

# **SAFEGUARDING, CHILD PROTECTION AND ADULTS AT RISK POLICY**

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## **1. Safeguarding and Protecting Children and Adults at Risk**

This policy was adopted by the Governing Body on 20<sup>th</sup> July 2016. The policy will be reviewed annually when the lead senior postholder for Safeguarding will report to the Governing Body on its operation and effectiveness. The Corporation will appoint a lead link governor for safeguarding.

Each College/training company within the group will have a lead senior manager and designated person responsible for safeguarding.

## **2. Introduction**

CAPITAL CITY COLLEGE Group fully recognises its responsibility for the safeguarding and protection of student and Adults at Risk and for promoting the welfare young people and Adults at Risk who are students of the Group. The Group aims at all times to create and maintain a safe environment for all students, staff, volunteers and visitors.

### **Safeguarding Principles**

- **All young people and Adults at Risk have the right to be safe from harm, abuse and exploitation**
- **The welfare of the student is paramount and this principle underpins all safeguarding work**
- **Statements about abuse or neglect made by students will be taken seriously**

**A commitment to the Health and Wellbeing of students, which underpins a successful learning experience**

## **3. Application**

This policy applies to all governors, staff, agency staff, contractors, visitors and volunteers working for or within the Group.

This policy should be read in conjunction with the following appendices and Group's policies on:

### **Appendices to the Group Safeguarding, Child Protection and Vulnerable Adult Policy**

- |                                      |             |
|--------------------------------------|-------------|
| • ICT acceptable use                 | Appendix 1  |
| • Social Media Policy                | Appendix 2  |
| • Bullying and Harassment (Students) | Appendix 3  |
| • Staff Code of Conduct              | Appendix 4  |
| • Physical Restraint Policy          | Appendix 5  |
| • Site Security                      | Appendix 6  |
| • Executive Summary                  | Appendix 7  |
| • Safe Touch Policy                  | Appendix 8  |
| • External Visitors Policy           | Appendix 9  |
| • The Prevent Policy                 | Appendix 10 |

## **Group Policies**

- Learning and Behaviour Policy
- Health & Safety
- Whistle Blowing
- Equality and Diversity
- E – Safety Policy
- Complaints Procedure
- Religion and Belief

### **4. Definitions**

For the purposes of this policy:

- i) a ‘child’ is someone who has not yet reached their 18th birthday (1989 Children Act)
- ii) an “adult at risk” is any person over the age of 18, “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness.”
- iii) ‘staff’ means all employees, full-time or fractional and all agency, franchise, contract and volunteer staff working at or for the Group;
- iv) the term ‘student’ is used in this policy to refer to anyone who is under the age of 18 or who meets the definition of a vulnerable adult.
- v) ‘visitor’ means any person who enters the building who is not a staff member
- vi) ‘volunteer’ means any person who is unpaid employment in the Group

### **5. Legislative Context and Framework**

Section 175 of the Education Act 2002 places a duty upon this Group to safeguard and promote the welfare of students. Section 11 of the 2004 Children Act requires all agencies working with or coming into contact with anyone under the age of 18 to have measures in place to safeguard and promote their welfare.

The duties of the Group are further outlined in ‘Safeguarding Children and Safer Recruitment in Education’ 2007, ‘the London Child Protection Procedures 2010, Working Together to Safeguard Student’ 2013, “Keeping Children Safe in Education; information for all school and Group staff September 2016”

### **6. Statutory Responsibilities**

The Governing Body of Capital City College Group holds responsibility for ensuring that the safety of the students is at all times of paramount importance and recognises the contribution the Group makes in safeguarding and protecting students. The Governing Body is responsible for ensuring that any deficiencies or weaknesses in the Group’s arrangements for safeguarding and promoting the welfare of students are addressed and remedied without delay.

Whilst the Governing Body holds overall responsibility for the child protection and

safeguarding functions of the Group, the day to day operational responsibility rests with the Chief Executive.

All staff including teaching and non - teaching staff, temporary and agency staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with students on placements have a statutory responsibility to safeguard and promote the welfare of students and must be fully conversant with and adhere to this policy. All staff are given an Executive Summary of this policy and must sign to say that they have read, understood it and will adhere to it.

For the purposes of this document, the term 'staff' will apply to those listed above. Because of their day to day contact with students, staff in this Group are well placed to observe possible signs of harm or abuse.

It is neither the role nor responsibility of those working with students in the Group to assess, diagnose or investigate whether a student is at risk of or is suffering harm. It is the responsibility of all staff to be aware of the need to report any concerns about a student to the Designated Member of Staff. A comprehensive list of safeguarding staff will be published in each College/Training Provider.

## **7. Purpose and Aims of the Policy**

The purpose of this policy is to:

- Raise the awareness of all staff of the need to safeguard students and of their responsibilities in identifying concerns and reporting them as a matter of priority
- Provide a framework to support staff in identifying concerns that a student may be suffering or at risk of suffering harm or abuse thereby enabling them to report those concerns without delay
- Promote and maintain an environment where students feel secure and are listened to
- Promote an environment where students and staff treat each other with mutual respect and develop positive relationships which are built on trust
- Ensure that the Group has sufficient Designated Members of Staff for Safeguarding to enable one of them to be available or contactable at all times during the Group day
- Ensure that the Governing Body has a nominated member who is responsible for safeguarding and protecting student and Adults at Risk
- Enable and support good levels of communication between staff to ensure that relevant information about students is disseminated and shared with appropriate staff on a 'need to know' basis
- Ensure that all members of staff have the appropriate level of training on safeguarding and that this is refreshed annually.

