoring and recording concerns about students are updated at an early stage and adhered to by all staff.
- g) Managing child protection concerns and seeking advice and guidance on suggested referrals to the DDSL.
- h) Referring cases of suspected abuse to the local authority children's care as required in agreement with the DDSL.
- i) Ensuring that relevant information about students is shared with staff on a 'need to know basis'.
- j) Maintaining accurate child protection records which are held securely and confidentially.
- k) Ensuring that all staff are aware of the need to record concerns about students and enabling them to do this as part of a College process. These would include bullying and racial issues.
- l) Ensuring that students, parents and carers have access to the Colleges safeguarding policies and procedures.
- m) Having a working knowledge of the role and function of the appropriate local Safeguarding Children Board.

Safer Recruitment and Staff Appointments

- 38. Safe recruitment and selection practice is vital in safeguarding and protecting students. The College recognises and takes seriously its responsibility to adopt practice which minimises risk to the students by ensuring that measures are in place through this practice to deter, reject or identify people who might abuse students or who are unsuitable to work with them. The Governing Body is committed to evidencing this practice in relation to all staff working with students at the College.
- 39. The safety and wellbeing of students is borne in mind at all times throughout the recruitment and selection process. The College follows guidance from "Keeping Children Safe in Education".
- 40. In accordance with this, the College will make sure that appropriate checks are carried out on new staff, Governors, contractors and volunteers. To consider the safety of students when drawing up job descriptions and person specifications, advertising posts, calling for and scrutinising references. To pick up on gaps in employment history

through to the interview process and carrying out enhanced DBS and professional checks and verifications of qualifications and identity.

41. Applicants will be scrutinised by:
- a) Verifying identity and academic or vocational qualifications.
 - b) Obtaining two written professional references.
 - c) Checking previous employment history for employment gaps.
 - d) Carrying out mandatory checks including List 99 and the Disclosure and Barring Service.
 - e) Conducting interviews with applicants.
 - f) Completion of the Pre-Employment Health Questionnaire.
 - g) Undertaking risk assessments where it is appropriate and necessary to do so.
 - h) Ensure Agency and Contracted staff undertake the mandatory training as directed by the College to include safeguarding, safer recruitment and Prevent.

Work Experience, Placements and Work Based Learning

42. College will ensure that:
- a) Health and safety checks are undertaken prior to establishing work experience placements.
 - b) 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, and ensuring that providers have appropriate policies and procedures in place which are followed by all staff.
 - c) 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.
 - d) Staff are appropriately trained to carry out the health and safety work placement audit.

Safeguarding Training

43. Capel Manor College ensures that:

- a) The College's nominated safeguarding staff undergo regular appropriate safeguarding and child protection training in accordance with best practice. Training should be refreshed at least once a year to ensure they are aware of current safeguarding issues and best practice.
- b) All staff undertake initial safeguarding, child protection, Adults at Risk and Prevent Duty training and that their training is refreshed, normally every year.
- c) All new staff and governors are given a copy of the Safeguarding, Child Protection and Adults at Risk Policy as part of the Capel's induction process and are expected to read and sign to confirm that they have read and will adhere to the full policy.
- d) The responsibility of ensuring that all staff employed by the College received appropriate training rests with the Director of Human Resources (HR).
- e) A central record of staff training is held with the HR team.

44. Initial training for staff will ensure that:

- a) All staff are able to recognise possible signs and indicators of abuse in students.
- b) All staff know to whom they should report any concern about a student's welfare and well being.
- c) All staff understand the College's safeguarding child protection and Adults at Risk policy and procedures and are clear about their statutory duties.
- d) All staff are aware of how to manage a disclosure from a student in order to promote the best outcomes for that student.
- e) All staff are aware of the need to work within professional boundaries and adhere to the code of conduct to safeguard students.
- f) All staff are aware of the importance of keeping detailed and accurate records of any concerns about a student.

- g) All staff are aware of the boundaries of confidentiality and disclosure and understand when the disclosure of confidential information would be a proportional response to the need to safeguard a student.
- h) All staff have a duty to report any child protection and vulnerable adult issues to the Designated Officer or a nominated member of the Safeguarding Team.
- i) All staff have read and understood Keeping Children Safe in Education (September 2018).

