

<b>CURRICULUM/LEARNER POLICIES AND PROCEDURES</b>		<b>LEWISHAM COLLEGE</b>
Policy title:	<b>Lewisham College Local Safeguarding Procedure: Young People and Adults at Risk</b>	
Applies to:	All staff, volunteers, governors and learners	
Owner of Policy	Designated Safeguarding Lead for Lewisham / Vice Principal Learner Experience and Resources	
Dates:	Published: November 2019 Review: October 2020	

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## 1. Policy Statement

NCG Safeguarding Policy: Young People and Adults at Risk outlines the measures that all Colleges in the group adopt. Lewisham College has a set of procedures that are in place to provide staff and learners with information and advice to ensure they understand and comply with the agreed policy and procedures.

Lewisham College, as part of the NCG, has a duty to safeguard and promote the welfare of all its students as well as the families that we come into contact with. It has a statutory duty to ensure that it takes action to safeguard and promote the welfare of young people and adults receiving education and training at the College.

It is important that all children and adults at risk are protected from abuse, including the risk of radicalisation. Section 26 of the Counter Terrorism and Security Act 2015 places a duty on 'specified authorities' which includes Lewisham College, to comply with the *Prevent Duty Guidance: for England and Wales*.

### 1.1. Safeguarding Young People (Children)

In June 2004 Section 175 of the Education Act 2002 came into force. The provisions of Section 175 make explicit the responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, arrangements must be made in accordance with any guidance issued by the Secretary of State.

Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002), the Education (Independent School Standards) Regulations (2014) and the Non-Maintained Special Schools (England) Regulations (2015). Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise. KCSIE is updated annually, this policy is in line with the September 2020 version.

KCSIE (2020, p5) defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

This policy and the derivative college procedures have been developed in response to KCSIE. The Children Act (1989) defines a child as any person under the age of 18

years. This includes all 14–16 year old children attending any College of NCG for whom additional procedures apply.

## **1.2. Safeguarding Adults at Risk**

This procedure have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication “Safer Practice, Safer Learning“ (2007). The guidance applies to all education providers of post-16 learning and skills.

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 19 or above at the point of enrolment.

The term ‘Adult at Risk’ is used to describe a vulnerable adult.

At the time of writing the UK remains in midst of the COVID-19 pandemic, as such this policy is required to be compliant with the following, additional guidance: <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

The NCG Executive will continue to monitor the guidance and provide updates (as an annex to this policy) on the NCG website. <https://www.ncgrp.co.uk/wp-content/uploads/2020/04/2020-04-Safeguarding-Policy-Annex-in-response-to-COVID-19.pdf>

Policies and Procedures will be reviewed and updated annually (unless an incident, any new legislation or guidance suggests the need for an interim review).

Information on our safeguarding policies and procedures will be made available to students, staff and parents/carers on the College website.

All staff (including agency, volunteers and contractors) should be aware of systems within their college which support safeguarding and these should be explained to them as part of staff induction processes. This will include the:

- NCG Safeguarding Policy and derivative college procedure (this document) for local reporting arrangements
- NCG Positive Student Behaviour Policy
- Staff Code of Conduct
- Designated Leads and key contacts

It is essential that all children and adults at risk are protected from abuse and have the right to access education and training free from fear of harm and protected from mistreatment and abuse, including the risk of radicalisation.

Our policies and procedures relating to safeguarding include (but are not limited to) Health and Safety, Safe Entry to College, Bullying Prevention, IT Acceptable Use Policy and Searching and Screening.

The College's Safeguarding Procedure has been informed by:

NCG Safeguarding Policy

Working Together to Safeguard Children (February 2017)

Keeping Children Safe in Education (September 2020)

Protecting Adults at Risk: London Multi-agency Policy and Procedures (January 2014)

Counter Terrorism and Securities Act (2015)

Prevent Duty Guidance: for further education institutes in England (April 2019)

## **2. Safeguarding Definitions**

Types and Forms of Abuse are outlined in the NCG Safeguarding Policy and are listed below:

- Physical abuse
- Emotional abuse
- Sexual Abuse
- Neglect

There are additional categories of abuse for adults at risk:

- Modern Slavery/Exploitation
- Organisational/Institutional
- Discriminatory
- Financial
- Domestic
- Self-Neglect

There are various signs and indicators to be aware of and these can be separated into two categories physical and behavioural/emotional.

Keeping Children Safe in Education (2020) defines a further 16 specific safeguarding issues, including

- Bullying including Cyber Bullying
- Child Sexual exploitation and Child Criminal Exploitation
- Domestic Abuse, Violence and children as witnesses to abuse
- 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

**2.1. A number of recent additions to the KCSIE guidance (since 2018) are highlighted below:**

#### **2.1.1. Peer Abuse**

All staff are requested to be vigilant around issues associated with sexual violence and sexual harassment between children in schools and colleges. The KCSIE guidance provides clarity of managing peer-on-peer abuse and additionally physical relationships between children.

