



Safeguarding Policy

Introduction

Inspire Middlesex College is committed to safeguarding and promoting the welfare of children, young people and adults at risk (this includes apprentices and other learners) and to ensure that the actions are taken to support them if abuse is suspected.

Staff in this organisation recognise and accept their responsibilities to develop awareness of the issues that may cause harm to young people, adults at risk (formerly vulnerable adults), apprentices and other learners and promote the concept of the 'safe learner'. We are committed to:

- Provide a safe environment for young people and adults to learn in.
- Practice safe recruitment in checking the suitability of staff (including agency staff), volunteers and contractors to work with or in an environment where young people and adults at risk are present.
- Identify young people and adults at risk who are suffering, or likely to suffer, significant harm.
- Take appropriate action to see that such young people and adults at risk are kept safe at all times.
- Identify young people and adults at risk who are suffering or likely to suffer impairment of their life chances and opportunities to learn and achieve.
- Take appropriate action to ensure that such young people and adults at risk have access to all appropriate, available support in order to improve life chances.

This policy is related to and should be read in conjunction with the Inspire Middlesex College Prevent Duty Policy, which we include within our safeguarding responsibilities. It should also be read in conjunction with the procedures that have been put together as part of our response to the Coronavirus pandemic. The main document is the Coronavirus (Covid-19) Resilience Plan.

Definitions

Children and young people – those aged under 18 years

Vulnerable adults – those aged over 18 who may be considered vulnerable to abuse.

Designated Safeguarding Lead (DSL) – Lead Safeguarding Officer

Purpose of this policy

The purpose of this policy is to provide advice for staff and others working with us on helping us to meet our commitment of ensuring that any child, adult at risk, apprentice or other learner receiving any form of training, advice or guidance through us is protected from all forms of exploitation and abuse. In particular it covers:

- how we promote the policy
- how we achieve commitment to the policy
- how we train our employees in implementing the policy
- how we ensure protection of and prevent abuse of apprentices and other learners
- our processes for raising, recording and investigating concerns
- our procedures for getting additional support and guidance
- how our IT usage is monitored
- how we review this policy annually

We have interpreted and acted on substantial guidance to take preventative measures to protect young people and adults at risk from abuse: physical; sexual; psychological, emotional; financial or material; neglect and acts of omission and impairment to their personal and social development.

We believe that our current arrangements reflect the level of risk associated with our 16-19 programme and adult-focused programmes. All staff and associates are asked to subscribe to our Code of Behaviour to help embed the delivery of our policy commitment. We recognise that no guidance can be exhaustive.

Our policy and accompanying procedure are to ensure, so far as is possible, that all who work with us maintain a proper focus on safeguarding and know when to initiate the safeguarding procedure to raise and report concerns.

Our responsibilities and how we achieve commitment to the policy

We will:

1. Promote the health and welfare of young people, adults at risk, apprentices and other learners by providing opportunities for them to take part in our programmes safely.
2. Respect and promote the rights, wishes and feelings of young people, adults at risk, apprentices and other learners.
3. Promote and implement appropriate procedures to safeguard the well-being of young people, adults at risk, apprentices and other learners, and protect them from abuse.
4. Support staff and associates to adopt best practice to safeguard and protect young people, adults at risk, apprentices and other learners from abuse and to minimise risk to themselves.
5. Continually promote this policy and require that staff and associates adopt and abide by it.

6. Keep a safeguarding register/log to record incidents or concerns and use this to inform our response to future incidents and for risk assessment.
7. Respond to any allegations of misconduct or abuse of young people, adults at risk, apprentices or other learners in line with this policy and its accompanying procedure.

Principles

The welfare of young people, adults at risk, apprentices and other learners is everyone's responsibility, particularly when it comes to protecting them from abuse. Our programmes provide an excellent opportunity for participants to learn new skills, grow in confidence and maximise their potential.

This policy is based on the following principles:

1. The welfare of young people, adults at risk, apprentices and other learners is a primary concern.
2. All young people, adults at risk, apprentices and other learners, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from abuse.
3. It is everyone's responsibility to report any concerns about abuse using the procedure prescribed within this policy.
4. Where necessary, we will cooperate with any investigations conducted by local Safeguarding Partnerships, Social Services Departments and/or the Police.
5. All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
6. All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
7. All staff in contact with our learners hold DRB clearance.

Training

Every member of staff will receive safeguarding and Prevent training scheduled by the Designated Safeguarding Lead (DSL). We use external safeguarding courses.

