

Safeguarding Children Policy



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Responsibility of:	Director
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Revised	
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1 Policy Statement

- 1.1 The London College of Policing is committed to safeguarding and promoting the well-being of children and expects all governors, students, staff, contractors, stakeholders, and volunteers to share this commitment. The College's duty of care include responsibility to act if there is a cause for concern about the safety of children and to notify the appropriate agencies so that they can investigate and take any action required.
- 1.2 The policy covers all members of the College community who are under 18¹ and extends to concerns that students may have about their home life. The College has a responsibility to respond to concerns or allegations of abuse and to provide information to the Local Authority about a student or family if required to do so for a protection assessment. The College may also provide help or a specific service to a student as part of a Child Protection Plan or Child in Need Plan, agreed at a Child Protection case conference and contribute to reviewing a student's progress in this regard.
- 1.3 In the light of this, the College's response to its role in safeguarding and protecting the welfare of its students concerning abuse is to:
- Provide a safe environment for children to learn in educational settings.
 - have a Senior Management Lead, a Designated Lead, and designated staff members for each course with responsibility for the protection and safeguarding of children.
 - provide all staff who are responsible for teaching and/or examining students who are under 18 with training to ensure they are aware of the issue of protection from abuse and the procedures to follow in the event of disclosure.
 - Ensure that staff and students engaged in volunteering activity which involves working with children whether on or off campus are trained in safeguarding.
 - Ensure that every student is aware of what to do and who they can talk to if they have got a concern about their own safety or that of others and ensure the person who discloses abuse is given all reasonable support in an appropriate and professional manner.
 - To identify vulnerable students at the earliest possible opportunity so that support strategies can be put in place as appropriate.
 - To ensure appropriate admissions policies and procedures including for those with relevant criminal convictions.
 - To raise staff (and where appropriate student) awareness of issues relating to **safeguarding, particularly the prevention of and protection from all**

¹The welfare of students over the age of 18 is subject to the 'Responding to Students in Difficulties' Policy.



forms of abuse, along with safeguarding matters that would include domestic violence, FGM, radicalisation and violent extremism, child sexual exploitation, bullying and on-line safety (this list is not exhaustive).

- To accurately and confidentially record data related to reported cases and to identify and respond to any trends or patterns that may emerge.
- To review the policy regularly.
- To ensure that all College staff who teach and/or examine children including individuals from external agencies who have contact with children are appropriately vetted through DBS, and a single central record is kept for audit purposes.
- To ensure that students or other volunteers working on behalf of the College with children and/or vulnerable adults are vetted and provided with appropriate training and support on safeguarding issues.

2 Legal Framework and definitions for the purposes of this policy

2.1 The Legal Framework which governs this policy and procedure is outlined in Appendix A.

2.2 The following definitions are used in this policy:

“Barred Person” a person prevented by the DBS from working within a regulated activity with children or adults.

“Child/ Children” means person(s) under the age of eighteen years.

“Designated Staff Members” means staff members with responsibility for safeguarding children as outlined in Section 5 below.

“DBS” means the Disclosure and Barring Service. This statutory body has been created out of the merger of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA).

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

“HEI” means Higher Education Institution.

“Local Authority” means local authorities who are responsible for social services and education such as a county council in England, a metropolitan district council, a non-metropolitan district council for an area where there is no county council, a unitary council, a London borough council, or the common council of the City of London.



“Local authority designated officer (LADO)” means the member of staff responsible for safeguarding in the local authority.



“Parents” means individuals who have parental responsibility.

“Regulated Activity” is work that a **“Barred Person”** must not do in relation to children. This is in brief:

- i) unsupervised activities: teach, train, instruct, care for, or supervise children, or provide advice / guidance on well-being, or drive a vehicle only for children.
- ii) work for a limited range of establishments (“specified places”), with opportunity for contact: e.g., schools, children’s homes, childcare premises.

Work under (i) or (ii) is regulated activity only if done regularly. For further details see the government guidance [here](#).

“Responsible Adult” means any adult who works in an education setting where there are children and who are likely to be perceived by children as a safe and trustworthy person for example, all members of staff, contractors, volunteers, members of the Governing Body, consultants, and agents.