Supporting Students

- 45. In line with the duty to 'help children achieve more' (Working Together to Safeguard Children 2013), the College will promote the many areas that support students to be successful and feel confident in terms of their:
 - a) Physical and mental health and emotional wellbeing.
 - b) Protection from harm and neglect.
 - c) Education, training and recreation.
 - d) Contribution to society.
 - e) Social and economic wellbeing.
- 46. Capel Manor College wants all students to be able to place their trust and confidence in any adult working at the College. Students should feel confident and comfortable that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately.
- 47. We aim to support students by:
 - a) 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 Bullying and Harassment Policy.
 - b) Promoting a caring and safe environment for all our students.
 - c) 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 this way staff are able to 'hear the voice of the child'.

- d) 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, anti-bullying, drug and alcohol support, gang prevention and health and well being.
 - e) 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.
 - f) Dedicated private and confidential online reporting abuse service.
48. Safeguarding is promoted through a students' course (induction, 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 following College policies:
- a) Student Handbook.
 - b) Student Code of Conduct and Disciplinary Procedure.
 - c) Bullying and Harassment Policy.
 - d) Observations of Teaching and Learning Procedures.
 - e) Computer and Networks Acceptable Use Policy.
 - f) Single Equality Scheme.

Professional Relationships with Students

- 49. Capel Manor College recognises that positive professional relationships with students will support and promote the best outcomes for them.
- 50. The College provides guidance on the expectations of staff in this matter to which all staff are expected to adhere. Good professional boundaries safeguard students and safeguard professionals from unfounded allegations.
- 51. All staff must adhere to the Staff Code of Conduct and Ethical Framework Policies.

Reporting Concerns of inappropriate behaviour

52. As stated in the staff code of conduct and in the Safeguarding Policy, all staff are responsible for reporting any concerns immediately they may have to the Director of HR, regarding the inappropriate behaviour or conduct of a member of staff towards a student.

Personal Relationships

53. It is the prime duty of the College to provide a safe and secure learning environment for students and staff and to protect the safety and welfare of all the students in its care.
54. The guidance below ensures that staff maintain professional standards while at work and do not commit acts of impropriety or abuse the trust of students for whom they are responsible. The personal relationships referred to are those that are of a romantic and/or sexual nature.

Maintaining Professional Relationships

55. A professional relationship exists where a member of staff is responsible for assessing, supervising, tutoring, teaching or providing pastoral support, administrative or technical support. Maintaining this professional relationship is vital to the educational development and achievement of its students.
56. All staff must hold in mind the need to ensure that their relationships with students are professional and act appropriately according to the College Code of Conduct and Ethical Framework.

College Standards

57. The College strongly disapproves of any and all personal/sexual relationships between staff and students. The age of the student is immaterial in considering whether a professional is in breach of trust.
58. Any relationship between a professional and a student under the age of 19 or a student who is an Adult at Risk can result in an immediate referral to the Local Authority Designate Officer (LADO).
59. The College strongly does not allow personal relationships between staff and students above the age of 19 where a professional relationship exists. Should a personal relationship already exist when a student joins the College, the staff member must inform their line manager, so that appropriate steps can be taken to ensure that s/he is no longer in a professional role in connection with that particular student. Failure to report such a relationship may lead to disciplinary action, depending on the individual circumstances of the case.

60. Where no professional relationship exists between staff and student, a personal relationship should be reported to the line manager in order to protect everyone's interests.

Other Consequences

61. All staff are reminded of the risks of a complaint being made under the Bullying and Harassment Policy and that they may face allegations of criminal misconduct. In some circumstances, staff may be referred to the Independent Safeguarding Authority and barred from teaching.

Child Protection Concerns

62. Abuse of trust may be reported to the nominated Designated Safeguarding Lead SLT or the Operational Designated Safeguarding Lead. It reflects our responsibilities under the Children's Act 1989, the Sexual Offences Amendment Act 2000 and the DfES Circular 2002 on the Prevention of Unsuitable Persons from working with children and young adults.
63. For the avoidance of doubt, student helpers and students on work placements are not considered members of staff. Apprentices will be treated as members of staff for the purpose of this policy.

Safe Touch Policy and Code of Practice

64. The College recognises that in certain disciplines, e.g. Saddlery, it is necessary for the tutor to physically touch a student to improve their understanding of the exercise or movement. Please refer to the Ethical Framework Policy.

Confidentiality

65. Confidentiality is an issue which needs to be fully understood by all those working with students, particularly in the context of safeguarding and the protection of children and Adults at Risk. We respect the right of students and families to have information about them dealt with sensitively and confidentially in line with statute and guidance. Child Protection information regarding students in our College will be shared with staff on a strictly need to know basis.
66. A member of staff will 'need to know' information when it is demonstrably to benefit the student. All staff are expected to conform to the College's standards of good professional practice and maintain confidentiality appropriately at all times.
67. All staff must be aware of their responsibility to share information with the appropriate Designated Officer and with other agencies in order to

protect and safeguard students. This must be done in accordance with the College's Safeguarding, Child Protection and Adults at Risk Policy.