- Develop and promote effective working relationships with partner agencies, including Children’s Social Care, the Police Child Abuse Investigation Team and local authorities. (or relevant managing body)
- Provide a systematic means of recording and monitoring students who are thought be at risk of harm or who are subject to child protection plans
- Provide structured procedures within the Group which will be followed by all staff when there are concerns about a student who is potentially deemed at risk.
- Ensure that all adults working with students in the Group have undergone appropriate safer recruitment vetting and checks as to their suitability to work with student in line with national guidance.
- Ensure that procedures are followed where an allegation is made against a member of staff or volunteer in accordance with Chapter 5 of ‘Safeguarding Children and Safer Recruitment in Education’ 2007 and with the involvement of the Local Authority Designated Offer (LADO) updated 1/9/16
- To support young people’s and Adults at Risk’ development in ways that will foster security, confidence and independence and to promote this through the curriculum, the tutorial programme, enrichment activities and the student engagement

## 8. Procedures and Guidance

This Policy should be read in conjunction with the DCFS Summary Booklet “What to do if You’re Worried a Child is Being Abused” available at [www.teachernet.gov.uk/publications](http://www.teachernet.gov.uk/publications) -reference 04319-2006BKT-EN. Our procedures are in line with the London Child Protection Procedures 2010 and subsequent amendments. These are available to read or download on the London Safeguarding Children Board website: [www.Londonscb.gov.uk](http://www.Londonscb.gov.uk)

All Group staff should be knowledgeable about what constitutes abuse and must attend the safeguarding training which is available to staff on an annual basis..

## 9. Roles and Responsibilities

### Safeguarding is everyone’s responsibility

#### All Staff are responsible for;-

- Adhering to the Group’s Safeguarding, Child Protection and Vulnerable Adults Policy and Procedures
- Complying with the Group’s staff code of conduct
- Reporting any Safeguarding, Child Protection and Vulnerable Adults concerns **immediately** via individual College’s Safeguarding referral system
- Reporting any concerns **immediately** they may have to the Group Director of HR, regarding the inappropriate behaviour or conduct of a member of staff towards a student
- Not promoting any form of extremist or radical view that endorses or supports the use of violent or non-violent acts.

- Making clear the appropriate boundaries when communicating with students

### **The Governing Body**

The Governing Body of the Group has a statutory obligation for ensuring the Safeguarding of Children and Vulnerable Adults and are responsible for:- Ensuring that robust Safeguarding, Child Protection and Vulnerable Adults policies and procedures are in place. For monitoring the service and receiving annual reports Undertaking Safeguarding, Child Protection and Vulnerable Adults training and annual refresher training including the Prevent Duty training

### **Chief Executive Officer**

The CEO is responsible for ensuring that the Safeguarding policy and procedures and all linked safeguarding policies adopted by the Governing Body are fully implemented and followed by all staff.

It is the CEO's responsibility to allocate sufficient resources and time to enable the responsibilities of the Designated Member of Staff for Safeguarding to be discharged fully and to ensure that relevant staff are able to attend strategy discussions, child protection conferences and other inter-agency meetings and to contribute fully to the assessment of students.

The CEO is responsible for ensuring that all staff feel able to raise concerns about poor or unsafe practice regarding students, and that concerns will be addressed sensitively and in a timely manner in accordance with the Group's whistle blowing policy. We recognise that it is not the responsibility of students to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the CEO who will deal with the concerns appropriately.

#### The Lead Designated Safeguarding Senior Postholder

The Executive safeguarding lead will ensure the Group meets its statutory duty by:

- ensuring the Group safeguarding and child protection policies are up to date and consistent with the appropriate laws and regulations and that policies are reviewed annually
- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the Group
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the Group
- Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities,
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans
- Working with the Colleges/Training Arm SMT leads with the aim of ensuring the policy and procedures are effective throughout the organisation
- Ensuring that Group staff receive appropriate annual safeguarding training
- Ensuring the Group offers a safe environment for staff and students to learn
- Ensuring that safeguarding issues are brought to the attention of the governing body as required.



## **The College Principal/CEO of the Training Arm**

College Principals are responsible for:

- appointing an SMT member with responsibility for leading on safeguarding
- monitoring safeguarding cases within the college/ training arm and taking appropriate actions to safeguard learners
- ensuring the SMT designated lead for safeguarding fulfils their duties

## **The College/Training Company SMT Designated Lead for Safeguarding**

Each College/Training Arm will appoint an SMT Designate lead for safeguarding. This person will be responsible for:

- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College/Training Arm
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College
- Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities,
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans
- Providing the Lead Designated Safeguarding Senior Postholder with reports on safeguarding alerts and cases as required
- In liaison with the Group Director Human Resources and Organisational Development, ensuring that College staff receive appropriate annual safeguarding training
- Ensuring the College offers a safe environment for staff and students to learn
- Ensuring that safeguarding issues are brought to the attention of the Lead Designated Safeguarding Senior Postholder.
- Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children
- In liaison with the Group Director Human Resources and Organisational Development, ensuring that all staff receive safeguarding training at induction and on an annual basis

## **The Designated Member of Staff:**

Each College/Training Arm within the group in addition to the SMT Designated Safeguarding Lead will have a Designated Member of Staff for Safeguarding. This post will act as a source of support and guidance on all matters of child protection and safeguarding within their College/Training Arm.