“Senior Management Lead” means the member of the London Policing College Advisory Board with responsibility for safeguarding policy and procedures.

“Social services” means the department in the local authority responsible for children’s services.

“Staff” means all adults employed by the College whether full time, part time, temporary or permanent.

“Student” in the context of this policy means any child who is registered for a Course at the College.

“Three Safeguarding partners” means the local authority, a clinical commissioning group and police chief from the local area.

3 The aims of the policy

3.1 The aims of the policy are to:

- Set out how the College provides a safe environment for children who are enrolled as students at the College or who are taught and or examined by staff.
- Provide guidance for staff.
- Provide robust procedures to follow in the event of suspected abuse of children which protect students and staff.

4 Scope of the Policy



- 4.1 The scope of this policy extends to all employees of the College, the Advisory Board, all students at the College, volunteers who work on behalf of the College and visitors to College premises
- 4.2 The policy applies to students who are volunteers in regulated activity in other settings. Such students will be trained in Safeguarding and how to report issues.

5 College staff with responsibilities for safeguarding

- 5.1 Set out below are the roles and responsibilities within the College's Safeguarding policy:

Senior Management Lead: The College Secretary is the member with overall responsibility for the development, implementation and advice on Safeguarding policies and procedures.

Designated Officers: The designated officers are the first point of contact for staff and students for Safeguarding issues.

6 The protection of children

- 6.1 Safeguarding and promoting the welfare of children defined as:
 - Protecting a child from maltreatment.
 - Preventing the impairment of a child health or development.
 - Ensuring that a child is growing up and thriving in circumstances consistent with the provision of safe and effective care.
- 6.2 When an issue has been identified and raised by a student or third party relating to the protection of a child, the College will take appropriate action as promptly as possible. This may include referring the case to the relevant LADO, the child's local social services and/or to the police.

7 What is abuse?

- 7.1 Abuse may involve inflicting harm or failing to act to prevent harm and can include any one or more of the following four nationally recognised forms of abuse:
 - **Physical abuse:** physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse 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 persistent adverse effects on the child's emotional development. It may involve conveying to children that they are



worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Sexual abuse:** sexual abuse involves forcing or enticing a child, young or vulnerable person to take part in sexual activities, including prostitution, whether the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children / people in looking at or in the production of pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways.
- **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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer, failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child’s basic emotional needs.

7.2 In addition to the above forms of abuse, there are several safeguarding issues that may constitute abuse in certain circumstances and that may cause serious concern and that can and do occur in relation to the College’s students. These are:

- **Cyber bullying:** is the use of communication technology to torment, threaten, harass, humiliate, embarrass, or otherwise harm an individual by sending or posting text messages or pictures intended to do so.
- **Bullying;** may take many forms and is an act of aggression causing a person to feel threatened or intimidated because of those actions.
- **Forced Marriage;** marriage in which one or both of the parties is married without his or her consent or against his or her will.
- **Financial Abuse:** including theft, fraud, exploitation, the misuse of possessions or benefits and pressure applied in relation to financial transactions.
- **Discriminatory Abuse:** is an action that denies social participation or human rights to categories of people based on prejudice. The College does not tolerate discrimination on any grounds.
- **FGM;** female genital mutilation (FGM) is a form of abuse which has devastating



physical and psychological consequences for girls and women. Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. The Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teaching staff, along with social workers and healthcare professionals, 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.

- **Radicalisation & Violent Extremism** the College recognises the positive contribution it can make towards protecting its students from radicalisation and violent extremism. It will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of safe spaces for free debate where shared values can be reinforced. Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

8 What to do when a student discloses abuse

8.1 When a student discloses to a member of College staff that abuse has taken place, the staff member **should**:

- Listen
- Stay calm.
- Take the student seriously.
- Ask clarification questions only if absolutely necessary. Remember that it is not your duty to investigate, merely to accurately record what is said.
- Inform the student that they will need to tell someone else.
- Report the issues immediately, as is detailed in Section 10 of this policy.

8.2 You must always inform a member of staff with responsibility for Safeguarding if a student has informed you of abuse.

