

# SAFEGUARDING POLICY & PROCEDURES

(INCLUDING PREVENT)

2019/20

<b>Date of Issue</b>	January 2020
<b>Approved by</b>	The College Corporation
<b>Contact</b>	Director of Learner Services, Marketing & Communication
<b>Review Date</b>	January 2021



## **1. PURPOSE**

The purpose of this policy is to offer guidance and instructions to all staff, governors, volunteers, sub-contractors and contractors to ensure the College commitment to safeguarding and promoting the welfare of young people and vulnerable adults. If any form of abuse is suspected or if a person is identified as, being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken.

The College requires all staff, governors, volunteers, sub-contractors and those contracted to provide services to share this commitment.

## **2. Scope**

This policy deals with the protection of children and young people and all adults at risk. For the purposes of clarity, any person under the age of 18 is deemed to be a child and an adult at risk is deemed to be a person 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 themselves, or unable to protect themselves against harm or exploitation.

An adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing. Any person up to the age of 24 with a current Educational Health and Care Plan (EHCP) in place is treated as a child for the purposes of safeguarding & child protection legislation.

All references to staff or adults comprises teaching staff, other staff and volunteers working in the organisation, visitors and includes contractors to the organisation with direct contact with learners, regardless of position, role or responsibilities.

The term 'safeguarding children, young people and adults at risk' embraces both reactive child protection and a preventative approach to keeping young people and adults safe. The statutory guidance Keeping Children Safe in Education 2019, Working Together to Safeguard Children 2018, The Protections of Freedom Act 2012, the Safeguarding Vulnerable Groups Act 2006 and the Prevent Duty Guidance are the key documents upon which this policy is predicated.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

A vulnerable student may be identified as a person who:

- Is a Looked After Child (LAC)
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse
- Has suffered from domestic violence
- Has social or emotional problems
- Has a criminal conviction

A student of any age may also be identified as vulnerable at any time during their programme of study based on behaviour. The Channel vulnerability framework of indicators which may provide psychological hooks leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Abuse can take many forms including emotional, physical, sexual and mental. Whilst it is more common for there to be a perceived disproportionate power differential between abuser(s) and abusee(s), peer on peer abuse is a significant issue. It must never be tolerated or treated as 'banter' or just 'part of growing up.'

Peer on peer abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment. Upskirting has also been recognised under the category of peer on peer abuse.

All disclosures will be recorded in the Safeguarding case files and reviewed on a weekly basis by the Designated Safeguarding Lead (DSL), Deputy DSL and the BeSafe team to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Given the local context of the London Borough of Waltham Forest and the issues surrounding county lines, the College recognises that so called 'initiation ceremonies' and 'hazing' (defined as: any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them regardless of a person's willingness to participate) may be disproportionately represented amongst our student population.

The College has a duty and a responsibility in the prevention of youth crime and staff will be made aware of indicators, which may signal that students are at risk from, or are involved with serious violent crime. This includes:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

All staff will be made aware of the associated risks and understand the measures in place to manage these. The College will incorporate learning from the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Further advice and guidance on the range of abuse and indicators of abuse can be found in Annex A of 'Keeping Children Safe in Education 2019'.

**The College has clear objectives:**

- To provide a safe environment for children, young people and adults in which to work, learn and take part in social and recreational activity
- To identify people who are experiencing, or likely to experience significant harm, providing support and taking appropriate action with the objective of producing positive outcomes for those people
- To foster, promote and maintain a genuine feeling of safety throughout the College via the curriculum, pastoral support, and appropriate working practices through the promotion of a College ethos where everyone feels secure, valued and listened to
- To take action where appropriate to safeguard the person through working in partnership with other agencies
- To educate all students and staff in safeguarding and child protection issues so that they become more aware and confident in dealing with issues relating to those matters

**The College has processes which:**

- Identify children, young people and adults at risk of significant harm, or where there are concerns for a person's welfare, provide procedures for reporting and addressing such concerns;
- Prevent unsuitable people from working with children, young people and adults;
- Maintain channels for reporting and dealing with all allegations of abuse;
- Work in partnership with local agencies including the sharing of information;
- Provide a safe environment for children, young people and adults within the College; Appropriately filter and monitor student internet usage

**The College will take action to:**

- Appoint and train a Designated Safeguarding Lead with responsibilities to lead on all matters pertaining to safeguarding and child protection, and who will ensure that appropriate and robust systems are in place that will coordinate reporting, monitoring, referral and support procedures. Name, role and contact details will be available to all staff, students and parents/carers;
- Appoint a train a Deputy Designated Safeguarding Lead(s) to act as the operational manager of day to day safeguarding issues.
- Train all staff to Recognise, Respond, Record and Report in regard to Safeguarding procedures with training updates provided on an annual basis.
- Keep accurate and secure records of concerns about individuals, even when there is no need for immediate referral to outside agencies; provide a systematic means of monitoring children, young people and adults known, or thought to be, at risk of harm, and contribute to assessments/support plans with other agencies;
- Make sources of help and support accessible for anyone who may experience abuse;
- Develop effective working relationships with other agencies: Police, Social Services, Health Authority and the Local Safeguarding Children's Board (LSCB);
- Train staff in safe practices to protect children, young people and adults in the learning environment, and also to protect themselves from false allegations of abuse.