Staff must report any concerns to the Designated Person or one of the deputies. Staff are also able to discuss safeguarding, child protection and Adults at Risk issues with the Designated Person, one of their deputies, or a nominated member of the safeguarding team, who will act in accordance with this policy and the London child protection procedures and report back to the Designated Person.

The Designated person is responsible for:

- Ensuring that there is a system for monitoring and recording concerns about students at an early stage which is implemented across the College/Training Arm and adhered to by all staff
- Managing child protection concerns and making referrals to Children’s Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate
- Attending and providing reports to ‘child in need’ meetings, child protection conferences and core group meetings and contributing to child protection and ‘child in need’ plans
- Monitoring the attendance and progress of students who are the subject of ‘child in need’ or child protection plans and implementing the College/Training Arms part of the plan
- Informing Children’s Social Care of any proposed change of College/Training Arm of a child who is subject to a ‘child in need’ or child protection plan and alerting them if a child who is subject to a protection plan is absent from College/Training Arm without reasonable justification
- Ensuring that relevant information about students is shared with staff on a ‘need to know basis’
- Maintaining accurate child protection records which are held securely and confidentially
- Ensuring that all staff are aware of the need to record concerns about students and enabling them to do this as part of a College/Training Arm-wide process, such as in tutorial records, individual/personal learning plans. These would include bullying and racial issues.
- Ensuring that complete and accurate records are forwarded to receiving Colleges, such as tutorial records and the individual/personal learning plan
- Ensuring that students, parents and carers have access to the Colleges safeguarding policies and procedures
- Having a working knowledge of the role and function of the appropriate Safeguarding Children Board
- Clarifying to personal and lead tutors, deputy directors and student support services their role in monitoring students at risk in terms of welfare and tracking cases of concern
- Training for staff with designated child protection and safeguarding responsibility occurs every year

## **10. Safeguarding Training for Capital City College Group Staff**

Capital City College Group ensures that:

- The Group’s nominated safeguarding staff undergo regular appropriate safeguarding and child protection training in accordance with best practice. Training should be refreshed at least once a year to ensure they are aware of current safeguarding issues and best practice.
- All staff undertake initial safeguarding, child protection, Adults at Risk and Prevent Duty training and that their training is refreshed every year
- All new staff and governors are given an Executive copy of the Safeguarding, Child Protection and Adults at Risk Policy as part of the Capital City College Group induction process and are expected to read and sign to confirm that they have read and will adhere to the full policy.
- The responsibility of ensuring that all staff employed by the Group received appropriate training rests with the Group Director Human Resources and Organisational Development,

- A central record of staff training is held with the Group's HR team

Initial training for staff will ensure that:

- All staff are able to recognise possible signs and indicators of abuse in students. Specific training is delivered to enable staff to safeguard and promote the welfare of Adults at Risk
- All staff know to whom they should report any concern about a student's welfare and well being
- All staff understand the Group's safeguarding child protection and Adults at Risk policy and procedures and are clear about their statutory duties
- All staff are aware of how to manage a disclosure from a student in order to promote the best outcomes for that student
- All staff are aware of the need to work within professional boundaries and adhere to the Group code of conduct to safeguard students
- All staff are aware of the importance of keeping detailed and accurate written records of any concerns about a student
- All staff are aware of the boundaries of confidentiality and disclosure and understand when the disclosure of confidential information would be a proportional response to the need to safeguard a student
- All staff have a duty to report any child protection and vulnerable adult issues to the Designated Person or a nominated member of the Safeguarding Team
- All staff understand that they have a duty to safeguard and promote the welfare of students through tutorial and enrichment activities

## **11. Safer Recruitment and Staff Appointments**

Safe recruitment and selection practice is vital in safeguarding and protecting students. The Governing Body recognises and takes seriously its responsibility to adopt practice which minimises risk to the students in this Group by ensuring that measures are in place through this practice to deter, reject or identify people who might abuse students or who are unsuitable to work with them. The Governing Body is committed to evidencing this practice in relation to all staff working with students in the Group.

The safety and wellbeing of students is borne in mind at all times throughout the recruitment and selection process. The Group follows guidance issued by Cambridge Education @Islington Human Resources and that contained in the DCFS guidance 'Safeguarding Student and Safer Recruitment in Education' 2007. The Group has amended its Recruitment and Selection Policy and processes to reflect the guidance issued in "Keeping Children Safe in Education; information for all school and Group staff 2016". The Group will continue to uphold best practice in safer recruitment.

