



The Camden College

Safeguarding Policy 2015

1 Policy Statement

- 1.1 The Working Men's College ("WMC") fully recognises its responsibility to promote safe practice and to protect and safeguard the welfare of everyone working and studying here. We believe that learning takes place most effectively within a culture in which all individuals trust the college to keep them safe from harm while here and give them information, advice and help to keep themselves safe from harm at other times.

WMC believes that everybody working or studying here has a right to freedom from abuse and harm. Everyone working in the college is required to abide by the college's courtesy code, which makes it clear that actions which harm others will not be tolerated.

- 1.2 WMC also recognises its responsibility to take all reasonable steps to protect children and vulnerable adults from harm, abuse and exploitation. A child is defined as a person under the age of 18. A vulnerable adult is defined as a person aged 18 or above who is, or may be, in need of community care services because of mental disability or other disability, age or illness, and who is, or who may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

This is a very narrow definition of vulnerable adult. The college recognises a broader category of people who may not be in need of community care services, but nevertheless may be more susceptible to harm, abuse and exploitation than others. All references to vulnerable adults in the rest of this document use this broad definition. A list of students believed to be in this broad category is maintained by the college.

Vulnerability is difficult to judge. Staff should always assume that any adult student they deal with might be a vulnerable adult and treat them accordingly.

- 1.3 This policy applies to everyone working or studying in the college: full-time, part-time and sessional staff, governors, contractors, volunteers and students. It applies to its centres at Crowndale Road and Kentish Town and to all its provision delivered elsewhere, including community centres and employers' premises. Everyone is expected to demonstrate these values, through their behaviour, at all times.
- 1.4 All staff, governors, contractors and volunteers are required to familiarise themselves with this Safeguarding policy and related practices and procedures as directed in this document on induction to the College and when updates are notified and circulated. In addition all staff and volunteers are required to prioritise attendance at Safeguarding training events to which they are invited by the College.
- 1.5 Under the Government's "PREVENT" strategy, colleges have a responsibility to identify the risks of, and protect children, young people and vulnerable adults from the dangers of, radicalisation and extremism. In this regard, staff should follow the same approach and procedures set out in this document for identifying, raising and addressing concerns about radicalisation and extremism as they would about other Safeguarding concerns.

2 Responsibility for the Policy

- 2.1 The Lead Person for Safeguarding in the College with overall responsibility for the policy is the Assistant Principal - Operations,. Until an appointment is made to this post, the person with overall responsibility for the policy is the Interim Vice Principal Resources.
- 2.2 The policy is approved by governors. A lead governor is appointed to support and work with the College named Lead Person for Safeguarding and to oversee the implementation of the policy. Currently the Chair of the Quality, Curriculum and Standards Committee undertakes this role.
- 2.3 The Assistant Principal - Operations will act as the Lead Nominated Person for Safeguarding in the College and is responsible for updating the policy annually (or more frequently if legislative or regulatory changes prompt an earlier review) and making an annual report to governors on its implementation. S/he is responsible for managing referrals, training and raising awareness as set out in Annex 5. S/he is responsible for the DBS, recruitment, health & safety and training aspects of the policy. S/he will chair a termly Safeguarding Working Group which directs and monitors implementation of the policy. S/he is also responsible for maintaining contacts with the local Safeguarding Boards and other agencies. In the absence of the Assistant Principal – Operations, the Head of Student Support will deputise as the Lead Nominated Person for Safeguarding in the College.
- 2.4 There are four Nominated Safeguarding Contacts who are the first point of contact for students with concerns. The college also maintains a Safeguarding Hotline which may be used for reporting incidents. The contacts are:
- Irina Staneva, Head of Student Support
 - Kazi Nessa, Central Services Manager
 - Ali Hussein, Student Support Officer
 - (t.b.c.), Kentish Town based member of staff

These members of staff together with the Assistant Principal – Operations will receive specialist training to enable them to fully understand and discharge the responsibilities of their roles.

Contact details for these staff will be included in student handbooks and displayed prominently in the college centres.