- All staff are required to access and read Part 1 of 'Keeping Children Safe in Education 2019' document and sign to confirm they have understood the content of the document.
- Ensure safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), taking of references, and training interviewers in accordance with Department of Education guidance to effectively establish suitability for role at the time of employment
- Provide tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help children, young people and adults to develop their self-esteem, assertiveness and problem-solving skills, to promote their resilience, and help with behaviour problems such as anger.

### **Duty of Care**

Staff are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and people from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of the College. Staff behaviour should demonstrate integrity, maturity and good judgement, e.g. management of risk in external visits/residential visits.

### **Breach of Trust**

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the child. Where a sexual relationship exists between a staff member and a student aged 18 or over, it is required that the staff member discloses this to HR immediately.

### **Information Sharing**

Waltham Forest College will ensure that it pursues robust and timely information sharing protocols with all of the agencies working with young people which include schools, statutory authorities, support services and social services in line with the 'Working Together to Safeguard Children 2019' document.

### **Safeguarding Reporting Protocols for staff:**

All staff are responsible for safeguarding one another and our students. Where a student makes a disclosure to a member of staff they should do the following:

- **LISTEN** carefully, stay calm; do not express shock or embarrassment
- **DO NOT** guarantee confidentiality, but be clear that you will act sensitively and explain what will happen next
- **GIVE REASSURANCE** that you are taking the information seriously
- **DO NOT** ask leading questions
- **DO NOT** examine any physical injuries
- **DO NOT** attempt to investigate the allegations yourself
- **NEVER JUDGE** – even if the allegation is against a colleague
- **RECORD** what was said, also time, date and place.
- **CONTACT** a member of the Safeguarding Team as soon as is reasonably possible

## **College Safeguarding Recording & Case Management Procedure**

- All safeguarding concerns are either identified by or referred through to College Safeguarding Team (BeSafe) by members of staff, external agencies, students or parents. The College also receives self-referrals by students or brings concerns about peers or parent/carers
- The Safeguarding Team will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency, and/or compose an Early Help Record, taking advice from the DSL as and when required
- The Safeguarding Team will meet with the DSL/Deputy DSL on a weekly basis to review all live cases, monitor on-going cases, and review and monitor a watch-list of those cases where there are concerns or known pertinent information but that have not yet met an intervention threshold
- Cases are opened and closed by common agreement and the DSL always makes final judgement.
- All cases are recorded in a secure folder on the College's network.

### **14 – 16s in College**

- The College will ensure that all 14–16 year olds are cared for and have their wellbeing needs met appropriately.
- Where a young person is on the roll of another education establishment there will be protocols in place between the College and the designated officers at these establishments for communication, regarding unexplained absence or other concerns.
- There will also be liaison with the parents or guardians and the schools.
- Young people will be appropriately supervised and registered by qualified staff in all areas of the provision

### **SEND students in College**

- Students with SEND are more likely to be abused and/or neglected. The College will monitor and support these students through College staff and support structures in order to ensure these students are appropriately identified and supported
- The College will ensure that guidance is available so that all staff have an awareness that: behaviour, mood and injury may relate to potential abuse and not just as a result of SEND
- SEND students face a higher risk of peer group isolation
- That bullying/cyberbullying has a disproportionate impact on SEND students
- That difficulties with communication may also adversely impact SEND students

### **Early Help**

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of 'Working Together to Safeguard Children 2019' provides detailed guidance on the Early Help process. The Safeguarding Team will be responsible for identifying and implementing any Early Help measures which are required.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child

### **Child on child sexual violence and sexual harassment:**

Where any reports are made of child on child sexual violence or sexual harassment these must be dealt with robustly. The normal disclosure protocols apply. Where such an allegation is made, the BeSafe Team will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them;

This will be recorded and communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the College on a case by case basis.

### **Prevent Strategy**

To ensure that the College effectively safeguards students and staff, manages risks and is able to deal appropriately with issues around radicalisation and extremism, the College will;

- Understand the nature of the threat from extremism and how this may impact directly or indirectly on the College
- Encourage staff and students to respect and adhere to fundamental British values
- Ensure staff receive awareness training in recognising and preventing extremism and radicalisation
- Understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of College premises
- Respond rapidly and appropriately to events in local, national or international news that may impact on the College community
- Ensure measures are in place to minimise the potential for acts of extremism within the College
- Ensure plans are in place to respond appropriately to a threat or incident within the College

- Work with sub-contractors, employers and work placement providers to ensure they are compliant with the Prevent Duty and the College's safeguarding procedures
- Adopt effective ICT security and responsible user policies and promote these to all staff and students

### **On-line safety and E-safety**

The College will endeavour to both filter and monitor all internet usage within the College in a responsible and transparent way in order to ensure and maintain the safety of all.

### **Wearing of Identity Badges**

In order to ensure that anyone accessing the College campus is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided, this includes both inside and outside the classroom environment. Anyone not wearing a lanyard will be challenged and

- No College services will be provided to any person not wearing their lanyard & ID badge
- All teaching staff are required to check their students' ID badges are worn at the start and at the end of all teaching sessions
- Any student who has forgotten or lost their ID badge must get a temporary ID from Learner Services. If a student records three Temporary ID badges requests in any one term their name must be passed to the relevant Head of Learning to invoke a meeting with the student

### **Contextual Safeguarding & Local Circumstances**

Waltham Forest College believes all students have the right to be able to access and enjoy a high quality teaching, learning and assessment with a rich learning experience that both enhances and increases their life chances. The College serves the needs of students from a range of backgrounds including higher proportions of:

- Students from socio-economically deprived areas
- High Needs SEND students
- LAC's/ Care Leavers and Young Carers
- Waltham Forest also faces on-going challenges with gang welfare

The College will ensure that all staff have an effective understanding of the local context to safeguarding and all safeguarding training will acknowledge and reference this to ensure that staff are adequately prepared to manage such issues that arise from this.