In accordance with this, the Group makes sure that appropriate checks are carried out on new staff, Governors, contractors, volunteers and helpers and bears in mind the safety of students when drawing up job descriptions and person specifications, advertising posts, calling for and scrutinising references and picking up on gaps in employment history through to the interview process and carrying out enhanced DBS and professional checks and verifications of qualifications and identity. Applicants will be scrutinised by:

- verifying identity and academic or vocational qualifications;
- obtaining two written professional references

- checking previous employment history for employment gaps
- carrying out mandatory checks including List 99 and the Disclosure and Barring Service.
- conducting interviews with applicants
- completion of the Pre-Employment Health Questionnaire.
- undertaking risk assessments where it is appropriate and necessary to do so.
- Checking compliance with regarding Disqualification by Association for Nursery Staff
- Ensuring all staff receive the necessary information for mandatory training prior to or in the first week of employment.
- Ensure contracted staff undertake the mandatory training as directed by the Group to include safeguarding, safer recruitment and Prevent

## **12. Work Experience, Placements and Work Based Learning**

Colleges/Training Arms within the Group will ensure that:

- health and safety checks are undertaken prior to establishing work experience placements
- employers and providers are aware of and are carrying out their responsibilities in relation to safeguarding and the protection of children and Adults at Risk, and ensuring that providers have appropriate policies and procedures in place which are followed by all staff
- Group staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement
- Group staff are appropriately trained to carry out the health and safety work placement audit

## **13.Safe use of E Technology**

The Group has an Acceptable Use Policy and a Social Media policy. The College/Training Arm will appointed a member of staff with responsibility for monitoring the safe and appropriate use of E technology and any concerns about inappropriate use will be flagged and followed up.

**Refer to Appendix 1: ICT Acceptable Use Policy and Appendix 2: Social Media Policy**

## **13. Extended Services and Activities**

The Governing Body of the Group is responsible for controlling the use of Group premises both during and outside normal hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made. Where services are provided directly under the supervision and management of the Group, the Group's safeguarding policies and procedures will apply.

Where activities and services are provided separately, the Governing Body will seek assurances and evidence that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the Group on these matters where appropriate. Evidence of appropriate policies and procedures must be provided to the Governing Body. The Governing Body will only work with providers that can demonstrate that they have effective child protection policies and procedures in place, provide appropriate training and that the vetting arrangements for their staff are compatible with those of local authorities and government guidance. The Governing Body will enter into a formal letting

contract with the provider once these conditions are met but reserve the right to withdraw permission for any letting. There will be at any one time, a number of professionals delivering services to students on behalf of the Group in the community as well as on the Group site. These professionals may be employed by partner agencies or other agencies.

All staff providing services to student whether in Group or in the community on behalf of the Group must adhere to the Group's child protection policy.

Staff from partner agencies working with students off site will follow the referral procedures of their own agency and will inform the appropriate Designated Person they have made a child or vulnerable adult protection referral as a matter of priority.

## **15. Cross Group Use of Sites and Sub-Contracted Providers**

Where students attend other Group sites or provision, including centres and facilities owned, leased or used by sub-contracted partners for the purpose of engaging with students, it is the responsibility of the Cross College sites' or sub-contracted partners' Centre based safeguarding staff or Designated Person to manage any concerns about those students appropriately, ensuring that there is good, effective and timely communication, liaison and information sharing with the Designated Person.

## **16. Supporting Students**

In line with the duty to 'help children achieve more' (Working Together to Safeguard Children 2013), the Group will promote the many areas that support students to be successful and feel confident in terms of their:

- physical and mental health and emotional wellbeing
- protection from harm and neglect
- education, training and recreation
- contribution to society
- social and economic wellbeing
- We recognise that a student who is abused or neglected may find it difficult to develop and maintain a sense of self - worth. We recognise that a student may feel helpless and humiliated and may blame themselves for what has or is happening to them. The College/Training Arm may provide a vital source of stability in the life of student who has been abused or is at risk of harm. We recognise that the behaviour of a student in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

We aim to support students by:

- Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviours in accordance with our anti-bullying policy; From September 2010 all allegations of bullying must be recorded. **See Appendix 3: Bullying and Harassment Policy for Students**
- Promoting a caring and safe environment for all our students
- Providing an environment where students are able to make positive relationships with staff and are better able to talk to staff about their lives. In this way staff are able

- to 'hear the voice of the child'
- Providing opportunities through the curriculum for students to learn strategies to protect themselves ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. e.g. through awareness raising activities and workshops including sexual health, anti bullying, drug and alcohol support, gang prevention and health and well being
- Working in partnership with other services involved in safeguarding students and notifying Children's Social Care or the Adults at Risk Team as soon as there are significant concerns about a student.

Safeguarding is promoted through a students' course (tutorial, enrichment and curriculum) and students are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for students is available through a range of student support services.. These aims are underpinned by the following Group policies:

- Lesson Observation Procedures and Proformas
- Bullying and Harassment Policy - Students
- Complaints Procedure
- Learning and Behaviour Policy
- ICT Acceptable Use Policy
- Equality and Diversity Policy

## **17. Professional Relationships with Students**

Capital City College Group recognises that positive professional relationships with students will support and promote the best outcomes for them. Capital City College Group gives guidance on the expectations of staff in this matter to which all staff are expected to adhere. Good professional boundaries safeguard students and safeguard professionals from unfounded allegations. The College has a professional code of conduct which all staff must adhere to. **See Appendix 4: Staff Code of Conduct**

### **Reporting Concerns of inappropriate behaviour**

As stated in the staff code of conduct and in the Safeguarding Policy, all staff are responsible for reporting any concerns **immediately** they may have to the Group Director of HR, regarding the inappropriate behaviour or conduct of a member of staff towards a student

### **Personal Relationships**

It is the prime duty of the Group to provide a safe and secure learning environment for students and staff and to protect the safety and welfare of all the students in its care. The guidance below ensures that staff maintain professional standards while at work and do not commit acts of impropriety or abuse the trust of students for whom they are responsible. The personal relationships referred to are those that are of a romantic and/or sexual nature.