If a member of staff, and in particular those working with apprentices, feel they need additional training, or refresher training, Inspire Middlesex College will support this training need and the member of staff should approach the DSL in the first instance.

Our recruitment policy includes procedure around safeguarding. As part of their induction programme, every new member of staff will receive safeguarding training covering, Safeguarding, Prevent, Channel, and Equality and Diversity.

All staff will receive safeguarding training at induction and be provided with regular updates through emails and/or meetings at least annually.

Level 2 safeguarding training will also be delivered to staff and governors and refreshed annually (either online or face-to-face).

In addition, specific areas of concern in safeguarding, for example: knife crime, violence and bullying, etc. may be the subject of workshops, training, guest speakers or events which will allow staff to build expertise and help shape practice through training workshops and events.

Where there is an allegation of harm or abuse against staff, both inside and outside the work setting, the College will work to ensure allegations are dealt with quickly, fairly and consistently. Procedures under this policy apply to all staff, as well as volunteers (see section on Allegations of harm or abuse against children).

All staff should read 'Keeping children safe in education 2022 Statutory guidance for schools and colleges Part one: Information for all school and college staff' via the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101457/KCSIE_2022_Part_One.pdf

Recruitment of staff and volunteers

The College will ensure that procedures are in place to ensure that all appropriate checks are carried out on staff and volunteers who have substantial access to children and students, including DBS (enhanced) checks), and as safer recruitment checks minimum two references from previous employers and records are kept of such checks. The safer recruitment checks will be kept in a single record access point to be accessible to the DSL and Managing Director. This process is detailed further in the Staff Policy.

Code of Behaviour - for all staff and associates

1. Staff and associates must respect a young person's, adult at risk's, apprentice's and other learner's rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviour they do not like.
2. Our staff and associates are expected to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their professional role within the organisation.
3. All staff and associates should be aware of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the Designated Safeguarding Lead (DSL).
4. If a member of staff finds himself or herself the subject of inappropriate affection or attention from a young person, adult at risk, apprentice or other learner they should make others aware of this immediately.
5. If a member of staff has any concerns relating to the welfare of a young person/ adult at risk, be it concerns about actions or behaviour of another staff member or concerns based on any conversation with the young person/ adult at risk, particularly if an allegation is made, they should report this to the DSL.
6. Staff and associates should not start an investigation or question anyone after an allegation or concern has been raised. Staff or associates should just record the facts and report these to the DSL.

All allegations of abuse or harm will be treated seriously and consistently. This may lead to an investigation of a possible criminal offence by the police, involvement of an appropriate social care worker or an investigation of our provision and consideration of disciplinary action on staff or learners.

Monitoring of IT usage

In line with GDPR guidelines, we may monitor IT usage of apprentices, trainers/assessors and other staff. This is of particular importance regarding our Prevent strategy. The use of and monitoring of IT usage is also referenced in our Health and Safety Policy. Due consideration is to be given to the well-being of our learners as a result of the Coronavirus pandemic and this may sometimes be linked to a safeguarding concern. On-line programme delivery has increased and thus we have raised the importance of the monitoring of IT usage.

Confidentiality

Information will be gathered, recorded and stored in accordance with the Data Protection Policy.

All employees must be aware that they have a professional duty to share information with other agencies in order to safeguard children and adults at risk.

Safeguarding children and adults at risk may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding Lead (DSL).

Our process for raising, recording and investigating concerns

1. If a member of staff identifies a young person, adult at risk, apprentice or other learner at risk of abuse or has any safeguarding concerns, they should assess the nature and extent of that risk and consider if it poses an immediate danger.
2. Report to the Designated Safeguarding Lead (DSL), initially this can be a verbal report but it should be followed up with a written report using the Safeguarding Referral Record Form.
3. Seek medical attention for the apprentice, child or adult at risk if needed.
4. DSL to take any immediate steps to prevent any further danger to the young person, adult at risk, apprentice or other learner (in the case of an emergency incident).
5. Make accurate notes to record an incident or conversation. This is important as the DSL may need to refer to them if an investigation is pursued.
6. Complete the Incident Report Form as fully as possible (see Appendix Two).
7. In the case of an apprentice the DSL is to liaise with the apprentices' employer (and/or parent if under 18) where it is safe and appropriate to do so.
8. Upon receiving a report of a safeguarding concern, the DSL reviews, the Incident Report Form and conducts an investigation, if required.
9. Where relevant, develop the most appropriate support plan for the apprentice or member of staff.