#### **2.1.2. Serious Violence, Organised Violence, Knife Crime and County Lines**

Staff are required to be vigilant around the indicators of learners being at threat and/or drawn into serious violence and gang cultures. Staff should understand the local hazards and risks and advise learners on how to avoid them.

Advice for colleges is provided in the Home Office's documents: [Preventing youth violence and gang involvement](#) and [criminal exploitation of children and vulnerable adults: county lines guidance](#)

#### **2.1.3. Online Safety and Remote Study/Working**

Colleagues are additionally expected to be vigilant around harmful online material that may constitute one or more types of abuse. The period of home study resulting from the COVID outbreak in the spring and summer for 2020 has increased the amount of online learning and study significantly, and staff are required to be aware of the risks to their learners and take steps to reduce those risks through training and education. Additional arrangements (such as additional training, learner engagement and wellbeing monitoring and learner surveys) may be necessary in the event of a prolonged period of home study, which will be advised to staff via the NCG website. <https://www.ncgrp.co.uk/guide-to-information/our-policies-and-procedures/safeguarding/>

#### **2.1.4. Child Sexual Exploitation and Child Criminal Exploitation**

KCSIE 2020 provides additional information on both CSE and CCE which are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

### **2.1.5. Mental Health / Mental Wellbeing and Fitness**

If staff have a concern about a learner's mental wellbeing then that is also a safeguarding concern, immediate action should be taken, following this Safeguarding Policy and College Safeguarding Procedure, speaking to the designated safeguarding lead.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff should also be aware that where learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences, can impact on their mental health, behaviour and education.

### **2.1.6. Radicalisation and Extremism**

*The [Prevent Duty Guidance](#) defines **radicalisation** as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. The Counter-Terrorism and Security Act 2015 places a duty on specific organisations, including colleges, to have regard to the need to prevent people from being drawn into terrorism. This policy seeks to put in place the requirements of the Act through a Prevent Risk Assessment – an NCG cascade policy to be adapted and implemented locally.*

*The [Counter Extremism Strategy 2015](#) defined **extremism** as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs.'*

*For the purposes of clarification, **terrorism** is the act or threat designed to influence a body or organisation through intimidation and violent action.*

### **2.1.7. Missing Children or Young People and Private Fostering**

Where there are cases of students going missing, repeatedly going missing or being in Private Fostering, then procedures should be followed as outlined in KCSiE page 76 and 86. The Designated Safeguarding Officer(s) will seek advice and/or refer to Children's Social Care as appropriate.

### **2.2. Child: someone under the age of 18**

Abuse can happen to anyone, but research shows that some children who have experienced abuse share similar characteristics. This means they may be more vulnerable.

Having one or more of these characteristics doesn't automatically mean a child will experience abuse or neglect – and not having any of them isn't a guarantee that a child will never be harmed.

- Learning difficulties or disabilities
- Domestic Abuse
- Mental Health concerns (Parental or self)
- Substance misuse (Parental or self)
- Child abuse or neglect
- Care experienced

**2.3. Adult at Risk:** An adult aged 18 years or over 'who may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (DH, 2000). This definition is taken from the current Department of Health guidance to local partnerships.

Other definitions exist in partner organisations. An 'Adult at Risk' may therefore be a person who:

- Is elderly and frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability and/or a sensory impairment
- Has mental health needs including dementia or a personality disorder
- Has a long term illness/condition
- Misuses substances or alcohol
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse

- Is unable to demonstrate the capacity to make a decision and is in need of care and support

### **3. Lewisham College SLT and Local Board**

Lewisham College SLT and Local Board are committed to ensuring that the College:

- Raises awareness of issues relating to safeguarding and promoting the welfare of children and adults at risk in the College
- Provides a safe environment for children and adults at risk
- Identifies children and adults at risk who are suffering, or at risk of suffering significant harm and takes appropriate action to see that such individuals are kept safe
- Has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- Operates safe recruitment procedures
- Provides appropriate training for designated/staff on child protection and adults at risk
- Designates a senior member of staff to take lead responsibility for child protection and adults at risk
- Remedies any deficiencies in or weaknesses in regard to child protection and adult at risk arrangements that are brought to the Divisional Board's attention
- Has a robust Staff Code of Conduct that sets out the core expectations staff must adhere to
- curriculum includes teaching all students about safeguarding in an age appropriate way
- develop and update the Lewisham College Local Safeguarding Procedure Child Protection within the framework of the NCG Safeguarding Policy
- has a staff induction in place which includes child protection and safeguarding

The Lewisham College Board will annually review and approve Lewisham College policies and procedures.