#### **1. Maintaining Professional Relationships**

A professional relationship exists where a member of staff is responsible for assessing, supervising, tutoring, teaching or providing pastoral support, administrative or technical support. Maintaining this professional relationship is vital to the educational development and achievement of its students.

All staff must hold in mind the need to ensure that their relationships with students are

professional and act appropriately according to the College code of conduct.

## **2. Group Standard**

The Group strongly disapproves of personal/sexual relationships between staff and students. The age of the student is immaterial in considering whether a professional is in breach of trust. Any relationship between a professional and a student under the age of 19 or a student who is a vulnerable adult will result in an immediate referral to the Local Authority Designate Officer (LADO).

The Group strongly disapproves of personal relationships between staff and students above the age of 19 where a professional relationship exists. Should a personal relationship already exist when a student joins the Group, the professional must inform their line manager, so that appropriate steps can be taken to ensure that s/he is no longer in a professional role in connection with that particular student. Failure to report such a relationship may lead to disciplinary action, depending on the individual circumstances of the case. Where no professional relationship exists between staff and student, a personal relationship should be reported to the line manager in order to protect everyone's interests.

## **3. Other Consequences**

All staff are reminded of the risks of a complaint being made under the Bullying and Harassment Policy and that they may face allegations of criminal misconduct. In some circumstances, staff may be referred to the Independent Safeguarding Authority and barred from teaching.

## **4. Further Advice**

Staff may seek advice and guidance on this code from the Deputy Director of Human Resources. Students may seek guidance from the Deputy Director (Teaching and Learning) or from one of the student advisers or the safeguarding team.

## **5. Child Protection Concerns**

Abuse of trust may be reported to the nominated Protection of Abuse Officer (Grant Glendinning, the Senior SMT Lead for Safeguarding Child Protection and Adults at Risk at CIC and Caireen Mitchell at WKC/Training Arm) Note: this policy should be read in conjunction with all other relevant Group policies and procedures including the Protection from Abuse Procedure and the Harassment Policy. It reflects our responsibilities under the Children's Act 1989, the Sexual Offences Amendment Act 2000 and the DfES Circular 2002 on the Prevention of Unsuitable Persons from working with children and young adults

For the avoidance of doubt, student helpers and students on work placements are not considered members of staff. Apprentices will be treated as members of staff for the purpose of this policy.

## **18.Safe Touch Policy and Code of Practice**

The Group recognises that in certain Performing Arts disciplines, e.g. Dance, it is necessary for the tutor to physically touch a student to improve their understanding of the exercise or movement. Please refer to the Safe Touch Policy and Code of Practice in Performing Arts. **See Appendix12: Safe Touch Policy and Code of Practice**

## **19.Confidentiality**

Confidentiality is an issue which needs to be fully understood by all those working with students, particularly in the context of safeguarding and the protection of children and Adults at Risk. We respect the right of students and families to have information about

them dealt with sensitively and confidentially in line with statute and guidance. Child Protection information regarding students in our Group will be shared with staff on a strictly need to know basis. A member of staff will 'need to know' information when it is demonstrably to benefit the student. All staff are expected to conform to the Group's standards of good professional practice and maintain confidentiality appropriately at all times.

All staff must be aware of their responsibility to share information with the appropriate Designated Person and with other agencies in order to protect and safeguard students. This must be done in accordance with the Group's Safeguarding and Child Protection Policy. Where there is uncertainty about the need to share information, the six points referred to in Appendix 1 should be considered. Advice will be sought by the appropriate Designated Person on this issue and where necessary from the appropriate local authority..

No one in the Group may guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information. Where a student has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the student.

No one in the Group may guarantee to a student that they will keep a secret or confidence and must always make it clear to student in language that is appropriate, that any information which leads a member of staff to be concerned that a student is suffering or is at risk of suffering harm will be shared with the appropriate Designated Person in order to take measures to safeguard the student at risk.

Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a student.

## **20. Managing Disclosures** Guidance for Staff

### **Receive**

- Do not ask questions or probe for information as this may contaminate evidence and prohibit a police investigation
- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said.
- Make a note of what has been said as soon as practicable.

### **Reassure**

- Reassure the learner, but only so far as is honest and reliable. For example, don't make promises you may not be able to keep eg 'I'll stay with you' or 'everything will be alright now'.
- Do reassure and alleviate guilt, if the learner refers to it. For example, you could say:
  - You have been brave to tell me.
  - I am glad you came to me.
  - I am sorry this has happened.
  - This was not your fault.
  - We are going to do something together to get help.



- Do not promise to keep it a secret as your professional responsibilities require you to report the matter.

## **React**

- React to the learner only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions, for example 'what did he do next?' (this assumes he did!), or 'did he touch your private parts?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not criticise the alleged perpetrator;
- Do not ask the learner to repeat it all for another member of staff. Explain what you have to do next and who you have to talk to. Reassure the pupil that it will be a DMS and no one else. Try to see the matter through yourself and keep in contact with the pupil. Ensure that if an interview undertaken by Children's Social Care or the Police is to follow, that the pupil has a support person present if the pupil wishes it (possibly yourself).

## **Record**

- Make some very brief notes at the time on any paper which comes to hand, and write them up as soon as possible.
- Do not destroy your original notes in case they are required by a court.
- Record on the same day the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the learner. If the learner uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Draw a diagram or complete a body map to indicate the position of any bruising if it visible.
- Record statements and observable things, rather than your 'interpretations' or 'assumptions'.