10. DSL to take appropriate steps which may include, referral to outside agencies (local Safeguarding Partnership) or the apprentices' employer or other organisations and/or disciplinary action or instigating the Channel process (if a Prevent Duty concern). This is part of our procedure for getting additional support and guidance.
11. Staff and the DSL will cooperate with the authorities who may take the process forward from this point.

Designated Safeguarding Lead (DSL)

There will be a Designated Safeguarding Lead (DSL) at Inspire Middlesex College.

The DSL has a key duty to take lead responsibility for raising awareness amongst 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.

The DSL will receive training in child protection issues and inter-agency working, as required and will receive refresher training at least every 2 years.

The DSL will oversee the referral of alleged harm or abuse to the relevant investigating agencies in line with Local Children Safeguarding Board (LSCB) procedures.

The DSL will oversee the referral of alleged harm or abuse to the relevant investigating agencies in line with LSCB procedures.

The DSL is also responsible for ensuring that:

Advice and support to staff on issues relating to safeguarding and child protection, including e-safety, is provided.

A proper record of any child protection referral, complaint or concern is maintained (even where that concern does not lead to a referral).

Making referrals to statutory child protection agencies, i.e. through the Multi Agency Safeguarding Hub (MASH) or the Police without delay, and working in full cooperation with external agencies as required.

The College liaises with local authorities and LSCB and other appropriate agencies.

The DSL will promote the educational outcomes for vulnerable students, including those with a social worker, by liaising with curriculum staff to identify the challenges the student may face and the support needed.

Staff receive initial safeguarding training and are aware of the College safeguarding and child protection procedures.

The College's Safeguarding Committee meets as a minimum once every 3 months. A Safeguarding Operational Plan is prepared and reviewed in the governance meeting and is therefore subject to Senior Leadership Team's scrutiny. The DSL will provide an annual and mid-year reports to the Governing Body of the College setting out how the College has discharged its duties.

As set out in Keeping Children Safe in Education, College Governors are responsible for ensuring that:

- The College complies with its duties under the legislation
- An appropriately senior safeguarding lead is appointed
- Appropriate policies and procedures are in place, that the Safeguarding Policy is updated annually and is available to the public when require
- Arrangements are in place for children who go missing from education
- The College contributes to inter-agency working in line with the statutory guidance (Working Together to Safeguard Children)
- Safeguarding arrangements take into account the procedures and practice of the relevant local authorities
- Information sharing between agencies is appropriately facilitated and promoted and is not a barrier to the promotion of welfare
- all members of staff undergo safeguarding training at induction and on a regular basis thereafter
- that opportunities exist for the expertise of staff to contribute to and shape safeguarding arrangements and policy
- students are taught about safeguarding, including whilst online, through teaching and learning opportunities, as part of a broad and balanced curriculum
- the College has processes for ensuring safe recruitment and dealing with allegations of abuse against members of staff
- the student's wishes and feelings are taken into account in determining action and support
- staff have the skills, knowledge and understanding necessary to keep Looked After Young People safe, and that a Designated Member of Staff (DMS) is in place
- to ensure any External Speakers/Visitors are only permitted after approved by the DSL who will ensure a tutor is in direct supervision.

Allegations of harm or abuse against children

Staff should not investigate concerns or allegations themselves, but should report them immediately to a Designated Safeguarding Lead (DSL). See Appendix three for further guidance.

Written records of concerns about children and students will be kept, even where there is no need to refer the matter immediately.

All records will be kept securely, separate from other student files, and in locked or secure electronic file locations by a DSL.

The Schools Child Protection Officer or Children's Social Care Duty Officer or Police for the victims local authority will be notified following approval by a DSL (see Appendix three).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point. Staff should refer to Appendix three in such cases. In addition, staff should be aware of the College's Public Interest Disclosure Whistleblowing Procedure to raise concerns of suspected malpractice.

Disclosure

Children and young people have a right to expect the College to provide a safe and secure environment and a fundamental right to be protected from harm.

Harm is any behaviour that endangers the well-being of a child or young person and includes:

- Sexual abuse
- Domestic violence
- Child pornography or prostitution
- Neglect

If a child or young person discloses a Child Protection issue it is essential as a member of College staff that you:

- Listen carefully but do not question or do not question or interview
- Do not make judgements
- Reassure
- Keep accurate notes
- Refer - All concerns must be reported to the Designated Safeguarding Lead (DSL)

In addition, you MUST tell the child or young person that you have to pass this information on to the Designated Safeguarding Lead (DSL).