#### **3.1. Designated Board Member**

The designated Board Member is responsible for liaising with the Principal and Senior Lead Manager for Safeguarding over matters regarding child and adults at risk protection, including:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Boards
- Ensuring that the College Board considers the College procedure on child and adults at risk protection each year
- Ensuring that each year the College Board is informed of how the College and its staff have complied with the policy and procedure, including but not limited to a report on the training that staff have undertaken
- Promoting and ensuring inter-agency working in line with statutory guidance

To assist in these duties, the designated board member shall receive appropriate training in line with Local Safeguarding Board procedures.

The College Board has nominated **Hilary Moore** as the Board member with special responsibility for safeguarding issues.

#### **4. The Role of Staff**

##### **4.1. Principal**

The Principal is responsible for:

- ensuring all staff follow NCG and Lewisham College Safeguarding Policy and Procedure

##### **4.2. Senior Lead Manager for Safeguarding**

The Senior Lead Manager for Safeguarding is responsible for:

- Taking lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College
- Overseeing the referral of cases of suspected abuse or allegations to Social Care Referral and Assessment Team or Multi Agency Safeguarding Hub (MASH)
- Liaise with the Principal to inform them of referrals and issues – especially ongoing enquiries under Section 47 of the Children Act 1989 and Police Investigations
- Ensure the College has the details for each Looked After Child (LAC) in College including the name of their Social Worker and Virtual Head teacher in the LAC's local authority
- Ensure the NCG Safeguarding Policy and Lewisham College Safeguarding Procedure is available publically and parents are aware that the College will make referrals to the Local Authority if there is a Safeguarding concern
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral) ensuring that parents/carers of students within the College are aware of the College's Safeguarding Children and Adults at Risk Policy and Procedure
- Liaising with the Local Safeguarding Boards and other appropriate agencies
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils including the sending and receipting of Child Protection Files

- Liaising with employers and training organisations that receive children or adults at risk from the College on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in child protection issues and are aware of the College's child protection procedures
- Reporting annually to the governing body of the College on how the College has discharged its duties
- Reporting deficiencies in procedure to the governing body at the earliest opportunity
- Submitting a monthly report for the College's Senior Leadership Team on safeguarding incorporating Health and Safety, Safeguarding Referrals, caseloads, serious incidents and training undertaken/delivered by the College
- Disseminating learning from Child Safeguarding Practise Reviews (CSPs) to the Senior Leadership/College Management Team.
- Ensuring the College carries out a risk assessment process for serious safeguarding and serious criminal disclosures

They will receive updates in child protection issues and inter-agency working, at least annually and as required by the Local Safeguarding Boards (LSB) and will receive refresher training at least every 2 years. They will keep up to date with developments in child protection issues.

The Designated Safeguarding Lead responsible for safeguarding concerns is the Vice Principal Learner Experience and Resources.

The Deputy Designated Safeguarding Lead for safeguarding concerns is the Head of Student Services and Learning Technology.

In the absence of the Vice Principal or Head of Student Services their designated representative will fulfil this role. The safeguarding team can be contacted by email at [safeguarding@lewisham.ac.uk](mailto:safeguarding@lewisham.ac.uk) or by calling 0208 3757 4120.

#### **4.3. Designated Members of Staff (Designated Safeguarding Officers)**

The Designated Safeguarding Officers:

- Report to the Senior Lead Manager for Safeguarding
- Know how to make an appropriate referral
- Are available to provide advice and support to other staff on issues relating to safeguarding
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received updates in child protection issues and inter-agency working, at least annually and as required by the Local Safeguarding Board, and will receive refresher training at least every 2 years
- Will take children's or young people's wishes into account, and where possible, involve them in decision making

- Keep accurate and secure records on the safeguarding system of concerns and referrals
- Understand the assessment process for Early Help and other support mechanisms within the Local Authorities (LAs)
- Have a working knowledge of how the LA conducts a Section 47 and Section 17 Case
- Be alert to the specific needs of children in need, those with SEN and young carers
- Understand and support the College with regard to the requirements of the Prevent Duty and be able to provide advice and support to staff and students.
- Promote and raise awareness with staff and learners about key safeguarding issues

Designated Safeguarding Officers are:

- Safeguarding and Support Officer
- Wellbeing Officer
- Team Leader Customer Services

#### **4.4. All staff**

It is the responsibility of all staff to:

- Read and understand NCG Safeguarding Policy: Young People and Adults at Risk
- Read and understand Keeping Children Safe in Education, Part one (Sept 2020), and teaching staff to also read and understand Appendix A “Further Information”.
- Be aware of the signs and symptoms of abuse and neglect including Prevent, Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage, Peer on Peer Abuse and Private Fostering
- Be aware of the seriousness of peer on peer abuse and challenge inappropriate behaviour including ‘banter’.
- Behave professionally and in accordance the College’s Code of Conduct
- Understand the parameters of their role and be aware that (under the Sexual Offences Act 2003) it is an offence for a person over the age of 18, in a position of trust, to have a sexual relationship with a person under the age of 18, even if the relationship is consensual
- Be ‘professionally curious’ particularly where there are warning signs of abuse and/or neglect
- Ensure that they carry out their duties in accordance with the duty to safeguard all students and protect children and young people
- Follow procedures if they’re aware of or suspect a child is missing
- Take prompt, appropriate, action when they have concerns about a child or adult at risk

The Principal and all staff working with students will receive training adequate to familiarise them with safeguarding issues and responsibilities and the College policy and procedures, with refresher training at least every three years.