68. Where there is uncertainty about the need to share information advice will be sought from the appropriate Designated Officer on this issue and where necessary from the appropriate local authority.
69. No one at 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.
70. No one at the College may guarantee to a student that they will keep a secret or confidence and must always make it clear to 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 appropriate DSO and/or DDSL in order to take measures to safeguard the student at risk.
71. 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.

Managing Disclosures

72. Receive
 - Do not ask questions or probe for information as this may contaminate evidence and prohibit a police investigation.
 - Listen to what is being said, without displaying shock or disbelief.
 - Accept what is said.
 - Make a note of what has been said as soon as practicable.
73. Reassure
 - Reassure the student, but only so far as is honest and reliable. For example, don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now'.
 - Do reassure and alleviate guilt, if the student refers to it. For example, you could say:
 - You have been brave to tell me.
 - I am glad you came to me.
 - I am sorry this has happened.

- This was not your fault.
- We are going to do something together to get help.
- Do not promise to keep it a secret as your professional responsibilities require you to report the matter.

74. React

- React to the student only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions, for example 'what did he do next?' (this assumes he did!), or 'did he touch your private parts?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not criticise the alleged perpetrator.
- Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and who you have to talk to. Reassure the student that it will be a Designated Safeguarding Officer no one else. Try to see the matter through yourself and keep in contact with the student. Ensure that if an interview undertaken by Children's Social Care or the Police is to follow, that the student has a support person present if they wish (possibly yourself).

75. Record

- Make some very brief notes at the time on any paper which comes to hand, and pass a record of those concerns to a DSO as soon as possible.
- Do not destroy your original notes in case they are required by a court. This can be added to the system as an attachment and must be dated and signed in ink.
- Record on the same day the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the student. If the student uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Use the body map to indicate the position of any bruising if it visible. Record statements and observable things, rather than your 'interpretations' or 'assumptions'.

Supporting Staff

76. We recognise that child protection is a difficult and sometimes upsetting subject for those who work with students. Working with a student who has suffered harm or is at risk of harm may be stressful and distressing. We

are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the DSO and/or DDSL or another member of the safeguarding team, and to seek further support as appropriate.

77. All staff and volunteers should feel able to raise concerns about poor or unsafe practice; such concerns will be addressed sensitively and effectively in accordance with agreed whistle blowing procedures. A copy of the summary version of 'What to do if You're Worried a Child is Being Abused' should be made available to every member of staff.
78. We believe that working within clear safeguarding and child and Adults at Risk protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

Students with Learning Difficulties and/or Disabilities

79. 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.
80. 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 Officer or in their absence another member of the safeguarding team.

Intimate Care and Toileting of Disabled Students

81. The College is committed to supporting and meeting the needs of students with disabilities and will ensure that no student is put at a substantial disadvantage compared with her or his non - disabled peers.
82. 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 into account and respected throughout this process.

Working in Partnership with Parents and Carers

83. Capel Manor 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.
84. Parents and carers will be encouraged to access our safeguarding policy, and a summary of it is included in the literature given to students and families on admission. We believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that we will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.
85. Wherever possible and appropriate we 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.
86. There may be instances however, 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 DSO and/or DDSL or a member of the safeguarding team judges that a student's well being will be endangered 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 competence' and this will inform judgements and decisions.

Implementation of Safeguarding Policy and Practice

87. All staff have a duty to be fully conversant with the safeguarding child protection and Adults at Risk policy and procedures. All staff are required to read and sign the policy and to adhere to it at all times.
88. Agency staff are also required to read and sign the policy.

Site Security

89. All students and staff should be able to feel safe when they are on the site. All staff and students will wear their ID at all times and will not be allowed to enter a site without it. 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.

Contractors

90. 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 Safeguarding Child Protection and Adults at Risk Policy and Staff Code of Conduct. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.

Agency Staff

91. Agency staff and those who work at the College 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.

Restraint and Reasonable Force

92. 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:
93. Causing personal injury to any person (including themselves) or damage to any property; Prejudicing the maintenance of good order and discipline.
94. This includes occasions when the student is not on College premises e.g. on College visits. 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.
95. 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.
96. 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.
97. 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. 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):

- Not to treat a disabled child unfavourably without justification.
- To take reasonable steps to avoid putting disabled students at a substantial disadvantage.