Responsibilities and contact details

Primary responsibility for safeguarding sits with the Designated Safeguarding Lead (DSL), Satvinder Mahal, who is the designated safeguarding lead for Inspire Middlesex College. Oversight is provided by the Managing Director and Senior Leadership Team. DSL is also the Prevent Lead for the college.

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| <ul style="list-style-type: none">• Contact details for reporting or contacting the IMC Safeguard Team• Email: Safeguarding@inspiremiddlesexcollege.org• Telephone: 020 3441 6729 |
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Satvinder Mahal, Designated Safeguarding Lead (DSL)

Email: sat@inspiremiddlesexcollege.org

And/or

Akash Mahi, Deputy Designated Safeguarding Lead (DSL)

Email: akash@inspiremiddlesexcollege.org

Referral procedure for 'serious' cases

- All reports of Child Protection issues must be referred to the Designated Safeguarding Lead (DSL) as soon as possible after disclosure has been made.
- All referrals should be clearly identified or marked 'Safeguarding Issue' and can be made by telephone, e-mail or any other appropriate method. The following procedures refer to safeguarding concerns a student may have about themselves, another student, parents or guardians or any other adults.
- Once the initial referral has been made the DSL will talk to the child or young person and others involved then make a decision regarding further appropriate action.
- The DSL will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect them. Students will be supported to express their views and give feedback on the service wherever possible.
- If an allegation has been made by one student against another then an investigation will be conducted. The Designated Lead for Safeguarding will oversee any investigations of this nature and reserves the right to suspend students where necessary during an investigation.
- The College's responsibility is not confined to the protection of College students. If any member of staff is made aware of any harm to any child, a referral to the DSL should be made.
- For those issues, which require a serious safeguarding response; (e.g. referral to the Police, the local authority, social services) examples include: serious domestic violence; threat of forced marriage; sexual assaults; serious incidents involving mental health issues; witness protection; (this list is not exhaustive). In these cases, the DSL (Lead responsible person) will decide (independently in an emergency, or more usually, through agreement) if the threshold has been met to contact an external agency. Other staff may contact external agencies with the permission of one of the staff listed below or independently in an emergency.
- Safeguarding referrals will be made to external agencies such as: Local authority Child protection officer.
- Police; Social Services; Mental Health e.g. CPN's (community psychiatric nurses if contact details are known). The lead person with responsibility for Safeguarding is to be made aware of all referrals to external agencies.
- If an Inter-agency referral form (previously Common Assessment Framework, CAF) is required this will be completed by the DSL. Forms are available on the local authority websites see below or appendix 4.

https://www.hounslow.gov.uk/info/20075/child_protection

<https://hillingdonsafeguardingpartnership.org.uk/professionals/useful-guidance/mash/>

https://www.richmond.gov.uk/services/children_and_family_care/single_point_of_access/single_point_of_access_for_professionals/make_a_referral_to_spa

<https://www.harrowscb.co.uk/report-a-concern/general-referral-form-for-practitioners/>

or <https://www.londonscb.gov.uk/contacts/safeguarding-contacts/>

Parents will be contacted (for under 18 year olds and over 18 if genuine concern of mental well-being, or vulnerable person) unless to do so would put the student 'at risk' of harm.

All serious cases will be recorded on the College's Safeguarding log. In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children.

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of the full version of KCSIE.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Our commitment to reviewing and monitoring our safeguarding practices

We will work in partnership with local safeguarding partnerships and committees to seek guidance on developing our safeguarding practices and dealing with allegations of harm that may have occurred at home or in other situations outside of our remit.

The effectiveness of the Safeguarding Policy will be monitored by the Designated Safeguarding Lead (DSL) through data collections and observations undertaken periodically.

We also monitor IT usage. In line with GDPR guidelines we may monitor IT usage of our learners and staff. This is of particular importance with respect to our Prevent strategy.

Concerns recorded in the Safeguarding Register will be reviewed at regular meetings of the Senior Leadership Team and used to identify risks and put in place actions to mitigate them.

All policies and practices are reviewed annually to ensure that we have we have sound systems in place to minimise abuse of young people and adults at risk, and to take action where abuse is suspected. It will be evaluated against the latest iteration of the Ofsted criteria in the Education Inspection Framework. We seek to identify which descriptor best matches current safeguarding and Prevent provision at Inspire Middlesex College and then identify actions, where necessary, to reach the next descriptor.

Review and Updates

A review date is included in the document control box which is on the front page of this plan.

This policy will be reviewed every 12 months or more frequently in the event of the publication of new guidelines/official communications.