## 5. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

Sometimes a member of staff may have suspicions that a student is being abused or is at risk of significant harm. A student may also disclose to a member of staff that s/he is being abused. In these circumstances, the procedure outlined below should be followed:

### 5.1. Disclosure of Abuse/Suspicion of Abuse:

If a child or adult at risk discloses abuse, or if abuse is suspected, staff should:

**Receive** - listen carefully and stay calm

Use open questions without pressure, in order to be sure that what the child/young person is saying is understood by the member of staff. *The member of staff should not ask questions about the incident/s*

**Reassure** the child that by telling a member of staff, they have done the right thing. Inform the child/adult at risk that the information must be passed on, but that only those who need to know about it will be told. Inform the child/adult at risk to whom the matter will be reported and what may happen next.

**Record** the main points carefully.

Make a note of the date, time, place, what the child/adult at risk said, did and the questions asked by the member of staff together with what they said to the child/adult at risk, etc.

**Report** the matter immediately to a Designated Safeguarding Officer followed up with a completed Safeguarding Referral form (Appendix A).

The full Safeguarding Flow Chart can be found in Appendix B.

Staff should not:

- put words into the child/adult at risk's mouth or ask leading questions
- **investigate** concerns or allegations,
- promise confidentiality

### 5.2. Reporting to Designated Staff

Staff should report any concerns, suspicions or disclosures of abuse as soon as possible, and within 24 hours, to one of the Designated Safeguarding Officers via a Safeguarding Referral form (Appendix A). If a Designated Safeguarding Officer cannot be contacted, the report should be made to the Senior Lead Manager for Safeguarding (Vice Principal of Lewisham college)

### **5.3. Contact with Social Care**

The Designated Safeguarding Officer (or the Principal) must report the matter by telephone within 24 hours to social workers in the Social Care Department for the local authority where the child or adult at risk lives. A referral form should be completed and submitted within 48 hours depending on the referral route needed for the appropriate social care team. This form should also be forwarded to the Senior Lead Manager for Safeguarding.

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. The telephone report must be confirmed in writing, using the appropriate referral form where possible, to the *Children's Social Care* department within 24 hours.

The Designated Safeguarding Officer/ Principal should discuss with the Social Worker:

- what action will be taken and if there is a need to inform the parents/carers of the child/young person and a note of that conversation should be made (it may be that informing the parents/carers is not appropriate)
- the process for keeping the College informed of further action taken

### **5.4. 14-16 School Link Students**

In the case of a 14-16 School Link student, the Designated Safeguarding Officer should liaise closely with the school's Child Protection Officer. The Designated Safeguarding Officer at the College and the Child Protection Officer for the school will decide who is responsible for undertaking the referral to the appropriate *Children's Social Care* team.

### **5.5. Allegations against Students**

In the case of an allegation or actual abuse of a child by a student (peer on peer abuse), the Designated Safeguarding Officer having due regard to other college procedures, shall:

#### **5.6. Notify the Principal**

- Take such steps s/he considers necessary to ensure the safety of the student/child in question and any other student/child who may be at risk
- Report the matter to the local *Social Care Department within 24 hours* and in accordance with the College procedure
- Ensure that the person who reported the concern completes a written report

### **5.7. Written Records**

The Designated Safeguarding Officer shall retain a copy of:

- The referral form
- Any written reports, notes or correspondence dealing with the matter
- Any other relevant material

Reports, notes should be kept securely at all times. Access to records will be confined to the College's Designated Safeguarding Officers.

The College recognises the importance of recording interventions and that this could be used as evidence by the Police and Domestic Homicide/Child Safeguarding Practice Reviews. All Designated Safeguarding Officers have access to and record their work on the safeguarding system as part of the College's efforts to safeguarding and support students.