98. For the purposes of this policy a student will be committing an offence if causing personal injury to any person (including themselves) or damage to any property, prejudicing the maintenance of good order and discipline. This includes occasions when the student is not on College premises e.g. on College visits.
99. 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
100. 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.
101. All such offences will be recorded and may be reported to the Local Authority.
102. 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.
103. 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.
104. 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

105. Section 548 of the 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):

- a) Not to treat a disabled child unfavourably without justification.
- b) To take reasonable steps to avoid putting disabled students at a substantial disadvantage.

Recording

106. Concerns about students should be reported to a Designated Safeguarding Officer who will record those concerns on "MyConcern" the College's safeguarding software. The system will assist in protecting children and Adults at Risk by recording and managing all concerns and outcomes accurately.

Referral

107. If a student discloses that they have been subjected to abuse to any staff member, the staff member must report this to Designated Safeguarding Officer. The Designated Officer will liaise with the Operational Designated Safeguarding Lead who will make the necessary referrals to Children's Social Care in the child's home borough.

Hospitalisation

108. Students aged under 16 who are taken to hospital must be accompanied by a member of staff or trusted person. The member of staff must make direct contact with the parent /relative to make them aware of the situation.

109. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/relative or trusted person arrives. As a general rule however, the member of staff is not required to accompany the student in the ambulance, where parent/relative has been made aware of the situation.

110. Where the student is over 18 and is an Adult at Risk the member of staff must also make direct contact with the parent /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.

111. Normally a member of staff is not required to accompany the student in the ambulance, where parent/relative has been made aware of the situation.

112. In all cases, the appropriate DDSL should be made aware as soon possible of the situation.

Allegations against staff and volunteers

113. Allegations made against staff and volunteers will be dealt with according to the process laid out in 'Keeping Children Safe in Education- Part Four'.

114. The Director of Human Resources or the Chair of the Governing Body (if it is an allegation about the Chief Executive) will work with the Local Authority Designated Officer to confirm the details of individual cases and to reach a decision on the way forward in each case, in conjunction with Children's Social Care and the Police Child Abuse Investigation Team.

115. Staff will not investigate cases of suspected abuse themselves. The College will cooperate fully with the Police and Student's Social Care.

Forced Marriage/Honour Violence/Killings

116. 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.

117. 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 classes 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.

118. Honour based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are a risk from their parents and families.

119. College staff should respond to suspicions of a forced marriage or honour based violence by making a referral to Children's Social Care

0207 527 7400 and if the risk is acute, to the Police Child Abuse Investigation Team 020 7527 8102.

120. Staff should not treat any allegations of forced marriage or honour based violence 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.
121. 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.
122. 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

123. 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, reporting of FGM to police is mandatory – Female Genital Mutilation Act 2003 and Serious Crime Act 2015. Despite the harm it causes, FGM practising 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.
124. Although the age of students at the College 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.
125. Staff should be alert to the following indicators:
 - a) The family comes from a community that is known to practice FGM.
 - b) A student may talk about a long holiday to a country where the practice is prevalent.
 - c) A student may confide that she or a sister or family member is to have a 'special procedure' or to attend a special occasion.
 - d) A student may request help from a teacher or another adult.
 - e) 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 via the appropriate Designated Officer and will be treated as an immediate child protection referral to the student's home borough.

Domestic Violence

126. 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:
- a) Psychological
 - b) Physical
 - c) Sexual
 - d) Financial
 - e) Emotional
127. 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.
128. 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.
129. Forced marriage, 'honour based violence' and female genital mutilation are included in this definition.
130. It 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 DDSL.
131. 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 the appropriate DSO and/or DDSL who will in turn refer the matter to or to Children's Social Care for the borough in which the student lives.

Young Carers

132. Capel Manor College works to ensure that all students are given every opportunity to achieve their chosen qualification. We acknowledge that some students are likely to be young carers whose responsibilities at home may adversely affect their education.
133. 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.
134. 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:
- a) Emotional and physical support for the family member.
 - b) Carrying out their personal care (bathing, dressing and feeding).
 - c) Administering medication.
 - d) Taking to medical appointments.
 - e) Looking after younger siblings.
135. How can you identify a young carer?
- a) The student seems tired and lacks concentration.
 - b) Illness or disability in the family.
 - c) Frequent lateness or absence.
 - d) Poor academic achievements, failure to complete assignments on time.
 - e) Isolation or difficulty in forming friendships.
 - f) Failure to engage in enrichment activities outside of college.
 - g) Behavioural problems.
 - h) Victims of bullying.