### **LAC and Care Leavers**

The College will work in close collaboration with the Virtual School and Children's Social Services to ensure all Looked After Children (and previously LAC) are identified and offered appropriate support mechanisms.

The Designated Teacher for LAC is Nicola Sands, Welfare and Wellbeing Adviser.

### **Partnership and Information Sharing**

The College will work in conjunction with the local authority and other external agencies such as the Metropolitan Police to ensure information is passed freely where there are safeguarding concerns and information sharing protocols are well established.

All safeguarding referral protocols will reflect the guidance laid down in Part 1 of Keeping Children Safe in Education 2019 and the Prevent referrals to Channel.

The Counter-Terrorism and Securities Act (2015) places additional responsibilities on Further Education College's to include working with multi-agencies as part of the Channel Process.

### **3. Roles and Responsibilities**

#### **All staff**

All members of staff, volunteers, sub-contractors and contractors have a responsibility to be aware of the procedures to be followed in cases of suspected abuse or people at risk of being drawn into terrorism-related activity. Staff who are in regular contact with students are well-placed to notice signs of abuse, behavioural change or failure to develop as expected

If a member of staff suspects a student may be at risk or hears a disclosure from a student, the BeSafe team should be informed as soon as possible. Tutors are responsible for identifying students at risk and will work with the BeSafe Team to develop a College support plan.

During the application and interview process, staff are responsible for identifying students with criminal convictions and referring them to a designated member of staff in Student Services. Staff will liaise with the BeSafe team so that detailed disclosures can be captured by liaising with multi-agencies, such as the Youth Offending Team. The BeSafe team will carry out necessary risk assessments and drafting a support, where appropriate.

- Concerns are any worries about a particular student or colleague that need to be referred onto the Safeguarding Team, wherever there is a lack of surety or clarity about someone's safety.
- Risk of immediate danger or harm means a situation where action must be taken without delay in order to ensure adequate protection is put in place for the person at the centre of the issue. Staff are able to refer direct to Social Services or the Police in these circumstances should the need arise. The Safeguarding Team should be advised of any such action as soon as possible.

#### **Use of Reasonable Force by staff on students:**

Keeping Children Safe in Education 2019 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard students. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

## **Designated Safeguarding Lead**

- Take lead responsibility in all safeguarding matters
- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies
- Liaise with Principal and Link Governor for safeguarding to inform of any issues/ongoing investigations, and ensure there is always cover for the role
- Deliver training on how to recognise signs of abuse, and when it is appropriate to make a referral. Training should be updated on an annual basis
- Ensure all safeguarding team members have access to appropriate supervision as required
- Working knowledge in how the Local Safeguarding Children's Board works (until such time as new arrangements are put in place as specified in Working Together to Safeguard Children 2019 comes into effect and then to work collaboratively within those new arrangements), the conduct of case conferences, and be able to attend and contribute to these when necessary.
- Ensure all staff have access to and understand the College Safeguarding Policy (including Prevent)
- Ensure all staff have child protection/Safeguarding induction training and are able to recognise and report any concerns as they arise
- Keep detailed, accurate and secure written records of referrals/concerns.
- Have access to resources and attend relevant or refresher training courses and to update training annually
- Ensure Safeguarding policy is updated and reviewed annually, and following ratification is returned by the governing body to the Local Authority
- Ensure students/parents/carers have access to copies of the College Safeguarding Guidance, which alerts them to the fact that referrals may be made, contact details for the Safeguarding Team, and the role of the establishment
- Where a young person leaves an establishment, ensure the file/information is transferred to a new establishment
- Provide regular safeguarding reports to the Board of the Corporation
- The Designated Safeguarding Lead is Amir Ahmed, Director of Learner Services, Marketing & Communication

## **Deputy Designated Safeguarding Lead**

- To take responsibility for day-to-day operational management of safeguarding issues under the direction of the DSL
- Monitor staff induction and ensure induction resources are relevant and up to date
- Maintain and keep accurate records of all safeguarding cases
- Create effective strategies in conjunction with the DSL to ensure safeguarding is embedded throughout the College
- The Deputy Safeguarding Lead is Shiguftah Gulzar, Welfare and Wellbeing Manager and Rosemary Partin, SEN Manager.

## **Role of the Governing Body, Senior Management Team and Principal & Chief Executive**

Paul Butler is the nominated link governor with special responsibility for Safeguarding Children nominated by the Board of the Corporation. He will liaise closely with the Designated Safeguarding Lead and ensure appropriate systems and procedures are in place that meet the statutory requirements for this area of activity.