### **5.8. Significant Concerns:**

The College recognises that many students require support to safeguard and enhance their welfare, however, this may not warrant intervention by Children's Social Care. In these cases, students should be referred to the College's Student Support Team. The Student Support Team provide a range of support which includes:

- Counselling and mental health support
- Behaviour management support
- Welfare advice and guidance
- Referral to Internal and External specialist support

If a member of staff has significant concerns about a student, but does not believe that they are being abused or are at risk of immediate significant harm s/he should:

- Talk to the student about the concerns
- Speak to the Safeguarding team who will consider whether the concerns about the student should be discussed with local safeguarding professionals or a 'Team Around the Child' meeting arranged
- Arrange ongoing support for the young person in conjunction with the Student Support Team

### **5.9. Notifications to the College**

Occasionally, the College may receive information e.g. a disclosure under MAPPA (Multi Agency Public Protection Arrangements) about an individual attending college who may present a risk to children/adults at risk. In these circumstances the Principal and Senior Lead Manager for Safeguarding will call a professionals meeting to:

- Discuss the case with the professionals supporting and monitoring the individual concerned e.g. Police, Probation, Youth Offending Service
- Undertake a risk assessment

- Determine what action should be taken to ensure the college fulfils its safeguarding responsibilities

It is also recognised that students attending the College may have previously had a criminal conviction which may present a cause for concern about the safety of our other students. In the majority of cases, this is picked up as part of the interview and assessment stage, although we recognise that sometimes these students will disclose to College staff after they have enrolled or start learning.

In this case, a Safeguarding Officer will carry out a risk assessment, with a recommendation for the Principal to approve. In the cases of students that are here for short periods of time through Job Centre Plus/Work Programme provision, the College reserves the right to refer students back to the referring agency and share information appropriately.

#### **5.10. Staff Code of Conduct**

The College has a Staff Code of Conduct. Staff must comply with the Code of Conduct and ensure students are safe. Staff must take prompt, appropriate action when they have concerns about a child, young person, or vulnerable adult. Staff also have a right to be treated fairly if an allegation of abuse is made against them.

Staff are expected to be aware of the Safeguarding Children and Adults at Risk Policy and Procedure and all are responsible for its implementation.

Volunteers are expected to adhere to the Staff Code of Conduct in the same way as an established member of staff/agency worker.

Failure to follow this may result in disciplinary action.

### **6. Reporting and Dealing with Allegations of Abuse Against Members of Staff or volunteers**

The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. The College recognises that the Children Act (1989) states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, allegations of abuse by a member of staff shall be handled with sensitivity.

If an allegation is made regarding a staff member who is no longer a volunteer at the College or employed by the College, the matter will be immediately reported to the Police. A referral to the LADO should also be considered.

Where concerns are raised regarding a member of staff or volunteer's suitability to work with children and/or adults at risk, all relevant checks must be undertaken again as if they were joining the organisation

## 6.1. Receiving an Allegation about Staff from a Child/young person

A member of staff who receives an allegation about another member of staff from a child/young person should follow the guidelines in the section entitled Disclosure of Abuse/Suspicion of Abuse. The allegation should be reported immediately to the Principal, unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Executive Director of Quality who is NCG's Group Designated Safeguarding Lead (GSL) – at which point the appropriate NCG policy and procedures shall be followed. The Principal should:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- The written details should be countersigned and dated by the Principal (or Senior Lead Manager for Safeguarding).
- Appoint a Case Manager

## 6.2. Initial Assessment by the Principal and Senior Lead Manager for Safeguarding

The Principal should make an initial assessment of the allegation, consulting with the Senior Lead Manager for Safeguarding. Where the allegation is considered to be either a potential criminal act or indicates that the child or adult at risk has suffered, is suffering or is likely to suffer significant harm, the matter should be reported *within 24 hours* to the Local Authority Designated Officer (LADO) in the appropriate Local Authority and the local Safeguarding Children's Board.

**To make a referral to the Local Authority Designated Officer (LADO), please email a [LADO Referral Form](#) to [LewishamLADO@Lewisham.gov.uk](mailto:LewishamLADO@Lewisham.gov.uk).**

The LADO for Lewisham is Finola Owens London Borough of Lewisham, 1st Floor Laurence House, 1 Catford Road, SE6 4RU Tel: 020 8314 3114, [Finola.Owens@lewisham.gov.uk](mailto:Finola.Owens@lewisham.gov.uk)

It is important that the Principal (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child/ adult at risk. The matter should be addressed in accordance with the College disciplinary procedures
- The allegation can be shown to be false because the facts alleged could not possibly be true

## 6.3. Enquiries and Investigations

Safeguarding enquiries by Social Care, or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the Police, have no power to direct the College to act in a particular way, however, the College should assist the agencies with their enquiries. The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation.

Any internal enquiries shall conform to the existing staff disciplinary procedures. If there is an investigation by an external agency, for example the Police, the Principal and (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

The Principal (or designated person) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the Case Manager shall:

- Inform the student or parent/carer, making the allegation, that the investigation is taking place and what the likely process will involve
- Ensure that the parents/carers of the individual making the allegation have been informed that the allegation has been made and what the likely process will involve
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- Appoint a named representative to keep the person subject to the allegation informed
- The Principal (or Case Manager) shall keep a written record of the action taken in connection with the allegation

#### **6.4. Suspension of Staff**

Suspension should not be automatic. All options to avoid suspension should be considered prior to suspension. In respect of staff other than the Principal, suspension can only be carried out by the Principal.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where a child/adult at risk is at risk
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct
- Where necessary for the good and efficient conduct of the investigation

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

If the Principal considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.