- 2.5 The College's role where there are concerns for a child, young person or vulnerable adult is not to investigate, but to recognise the risk and refer. Any member of staff or volunteer who has a concern for a child, young person or vulnerable adult, however insignificant, should raise the matter with the Lead Nominated Person for Safeguarding in the College as soon as possible.
- 2.6 The Assistant Principal - Operations is responsible for maintaining central registers of safeguarding incidents/concerns and vulnerable students.
- 2.7 The Assistant Principal – Operations is responsible for ensuring that all staff, Governors, contractors and volunteers in the College have received appropriate initial and updating training and for keeping records of attendance at training events or completion of online training.
- 2.8 All members of staff must also take personal responsibility for ensuring they are appropriately trained, that they fulfil their referral and reporting obligations under this policy and that this policy is disseminated and implemented consistently throughout WMC.

3. Students' Safety and Well-Being

3.1 Everyone who has responsibility for students must take steps to promote their well-being and safety. For children, the Government's aim is to ensure every child has the support they need to:

- Be healthy
- Stay Safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well-being

For adults, these are also relevant, though the responsibility of WMC in achieving some of them is less clear. Nevertheless, WMC has a commitment to the safety of all its students.

3.2 The potential risks to students is very broad. A list of some of them is given in Appendix 1. Teachers should be aware of these risks and be alert to the possibility that some of their students may be experiencing some of these problems.

3.3 WMC aims to provide a supportive environment which encourages students to speak out about any problems they may have, whether or not they are connected with their study, and works with the student to resolve these problems wherever possible.

3.4 WMC aims to provide all its students with the information they need in order to keep themselves safe, through their curriculum teaching and through dissemination of information via noticeboards, forums and on-line resources.

4. DBS Policy and Recruitment of Staff

4.1 All WMC staff undergo a Disclosure & Barring Service (DBS) check prior to employment, under the terms of our separate DBS Policy.

4.2 This covers full time, part time and sessional staff, whether permanent, fixed term or temporary, unless they are here for fewer than 4 weeks.

4.3 Any contractor or volunteer who has or is likely to have unsupervised access to students under the age of 18 or vulnerable adults will also be subject to DBS checking. This will include some student representatives, to be decided on a case-by-case basis by the Assistant Principal - Operations.

4.4 Any member of staff for whom the results of a DBS check are not known when they start employment will be subject to a specific risk assessment prepared by the Head of Student Support and reviewed by the Assistant Principal – Operations. The risk assessment will identify appropriate actions to mitigate the risks, such as providing additional supervision and unannounced observations on the staff member. In some cases it might be appropriate to determine that the staff member is not permitted to be alone with the following students or groups of students:

- Classes or groups specifically for children or young people under 19
- Classes or groups specifically for vulnerable adults
- Individual children or young people under 19
- Individual adults who may be vulnerable

- 4.5 If the results of a DBS check are still not known 6 weeks after a member of staff commences employment an updated risk assessment must be prepared by the Assistant Principal – Operations and reviewed by the Principal. Consideration must be given to suspending the member of staff from the College until the DBS check results are received and shared with the College.
- 4.6 Re-checks will be carried out when staff apply for a new position within the College or every 3 years, whichever is sooner.
- 4.6 Safer Recruitment procedures are followed by the College, with all staff who will be chairing recruitment panels receiving training in Safer Recruiting – recruitment advertising, job adverts and job descriptions all state that a DBS check is required, two written references are taken up and offers are made conditional on satisfactory background checks. In addition, steps will be taken to ensure that all shortlisted candidates provide a career history and satisfactory explanations are received and corroborated as necessary, to explain any career gaps.
- 4.7 There is no general requirement for governors to have a DBS check. However, governors who have unsupervised access to students under the age of 18 or vulnerable adults, or access to sensitive safeguarding records, will require a DBS check.
- 4.8 A single central record of staff DBS activity will be maintained by the Head of HR, stating when they were last checked, the type of check obtained and the certificate number, as required by law.