8.3 Staff **should not**:

- Put words into the student's or third party's mouth or ask leading questions.
- Investigate concerns or allegations.
- Promise confidentiality.
- Fail to record what you have been told.



- Fail to pass on the information to the correct person (as outlined in section 10).

8.4 A member of staff must not question the student in depth. This is because asking leading questions or attempting to investigate the allegations can jeopardise any criminal investigation that may follow. The member of staff should re-assure the student that they are doing the right thing in making the disclosure and avoid making comments or judgements on the disclosure.

9 Maintaining confidentiality

9.1 The College acknowledges that it is necessary to maintain and respect confidentiality. However, appropriate disclosure to designated officers or external agencies may be required to ensure that the safety of children at the College is maintained.

9.2 Normally, personal information should only be disclosed to third parties with the consent of the person that the information relates to. Wherever possible, consent should be obtained in writing before sharing personal information with third parties. In some circumstances, consent may not be possible or desirable but the safety and welfare of the student dictates that the information should be shared.

9.3 All members of staff have a professional responsibility and obligation in accordance with their pastoral care obligations to share relevant information about the protection of children with Designated Safeguarding Officers responsible for safeguarding and where requested with other appropriate professionals and/or investigative agencies.

9.4 If a student confides in a member of staff and requests that the information be kept confidential, it is important that the member of staff tells the student in an appropriately sensitive way that he or she has a responsibility to refer cases of alleged abuse to the appropriate people in accordance with this policy. However, the student should be assured that the matter will be disclosed only in accordance with this policy and procedures, which should be explained to them.

9.5 Remember staff **cannot guarantee confidentiality. If possible, they should tell the student about this before they disclose the abuse.** If the child then does not wish to continue when informed that the information will be disclosed in accordance with this policy, he/she should be referred to the College Secretary who will help the child access support from specialist child protection organisations.

10 Requests for assistance by other agencies

10.1 Staff have a legal duty to assist Local Authority Children and Family Social Care Services or the Police when they are making enquiries about the welfare of students. Information about a student must therefore be shared on a "need to know" basis with other agencies. Staff should refer such requests to the College Secretary before responding unless they have prior authority to provide the information. When telephone requests



for information are received, always maintain security by checking the identity of the caller and if necessary, calling back before giving information about a student. All responses to such requests must be in line with the College's Data Protection Act.

11 How to record and report abuse

11.1 If the student wishes to continue to disclose the abuse, the member of staff must:

- Refer the student to a Designated Lead in the relevant academic area immediately.
- Inform the student of the action that would follow the conversation and assure them that they will be kept informed of developments.
- Complete the disclosure form (attached at Appendix B) and include what the student has told them as soon as they can but within 2 hours. Make a detailed note of:
 - the date.
 - the time.
 - the place where the alleged abuse took place.
 - what the student said, did and the questions asked by the member of staff.
 - Include a description of any injuries observed,
 - your name, the name of any other person who is present during the disclosure.

11.2 Staff may make a referral directly to local social services. However, they should only do this if the student is in immediate harm and/or they are unable to contact the College Secretary. When a staff member does inform social services, they should always inform the College Secretary as soon as possible.

11.3 If the disclosure is made by a parent/guardian/carer or another student, the member of staff should follow the same procedure.

11.4 Once a referral is made to the Designated Officer they will:

- ensure that the child is not in any immediate danger and seek medical attention if needed.
- if it is decided that it is necessary to take action following a disclosure of abuse, they will contact the LADO, local social services and/or the police as appropriate.
- a written record of the date and time of the report should be made, and the report must include the name and position of the person to whom the matter is reported, maintaining a single copy of that report which will be safely maintained by the College Secretary on behalf of the College. The telephone report must be confirmed in writing, using the appropriate referral form where possible, to the LADO within 24 hours. **All staff should be aware that well-kept records are essential for good**



practice.

- when a child is not sure about taking the allegation forward, the College Secretary will decide based on the information provided and seek advice from the LADO, social services, or the police, as necessary.