The Governing Body must:

- Make arrangements for ensuring that their functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the institution and in considering those arrangements, have regard to any guidance given from time to time by the Secretary of State
- The governing body should ensure the institution has a safeguarding policy and procedures that satisfy and evidence statutory requirements and consider safeguarding needs as set out in the Department of Education, Keeping Children Safe in Education 2019 statutory guidance, 'Working Together to Safeguard Children 2015 (updated September 2018),' and the Prevent Duty Guidance 2015;
- Have procedures for dealing with allegations against staff/volunteers that comply and balance the need to protect children whilst protecting staff/volunteers from false/unfounded accusations
- Have a senior staff member to lead on Safeguarding, advise/support staff/ liaise with local authority and other agencies who is a member of Senior Leadership Team who has status/authority to carry out the role e.g. commit resources to Safeguarding and direct staff as appropriate;
- Ensure all new staff who work with young people receive written guidance about the institution's Safeguarding policy/procedures and name/contact of DSL
- All staff receive refresher training annually;
- All students receive appropriate safeguarding and Prevent education
- Remedy any deficiencies or weaknesses in Safeguarding arrangements without delay
- Annually review policies/procedures and how duties are discharged
- Ensure a senior manager is designated as the senior lead for Prevent;
- Scrutinise the work of the DSL and Safeguarding Team;
- In addition, the Chair of the Board is nominated to be responsible for liaising with partner agencies, as appropriate in the event of the allegation of abuse being made against the Principal.

**The Principal should ensure through the Senior Management Team:**

- Policies and procedures are fully implemented and followed by all staff
- Sufficient resources and time are allocated so that the DSL and staff can attend strategy discussions, interagency meetings, contribute to assessments etc.
- Personally make referrals to the Local Authority Designated Officer where allegations of abuse by staff are brought forward, or delegate that responsibility to the DSL where required
- Staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with public interest disclosure policies;
- The operation of safer recruitment and checks on new staff and volunteers

- The reporting of cases to the Secretary of State. It is essential that cases are reported if a person ceases to work in an education setting and there are grounds for believing he/she may be unsuitable to work with children, or may have committed misconduct. The Secretary of State will consider whether to prohibit the person from working with children in the future or place restrictions on their employment in educational establishments. FE institutions have a statutory duty to make reports, and to provide relevant information to the Secretary of State.

#### **4. Public Interest disclosure**

Staff should acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies (Public Interest Disclosure Act 1998). This should be a mechanism by which staff can voice concerns, made in good faith, without fear of repercussion. Staff should consult the Waltham Forest College Public Interest Disclosure Policy and can also use the NSPCC whistle-blowing helpline number 0800 028 0285, if required.

#### **5. Confidentiality**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The student must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need to know basis.

Waltham Forest College is committed to protecting the rights and privacy of individuals, including learners, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018 and complies with the requirements of the Data Protection Act 1998 that allows for disclosure of personal data where this is necessary to protect the vital interests of the students.

#### **6. Staff Training**

All staff will receive adequate training to familiarise themselves with Safeguarding issues and responsibilities at induction (to include 'Part One of KCSiE 2019') and on at least an annual basis, and all staff with a role in directly working with under 18s will be required to read and understand Part One and Annex A of KCSiE 2018.

#### **7. Review**

This policy statement will be reviewed annually or sooner, in response to changes in legislation or College organisation. This will be initiated by the Designated Safeguarding Lead.

#### **8. Access to Policy**

This Procedure is available on the College Intranet and College website.

#### **9. Mechanisms for Feedback**

Constructive comment on the continued improvement of these procedures is welcomed and should be forwarded to the Director of Learner Services, Marketing and Communication

## Appendix 1

The College recognises that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. The following categories of abuse are recognised for the purposes of the child protection register and have been augmented to cover vulnerable adults.

Abuse	<p>Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm or by failing to act to prevent harm. Children or vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.</p>
Physical abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p> <p><b>Indicators of physical abuse / factors that should increase concern:</b></p> <ul style="list-style-type: none"> <li>• Multiple bruising or bruises and scratches (especially on the head and face)</li> <li>• Clusters of bruises – e.g., fingertip bruising (caused by being grasped)</li> <li>• Bruises around the neck and behind the ears – the most common abusive injuries are to the head</li> <li>• Bruises on the back, chest, buttocks, or on the inside of the thighs</li> <li>• Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle</li> <li>• Bite marks</li> <li>• Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette</li> <li>• Scalds with upward splash marks or tide marks</li> <li>• Untreated injuries</li> <li>• Recurrent injuries or burns</li> <li>• Bald patches</li> </ul>
Emotional abuse	<p>Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult causing severe and persistent adverse effects on the child's or vulnerable adult'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 feature age of developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's development 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 cyberbullying), 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 or vulnerable adult, although it may occur alone.</p>

	<p><b>Indicators of emotional abuse:</b></p> <p><b>Developmental issues</b></p> <ul style="list-style-type: none"> <li>• Delays in physical, mental and emotional development</li> <li>• Poor school performance</li> <li>• Speech disorders, particularly sudden disorders or changes.</li> </ul> <p><b>Behaviour</b></p> <ul style="list-style-type: none"> <li>• Acceptance of punishment which appears excessive</li> <li>• Over-reaction to mistakes</li> <li>• Continual self-deprecation (I'm stupid, ugly, worthless etc)</li> <li>• Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)</li> <li>• Self-mutilation</li> <li>• Suicide attempts</li> <li>• Drug/solvent abuse</li> <li>• Running away</li> <li>• Compulsive stealing, scavenging</li> <li>• Acting out</li> <li>• Poor trust in significant adults</li> <li>• Regressive behaviour – e.g., wetting</li> <li>• Eating disorders</li> <li>• Destructive tendencies</li> <li>• Neurotic behaviour</li> <li>• Arriving early at school, leaving late</li> </ul> <p><b>Social issues</b></p> <ul style="list-style-type: none"> <li>• Withdrawal from physical contact</li> <li>• Withdrawal from social interaction</li> <li>• Over-compliant behaviour</li> <li>• Insecure, clinging behaviour</li> <li>• Poor social relationships</li> </ul> <p><b>Emotional responses</b></p> <ul style="list-style-type: none"> <li>• Extreme fear of new situations</li> <li>• Inappropriate emotional responses to painful situations (“I deserve this”)</li> <li>• Fear of parents being contacted</li> <li>• Self-disgust</li> <li>• Low self-esteem</li> <li>• Unusually fearful with adults</li> <li>• Lack of concentration, restlessness, aimlessness</li> <li>• Extremes of passivity or aggression</li> </ul>
Sexual abuse	<p>Sexual abuse involves forcing or enticing a child or young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve physical contact, including assault by (for example rape or oral sex) or non-penetrative acts such as masturbating, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, , or encouraging children or vulnerable adults to behave in sexually inappropriate ways, or</p>