- i) Parents not engaging with the college, e.g. attending meetings.
 - j) Unusual levels of maturity and responsibility.
136. It is important to note that the above includes possible indicators that a student might be young carer:
- a) Caring responsibilities can significantly impact upon a child's health and development.
 - b) The individual College's Safeguarding Officer will let all new students know who they are and what they can do to help.
 - c) 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.
 - d) 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.
 - e) 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, at the earliest opportunity.
 - f) 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.

Children Missing In Education

137. 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 College i.e 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.
138. Capel Manor 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.

139. The College is 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 ensure they inform the appropriate DSO who in turn will contact the Police Liaison Officer and the Education Welfare Service.

Gang Violence and Gang Grooming

140. (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

141. As part of the teaching and tutorial process staff are well placed to pick up signs of anti-social behaviours, aggression, bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators.

142. Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime. Staff should follow the College's bullying and harassment procedures and if necessary work collaboratively with external bodies such as Reality Around Gangs.

Sexual Exploitation/Sexploitaton

143. '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.'

144. Child sexual exploitation can 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.

145. 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.'

146. 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.

147. 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.
148. Staff must be vigilant to any signs or concerns that a student may be sexually exploited and report concerns as a matter of urgency.

Peer on Peer Abuse

149. 'Peer on peer abuse' relates to managing reports of child on child sexual violence and sexual harassment.
150. When there has been a report of sexual violence, consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other students involved/impacted) following guidance set out in Keeping Children safe in Education: Statutory Guidance for Schools and Colleges (Sept 2018).
151. Sexual violence and sexual harassment is not acceptable and will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.
152. Paragraph 43 and Annex A in 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' (May 2018) provides advice, sources of information and links to resources.

eSafety

153. This refers to the internet and other electronic forms of communication such as e-mail, text messages, face -book can be used to put young people and Adults at Risk.
154. Key Stroke Monitoring. The college uses a sophisticated keystroke and image monitoring software system provided by an external company. This provides daily reports on breaches in the Computer and Networks Acceptable Use Policy, such as adult material searches, along with safeguarding related identified risks.

155. Safeguarding officers monitor and follow up directly on all reports and where a “high risk” indicator is raised the response is within hours of the report being logged.
156. There are many ways in which the various forms of technology can be used in a harmful way:

Internet Grooming

157. Flattering someone into talking in a private chat room where they will be isolated or befriending someone on a social networking web page. Asking someone what problems they have to create the illusion of being a best friend and building up a sense of mutual love and trust, suggesting that they can discuss “anything”.

Sex talk/Sexting

158. Engaging someone in explicit conversations or requesting sexually explicit pictures from them. Sexting or otherwise known as ‘youth produced sexual imagery’.
159. Sexting advice covers the sharing of sexual imagery by young people. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if under 18. It presents a range of risks which need careful management.
160. As a member of college staff all incidents of youth produced sexual imagery should be dealt with as a safeguarding concern. The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved. If youth produced sexual imagery is reported or discovered then an RF1 should be completed immediately and sent to a College Safeguarding Officer to investigate and to decide if guardians should be involved and/or a referral made.

Cyberbullying

161. Using electronic forms of communication such as e-mail, text, face - book to send malicious or unkind messages to try and intimidate or threaten someone.

Radicalisation

162. Under the Prevent Duty legislation, Colleges have a duty to put into place policies and procedures to prevent young people and vulnerable adults from being drawn into radicalisation and extremism.

163. Staff have responsibility to familiarise themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College.
164. The College recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. Capel Manor 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.
165. 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 judgement and discuss with other colleagues if they have any concerns:
- a) Use of inappropriate language.
 - b) Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages.
 - c) Behavioural changes.
 - d) The expression of extremist views.
 - e) Advocating violent actions and mean.
 - f) Association with known extremists.
 - g) Seeking to recruit others to an extremist ideology.
166. If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism, they should discuss this with the appropriate Designated Officer or in their absence another member of the safeguarding team.

Channel

167. Channel is the pre-criminal early prevention multi-agency process designed to safeguard vulnerable people from being drawn into terrorist behaviour. Channel works in a similar way to existing safeguarding referrals. Channel interventions are delivered by local partners and specialist agencies and include a close individualised support package aligned to the family, mentoring, faith groups, sports and other groups.
168. The College refers to Prevent and Channel using the safeguarding referral process.

169. Appendices

The following appendices offer procedures, guidance and best practice when working with young people, to ensure a safe learning environment, and dealing with any safeguarding matters:

Appendix A – Guidance for good practice when working with young people

Appendix B – Types of abuse and specific safeguarding issues

Appendix C – Recognising abuse and indicators of abuse

Appendix D – The Process

Appendix E – Key Contacts

Appendix F – Borough Contacts

Appendix A - Guidance for good practice when working with young people

College Policies, Procedures, and Systems

In devising, implementing, and revising any policy/procedure/system that is relevant to young people, consideration must be given to making that policy/procedure/system appropriate to the developmental needs and capacity of young people, accessible to them, and where possible their input should be sought.