- 11.5 In all circumstance the child will be kept at the centre of the decision-making process. LADOs and the of other professionals' views will be taken in to consideration. However, it remains the responsibility of the Designated Lead to take whatever action is necessary to ensure the child's safety and that of any other children who may be at risk. They will always discuss cases and referrals with the Head of the College Secretary before taking action. If the Head of The College Secretary is not available, they will discuss it with the Senior Management Lead.
- 11.6 In the event of a decision to report, the Designated Officer/Head of The College Secretary should inform the child of the proposed action and the reasons for the decision. Ideally this should happen before the appropriate agency is informed.
- 11.7 The Designated Officer or Head of The College Secretary as agreed should contact the LADO of the appropriate Local Authority by telephone in the first instance and record the date and time that this took place. They will agree with the recipient of the referral what the next steps should be. They will confirm the referral in writing, using the inter-agency referral form provided by the relevant local authority.
- 11.8 Where an allegation is made against a member of staff, the College Secretary should report this to the Director.
- 11.9 Where the child decides not to take the matter further, the child will be asked to sign a written statement to that effect. As outlined in 9.5 the Head of The College Secretary in conjunction with the Director may still consider that action is appropriate to protect the child or other students at the College.
- 11.10 The Head of The College Secretary will be the College contact if social services or the police require further information about the student.
- 11.11 If necessary, the College Secretary will represent the College at multi- agency strategy discussions or child protection conferences.
- 11.12 Where the instance of abuse includes radicalisation or extremism, the College Secretary will consider whether a referral under the Information Sharing Protocol for Prevent is appropriate.

12 Contact with the family.

- 12.1 Contact with the family should be discussed with the College Secretary or Director, who may consult with Children's Social Care



- 12.2 In cases where a minor physical injury causes concern, it is usual practice to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury, (or a failure to protect the student from harm), the student, parent or carer should be informed that the matter must be referred to Children’s Social Care
- 12.3 I he concern may have built up over a period of time. There may have been discussion previously between College staff and the family about sources of help, but if concerns persist, the College Secretary who will need to refer Children’s Social Care and will normally advise the family of this.
- 12.4 In cases where there are suspicions of sexual abuse, the College Secretary will seek immediate advice from Children’s Social Care before discussing this with the family.

13 Record Keeping

- 13.3 The College Secretary is responsible for maintaining confidential records of all safeguarding issues including a Safeguarding log. The Head of The College Secretary shall control access to such records at all times.
- 13.4 All concerns, discussions, decisions made and reasons for those decisions will be accurately recorded and kept confidential. Any paper records will be kept in a securely locked location, and on an appropriately protected area on the College’s L drive for use by authorised persons only and separate from the student’s records.

14 Allegations against students

- 14.1 If the allegation of abuse is made against a College student, the College Secretary must be informed.
- 14.2 The College Student Disciplinary Procedures will be implemented where appropriate.
- 14.3 If the student must be suspended from the College Premises (s)he must be given a full explanation as to why and be dealt with in a sensitive, safe, and discrete manner. The suspension will be undertaken by the College Secretary in accordance with the Student Disciplinary Procedures.
- 14.4 The College recognises that it has duties and responsibilities relating to the protection and fair treatment of its students. Should allegations of abuse and or inappropriate behaviour be levelled against a student, the College will afford that student the necessary support as is appropriate in the circumstances.

15 Harm, from or to, other children



15.1 A students is subject to the same safeguarding procedures as in respect of
 b students being abused by an adult.

15.2 Staff should be alert to the risk a child or young person may pose to other
 young people other than any “current” victim. Young people who harm
 others are likely to have considerable needs themselves (e.g., they may have
 been subjected to abuse, witnessed domestic violence, or committed criminal
 offences). In such cases there will usually be a need to refer the alleged perpetrator
 of harm to Children’s Social Care.

16 Allegations against a member of staff

16.1 It is essential that that any allegations of abuse made against a member of staff or
 a member of staff are dealt with fairly, quickly, and consistently. These
 procedures apply to all staff, whether teaching, administrative, management or
 support staff.