### **21.Supporting Staff**

We recognise that child protection is a difficult and sometimes upsetting subject for those who work with students. Working with a student who has suffered harm or is at risk of harm may be stressful and distressing. We are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the Designated Person for your College/Training or another member of the safeguarding team, and to seek further support as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice; such concerns will be addressed sensitively and effectively in accordance with agreed whistle blowing procedures. A copy of the summary version of 'What to do if You're Worried a Child is Being Abused' should be made available to every member of staff.

We believe that working within clear safeguarding and child and Adults at Risk protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

### **22.Students with Learning Difficulties and/or Disabilities**

Research suggests that students with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care which may be delivered by a number of

different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated or may not understand that they are being abused.

Staff who work with students in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern that should be shared immediately with the Colleges Designated Safeguarding Person or in their absence another member of the safeguarding team. .

#### **24. Intimate Care and Toileting of Disabled Students**

The Group is committed to supporting and meeting the needs of students with disabilities and will ensure that no student is put at a substantial disadvantage compared with her or his non - disabled peers.

If a student has particular needs which require intimate care or the administration of medication, a meeting will be held with the student, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The student's wishes and feelings will be taken in to account and respected throughout this process.

#### **25 Working in Partnership with Parents and Carers**

The Governing Body and staff of the Group are committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Staff working for the Group will engender an environment which develops co-operative working relationships within which parents and carers feel respected.

Parents and carers will be encouraged to access our safeguarding policy, and a summary of it is included in the literature given to students and families on admission which links to the appropriate page on the Group web site. We believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that we will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.

Wherever possible and appropriate we will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care.

There may be instances however, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the Group's Designated Person or a member of the safeguarding team judges that a student's well being will be imperilled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser competence' and this will inform judgements and decisions.

#### **26. Implementation and Evaluation of Safeguarding Policy and Practice**

All staff have a duty to be fully conversant with the safeguarding child protection and Adults at Risk policy and procedures. All staff are required to read and sign an Executive Summary of the policy and to adhere to it at all times.

Agency staff are also required to read and sign up to an Executive Summary of the policy.

The implementation of the policy and the resulting good practice are monitored in the following ways to ensure effectiveness:

- Staff raise concerns immediately about the welfare of students routinely as good practice with the appropriate Designated Person or in their absence another nominated member of the safeguarding team.
- Staff attend safeguarding training and a central register of training is held
- Staff are willing to raise concerns about students at an early stage to ensure that appropriate support or intervention is offered
- Staff use the correct recording format to document concerns
- Poor safeguarding practice is challenged and appropriate action is taken to remedy it
- A full safeguarding child protection and vulnerable adult report is submitted to the Governing Body annually.

### **27. Site Security**

All students and staff should be able to feel safe when they are on the campus. All staff and students will wear their ID at all times and will not be allowed to enter a site without it. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be admitted to a site unless they are accompanied by a member of staff.

Appendix 8 Site Security Policy

### **28. Contractors**

Regular contractors who work on site will be DBS checked as part of their service level agreement/contract and will be expected to read and sign the Executive Summary, and adhere to the Safeguarding Child Protection and Adults at Risk Policy and Staff Code of Conduct. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.

### **29. Agency Staff**

Agency staff and those who work at CAPITAL CITY COLLEGE Group for one or two days will be asked to provide their DBS check before they can begin work. They will be given an Executive summary of the Safeguarding, Child Protection and Adults at Risk Policy and will be asked to sign to confirm that they have read and will adhere to it.

### **30. Restraint and Reasonable Force**

Section 93 of the Education and Inspections Act 2006 enables Group staff (including support staff, non-teaching staff and voluntary staff) to use such force as is reasonable in the circumstances to prevent a student from:

- Committing an offence;
- Causing personal injury to any person (including themselves) or damage to any property;
- Prejudicing the maintenance of good order and discipline

This includes occasions when the student is not on Group premises e.g. on College visits. Section 45 of the Violent Crime Reduction Act 2006 gives authorised staff the right to search pupils for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon. If resistance is expected the police MUST be called.. Further guidance is at

[www.teachernet.gov.uk/whole](http://www.teachernet.gov.uk/whole). The security staff at are trained in the use of

reasonable force and restraint.  
See Appendix 7 Physical Restraint Policy

Guidance is given to staff on appropriate behaviour including the use of reasonable force. Further guidance to staff can be found in the Physical Restraint Policy which is informed by the DfE document 'Use of Reasonable Force' 2012.

There should be a rigorous recording system and procedures in Group and reporting to the Local Authority. There is a model recording form in the DCSF Guidance. Parents/carers should be informed when reasonable force has been used and protocols agreed with parents/carers if use of reasonable force is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Students displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioural, emotional and social difficulties or with severe behavioural difficulties should be handled according to the guidance in [www.teachernet.gov.uk/wholeschool/sen/piguide](http://www.teachernet.gov.uk/wholeschool/sen/piguide). S548 Education Act 1996 states that the use of force as a punishment is unlawful. Groups have two duties under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001):

- Not to treat a disabled child unfavourably without justification
- To take reasonable steps to avoid putting disabled pupils at a substantial disadvantage

#### [Summary of Groups' statutory responsibilities under disability discrimination](#)

### **31. Recording**

Concerns about students should be recorded on the Group's individual/personal learning plan and on the Centres' central 'at risk' register, which will detail the concerns about a student, discussion with the appropriate Designated Person or in their absence, another appropriate member of the safeguarding team and parents or carers where appropriate and any agreed actions and outcomes. Tracking sheets, referrals to Children's Social Care and Child Protection Conference and Core Group meeting minutes will be held confidentially, separately from a student's main Group records. Records should be signed and dated and kept in chronological order. Group actions minuted in child protection conferences/strategy meetings must be implemented.