5. Staff Training and Code of Conduct

- 5.1 All staff and, where appropriate, contractors and volunteers, are required to be trained in the principles and practice of safeguarding. The training is designed to give staff information on:
- The principles of safeguarding
 - What we are safeguarding against: the signs of abuse
 - How to deal with possible situations
 - How to deal with the issue of confidentiality
 - How safeguarding is embedded throughout the organisation
 - Safer recruitment (where appropriate)
- 5.2 The principal source of training is the on-line Safeguarding training provided by LSIS. Managers who recruit staff also undertake LSIS on-line Safer Recruitment training. This is compulsory for all staff.
- 5.3 External adult and children safeguarding training, both provided by LB Camden, is compulsory for staff with specialist responsibilities under this Policy, or who are involved in policy development, or who deal regularly with children and/or vulnerable adults.
- 5.4 A Code of Conduct is available for staff, which sets out simple rules for behaviour towards students. See Appendix 4.
- 5.5 A training programme will be delivered to governors in order for them to fully appreciate and discharge their responsibilities in relation to safeguarding. The lead governor will be provided with additional specialist safeguarding training as appropriate.

6. Risk Assessments

- 6.1 If any member of the Executive Management Team considers there is a significant risk to the safety of people working or studying here they will designate a nominated safeguarding contact to carry out a Risk Assessment.
- 6.2 The Risk Assessment will aim to identify all the risks, assess their likelihood and impact in each case and devise strategies to mitigate them. Risk assessments will be fully documented and retained by the Head of Student Support.

7. Information, Advice & Guidance for Students

- 7.1 The Courtesy Code will form part of the student handbook which is given to all new students.
- 7.2 An information programme for students is available as part of their curriculum induction, where appropriate, covering the College's Courtesy Code and aspects of their personal safety.
- 7.3 College student representatives are involved in policy development and the planning of safeguarding information for students, including noticeboards and inductions. A training programme is delivered.
- 7.4 Safeguarding is incorporated into the college's system for observations of teaching & learning.
- 7.5 A noticeboard is maintained for students giving contact details for advice on all aspects of abuse and personal safety, including both college and external resources.

These will also be provided on-line through the College's virtual learning environment as this is developed.

The College's ICT Acceptable Use Policy contains advice and rules for both staff and students, which aim to minimise the risk of cyber-bullying, on-line financial deception and other on-line threats.

- 7.6 A health & safety and safeguarding risk assessment will be completed for students on work placements and reviewed by the relevant Curriculum Manager. Cases causing concern will be raised with the Assistant Principal – Operations and followed up as necessary.

8. Reporting Suspected Abuse

- 8.1 Any person working in the college (staff, governors, contractors and volunteers), who has a reasonable suspicion that any other person is currently being abused, must report it as soon as possible to the Lead Nominated Person for Safeguarding.

If the allegation concerns the Assistant Principal – Operations, then the concern should be raised with the Principal and if the allegation concerns the Principal personally, it should be made to the Chair of Governors, who will be able to request advice from external sources as necessary.

- 8.2 All staff, governors, contractors and volunteers must understand their responsibility to be alert to the signs of possible abuse. See Appendix 2 for details. If anyone working in the college recognises signs of possible abuse in any other person, they should raise the concern with a nominated safeguarding contact or the Lead Nominated Person for Safeguarding at the earliest opportunity, using the Safeguarding Concern / Incident form. Serious concerns or where there is a perceived risk of immediate harm to the individual should be reported directly

to the Lead Nominated Person for Safeguarding so that immediate intervention can be put in place if necessary.