Where a member of staff is suspended, the Principal should address the following issues:

- The NCG Senior Lead for Safeguarding should be informed of the suspension in writing
- The parents/carers of the student making the allegation should be informed of the suspension. They should be asked to treat the information as confidential
- Consideration should be given to informing the student making the allegation of the suspension
- Senior staff who need to know of the reason for the suspension should be informed
- depending on the nature of the allegation, the Principal should consider with the Divisional Board Member whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity
- The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The *LADO* and external investigating authorities should be consulted
- The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals by the Case Manager
- The suspension should remain under review in accordance with the College disciplinary procedures

## **6.5. The Disciplinary Investigation**

The disciplinary investigation should be conducted in accordance with the College's existing staff disciplinary procedures.

The member of staff should be informed of:

- The disciplinary charge against them
- Their entitlement to be accompanied or represented by a trade union representative or friend
- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work
- The child/adult at risk making the allegation and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended)
- The Principal (or Case Manager) should give consideration to what information should be made available to the general population of the College

## **6.6. Allegations without foundation**

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Social Care Department in order that other agencies may act upon the information.

- Records of malicious allegations will be removed from personnel records.

In consultation with the Case Manager and the Senior Lead Manager for Safeguarding the Principal shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome
- Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken

## **7. Partnership Working with Parents/Carers**

We work in partnership with parents/carers to secure the best outcomes for our children and young people. We will therefore communicate as clearly as possible about the aims of the College. We will:

- Use clear statements in our parent/carer guide and other correspondence
- Involve parents/carers and students in the review of key policies and procedures of
- Liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families
- Be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary

## **8. Records**

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform *the Disclosure and Barring Service*.

## **9. Monitoring Effectiveness**

Where an allegation has been made against a member of staff, the nominated Governor, together with the Senior Lead for Safeguarding should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Children's Board. Consideration should also be given to the training needs of staff.

## **10. Safer Recruitment Policy**

NCG has in place a safer recruitment policy (Recruitment and Selection Policy and Procedures) recruitment procedures which will ensure that every care is taken to ensure that children/young people are protected from unsuitable people. The recruitment procedures will apply to all staff and volunteers (*for volunteers where attendance is long term and unsupervised*) within the College who may work with children or young people. The recruitment procedures will include the following:

- The post or role will be clearly defined
- The key selection criteria for the post or role will be identified.
- The requirement to produce documentary evidence of academic/vocational qualifications.
- Obtaining professional references
- Verification of previous employment history
- DBS checks
- Use of a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).
- For agency staff, the College will check that the person presenting at the College, is the same person that the agency provided the vetting checks for
- Recruitment and Selection processes are designed to assist managers to recruit and select the best candidates for a vacancy. The College takes account of all relevant legislation
- For consultants the College will check that the person presenting at the College, is the same person that the agency provided the vetting checks for.
- Volunteers will undertake the same vetting checks as any other member of staff before being invited to work at the College

In addition to the above, all staff will:

- Complete a Lewisham College application form
- Be asked about significant gaps in their CV/application form

Where the candidate:

- Has been disqualified from working with children, young people or 'adults at risk'
- Has provided false information, on or in support of, his or her application
- Is a cause for concern with regard to their suitability to work with children, young people or 'adults at risk'

The facts will be reported to the Disclosure and Barring Service.

## Appendix A



## Appendix 2

# PREVENT AND SAFEGUARDING NOTIFICATION FORM

## Strictly Confidential

This form is to be used by employees or volunteers to record any Prevent issues and safeguarding incidents, disclosures or suspicions of abuse or potential risk of harm relating to a child (under 18 years), young person or adult at risk.

The completed form should be sent to the Designated Safeguarding Officer immediately to the referrals e-mail [safeguarding@lewisham.ac.uk].

<b>College:</b>		<b>Name of person making this referral:</b>  (please print name)	
<b>Job title of referrer:</b>		<b>Contact phone number</b>	
<b>Place of work of referrer:</b>		<b>Email of referrer:</b>	
<b>Is this a safeguarding incident?:</b>	<b>Yes/No</b>	<b>Is this a Prevent incident?:</b>	<b>Yes/No</b>
<b>The Learner's details</b>			
<b>Is the referral in respect of a:</b>  (tick as appropriate)	<b>Child or young person</b>  (under 18 years of age) <b>Yes/No</b>		