	<p>grooming a child or vulnerable adult 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.</p> <p><b>Indicators of sexual abuse:</b></p> <p><b>Physical observations</b></p> <ul style="list-style-type: none"> <li>• Damage to genitalia, anus or mouth</li> <li>• Sexually transmitted diseases</li> <li>• Unexpected pregnancy, especially in very young girls</li> <li>• Soreness in genital area, anus or mouth and other medical problems such as chronic itching</li> <li>• Unexplained recurrent urinary tract infections and discharges or abdominal pain</li> </ul> <p><b>Behavioural observations</b></p> <ul style="list-style-type: none"> <li>• Sexual knowledge inappropriate for age</li> <li>• Sexualised behaviour or affection inappropriate for age</li> <li>• Sexually provocative behaviour/promiscuity</li> <li>• Hinting at sexual activity Inexplicable decline in school performance</li> <li>• Depression or other sudden apparent changes in personality as becoming insecure or clinging</li> <li>• Lack of concentration, restlessness, aimlessness</li> <li>• Socially isolated or withdrawn</li> <li>• Overly-compliant behaviour</li> <li>• Acting out, aggressive behaviour</li> <li>• Poor trust or fear concerning significant adults</li> <li>• Regressive behaviour,</li> <li>• Onset of wetting, by day or night; nightmares</li> <li>• Onset of insecure, clinging behaviour</li> <li>• Arriving early at school, leaving late, running away from home</li> <li>• Suicide attempts, self-mutilation, self-disgust</li> <li>• Suddenly drawing sexually explicit pictures</li> <li>• Eating disorders or sudden loss of appetite or compulsive eating</li> <li>• Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys</li> <li>• Become worried about clothing being removed</li> <li>• Trying to be 'ultra-good' or perfect; overreacting to criticism.</li> </ul>
Neglect	<p>Neglect is the persistent failure to meet a child's or vulnerable adults basic physical and/or psychological needs, likely to result in serious impairment of the child's or vulnerable adult's health or development. Neglect may occur during pregnancy because 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 caregivers): or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>