- 8.3 If a child, young person or vulnerable adult makes a disclosure of abuse to a member of staff they should:
- Allow them time to make the disclosure at their own pace and in their own way.
 - Avoid interrupting except to clarify what they are saying (attentive listening/reflective feedback).
 - Not ask leading questions or probe for information that they do not volunteer.
 - Reassure them that they have been heard and explain what will be done next and with whom further discussions will be held.
 - Record the conversation as soon as is practicably possible, even in a draft format, and certainly within 2 hours of the incident, on the formal documentation.
 - Inform the Lead Nominated Person for Safeguarding.
- 8.4 There are cases where signs of possible abuse may be evident, but are believed to have other causes. In these circumstances it is appropriate to give assistance. Most people working in the college are not professionally trained advisors and must not offer support personally. The college has access to independent advisors and counsellors who can be contacted through the Head of Student Support.
- 8.5 Cases of suspected abuse are raised with a Nominated Safeguarding Contact in the first instance so that they can make further enquiry or investigate and take appropriate action before the disclosure is in the public domain. This is necessary to protect all parties concerned.
- 8.6 If an allegation of abuse is made against another student, the process will be the same, but the Lead Nominated Person for Safeguarding will decide whether to invoke the Student Disciplinary Policy against the alleged abuser. If an allegation of abuse is made against a member of staff, the process will be the same, but additionally the Staff Facing an Allegation of Abuse procedure will apply.
- 8.7 The Lead Nominated Person for Safeguarding will decide whether the local adult or child protection unit should be informed. The protection of the child or vulnerable adult must always come first.
- 8.8 All communication with the media and external authorities other than local adult and child protection units must be referred to the Principal, except for disclosures made under the terms of the College's Whistleblowing policy.

9. Record Keeping and Data Protection

- 9.1 Staff can play a vital role in helping a child, young person or vulnerable adult in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a child, young person or vulnerable adult that gives cause for concern should be recorded on the Safeguarding Incident/Concern Form. It is important that records are factual and reflect the words used by the child, young person or vulnerable adult. Opinion should not be given unless there is some form of evidence base which can also be quoted. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential and staff should know only on a 'need to know' basis

- 9.2 The following information should always be recorded by the member of staff:
- Learner's name and date of birth.
 - Learner in normal context, e.g. behaviour, attitude, (has there been an extreme change).
 - The incident(s) which gives rise for concern with date(s) and times(s).
 - A verbatim record (as far as practical) of what the learner has said.
 - If recording bruising/injuries indicate position, colour, size, shape and time on body map.
 - Action taken.

These basic details are vital to the information gathering process and do not constitute an investigation. Written information should be passed to the Lead Nominated Person for Safeguarding.

- 9.3 The Assistant Principal - Operations must keep:
- a central register of safeguarding incidents/concerns
 - a formal record of all investigations into suspected abuse
 - a file of safeguarding risk assessments
 - A list of vulnerable students
- 9.4 The Head of HR must keep a single central record of DBS checks completed
- 9.5 The Nominated Person for Safeguarding will ensure that records relating to concerns for the welfare or safety of a child, young person or vulnerable adult are kept separate from other College files and are stored securely. Information will be shared on a strictly need to know basis and in line with the policy guidance.
- 9.6 Under the College's Data Protection Policy, personal data must not be passed to anyone outside WMC without their permission, with the exception of:
- funding bodies, for their prescribed purposes and
 - the Police, subject to compliance with the limitations and requirements laid down in the Data Protection Act.

The MIS Director is the College's Data Protection Officer and can provide further advice.

- 9.7 Consequently, no member of staff should disclose the whereabouts, or even the presence in the building, of a student, to anyone, even someone claiming to be their relative or friend. In an emergency a staff member may offer to pass on a message if they are here, but cannot disclose whether they have been successful or not.

10. Subcontracted Provision

- 10.1 Where WMC carries out subcontracted provision on behalf of another provider, it must ensure that any safeguarding concerns about one of that provider's learners are raised immediately with the relevant Nominated Safeguarding Contact person at that provider. This is particularly important in the case of provision for students of statutory school age, referred to us by their school.

