



## **Safeguarding Policy**

## Definitions

Safeguarding of staff and students is the prime responsibility of Alexander London College. The policy applies to entire staff and students irrespective of any other characteristics. It means that it applies to anyone may be susceptible to being drawn in to extremism.

A child is defined as a young person under the age of 18 (Education Act 2002 section 175). The term child also includes those aged 18-20 who have been looked after by an authority from 16 or who have a learning disability (Children Act 2004).

The Government has defined the term 'safeguarding children' as:

*'The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.'*

Child protection is part of safeguarding and promoting welfare and it refers specifically to those children who are suffering, or at risk of suffering significant harm. The prime responsibility for child protection lies with the Local Authority Children & Young People services and the police. Under the Children Act 1989 and the Children Act 2004, local authorities have a duty to protect children from abuse and to establish co-operative partnership working arrangements to improve the well-being of children.

## Key Principles

- It is the responsibility of all adults to safeguard and promote the welfare of children and young people.
- It is the responsibility of the College to safeguard and promote the welfare of its staff and students and other people associated with the premises directly or indirectly.
- Adults who work with children and young people are responsible for their own conduct and should avoid conduct which may lead to any reasonable person questioning their motivation and intentions
- The protection of children is a shared agency responsibility
- The abuse of staff or students is a clear infringement of human rights and in many cases may be a criminal offence.
- The same professional standards apply regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.

## Statement of Policy

Alexander London College recognises that it has a role in the safeguarding and welfare of its staff and students.

Alexander London College recognises that members of staff, volunteers and learners have a role in safeguarding the welfare of children and vulnerable adults (as defined by the Children Act 1989, the Children Act 2004 and the Education Act 2002).

Alexander London College will establish and maintain policies and procedures to provide a safe environment for its staff, students, children and vulnerable adults. Alexander London College will operate according to the procedures established by the Government Legislation..

The Head of Human Resource is nominated by the Directors to co-ordinate and manage the procedures related to the protection of staff and students.

This policy applies to all provision for staff, students, and children, including 14-18 programmes, work placements, trips and visits. Alexander London College will ensure that appropriate risk assessments will be undertaken before students and staff go on trips, visits or work placements. Alexander London College procedures, including advance approvals if required, will be followed in every case.

Alexander London College will promote the well being and safety of its staff and students through the Safeguarding action plan.

### **Types of abuse**

The definition of abuse is broad but includes:

**Neglect:** failure to keep a student from harm, failing to provide care including proper hygiene, safety and emotional support.

**Physical Abuse:** includes shaking, throwing, poisoning, burning, hitting, scalding, drowning, suffocating or failing to protect from physical harm.

**Emotional Abuse:** persistent emotional ill treatment such as conveying that a student or staff member is worthless, unloved or inadequate. It may involve children feeling constantly frightened or in danger.

**Sexual Abuse:** forcing or enticing to be involved with sexual activities. Activities may be physical or they may involve non-physical activities such as looking at pornographic material and grooming. It can be committed by men, women and other children.

**Abuse by a person in a position of trust:** includes a professional or staff member encouraging and engaging in an inappropriate relationship with student, child or vulnerable adult. The person in a position of trust may have behaved in a way that has harmed or may have harmed a student or vulnerable adult. They may have committed a criminal offence in relation to a child or vulnerable adult. They may have behaved towards children in a way that indicates they are unsuitable to work with children or vulnerable adults.

**Bullying & Coercion:** threatening a student/staff that something will happen if they do not comply with a specific request. The wilful, conscious desire to hurt, threaten or frighten someone else.

**Forced Marriage:** a marriage conducted without valid consent of one or both parties

**Domestic Violence:** any threatening behaviour, violence or abuse between adults who are or have been in a relationship, or between family members.

**Fabricated and Induced Illness:** a parent or carer fakes or causes the symptoms of illness in a student/child who is under their care.

**Female Genital Mutilation or Circumcision:** any procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs, whether for cultural, religious, or other reasons.

**Extremism:** views and actions that promote: 1) violence against others 2) hatred towards others 3) undermining the rights of others

Possible warning signs of extremism and radicalisation include:

- A drop in attendance or a person goes missing
- An identity crisis re: family tension, social, religious, rejection of civic life, acute marginalisation or sense of victimisation

Family, community or social factors include:

- Older sibling or family members involved in extremism
- Reasons to believe a someone may be a risk of being targeted
- Evidence of access to social media with extremist content

Evidence young people or adults are involved in extremism include:

- Interest in or use of extremist or hate crime terms
- Preaching extremist views
- Disseminating on/offline extremist material
- Actively recruiting for an extremist cause

Alexander London College is clear that extremism and radicalisation should be viewed as safeguarding concerns. We value freedom of speech and the expression of beliefs. Children, learners and staff have the right to speak freely and voice their opinions. However, we are clear that any manipulation or exploitation of the staff and students at Alexander London College through the normalisation of extreme views that could leave them vulnerable to radicalisation will be responded to by the use of our safeguarding procedures and the involvement of our partner agencies. It is the responsibility of Alexander London College staff to report concerns no matter how minor the issue may seem.