	<p><b>Physical indicators of neglect</b></p> <ul style="list-style-type: none"> <li>• Constant hunger and stealing food</li> <li>• Poor personal hygiene - unkempt, dirty or smelly</li> <li>• Underweight</li> <li>• Dress unsuitable for weather</li> <li>• Poor state of clothing</li> <li>• Illness or injury untreated</li> </ul> <p><b>Behavioural indicators of neglect</b></p> <ul style="list-style-type: none"> <li>• Constant tiredness</li> <li>• Frequent absence from school or lateness</li> <li>• Missing medical appointments</li> <li>• Isolated among peers</li> <li>• Frequently unsupervised</li> <li>• Stealing or scavenging, especially food</li> <li>• Destructive tendencies</li> </ul>
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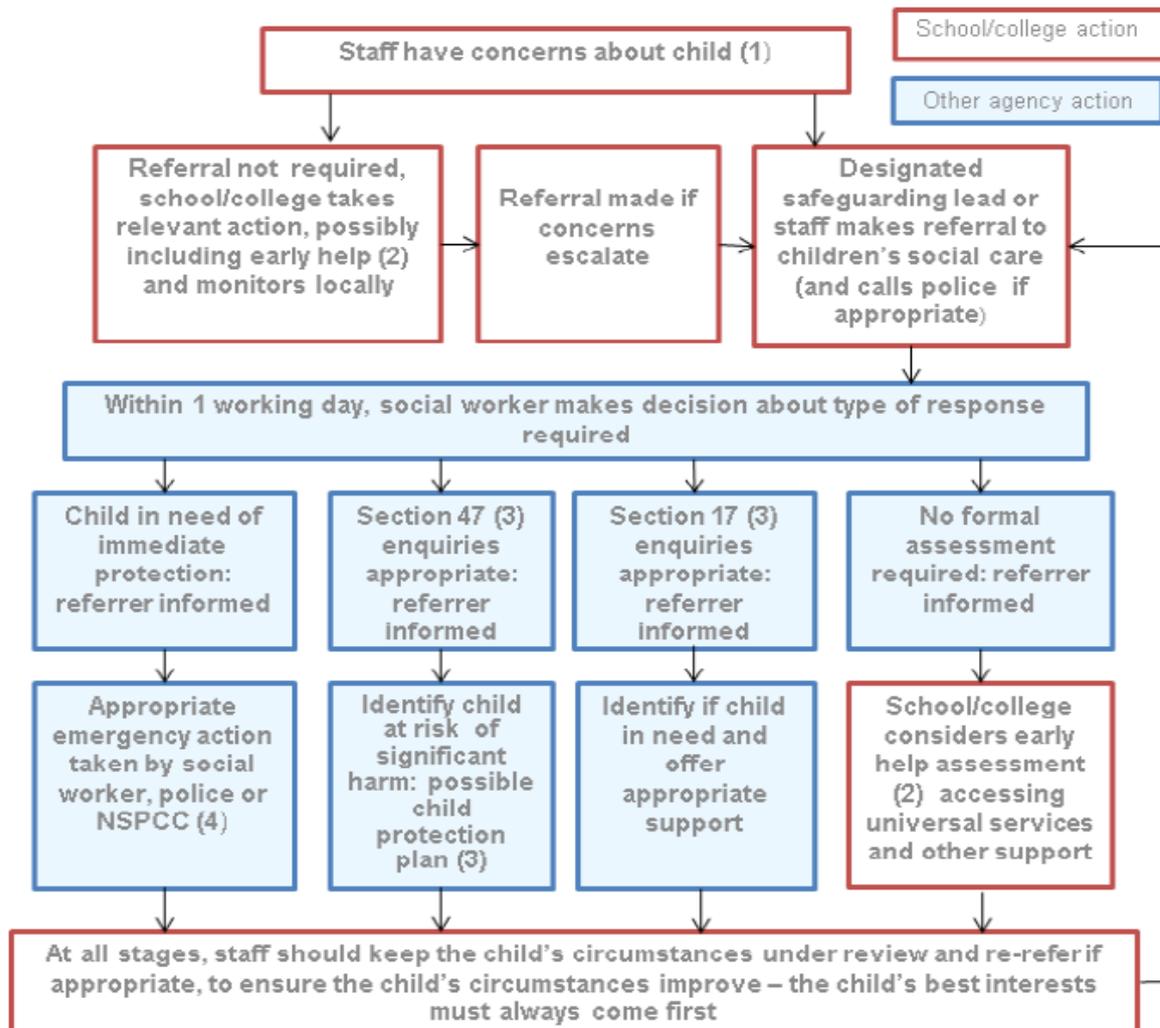
### **Specific Safeguarding Issues**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The BeSafe Team are aware of specific safeguarding issues, some of which are listed below:

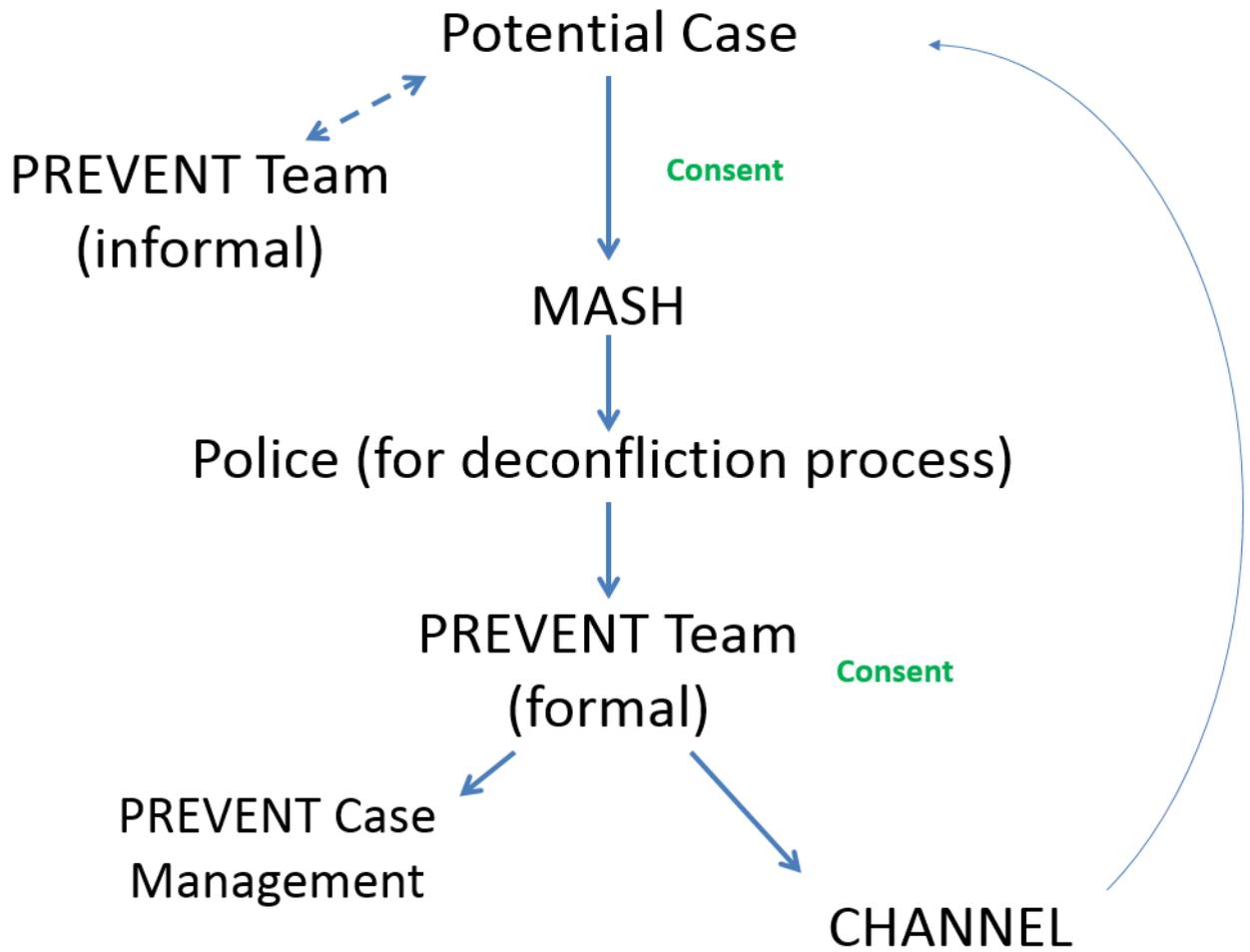
- Bullying including cyber bullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based violence/violence against women and girls
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Staff allegations
- Trafficking
- Youth produced sexual imagery (sexting)