Appendix One

Further information website hyperlinks

1. DBS Code of Practice: <https://www.gov.uk/government/publications/dbs-code-of-practice>
2. Keeping children safe in education 2022 Statutory guidance for schools and colleges September 2022:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf
3. The Care and Support Statutory guidance
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

Definitions of abuse

Inspire Middlesex College follows The Care and support statutory guidance in identifying ten types of abuse, these are:

Physical abuse
Domestic violence or abuse
Sexual abuse
Psychological or emotional abuse
Financial or material abuse
Modern slavery
Discriminatory abuse
Organisational or institutional abuse
Neglect or acts of omission
Self-neglect

Physical abuse

This may include: hitting, slapping, shaking, throwing pushing, kicking, misuse of medication, poisoning, drowning, suffocating or causing any physical harm, restraint or inappropriate sanctions. Some of the recognised signs of physical abuse are:

1. Unexplained burns
2. Scratches
3. Bruising and abrasions
4. Drowsiness from misuse of medication
5. Anxiety in the presence of an abuser

Sexual abuse

This may include: rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and of the College policy and procedures for dealing with it.

Some of the recognised signs of sexual abuse are:

1. Changes in behaviour
2. Bruising
3. Sexually transmitted diseases
4. Sexualised behaviour.

Psychological/emotional abuse

There is a strong similarity between both psychological and emotional abuse. Emotional abuse is generally described as an element of psychological abuse. Psychological abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Some of the recognised signs of psychological or emotional abuse are:

1. Fear
2. Passivity
3. Confusion
4. Apathy
5. Lack of eye contact
6. Low self-esteem
7. Disturbed sleep patterns
8. Reluctance to talk openly

Financial or material abuse

This may include: theft, fraud, exploitation or the misuse or misappropriation of property, possessions or benefits. Some of the recognised signs of financial or material abuse are:

1. Loss of jewellery and personal property
2. Lack of money to purchase basic items
3. A bill not being paid when money is entrusted to a third party

4. Inadequate clothing
5. Unexplained withdrawal of cash
6. Loss of money from a wallet or purse

Neglect and acts of omission

Neglect is when the constant failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. This may include: failing to provide medical or physical care needs, adequate food, clothing and shelter including home and abandonment, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition.

Some of the recognised signs of neglect and acts of omission are:

1. Dehydration
2. Infections
3. Malnutrition
4. Hypothermia.

Discriminatory abuse

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.

Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse. Although all these forms of abuse are now better analysed and documented not all have been fully recognised by education and training provision in the past. These guidelines recommend that education and training providers should formally recognise all ten areas of abuse as identified by the

Other safeguarding issues

Staff will be aware of other behavioural issues, for example alcohol misuse, taking drugs, deliberately missing classes or even consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Other safeguarding issues include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting

or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same; however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

Criminal sexual exploitation can affect any child, who has been coerced into engaging in sexual activities. CSE is a form of child sexual abuse. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Female Genital Mutilation (FGM)

Staff must be aware of female genital mutilation and of the requirement on them to comply with the specific legal duty in this regard. They must speak to the Designated Safeguarding Lead (DSL) if they have any concerns about female genital mutilation (FGM) or if they suspect an act of FGM appears to have been carried out on a girl under the age of 18. Staff must report this to the DSL who will report it to the police.

Peer on Peer Abuse

This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing

someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting; which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy) or support alleged victims to report to the authorities such as the police.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- up skirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Serious violence

Staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.

Indicators may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups,
- A significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Concerns that a student may be forced into marriage

A distinction should be made between ‘forced’ and ‘arranged’ marriage. The Forced Marriage Unit describes the difference between a forced and an arranged marriage thus: *“There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses. In forced marriage one or both spouses do not (or, in the case of some adults with disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, sexual, financial and emotional pressure. Consent is essential to all marriages – only the spouses will know if they gave their consent freely”.*

All suspicions of forced marriage must be reported to a Designated Safeguarding Lead (DSL); this applies even if the marriage has already taken place.

Full credence should be given to information about forced marriage supplied by third parties (e.g. a friend of the student).

The College will follow the London Child Protection Procedures and the guidance issued by the Forced Marriage Unit (Foreign & Commonwealth Office, <http://www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/>)

Concerns that a student may have gone missing

Staff should be mindful that a child going missing from an education setting is a potential indicator of abuse or neglect. Any suspicion that a child has gone missing should be reported to the Designated Safeguarding Lead (DSL).