Curriculum design

In setting up any new course (or course component) onto which children or vulnerable adults will be enrolled, safeguarding their well-being must be the main priority and with this should take into account the developmental needs and capacity of young people.

Provision of support resources for young people

The College induction process will include appropriate information on the College's Safeguarding and Child Protection policy and procedures. This includes advice on keeping themselves and others safe, information on the support teams available to them within the College and details of how to contact the Designated Safeguarding Officer.

Appropriate behaviour

All Capel Manor College employees and volunteers are encouraged to demonstrate exemplary behaviour and good practice in order to create a positive culture and climate within the College and protect staff from false allegations. This is further detailed in our **Ethical Framework Policy**

Always:

- Be an excellent role model e.g. no inappropriate language in the company of students.
- Treat all students with equal respect and dignity.
- Recognise the developmental needs and capacity of young people.
- Always put the welfare of each student first, before the achievement of goals or targets.
- Give enthusiastic and constructive feedback rather than negative criticism.

Avoid:

- Spending excessive amounts of time alone with a student away from others.
- Giving personal details to a student, e.g. phone numbers.

Never:

- Enter into a personal or sexual relationship or sexual activity with any student.
- Engage in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching.
- Make sexually suggestive comments to a student, even in fun.
- Reduce a student to tears as a form of control.
- Do things of a personal nature for students, which they can do for themselves.
- Allow allegations made by a student to go unchallenged, unrecorded or not acted upon.
- Invite or allow students to stay with you at your home.

Appendix B - Types of abuse and specific safeguarding issues

Abuse is any form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse

Physical abuse is 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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and 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, although it may occur alone.

Sexual abuse

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.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Financial or material abuse

This is usually most likely to occur with vulnerable adults and may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory abuse.

This may include any of the above types of abuse or bullying and harassment based on an individual's age, gender, disability, sexual orientation, race, religion, gender identity or pregnancy.

Specific safeguarding issues

There are a number of current, specific safeguarding concerns which are relevant to students within our College. The Designated Safeguarding Officer and other designated staff will liaise with appropriate agencies to ensure they are up-to-date with current safeguarding concerns and that these are both disseminated to staff as appropriate and included in policy review and training.

Child Sexual Exploitation (CSE)

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

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon staff to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. If staff discover that FGM appears to have been carried out, this must be reported immediately to a DSO who will provide assistance in reporting to the police.

The below list covers other current national and local safeguarding issues which could affect our students:

- Radicalisation
- bullying including cyber bullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- sexting
- teenage relationship abuse
- trafficking

Appendix C - Recognising abuse and indicators of abuse (also Appendix E)

Recognising abuse can be difficult. Some acts of abuse are extreme, cause visible damage and can be clearly identified: we tend to agree on these clear acts of abusive behaviour. Other behaviours are not so easily identifiable.

It is important to think about the frequency, context and meaning they have for the victim.

It may be difficult to recognise abuse because it is a painful subject for us, because we don't want to believe it happens, because we know and like the family or because it is too much responsibility. However, if we have any concerns, it is our responsibility to report them.

All staff should be alert to the welfare of the students our work brings us into contact with and be mindful that:

- All people have the potential to abuse a child or vulnerable adult, regardless of gender, race, culture or social class.
- Students with a disability are particularly vulnerable.
- Where domestic violence is present or suspected in a household it is an important indicator of child abuse.

Indicators of abuse

A student may describe what appears to be an abusive act involving him/her, or someone else may express concern about the student. Other indications that a student may be being abused include the following:

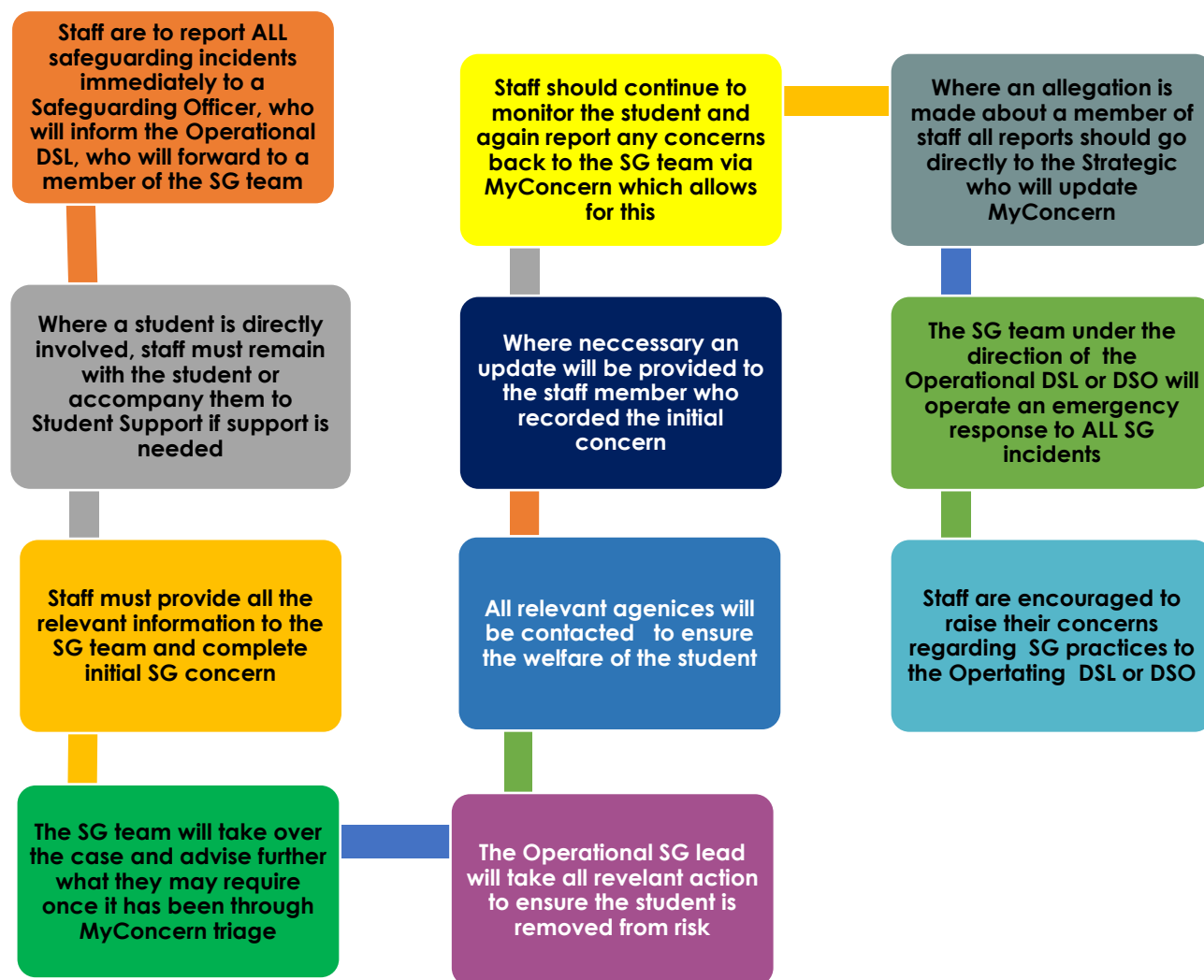
- Unexpected or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Sudden and/or unexplained changes in behaviour (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper, inability to focus, difficulty completing tasks).
- Inappropriate sexual awareness.
- Engaging in sexually explicit behaviour.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.
- Difficulty in making friends.
- Inappropriate or difficult social interaction with their peers.

- Variations in eating pattern (including overeating or loss of appetite).
- Unexplained weight loss.
- Poor (or changed) personal hygiene or presentation.

It should be noted that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place. It is not for staff to decide whether abuse is taking place. Any staff noticing any signs of abuse should consult with the Welfare Team for advice and/or further investigation. The DSL will decide whether there is significant concern for a referral to be made.

Appendix D - The Process

The below guidance sets out what procedures will be taken by ALL staff in the event of a safeguarding incident/disclosure from a student or a member of the public.



Safeguarding is everyone's responsibility

All staff with concerns should initially discuss these with their DSO or the Operating DSL.

MyConcern will record all safeguarding incidents and automatically alert the SDSL and ODSL and appropriate DSOs.