16.2 Where an allegation of abuse has been made against a member of College staff
 this should be referred immediately to the College Secretary who will inform the
 Director. Staff or students may make this allegation in accordance with the
 Public Interest Disclosure (whistleblowing) Policy if appropriate.

16.3 Where allegations are against a member of the advisory Board then the matter
 should be referred straight to the Director In cases where an allegation is made
 against the Director then this should be referred directly to the Advisory Board
 who will deal with it in consultation with the Lead for Safeguarding.

16.4 The College Secretary will assess the information and a decision will be made on
 whether the allegation can be dealt with internally or if it ought to be referred to the
 LADO and/or relevant external authorities and agencies. Referrals will be considered
 in accordance with guidance in the statutory guidance [Working Together to
 Safeguard Children](#) and [Keeping children safe in education](#) where it is alleged that a
 member of staff has:

- Behaved in a way that has harmed a student or other child.
- Possibly committed a criminal offence against or related to a student or
 other child.
- Behaved towards a student or child in a way that indicates he or she will
 pose a risk of harm if they work regularly or closely with a child or children.

16.5 The College Secretary will refer the case to the LADO and will be the point of
 contact with LADO, the police, social services and/ or any external agencies in
 relation to Safeguarding for the College.



- 16.6 D he allegations are so serious as to require immediate intervention by the police, e social services and/or relevant external agencies. c
- i (b) The allegation represents inappropriate behaviour or poor practice by the s member of staff and is neither potentially a crime nor a cause of significant harm i to the child. If this is the outcome, the matter shall be addressed in accordance o with the College’s Staff Disciplinary Policy and Procedure. n
- 16.7 For cases where there is referral to the police or social services, the College shall t consider holding in abeyance its own internal enquiries while the formal police, o social services or relevant external agency investigations proceed, where to do so p otherwise may prejudice the formal investigation. The College shall take advice r where relevant from the police, social services, or relevant external agency in o considering the application of internal procedures including the College’s Staff g Disciplinary Policy and Procedures. r
- 16.8 Disciplinary investigations relating to safeguarding will need to additionally record e one of the following outcomes: substantiated, malicious, false, or unsubstantiated s and this will be recorded. Allegations can be shown to be false because facts alleged s could not possibly be true. The Senior Management Lead will be consulted in t determining the safeguarding outcome to be recorded. h
- 16.9 Disciplinary investigations relating to safeguarding and outcomes need to be e retained until the accused has reached pensionable age or for a period of 10 years a from the date of the allegation if that is longer. s
- 16.10 In some circumstance the College may consider suspending the member of staff o until the case is resolved as part of Staff Disciplinary Policy and Procedure. The u following will be considered: l
- (a) a child is at risk; and/or
 - (b) the allegations are sufficiently serious if proven to justify dismissal on the b grounds of serious or gross misconduct within the context of staff disciplinary e procedures; and/or
 - (c) suspension is necessary for the good and efficient conduct of the a investigation. s
 - (d) the College has been advised by the police and or external agency to f consider suspension. o
- 16.11 The suspension will remain under review in accordance with Staff Disciplinary Policy w and Procedure or until the College is in receipt of written confirmation from the s police in relation to their intentions on whether to pursue a conviction in relation : to the alleged offence.
- 16.12 The College Secretary will be responsible for responding to and providing an update



rdian in all responses in relation to a safeguarding disclosure.

16.13 Following the staff disciplinary investigation and outcome, the child at the centre of the allegation and their parent or guardian should be kept informed of the outcome. This is particularly so, prior to the return of the member of staff or alleged individual returning to the College.

16.14 The College, as an employer, also recognises that it has duties and responsibilities relating to the protection and fair treatment of its staff. Should allegations of abuse and or inappropriate behaviour be levelled against an employee, the College will afford that employee the necessary support as is appropriate in the circumstances.

16.15 If a member of staff makes a malicious or false allegation, and particularly if he or she persists in making them, disciplinary action may be taken against the individual in question.

16.16 The College is aware that an allegation of abuse by a student or other child made against a member of staff from within or outside the College may be made for a variety of reasons and that the facts of the allegation may or may not be true. The College recognises the duty as established in the Children Act 1989 and 2004 that the welfare of the child is the paramount concern arising within or outside the College. It is also appreciated that hasty or ill-informed decisions in connection with a member of staff can irreparably have an adverse impact on an individual's reputation, confidence, and career.