Statutory guidance on children who run away or go missing from home or care is provided in the DfE in its January 2014 publication.

When a 16 or 17 year old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation or involvement with gangs.

A 16 or 17 year old who has run away may present as homeless. In this case, local authority children's services must assess their needs as for any other child. Where this assessment indicates that the child is a child in need and requires accommodation under section 20 of the Children Act 1989, they will become looked after.

The College procedure for dealing with missing children will be to immediately contact the next of kin and (if the case hasn't been reported) then contact the police and if necessary local authority will also be contacted. Children who repeatedly go missing will be subject to a risk assessment and be supported on the safeguarding register. For further information refer to: Education Statutory Guidance (2017) Children Missing Education (2016).

Child Sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Youth produced sexual imagery (YPSI) is the sharing of sexual images of themselves and others and will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily.

Upskirting: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Child sexual exploitation (CSE): involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual'

relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying, banter and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

One way that children might end up being sexually exploited is through child trafficking. The Modern Slavery Act 2015 places a duty on authorities to report concerns relating to child trafficking. Any staff that have concerns of CSE or child trafficking should report them immediately to the designated safeguarding lead. For further information: HM Government (2011) Safeguarding Children who may have been trafficked (2011).

Fabricated and induced illnesses

The fabrication or induction of illness in children is a relatively rare form of child abuse. Concerns that a child's illness may be fabricated or induced are most likely to come from health professionals. However, College staff may notice where a child is frequently absent from College on questionable health grounds. Normal safeguarding procedures apply in these circumstances. For further information please refer to the following policy.

HM Government (2008) Safeguarding children in whom illness is fabricated or induced
<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Concerns of violent extremism

The new Counter-Terrorism and Security Act 2015 placed specific duties on FE Colleges. These are addressed in the College's separate Preventing Terrorism & Radicalisation Policy.

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a Designated Safeguarding Lead (DSL). Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists.
- changing their style of dress or personal appearance to accord with the group.
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

As part of the Terrorism Act 2000 – the College has an obligation to disclose information which might be of material assistance in preventing an act of terrorism to the police. (<https://www.gov.uk/government/publications/prevent-strategy-2011>)

The College has a Preventing Terrorism and Radicalisation policy which contains more information on the specific duties for all staff and students.

Abuse linked to Faith, belief and culture

Child abuse may be linked to faith, belief and culture. Examples are: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list.

Staff are asked to be mindful of this type of abuse and report any concerns to the College Designated Safeguarding Lead (DSL).

Children in families experiencing multiple needs

Unfortunately for some children it is common to experience more than one safeguarding need. For example, a student may live in a household where there is domestic violence, drug and alcohol abuse and mental health issues. Occasionally staff may become aware of new abuses in an existing case. Staff are asked to be mindful of the negative impact this may have on these students and report any new information or concerns to the Designated Safeguarding Lead (DSL).

Child trafficking and modern slavery

Human trafficking, is defined in the UN Protocol (2000) as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern-day slavery, is a crime and safeguarding issue. Examples of industries and services where slavery may involve children and young people are: the sex industry, including brothels; retail: nail bars, hand car washes; factories: food packing; hospitality: fast-food outlets; domestic labour: cooking, cleaning and child minding. Additionally, victims can be forced into criminal activities such as cannabis production, theft or begging. Children and young people have an increased vulnerability to slavery, e.g. young people being moved internationally or domestically so that they can be exploited; forced labour; verbal or physical threats of violence against them as individuals or their families. Possible signs and indicators that someone is a victim of modern include:

- physical appearance: poor physical condition, malnourishment, untreated injuries, and looking neglected
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. they may not interact and be unfamiliar in their local community
- personal belongings: few possessions, wearing the same clothes each day, and no identification documents
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deportation or fear of violence on their family

Further advice can be provided directly by the modern slavery helpline on 0800 0121 700.

Health, Safety & Wellbeing

In line with the College's Equality and Diversity Policy and recognising the College's duties in the Equality Act 2010; the College seeks to have due regard to those students who present with issues related to their wellbeing either at the admissions phase or during their studies.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers

Staff should be aware of these barriers when dealing with a safeguarding issue and supporting children with SEN and disabilities.

Online safety

There is a recognition that most children are using data on their phones, on the 3G or the 4G network. In the College, this means that staff should be aware that students are accessing the internet whilst they're at College. Online safety can be categorised into three areas of risk which staff should be aware of:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Staff should be aware of these risks of online safety.