## Appendix 2 Safeguarding Flowchart

### Actions where there are concerns about a child



Appendix 3 The Channel Process





## Appendix 5: Allegations of Abuse Against Members of Staff or Volunteers

These procedures should be used in all cases in which it is alleged that a member of staff or volunteer has:

- Behaved in a way that has harmed, or may have harmed, a young person or vulnerable adult;
- Possibly committed a criminal offence against, or related to a young person or vulnerable adult; or
- Behaved towards a young person or vulnerable adult in a way that indicates he/she would pose a risk of harm.

The College also has a duty of care to its employees, and will act to manage and minimise the stress inherent in the allegations process. Support will be made available to anyone facing an allegation; such support may include access to counselling/medical advice, or, where applicable, support from a trade union representative or work place colleague.

It is essential that any allegation of abuse made against a member of staff is dealt with very quickly, in a fair and consistent way that provides effective protection for the young person/vulnerable adult, and at the same time supports the person who is the subject of the allegation.

### 1. Receiving an Allegation from a Young Person or Vulnerable Adult

- 1.1 If a member of staff receives an allegation against a member of staff, this should be reported immediately to the Designated Safeguarding Lead (DSL), unless this manager is the person against whom the allegation is made. In these circumstances, the report should be made to the Principal. In the event of the Principal being unavailable, the allegation will be reported to the Deputy Principal. The Principal will be subsequently notified of the allegation at the earliest opportunity. In the case of allegations against the Principal, the report should be made to the Chair of the Corporation.
- 1.2 Due regard must be given to the statutory guidance Keeping Children Safe in Education 2018, when dealing with any allegations against staff or volunteers. The following procedures take account of that guidance accordingly.

### 2. Receiving an allegation from a member of staff

- 2.1 Where a member of staff has a concern about another member of staff, the concern should be referred to the DSL. Where the concern relates to the Principal, the Chair of Governors should be informed.
- 2.2 In the first instance, the DSL (case manager) will immediately discuss the allegation with the Local Authority's Designated Officer for safeguarding. The purpose of the initial discussion will be for the Designated Officer and the case manager to consider the nature, content and context of the allegation, and agree a course of action. The Designated Officer may also ask the case manager to provide or obtain relevant additional information, such as previous history, whether the young person/vulnerable adult or their family have made similar allegations previously, and the individual's current contact with young people/vulnerable adults.

- 2.3 There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to young people/vulnerable adults, or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the Designated Officer in order to help determine whether police involvement is necessary to support the investigation process.
- 2.4 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In such circumstances this decision and a justification for it will be recorded by both the case manager and the Designated Officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the Designated Officer what action should follow both in respect of the individual and the person who made the initial allegation.
- 2.5 The case manager will inform the member of staff about the allegation as soon as possible after consulting the Designated Officer. Wherever possible, the case manager will provide him/her with as much information as possible at that time; however, where a strategy discussion is needed, or the police or Social Care need to be involved, this will not be possible until those agencies have been consulted, and have agreed what information can be disclosed to the accused.
- 2.6 The case manager will provide the employee with a named contact who will keep the employee informed of progress of the case and consider what other support may be available to the individual.
- 2.7 If there is cause to suspect a young person/vulnerable adult is suffering, or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the statutory guidance contained within the 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education 2018' document. Where the strategy discussion or initial evaluation decides that it is clear that an investigation by the police or Social Care is unnecessary, the Designated Officer will discuss the next steps with the case manager. In those circumstances, the options open to the College will depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action, dismissal after proceeding to the College's disciplinary procedure, the provision of relevant training, or, where the individual concerned is not an employee of the College, taking the decision not to use the person's services in the future.
- 2.8 If further enquiries are needed to enable a decision to be made about how to proceed, the Designated Officer will discuss with the case manager, how and by whom, any investigation will be undertaken. It is likely that in straightforward cases, any investigation would normally be undertaken in line with the College's own Disciplinary Policy.

### **3. Suspension**

- 3.1 The case manager must give careful consideration to whether the circumstances of the case warrants the member of staff being suspended from contact with young people/vulnerable adults, or whether alternative arrangements can be put in place until the allegation or concern is resolved. Suspension will not be an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to taking that step. Suspension should be considered only in cases where there is cause to suspect a young person/vulnerable adult, or other young

people/vulnerable adults at College, is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

- 3.2 If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by the case manager. This will also include what alternatives to suspension were considered, and why they were rejected.
- 3.3 Where it has been deemed appropriate to suspend the individual, written confirmation of this decision will be issued within one working day, and will give as much detail as appropriate for the reasons for the suspension. The individual will also be informed who their named contact is within the organisation and be provided with their contact details.