		<b>Adult</b>	<b>Yes/No</b>
<b>Name of learner/customer:</b>			
<b>Learner/customer number if applicable:</b>			
<b>Address:</b>			
<b>Telephone number:</b>			
<b>Date of birth:</b>		<b>Was interpreter: required?</b>	<b>Yes/No</b>
		<b>arranged?</b>	<b>Yes/No</b>
<b>First preferred language:</b>		<b>Any specific needs?</b>	

**Other relevant details about the person involved:**

*Include family circumstances (e.g. substance misuse, domestic abuse, parental mental health issues, or any other factor which may impact on parenting), physical and mental health of the person concerned, any communication or learning difficulties they may have.*

--

**What is the safeguarding concern?**

--

**Is the person in danger of further abuse:**

**Yes/No**

--

**Is the person any risk to others:**

**Yes/No**

--

<b>Parent/guardian/carer's contact details:</b>			
<b>Relationship to person concerned:</b>			
<b>Any siblings/children/dependents if known:</b>		<b>Yes/No/Not known</b> <i>(siblings/children/dependents ) delete as appropriate</i>	
<b>Name</b>		<b>D.o.b</b>	<b>Gender</b>
		.	r
<b>Name and address of GP if known:</b>			
If the child, young person or adult at risk is in work based learning or completing a work placement, please give details of the employer:			
<b>Name of Employer:</b>			
<b>Contact details:</b>			

<b>Details of the allegation/suspicious</b>	
<b>Are you recording:</b> <i>(tick as appropriate)</i>	<b>A disclosure made directly to you by the learner?</b> <b>Yes/No</b>
	<b>A disclosure or suspicions from a third party?</b> <b>Yes/No</b>
	<b>Your suspicions or concerns?</b> <b>Yes/No</b>
<b>Date and time of disclosure:</b>	
<b>Date and time of incident:</b>	
<b>Are there any previous reports?</b>	<b>Yes/No</b>
<b>Date(s) of any previous reports (if applicable)</b>	
<b>Is there a Risk Assessment in place for any learners involved in the disclosure?</b>  <b>Yes/No</b>  <i>(delete as appropriate)</i>	
<b>Name of learner (if different to report name):</b>	

<b>Date of risk assessment:</b>	
<b>Risk status:</b> <i>(please tick as appropriate)</i>	<p>Radicalisation <b>Yes/No</b></p> <p>Pregnant <b>Yes/No</b></p> <p>Has responsibility for children <b>Yes/No</b></p> <p>Current or recent suicide attempts <b>Yes/No</b></p> <p>History of self-harming <b>Yes/No</b></p> <p>Self-neglect <b>Yes/No</b></p> <p>Threats or violence to others <b>Yes/No</b></p> <p>Misusing substances <b>Yes/No</b></p> <p>Currently receiving medication <b>Yes/No</b></p>



<p><b>By external agencies:</b></p>	<p>Which agency/service was contacted?</p> <p>Was A &amp; E attended? <b>Yes/No</b></p>
<p><b>Was first aid administered?</b></p>	<p><b>Yes/No</b></p>
<p><b>Details of first aid administered:</b></p>	
<p><b>Has the person concerned been informed and consents to the sharing of this information with other professionals/organisations :</b></p>	
<p><b>Information shared with:</b></p>	

<i>(please include contact details)</i>	
<b>The person concerned is now:</b>  <i>(describe current condition and whereabouts)</i>	<i>e.g. living in a hostel, in a safe environment, still at risk</i>

<b>Ethnicity</b> <i>(please tick as appropriate)</i>	
<b>White</b>	
Welsh / English / Scottish / Northern Irish / British	
Irish	
Gypsy or Irish Traveller	
Any other White background, please describe	

<p><b>Mixed / Multiple ethnic groups</b></p> <p>White and Black Caribbean</p> <p>White and Black African</p> <p>White and Asian</p> <p>Any other Mixed / Multiple ethnic background, please describe</p>	
<p><b>Asian / Asian British</b></p> <p>Indian</p> <p>Pakistani</p> <p>Bangladeshi</p> <p>Chinese</p> <p>Any other Asian background, please describe</p>	
<p><b>Black / African / Caribbean / Black British</b></p> <p>African</p> <p>Caribbean</p>	

Any other Black / African / Caribbean background, please describe	
<p><b>Other ethnic group</b></p> <p>Arab</p> <p>Any other ethnic group, please describe</p>	
<p><b>Signed:</b></p> <p>.....</p>	<p><b>Dated:</b></p> <p>.....</p>

**PLEASE ENSURE THIS FORM IS CHECKED AND ANY FURTHER ACTION REQUIRED IS TAKEN.**

**ENSURE THIS FORM IS STORED IN A SECURE FILE AND A COPY HAS BEEN FORWARDED TO YOUR SAFEGUARDING MANAGER. EMAIL THIS FORM TO [referral e-mail]**