11. External Agencies

- 11.1 The Assistant Principal - Operations is responsible for maintaining contact with the Camden Safeguarding Children Board and other local agencies and for determining whether and when a referral is appropriate or necessary. This collaboration is intended to ensure that resources are made available to those who need them and that assistance and advice are available to the College where necessary.
- 11.2 Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual. WMC will abide this statutory requirement and will refer any such instances to the DBS without further reference to the individual.
- 11.3 Local support contact details:
- Camden Council Adult Social Care Information & Access team, telephone: 020 7974 4000
 - Camden Council Children In Need (North), telephone: 020 7974 6666
 - Camden Council Children In Need (South), telephone: 020 7974 4094
 - Camden Safeguarding Children Board, telephone: 020 7974 6639
 - NSPCC Helpline, telephone 0808 800 5000
 - Childline, telephone 0800 1111

***For Approval by Corporation
March 2015***

Related College Policies:

Health & Safety Policy
Disclosure & Barring Service (DBS) Policy
Whistleblowing Procedure
ICT Acceptable Use & Data Protection Policy
Staff Facing an Allegation of Abuse Guidelines on Procedure
Student Disciplinary Policy & Code of Conduct
Employee Disciplinary Procedure
Employee Grievance Procedure
Staff Code of Conduct

APPENDIX 1: Potential Risks to Students

The following are some specific safeguarding issues:

- child sexual exploitation (CSE)
- bullying including cyberbullying
- 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 (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- teenage relationship abuse
- trafficking

More information and guidance on these issues may be found via the Gov.uk website.

Other safeguarding issues may become apparent through:

Risky Behaviour:

- Drugs and alcohol
- Self-harm

Financial abuse:

- On-line fraud, e.g. phishing
- Door-to-door sellers

General crime & crime prevention

Accidents

APPENDIX 2: Abuse and Neglect

The Department for Education publication "Keeping children safe in education" published in April 2014 identifies the following types of abuse and neglect:

- Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.
- Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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, although it may occur alone.
- Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

However, there are other ways of categorising abuse and a huge degree of overlap between the different types. Some signs of abuse can be caused by any or all of these. Abuse can be in person or it can be through another medium, e.g. on-line.

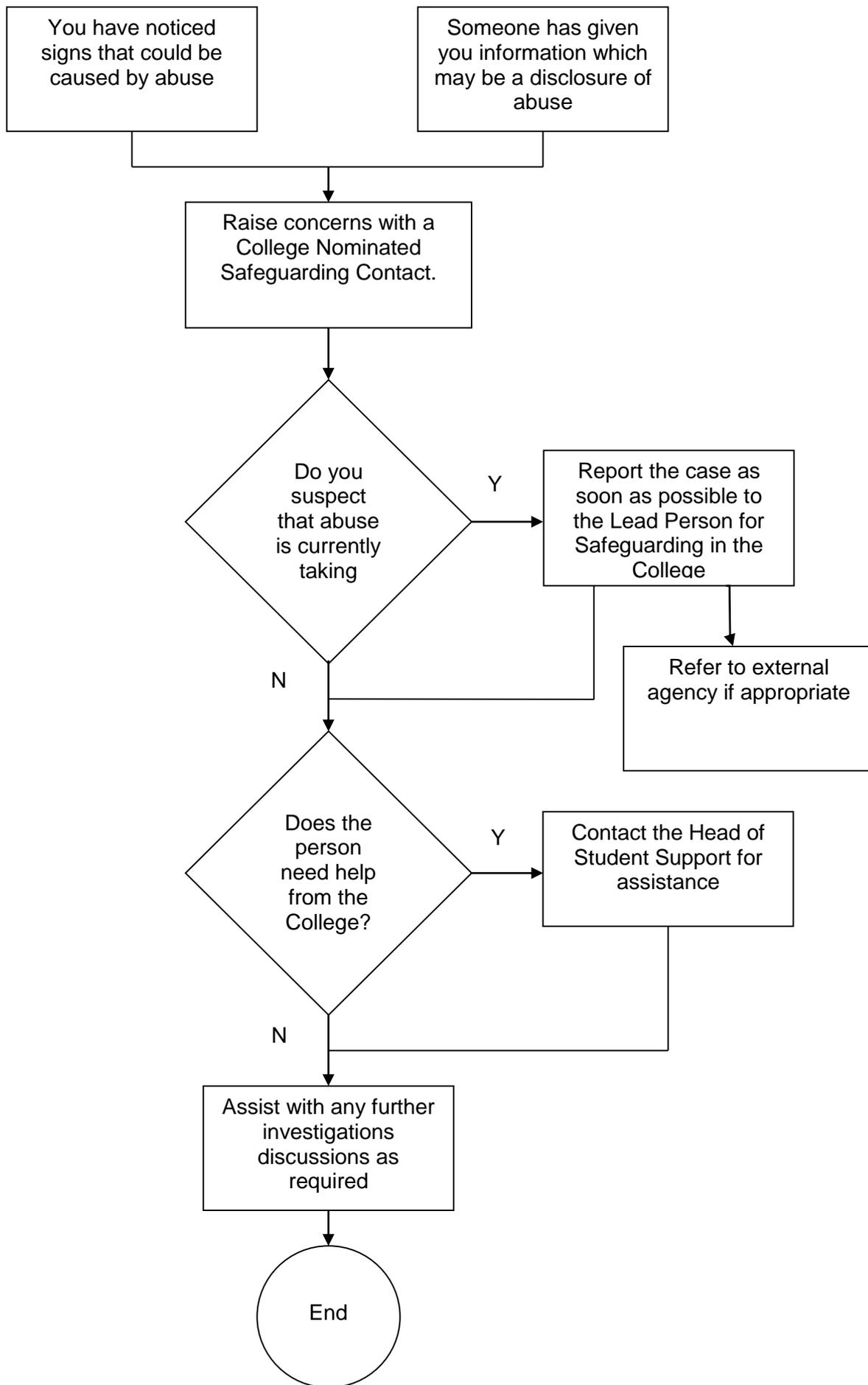
There are many different signs of abuse. Examples which could cause concerns of current abuse are:

- Any unexplained mark or bruise
- Any major changes in behaviour
- Any comment which may give cause for concern
- Any unexplained soreness or marks on the body
- Any deterioration in person's well-being
- Any inappropriate sexual language or sexual behaviour

However, none of these signs are conclusive proof of current abuse. Any of these examples may be caused by historical abuse or a variety of other reasons.

Disclosure is when a person, most likely a student, gives someone working in the college: staff, governors, contractors and volunteers, some information which leads them to suspect abuse is currently taking place. This information is most likely to be confused and tentative.

APPENDIX 3: Flowchart for dealing with Suspected Abuse



APPENDIX 4: WMC Code of Conduct for Staff

Propriety and behaviour

- Behave appropriately and professionally maintaining a constant awareness of the College's reputation
- Be aware of cultural issues relating to every aspect of behaviour in all working relationships
- Discuss any concerns about students with your line manager

Relationships with learners

- Treat learners equally, fairly and with respect
- Only develop professional relationships with learners
- Always give College rather than personal details, eg phone, address, email, social network. Use made for purpose group websites such as Yahoo or Moodle, not your own personal site.
- Never enter into any financial arrangements with students (eg lending, borrowing money, using a personal account to make a purchase)

Gifts, rewards and favouritism

- Don't accept inappropriate or expensive gifts
- All gifts offered or accepted should be notified to line manager

One to one situations

- Ensure you are familiar with the College guidelines for conducting one to one meetings with students and follow them for your own and students' safety

First aid and administration of medicine

- Only trained first aiders should give first aid treatment
- Never give medicines or drugs, not even proprietary medication such as paracetamol.

Annex B: Role of the Designated Safeguarding Lead

Governing bodies and proprietors should ensure that the school or college designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The broad areas of responsibility for the designated safeguarding lead are:

Managing referrals

Refer all cases of suspected abuse to the local authority children's social care and:

- The local authority designated officer (LADO) for child protection concerns (all cases which concern a staff member);
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).

Liaise with the Headteacher or Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations

Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

Training

The designated safeguarding lead should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

Raising Awareness

The designated safeguarding lead should ensure the school or college's policies are known and used appropriately:

- Ensure the school or college's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school or college ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file