16.17 The College Secretary in discussion where relevant with the Director should give due consideration to what information should be made available to the College community and the general population.

16.18 False allegations may be indicative of a problem of abuse elsewhere. A record should be kept, and consideration given by the Head of The College Secretary (Lead Designated Officer) to a referral appropriately in order that other agencies may act upon that information.

16.19 The College must refer someone to the DBS if they are:

- (a) Dismissed / removed because they have harmed a child or vulnerable adult.
- (b) Or otherwise, were planning to dismiss or remove them for either of these reasons but the person resigned first.

17 Creating a safe environment for study

17.1 Training

17.1.1 The College recognises that all academic staff members who work with



ware of, identify and respond to a child’s welfare concerns. Relevant staff will receive training which will adequately familiarise them with issues and responsibilities relating to safeguarding children in addition to the College procedures and policies, undertaking refresher training or updating annually as appropriate and as and when updates are required. A record of training will be maintained.

17.1.2 All Designated Officers must undertake appropriate training and will receive refresher training or updating annually as appropriate and following significant legislative change. Designated Staff will be required to keep up to date with developments in safeguarding children.

17.2 Recruitment of Staff

17.2.1 The College will seek to ensure that unsuitable and/or barred people are prevented from working with children and will follow safe recruitment practices.

17.3 Student DBS checks

17.3.1 In recruiting students on courses or volunteering activities where they will engage in Regulated Activities relating to children, DBS checks will be required. The School/Professional Service Department recruiting on such courses/activities has the primary responsibility for ensuring that the appropriate checks are carried out.

17.3.2 Any issues relating to a student’s DBS check will be dealt with under the appropriate regulations for DBS Screening available [here](#).

17.4 Contracts/ Contractors

17.4.1 The College is aware that contractors will not be covered through the staff recruitment process and will where appropriate include appropriate contractual provisions which will have regard to safeguarding principles.

17.5 IT restrictions

17.5.1 The College, as a part of its intention to provide a safe environment for children to learn, aims to ensure that children are adequately safeguarded against inappropriate material accessible online. This is contained within the Internet Access for Children Policy. The day-to-day responsibility for this policy and its implementation lies with the Director of IT.

17.5.2 Appropriate filtering is in place for those FE students who are under 18.



17.6 tion to provide a safe environment for students’ learning requires that offsite visits be appropriately conducted. Staff members must follow the procedures as outlined on the College’s Health and Safety website.

17.7 Further Education (FE) Student Placements

17.7.1 The College recognises that where FE students undertake placements with external organisations, checks must be made to ensure that the student has the necessary training and skills to work safely, that they understand their obligations, and that the placement provider is appropriately vetted to ensure the health, safety, and welfare of the student.

17.8 Use of images

17.8.1 The College ensures that it has the consent of students, staff, and visitors before taking images either photographs or films. There are additional safeguards in place for students below the age of 18 and these are outlined in Appendix C.

17.

17.9 Relationships & general guidelines on appropriate behaviour between Responsible Adults and Children

17.9.1 All Responsible Adults should be aware that inappropriate behaviour with or towards students is unacceptable. **In particular, under the Sexual Offences Act 2003 it is an offence for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.**

17.9.2 Guidance for staff is contained in the Staff-Student Relationships Policy available [here](#). Further guidance particularly for staff working with children is set out in Appendix D.

17.10 Projects and activities involving children from schools, colleges and youth and community groups.

17.10.1 The College runs a range of activities for children studying at schools and colleges and/or attending youth and community groups local to all the College’s sites. These activities and projects may involve engagement including funded learning, outreach projects, taster programmes, College visits and access to College facilities.

17.10.2 Staff members involved in this work will liaise, where appropriate, with the Safeguarding Contact for the activity (often Designated Child Protection Officer) at the local school(s), college(s), and youth and community group(s) to ensure clear communication channels are established. All staff and students participating in these projects, where working with children unsupervised must have a DBS check and be trained in safeguarding.