In terms of their own use of technology, staff should be aware of the following:

Staff will NOT give any student their personal mobile phone number and will only contact the student on their mobile phone from a College landline, College mobile or College messaging facility.

- Staff members should not have personal telephone numbers of any student on their mobile phone.
- Communication by email should only be through the College's email system and personal emails must not be shared with students.
- Staff will ensure that they follow the College's policy about access to and use of the internet.

Any staff with concerns about the inappropriate use of social media or technology or any issues around 'sexting', cyber-bullying or other inappropriate conduct should contact the Designated Safeguarding Lead (DSL) without delay.

As a safeguarding feature the College has online key word detection software to identify risk for all users that are logged in to the College network.

Child Sexual Violence and Sexual Harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. If possible reports should be made with two members of staff present, (preferably one of them being the designated safeguarding lead or tutor). When there has been a report of sexual violence, the designated safeguarding lead (or tutor) will make a risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. More advice is available in the following government publication.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Whistleblowing policy

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. The College's whistleblowing policy is the best way for staff to do this. The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled.

Appendix Two

Reporting Form:

All staff are aware that they must immediately report any concerns they have in relation to any child, vulnerable adult, apprentice or other learner portraying signs of the above definitions of abuse. These reports are to be made via the Inspire Middlesex College Incident Report Form below.

INSPIRE MIDDLESEX COLLEGE Incident Report Form
Name of Individual with concern:
Type of concern:
Position:
Learner Name:
Learner Address:
Parents/Carers (or for Apprentices the name of their employer) Name and Address:
Learner Date of Birth:
Date and Time of any Incident:

Your Observations:

Exactly What the Learner Said and What You Said

(Remember, do not lead the Learner – record actual details. Continue on separate sheet if necessary)

Action Taken so far:

External Agencies Contacted (Date & Time)

POLICE: Yes/No (Please Circle)

If yes – which:

Name and Contact Number:

	<p>Details of Advice Received:</p>
<p>Local Authorities Children’s Social Care: Yes/No (Please Circle)</p>	<p>If yes – which:</p> <p>Name and Contact Number:</p> <p>Details of Advice Received:</p>
<p>LOCAL AUTHORITY: Yes/No (Please Circle)</p>	<p>If yes – which:</p> <p>Name and Contact Number:</p> <p>Details of Advice Received:</p>

<p>Other (e.g. NSPCC)</p> <p>-----</p> <p>-----</p> <p>-----</p>	<p>Which:</p> <p>Name and Contact Number:</p> <p>Details of Advice Received:</p>
<p>Signature:</p> <p>Print Name in Block Capitals:</p>	
<p>Date:</p>	

Appendix Three

REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF

The procedures apply to all College students, contracted staff or agency staff, , outreach centres or other designated areas, volunteers or governors. The word “staff” is used for ease of description. These procedures only apply to ‘current’ staff. Any allegations against a staff member who is no longer employed by the College will be referred to the police and the LADO, Local Authority Designated Officer (<https://national-lado-network.co.uk/the-role-of-the-lado-local-authority-designated-officer/>).

Introduction

Because of their frequent contact with children and young people, staff in educational institutions may have allegations of child abuse made against them and, in rare instances, such allegations may be true. The College recognises that an allegation of child 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. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The College recognises that the Children Act 2004- 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, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

Receiving an Allegation from a Child

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines under the section dealing with disclosure.

The allegation should be reported immediately to a designated Child Protection Officer. The designated Child Protection Officer or the Designated Safeguarding Lead (DSL) should obtain written details of the allegation from the staff member who received it, that are signed and dated or receive the allegation direct from the child where no written record exists.

Record information about times, dates, locations and names of potential witnesses.

Initial Assessment by Designated Safeguarding Lead (DSL)

The DSL should make an initial assessment of the allegation, consulting with Managing Director or Senior Leadership Team as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LSCB.

Undertaking the Working Together to Safeguard Children guidance and DfE Guidance Keeping Children Safe in Education, the DSL will refer to the Local Authority Designated Officer for Safeguarding an allegation of abuse or maltreatment made against “a person who works with children where that person who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child;

- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that is unsuitable to work with children, in connection with the person's employment or voluntary activity.

Where there is an allegation against a member of staff it is important that the DSL investigates it and makes an initial assessment on the basis of the information received about whether the staff member should be suspended. In the event of suspension the DSL will make a decision that the allegation warrants further investigation.