Recording is a tool of professional accountability and is central to safeguarding and protecting students. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed.

Sub-Contractors are required to have in place a robust system to record concerns about student's ( the cause for concern and the action taken) and to have this information readily available for identified individuals within the Group.

### **32. Referral**

If a student discloses that they have been subjected to abuse to any staff member in the Group, the staff member must report to the Designated Person. The Group's Designated person or a nominated deputy will then respond within an hour and make the necessary referrals to Children's Social Care in the child's home borough. Where a student is transferring to another Group, the Group's Designated Person should liaise with the

setting the pupil is transferring to and copy and forward records to the other Group.

**33.Hospitalisation:** Students aged under 16 who are taken to hospital must be accompanied by a member of staff. The member of staff must make direct contact with the parent /relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/relative arrives. If a student age 16-18 is taken to hospital, the member of staff must make direct contact with the parent /relative to make them aware of the situation. As a general rule the member of staff is not required to accompany the student in the ambulance, where parent/relative has been made aware of the situation.

Where the student is over 18 and is a vulnerable adult the member of staff must also make direct contact with the parent /relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/relative arrives.

In all cases, the appropriate Designated Person or in their absence a deputy should be made aware as soon possible of the situation.

#### **34. Allegations against Group staff and volunteers**

Allegations made against Group staff and volunteers will be dealt with according to the process laid out in 'Safeguarding Children and Safer Recruitment in Education' 2007. The Chief Executive or the Chair of the governing body (if it is an allegation about the Chief Executive ) will work with the Local Authority Designated Officer to confirm the details of individual cases and to reach a decision on the way forward in each case, in conjunction with Children's Social Care and the Police Child Abuse Investigation Team. Group staff will not investigate cases of suspected abuse themselves. The Group will cooperate fully with the Police and Student's Social Care.

#### **35.Students Under 18 living alone or without any parental or guardian support**

Group staff must report any students who are living alone or without parental or guardian support to the Group's Safeguarding, Child Protection and Vulnerable Adult Manager via the CIC CPVA line 0207 697 1717 or WKC 0207 832 5266

#### **36. Private Fostering**

Privately fostered students under the age of 18 are cared for by someone other than a parent or close relative (e.g. step-parents, siblings, siblings of a parent and grandparents) for 28 days or more. Group staff should make a referral to Group's appropriate Designated Person or in their absence a deputy who will notify Children's Social Care if:

- They become aware of a private fostering arrangement which is not likely to be notified to the local authority
- They have doubts about whether a child's carers are actually their parents, and there is evidence to support these doubts, including concerns about the child's welfare

Further information about private fostering arrangements can be found at [www.baaf.org](http://www.baaf.org)

#### **37.Trafficked and Exploited Students**

A trafficked student is coerced or deceived by the adult who brings them into the country. Trafficked students are denied their human rights and are forced into exploitation e.g. domestic servitude, forced marriage, criminal activity, begging, benefit

fraud, acting as a drug mule, sweatshop or restaurant work. Students may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes. Recognition of trafficked and exploited students will normally rely on a combination of general signs of abuse and neglect and issues concerned with the student's immigration status. These students may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent, presenting with a history of missing links and unexplained moves. Group staff should make a referral to Children's Social Care if they suspect a child has been trafficked.

### **38. Forced Marriage/Honour Violence/Killings**

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A student who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the student themselves, or the student's peer group, a relative or member of the student's local community or from another professional.

Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self harm, child abuse or neglect, family/young person conflict, a student absent from Group or a missing/runaway. Forced marriage may involve the student being taken out of the country for the ceremony, is likely to involve non-consensual and or under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Young men as well as women are victims of forced marriage.

Honour based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are a risk from their parents and families.

Group staff should respond to suspicions of a forced marriage or honour based violence by making a referral to Children's Social Care 0207 527 7400 and if the risk is acute, to the Police Child Abuse Investigation Team 020 7527 8102. Group staff should not treat any allegations of forced marriage or honour based violence as a domestic issue and send the student back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage.

**For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement.**

Further information and advice can be obtained from the Forced Marriage Unit [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage) or 020 70080151 and the Honour Based Violence Helpline 0800 599 9247.

### **39. Female Genital Mutilation**

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003. Despite the harm it causes, FGM practising communities consider it acceptable to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is thought to be 6 - 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of students at CAPITAL CITY COLLEGE Group is such that they are not necessarily in the 'high risk' category for FGM, a student may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

Group staff should be alert to the following indicators:

- The family comes from a community that is known to practise FGM
- A student may talk about a long holiday to a country where the practice is prevalent.
- A student may confide that she or a sister or family member is to have a 'special procedure' or to attend a special occasion
- A student may request help from a teacher or another adult
- Any female student born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk. Any information or concern about a student or member of her family being at risk of FGM must be reported to via the appropriate Designated Person and will be treated as an immediate child protection referral to the student's home borough.

#### **40. Domestic Violence:**

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." \*

Forced marriage, 'honour based violence' and female genital mutilation are included in this definition.