### **Responsibility**

It is the responsibility of **all** Alexander London College to familiarise its employees and students with the Safeguarding Policy and Procedure and to adhere to them at all times.

It is the responsibility of the Head of Human Resource to ensure all disclosures and concerns are referred in accordance with the policy and legislation.

## **The Directors**

The Directors of Alexander London College have overall statutory responsibility. It is their responsibility to ensure the delegation of this responsibility to Alexander London College's Head of HR.

## **Guidance for managing a safeguarding disclosure, allegation of abuse or concern**

If a safeguarding disclosure is made or staff have a safeguarding related concern they should:

- Reassure the individual that they have done the right thing in making the disclosure
- Listen and do not make assumptions or ask leading questions
- Document the conversation using the individuals own words, on the internal referral form
- Do not promise confidentiality
- Record the date, time, individuals involved and any witnesses when recording a discloser or concern
- Ensure the written record makes clear what is factual and any separates any concerns formed from opinion, is legible, comprehensive, clear, factual and free from jargon and abbreviations
- Ensure that the individual is informed that the disclosure will be referred to a Designated Safeguarding Officer (DSO)
- Submit the internal referral form immediately to a DSO in an envelope marked 'Private and Confidential' or via email marked 'Private and Confidential' within 2 hours.
- Phone or speak to a DSO immediately to ensure that the email or envelope is received and opened within 2 hours of the disclosure.

## **Allegations against staff**

Alexander London College will deal with allegations of by staff according to the Disciplinary Policy and in conjunction with the legislation. Allegations against staff will be reported as required in 'Child protection: Preventing Unsuitable People from Working with Children and Young Persons in the Education Service', any allegation or suspicion of abuse of a student or young person by a member of staff will be reported to the Director within 2 hours. The staff member may be suspended from duty whilst the investigation takes place. Where possible, staff will be transferred or given duties that do not involve contact with students whilst the investigation takes place. Decisions to suspend staff whilst an investigation takes place and to refer allegations to external agencies will be made by the Director. Staff allegations will to be referred to the lead Local Authority Designated Officer (LADO), If immediate action is required to protect a child, this will be discussed with the LADO. Outside of 9am-5pm, the Emergency Duty Team or local Police (Met switchboard – 101 or in an emergency 999) will be contacted by the Safeguarding Officer or a Deputy.

## **Whistle-blowing**

If an allegation is made against a Deputy it must be reported to the Head of HR and if it is made against the Head of HR it must be reported to the Director.

Where an allegation against a member of staff has been made either to an employer, police or Local Authority Safeguarding Children Board, Children and Young People services, the Head of HR will liaise with the appropriate agencies. It is the responsibility of the Head of HR to inform the Local Authority Designated Officer and to follow the guidance and timescales detailed within "Working Together to Safeguard Children". If the Head of HR is the subject of the allegation, the Director will liaise with appropriate agencies. Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated and considered.

## **Administrative arrangements and record keeping**

Good record keeping is an important part of the accountability of professionals. All staff that have concerns must record their concerns appropriately. This includes the completion of Alexander London College's Internal Safeguarding Referral form. When completing a Safeguarding Referral form the information must provide a full and accurate instantaneous record of the events, any disclosure(s) and concerns. Additionally records must include any actions taken and the details of those to whom the disclosure or concern(s) were reported. All hard copy referral forms and records will be collated and archived by the Head of HR.

## **Education and Training**

All Staff inductions include safeguarding policy and procedures. Mandatory training is provided for all staff on safeguarding, including Prevent training. Nominated staff, teachers and assessors are required to complete level 2 safeguarding training. The DSO is required to complete Level 3 Safeguarding Training at least every two years. Alexander London College is committed to ensuring that refresher training for staff is provided as required.

## **Review**

The Safeguarding Children, Staff and Students Policy and Procedures will be reviewed annually as required by Department for Education guidance 'Safeguarding'. The policy will be published on Alexander London College's intranet and will be referred to in the learner guide.

## **Complaints**

Any complaints or disputes related to the scope or implementation of this policy should be referred immediately to the Director.