In ensuring this duty is discharged, the College will have appropriate arrangements in place, including a policy and procedures (including guidelines) to safeguard children in keeping with the above legislation and guidance.

- 1.7 Female Circumcision Duty updated Oct 2015** Under FGM legal duty to report from Oct 2015. The College and staff have a legal duty to report (female genital mutilation) FGM cases or suspected cases as part of safeguarding. Social services or child protection need to be alerted if there is suspected abuse of children of any kind.
- 1.8 Counter-Terrorism and Security Act 2015** sets out that specified authorities must have 'due regard to the need to prevent people from being drawn into terrorism.' This has become known as the 'Prevent duty'. The Act applies to the governing bodies or proprietors of 'relevant higher education bodies.
- 1.9 The Sexual Offences Act 2003:** Under section 16 of The Sexual Offences Act 2003, which provides that it is an offence for a person aged 18 or over (e.g., teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.



Appendix B: Form 1: Disclosure or Suspicion of Abuse

Name of Student	
Department of the Student	
Telephone Number of the Student	
Date and time of disclosure or incident that raised suspicion	
Location of disclosure or incident that raised suspicion	
Nature of disclosure or incident: Please include as much information as possible, using the continuation sheet if necessary.	
Action Taken:	
Date:	Signed: (Student involved with the disclosure)
Date:	Signed: (Person dealing with the disclosure)



Appendix C: Use of Images

1. Staff may use video equipment as a legitimate teaching and learning aid. However, children and their parents/guardians must be made aware that this is part of the course and care will be taken in the storing of such films.
2. In accordance with the Data Protection Act 1998, an individual's image, whether it is a photograph, or on film or videotape (other than CCTV) is personal data. Therefore, it must be accorded the same sort of protection as any other personal data under the Act.
3. If at any time a person is **specifically** asked to take part in a film or a posed photograph while on College premises, then written consent should be obtained prior to using the image(s). This is applicable for both student film and photo coursework, and for photos or film used for official College promotions and/or publications. People specifically asked to take part in photos/films should sign a consent form. If photographs/videoing of a child is to occur written consent from parent or guardian must be obtained before videoing takes place.
4. The College will not allow images of under 18's to be used on websites, publicity or press releases, without express permission from the parent/carer, and if we do obtain such permission, we will not identify individuals by name.
5. The College cannot however be held accountable for photographs or video footage taken by parents/guardians/carers or members of the public at College functions.



Appendix D: General guidelines on appropriate behaviour with students under 18

Practice to be avoided.

It is the responsibility of every member of staff of the College to avoid the following circumstances except in emergencies.

1. Avoid spending excessive amounts of time alone with a child away from others.
2. Avoid carrying children in your car without other people's prior knowledge.
3. Avoid giving and receiving gifts to and from children and parents/carers.
4. Avoid meeting children outside of scheduled College teaching sessions or duties.
5. Avoid becoming too involved with the emotional or personal problems of students outside the area of professional competence.

Should a case arise where some of the above situations are unavoidable, they should only occur with the full knowledge and consent of the staff member's line manager or someone in charge of the programme of study or the child's parents or guardians. For example, a child sustains an injury and needs to go to hospital.

Practice Never to be Sanctioned.

1. Allow or engage in any form of inappropriate touching outside that required when delivering of some elements of the curriculum, for example, teaching singing or an instrument may involve touching a student to adjust posture, demonstrate how to hold an instrument or correct hand position.
2. Engage in rough, physical, or sexually provocative games, including horseplay.
3. Share a bedroom.
4. Allow children to use offensive language or suggestive remarks unchallenged.
5. Make sexually suggestive comments to a child even in fun.
6. Reduce an individual to tears as a form of control.
7. Allow allegations made by a child to go unchallenged, unrecorded, or not acted upon.
8. Do things of a personal nature for children, which they can do for themselves.
9. Invite or allow children to stay with you at your home unsupervised.
10. Disclose their own personal details such as private phone number and sensitive information.
11. Engage in communication which is personally or

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professionally inappropriate either face to face or using any media.