**PLEASE REMEMBER TO COMPLETE THE FOLLOW UP FORM ATTACHED.**

**Names of Safeguarding Managers:**

- Newcastle College: Paula Miller
- Newcastle Sixth Form College: Simon Ross
- West Lancs College: Jane Hines
- Intraining and Rathbone: Gina Steele/Diane Thompson
- Kidderminster College: Cat Draper
- Carlisle College: Danielle Skelton
- Southwark College: Abida Umarji(interim)
- Lewisham College: Sharon Cousins



**Please ensure that you retain a copy of this form in your secure Safeguarding file or secure network folder**

Please inform the Designated Safeguarding Officer of all follow up details

**PREVENT AND SAFEGUARDING INCIDENT FOLLOW UP FORM**

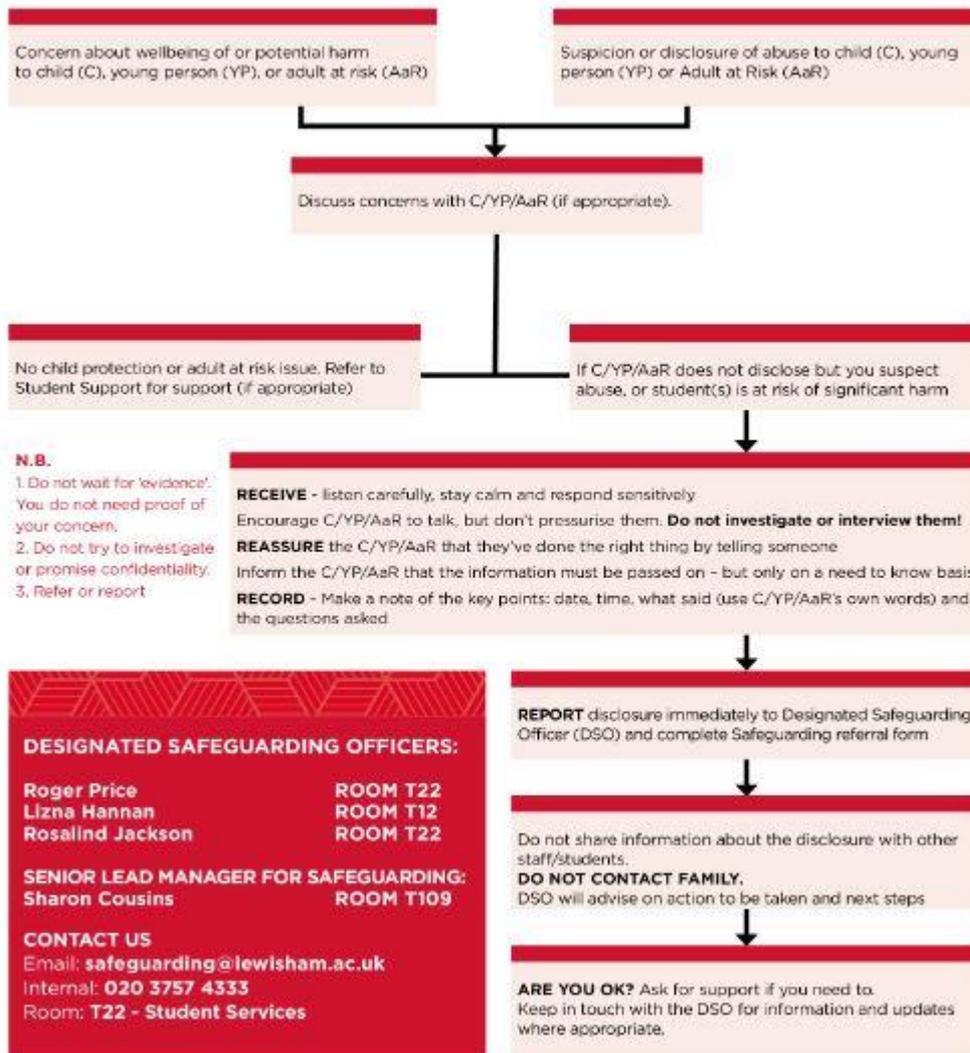
<b>College:</b>		<b>Name of referrer:</b>  <i>(please print)</i>	
<b>Student number:</b>		<b>Name of student:</b>	
<b>If referred to Social Care, please ensure that the referral is followed up within 7 working days to establish status</b>			
<b>Date of follow up:</b>			
<b>Further action required:</b>			
<b>Referral to other Agencies</b>			

<b>Name of Agency:</b>			
<b>Date of referral:</b>			
<b>Follow up/outcome of referral:</b>			
<b>Signed:</b>	.....	<b>Dated:</b>	.....
<b>Please print name:</b>	.....		

**College Designated Officer to keep Executive Lead apprised of outcomes.**

# LEWISHAM COLLEGE

## Safeguarding Flowchart



**LEWISHAM COLLEGE**

**External number for Safeguarding:**  
**020 3757 4120**