It important to note that the definition includes young people aged 16 or over, therefore staff must be vigilant to domestic violence within young people's relationships and refer this as a child protection concern to the CPVA.

Living with domestic violence is a form of emotional abuse and is included in the definition of emotional abuse as, 'seeing or hearing the ill treatment of another'. If staff are aware that a student is witnessing, hearing, living with or experiencing domestic violence, they should inform the appropriate Designated Person or in there absence an deputy , who will in turn refer the matter to or to Children's Social Care for the

borough in which the student lives.

#### **41. Young Carers**

The Capital College's Group works to ensure that all students are given every opportunity to achieve their chosen qualification. The group acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education.

##### **What are young carers?**

Young carers are children or young people under 18 who are responsible on a regular basis for a family member who has an illness or a disability.

Whilst within many families, children and young people helping out around the house is seen as a normal part of family life, young carers have added responsibilities which may include sole or main responsibility for:

- Emotional and physical support for the family member
- Carrying out their personal care (bathing, dressing and feeding)
- Administering medication
- Taking to medical appointments
- Looking after younger siblings

How can you identify a young carer?

- The student seems tired and lacks concentration
- Illness or disability in the family
- Frequent lateness or absence
- Poor academic achievements, failure to complete assignments on time
- Isolation or difficulty in forming friendships
- Failure to engage in enrichment activities outside of college
- Behavioural problems
- Victims of bullying
- Parents not engaging with the college, e.g. attending meetings
- Unusual levels of maturity and responsibility

It is important to note that the above includes **possible** indicators that a student might be young carer.

##### **The Group's Policy**

Caring responsibilities can significantly impact upon a child's health and development.

The individual College's Safeguarding Officer will let all new students know who they are and what they can do to help.

Young carers will be put in touch with the local Young Carers Service/ Local Authority Children and Families Services and families of any other support services.



The College will liaise directly with parents who have mobility and communication difficulties, to provide information on meetings concerning their 16-18 year old child.

In the event that a member of staff has a safeguarding concern about a young carer, the concern must be immediately reported to the Safeguarding Team via the Child Protection Line 0207 697 1717 at City and Islington College or the Safeguarding Hotline 0207 832 5266 at Westminster Kingsway College, at the earliest opportunity or at any rate before 5pm on the day the concern arises.

The College will respect the rights of young carers' privacy, only sharing information about the young person and their family on a need to know basis.

#### **42. Children missing In Education**

Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at Group including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

CAPITAL CITY COLLEGE Group will support students by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some students run away because they feel there is no other option. Students need to know where they can access help if they are thinking of running away and what alternatives are open to them. As a Group, we are well placed to advise young people about the dangers of running away and to point them to available support. If Group staff become aware of a young runaway, they should ensure they inform the appropriate Designated Person or one of their Deputies who in turn will contact the Police Liaison Officer and the Education Welfare Service.

#### **43. Gang Violence and Gang Grooming**

**(Adapted from “Safeguarding children affected by gang activity and/or serious youth violence” – London safeguarding children’s board section 14.5)**

[www.londonscb.gov.uk](http://www.londonscb.gov.uk)

As part of the teaching and tutorial process staff are well placed to pick up signs of anti-social behaviours, aggression, bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators. Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime. Staff should follow the Group’s behaviour management and anti bullying and harassment procedures and if necessary work collaboratively with external bodies such as Connexions and Reality Around Gangs.

#### **44. Sexual Exploitation**

‘Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social /economic and/or emotional vulnerability.'

Sexual exploitation may be organised or opportunistic. It may take place when a student is groomed using technology or is encouraged to think that they are entering into a relationship. It may be linked to gang membership. Boys as well as girls are sexually exploited. Young people are vulnerable to sexual exploitation in many ways and the vigilance of staff is key in identifying possible signs or indicators. The Rochdale Serious Case Review into the sexual exploitation of a group of young people highlighted the importance of FE Groups in identifying and meeting the needs of vulnerable young people who might be at risk of this form of abuse.

Staff must be vigilant to any signs or concerns that a student may be sexually exploited and report concerns as a matter of urgency.

#### **45. E-Safety**

This refers to the internet and other electronic forms of communication such as e-mail, text messages, face -book can be used to put young people and Adults at Risk at risks. There are many ways in which the various forms of technology can be used in a harmful way:

#### **46. Internet Grooming**

Flattering someone into talking in a private chat room where they will be isolated or befriending someone on a social networking web page. Asking someone what problems they have to create the illusion of being a best friend and building up a sense of mutual love and trust, suggesting that they can discuss "anything".

#### **47. Sex talk/Sexting**

Engaging someone in explicit conversations or requesting sexually explicit pictures from them.

#### **48. Cyber –bullying**

Using electronic forms of communication such as e-mail, text, face -book to send malicious or unkind messages to try and intimidate or threaten someone.

#### **49. Radicalisation**

Under the Prevent Duty legislation, Colleges have a duty to put into place policies and procedures to prevent young people and vulnerable adults from being drawn into radicalisation and extremism.

Staff have responsibility to familiarise themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College.

The Group recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The Group will continue to empower its students to create communities that are resilient to extremism and protect the

wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages.
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism, they should discuss this with the appropriate Designated Person or in their absence another member of the safeguarding team. CIC and WKC each have a named Specific Point of Contact (SPOC) for referring any concerns. The designated Person for WKC is also the SPOC for Capital City College's Training Arm.