#### **4. Confidentiality**

- 4.1 It is extremely important that when an allegation is made, every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the Designated Officer, police and Social Care services (if applicable), to agree the most appropriate way in which to manage the situation.
- 4.2 Parents/carers of the young person/vulnerable adult (without mental capacity) involved in the safeguarding issue, will be told about the allegation as soon as possible, if they do not already know of it. However, where a strategy discussion is required, or police or Social Care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents/carers.
- 4.3 Parents/carers will also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. Although the deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, the parents/carers will be told the outcome in confidence.
- 4.4 Parents/carers should also be made aware of the requirement to maintain confidentiality about any allegations made against individuals while investigations are on-going.

#### **5. Disciplinary Action**

- 5.1 The College shall hold in abeyance its own internal enquiries while any formal police or Social Care investigations proceed; to do otherwise may prejudice the investigation.
- 5.2 At the point at which criminal/Social Care proceedings have been completed, or where, after consideration of the allegation such proceedings are not deemed necessary, the College will instigate disciplinary proceedings where appropriate. If there are on-going safeguarding concerns whilst managing the allegation through the College's internal processes, the case manager will discuss these with the Designated Officer.
- 5.3 Where the College does proceed to disciplinary action as a result of a safeguarding concern, the statutory guidance 'Working Together to Safeguard Children 2018' and

'Keeping Children Safe in Education 2018' will be followed in respect of timescales and inter-agency sharing of information where appropriate, and will take precedence over the College's internal disciplinary processes.

5.4 Where the police have been involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements or evidence for use in the College's disciplinary process. This will be done as the police investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

5.5 If the accused member of staff resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with the statutory guidance. The College will make every effort to reach a conclusion in all cases of allegations relating to the safety or welfare of young people or vulnerable adults, including any in which the person concerned refuses to co-operate with the process. Wherever possible the accused will be given a full opportunity to answer the allegation and make representations about it.

5.6 However, the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done, or the accused does not co-operate. Whilst it may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, it is nevertheless important to reach and record a conclusion.

## **6. Timescales**

6.1 It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. The statutory guidance Keeping Children Safe in Education 2018 outlines clear expectations in relation to timescales for the resolution of cases of allegations against staff, which will take precedence over any timescales outlined in the College's internal disciplinary procedure.

## **7. Specific Actions**

7.1 Following a criminal investigation or a prosecution, the police will inform the case manager and Designated Officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged.

7.2 In those circumstances, the Designated Officer will discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or Social Care services should inform that decision. The options will depend on the circumstances of the case and consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

## **8. On conclusion of a case**

8.1 If the allegation is substantiated and the individual is dismissed following a disciplinary hearing, or the College ceases to use the individual's services, or the individual resigns or otherwise ceases to provide his/her services, the Designated

Officer will discuss with the case manager whether the College needs to make a referral to the Disclosure and Barring Service (DBS), for consideration of whether inclusion on the barred lists is required.

8.2 If an allegation is shown to be deliberately invented or malicious, the case manager should consider whether any disciplinary action is appropriate against the individual who made it, or whether the police should be asked to consider if action might be appropriate against the person responsible.

## **9. Effectiveness and Monitoring**

9.1 At the conclusion of a case in which an allegation is substantiated, the Designated Officer will review the circumstances of the case with the case manager and other colleagues as appropriate to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future, including staff training. This should include issues arising from the decision to suspend the member of staff if applicable, the duration of the suspension and whether or not suspension was justified.

9.2 The Designated Officer and case manager should also consider how future investigations of a similar nature could be carried out without suspending the individual.

## **10. Record Keeping**

10.1 Details of allegations that are found to have been malicious will not be kept on an individual's personnel file. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on the personnel file of the staff member concerned, and a copy provided to the person concerned.

10.2 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will also provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time.

10.3 The record should be retained at least until the member of staff concerned has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

## Appendix 6: Safeguarding Team

<b>Name</b>	<b>Role</b>	<b>Contact</b>
Amir Ahmed	Director of Learner Services, Marketing & Communication Designated Safeguarding Lead Prevent Lead	020 8501 8079
Shiguftah Gulzar	Welfare & Wellbeing Manager Deputy Designated Safeguarding Lead	020 8501 8330
Rosemary Partin	SEN Manager Deputy Designated Safeguarding Lead	020 8501 8282
Nicola Sands	Welfare & Wellbeing Advisor Designated Teacher for LAC	0208 501 8104
Jessica Kabra	Welfare & Wellbeing Advisor/ Counsellor	0208 501 8104
Urmi Medhi	Counsellor	0208 501 8111
Shazia Aslam	Welfare & Wellbeing Advisor	0208 501 8217
Liz Tattle	Head of Additional Support & Inclusion	0208 501 8259
Mark Cumberbatch	Head of Security	0208 501 8237

### Useful Contacts

Waltham Forest College Safeguarding Team  
[besafe@waltham.ac.uk](mailto:besafe@waltham.ac.uk)  
020 8501 8111

Local Area Designated Officer  
[lado@walthamforest.gov.uk](mailto:lado@walthamforest.gov.uk)  
020 8496 3646