Appendix E - Key Contacts

Name	Safeguarding Role	Tel No.	Email address
Susanne Datta	Executive Director of HR, Strategic Designated Safeguarding Lead	07713 487 145 ext 1101	susanne.datta@capel.ac.uk
Kieren McIntosh	Director of Student Experience & Support, Operational Designated Safeguarding Lead	07738 832 321 ext 1274	kieren.mcintosh@capel.ac.uk
Cynthia Amos	Counselling and Welfare Manager, Designated Safeguarding Officer	07973 844 774	cynthia.amos@capel.ac.uk
Glynis Maynard	Centre Manager (RP) , Designated Safeguarding Officer	07872 062 026 ext 1401	glynis.maynard@capel.ac.uk
Matthew Watson	Centre Manager (GP) , Designated Safeguarding Officer	07834 788 800 ext 1512	matthew.watson@capel.ac.uk
Yasmin Shevket	Counsellor and LS Planner, Safeguarding team (GP)	07834 784 973 ext 1506	Yazmin.shevket@capel.ac.uk
Antonella Balzarotti	Centre Manager (BF) , Designated Safeguarding Officer	07973 844 943 1601	antonella.balzarotti@capel.ac.uk
Andrew Smith	Centre Manager (CP) , Designated Safeguarding Officer	07713 568 029 ext 1127	andrew.smith@capel.ac.uk
Sarah Jane McClelland	Student Counsellor (CP) , Safeguarding Team	020 8659 1908	Sarah-jane.mcClelland@capel.ac.uk
Luiza Negura	Student Counsellor, Safeguarding Team (EN)	07973 844 774 ext 1264	Luiza.negra@capel.ac.uk

Police Public Protection Unit: 24hrs non-emergency 101 Emergency 999 NSPCC Helpline 0808 800 500
EN Enfield **CP** Crystal Palace **GP** Gunnersbury Park **BF** Brooks Farm **RP** Regents Park

Appendix F - Borough contacts

London Borough of Enfield	MASH Monday to Friday (9am-5pm) 020 8379 3196 TheMashTeam@enfield.gov.uk Out of hours: 020 8379 5212
	Prevent prevent@cityoflondon.police.uk 0207 601 2422 (lines open 08:00 - 16:00 Monday to Friday) Safe project: Safetogether.org 0800 917 5541 Prevent contact Enfield - Sam Howe Prevent Education Officer- +442083794368 - samuel.howe@enfield.gov.uk Police Prevent Counter Terrorism/protective Security - PC Robert JUDGE 5043 SO - 0208 345 1227 - Robert.Judge@met.police.uk
	LADO Contact LADO on 0208 379 2746/2850 and email completed referral to both cprq_admin@enfield.gcsx.gov.uk and safeguardingservice@enfield.gcsx.gov.uk Enfield Safeguarding Children Board Telephone: 020 8379 2767 (Please note, this is not a frontline service)
	Other telephone numbers: Child and Family Support Team: 020 8379 2574 Looked After Children team: 020 8379 8200
London Borough of Ealing	MASH Monday to Friday (9am-5pm) 020 8825 8000
	Prevent prevent@ealing.gov.uk 020 8825 9849 (non-emergency) Safe project: Safetogether.org 0800 917 5541
	LADO Contact LADO on 020 8825 8155 or 020 8825 8930 Ealing Safeguarding Children Board children@ealing.gov.uk
	Other telephone numbers: Early Help Team: 020 8825 5588
	Looked After Children 020 8825 9210 sscallcentre@ealing.gov.uk
London Borough of Waltham Forest	MASH and SAFEGUARDING Monday to Thursday (9am-5.15pm) and Friday 9am – 5pm 020 8496 2310 mashrequests@walthamforest.gov.uk Out of hours: 020 8496 3000
	Prevent prevent@cityoflondon.police.uk 0207 601 2422 (lines open 08:00 - 16:00 Monday to Friday) Safe project: Safetogether.org 0800 917 5541
	LADO Contact LADO on 0208 496 3646 or 07791 559 789 and email completed referral to both lado@walthamforest.gov.uk
	Other telephone numbers: Early help Team: 020 8496 1517 earlyhelp@walthamforest.gov.uk

London Borough of Bromley	MASH Monday to Friday 020 8461 7373 / 7379 / 7026 (Out of Hours 0300 303 8671) MASH@bromley.gov.uk or MASH@bromley.gcsx.gov.uk
	Prevent prevent@cityoflondon.police.uk 0207 601 2422 (lines open 08:00 - 16:00 Monday to Friday) Safe project: Safetogether.org 0800 917 5541 ChannelProject@met.pnn.police.uk Prevent contact– Rob Vale Community Safety Manager rob.vale@bromley.gov.uk
	LADO Contact LADO on 020 8461 7669 and email completed referral to lado@bromley.gov.uk or lado@bromley.gcsx.gov.uk Bromley Safeguarding Children Board 020 8379 2767 (Please note, this is not a frontline service) BSCB@bromley.gov.uk
	Other telephone numbers: Looked After Children Team: 020 8313 4016/4810 Adult Social Care 020 8461 7777 (Out of Hours 020 8464 4848)