## **Reporting/Referring a Concern**

**There are four main stages to referring a concern. Please read these and the NOTES below carefully before starting the procedure.**

## 1. RAISING A CONCERN

You should begin by having a discussion with an appropriate member of College:

**Students** should discuss with their **Personal Tutors**

**Staff** should discuss with their **line manager**

You must discuss all concerns with the Personal Tutor and asking that the information you discuss be treated sensitively. You may choose not to identify who the concern is about and instead discuss this in an anonymised way. If, after discussion, it is felt by the Tutor that the concern may be legitimate, you should arrange a meeting with a Local Adviser. You and the member of College you have shared your concern with should attend this meeting together wherever possible.

You may find it useful to consider the Vulnerability Assessment Framework below.

## 2. MEETING WITH THE HEAD OF HR/INTERNAL REFERRAL

It is the role of Head of HR to help you consider your concern and any basis for it carefully so as to determine if the concern may be genuine, if more information is required, or to consider if the concern may have arisen from misunderstandings. Outcomes of meetings with Head of HR are decided together with the persons raising concerns and depend on the information discussed.

As above, it may not be necessary to name the person(s) you are concerned about initially. However, if the discussion suggests it is worth investigating the matter further, the Head of HR may request some details at the end of the meeting so they can contact someone closer to the person(s) you are concerned about (e.g. their Personal Tutor/Senior Tutor/line manager), to understand whether the concern may be genuine.

Once further information has been gathered, a second meeting will usually be held to consider the concern more fully and to decide whether to close the matter or to refer the concern internally.

Head of HR will finalise with the Directors if it is necessary to consider offering the individual support via the Channel programme

## 4. REFERRAL TO CHANNEL

Channel is an external multi-agency approach to supporting people who may be at risk of becoming radicalised or drawn into terrorism. This is led by Local Authorities and may include representation from social services and mental health professionals as well as the organisation making the referral.

**Support is offered on a voluntary basis, so before a referral can be made, a decision will need to be taken over whether it is appropriate to have a conversation with the person(s) of concern to seek their consent for referral.**

In the case of a student, the Head of Student Support and HR, Registrar, and the Head of Academics are collectively responsible for agreeing to make a referral to the Channel Programme.

In the case of a member of staff, the Head of Human Resources, Registrar and the Director are collectively responsible for agreeing to make a referral.

In all cases, the Head of HR as the College's Single Point of Contact (SPOC) for Prevent-related matters is responsible for contacting the external Channel programme.

**If the evidence suggests that Channel may not be the appropriate route, the Head of HR will contact the Local Authority Channel Adviser and/or the Local Channel Police Practitioner and seek further advice based on an anonymised version of the case.**

### **Supporting Documentation**

The policy has been developed in line with current national guidance of good practice and legislation; specifically:

- Children's Act 1989
- Children's Act 2004
- The Victoria Climbié Inquiry (2003) report
- What to do if you're worried a child is being abused 2015
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the well-being of children 2015
- Keeping children safe in education – Statutory guidance for schools and colleges 2015
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015
- Protection of Children's Act 1999
- Education Act 2002
- Education Act 2011
- Safeguarding Children in Education 2004
- Safeguarding Children (2005) report
- Safeguarding Children (2008) report
- London Child Protection procedure
- Newham Local Safeguarding Board policies and procedures
- Newham Local Safeguarding Board Action Plan
- Guidance for Safer Working Practice for Adults who work with Children and Young People DCSF 2009
- The Protection of Children in England: A progress report March 2009
- European Convention of Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Bichard report 2006
- Child protection: Safeguarding unsuitable people from working with children and young person's in the education services DfES 2002
- Safeguarding Children and Safer Recruitment in Education DCSF 2006

- Managing Allegations against people with children (NSPCC 2010)
- The Education (Pupil Information) (England) Regulations 2005
- Dealing with Allegations of Abuse Against Teachers and Other Staff (DFE 2011)
- Prevent Duty Guidance for England and Wales 2015
- Counter-Terrorism and Security Act 2015
- Equality Act 2010
- UN Convention on the Rights of the Child
- Sexual Offences Act 2003
- The Adoption & Children Act 2002
- Safeguarding Vulnerable Groups Act 2006

### **Designated Staff with responsibility for safeguarding/ protection of vulnerable groups**

- The Director of Alexander London College holds overall responsibility for the safety of vulnerable adults;
- Head of HR is designated by the Director to act as the main contact person for safeguarding/protection of vulnerable groups

### **Recruitment and Selection**

Alexander London College will ensure, through its recruitment procedures, that all staff members, both full-time and part-time, paid and/or unpaid, whose role involves specific activity with vulnerable/protected groups are suitable for the position in line with policy and legislation requirements.

DBS Checks will be carried out for all staff in line with policy and legislative requirements when their normal duties involve providing activities which are wholly or mainly for children or vulnerable/protected adults, and for those who have a defined responsibility for decision making in safeguarding.