Potential outcomes following an investigation by the DSL/ Managing Director are that:

The allegation warrants further investigation by the appropriate authorities i.e. Social Services/Police. The allegation represents inappropriate behaviour or poor practice by a member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter will be addressed in accordance with the College disciplinary procedure.

The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the College to act in a particular way; however, the College will assist the agencies with their enquiries.

The College may decide to continue with its internal enquiries and disciplinary procedures while the formal police or social services investigations proceed as any internal enquiries shall follow the staff disciplinary procedures and the member of staff will be made aware that the College's disciplinary procedures will apply notwithstanding other investigations.

If there is an investigation by an external agency, the DSL will be involved in, and contribute to, the inter-agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance with the agency's enquiries. The DSL 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 Designated Safeguarding Lead (DSL) shall:

Inform the child/children 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 child making the allegation have been informed that the allegation has been made and what the likely process will involve.

The Managing Director shall inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the process will involve.

In the event of a serious sexual allegation the Managing Director shall inform the Governors of the allegation and the investigation.

The Managing Director shall keep a written record of the action taken in connection with the allegation.

Neutral Suspension of Staff

Suspension will not be automatic and will depend on the seriousness of the case. In respect of staff other than the Managing Director, suspension can only be carried out by a member of the Senior Leadership Team.

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 may be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties. During the investigation, the staff member will be supported by the Managing Director and/or Senior Leadership Team.

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

- Where a child 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 will be encouraged to seek advice, for example from a trade union.
- Prior to making the decision to suspend, the Managing Director and another SMT member will interview the member of staff.

The member of staff will be informed that an allegation has been made. The interview is not a formal disciplinary hearing, but the matter is being raised to hear what the staff member has to say about the allegation. A decision may then be taken to suspend pending further investigations.

- The LSCB (LADO) will be informed of the action taken and the reasons for doing so
- The interview will follow the process outlined under the College's disciplinary procedures.
- The Disciplinary Investigation/ Disciplinary Hearing
- The internal disciplinary investigation meeting will be conducted in accordance with the existing College disciplinary procedures.
- The investigating manager may then decide to refer the matter to a disciplinary hearing if a case to answer is found following the investigation meeting.

Following a disciplinary hearing the College may be required to contact the DBS as part of its legal duty to report concerns relating to risky staff. There are two main conditions for referral to the DBS:

- They have permanently removed a person from 'regulated activity' through dismissal or permanent transfer from 'regulated activity' (or would have if the person had not left, resigned, retired or been made redundant);
- They believe the person has: a. Engaged in 'relevant conduct' b. Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or c. Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website, or call the helpline for advice).

Allegations without foundation

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

Following consultation the DSL or the Managing Director shall:

- Inform the member of staff against whom the allegation is made both orally and in writing that no further disciplinary or child protection 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 will be given to informing the parents/carers of that child.
- prepare a report outlining the allegation and giving reasons for the conclusion and confirming that the above action has been taken.
- consider whether the allegation made against the member of staff was malicious. In such an event if the child is a student at the College, an investigation under the College's Student Disciplinary Procedures will be undertaken. If the false allegation was made by another staff member against a work colleague an investigation under the College's Disciplinary Procedure will be undertaken.

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 or in student records if it refers to a student.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the College's statutory duty to inform the relevant bodies such as DBS.

Appendix Four

Useful Contacts

Only to be used by Designated Safeguarding Lead (DSL) unless extremely urgent:

Children's social care team at the council in Hounslow

020 8583 6600 option 2 (Monday to Friday, 9am to 5pm)

Out of hours: After 5pm weekdays or weekends, call 020 8583 2222 and ask to speak to the duty social worker

Email: childrensocialcare@hounslow.gov.uk

Local Authority Designated Officer (LADO) for Hounslow

0208 583 5730/0208 583 3423

Email: LADO@hounslow.gov.uk

Others:

LB Hillingdon Child Protection Officer 01895 5566644

LB Harrow MASH / LADO / Golden number 0208 901 2690

LB Richmond 020 8547 5008

Forced Marriage Unit 0207 008 0151

Prevent: Anti-Terrorist hotline 0800 789 321

LADO Hillingdon 01895 250 975

LADO Richmond 020 8547 5008

LADO Harrow 020 8736 6435

Domestic violence team Hillingdon 0208 246 1745

Domestic Violence team Richmond 020 8943 8188

Harrow Duty team 0208 901 2690/ 0208 424 0999

Ealing Emergency Duty team (24 hrs) 0208 825 8000

Mead House Community Mental Health team 01895 558 270

Pembroke Centre 01895 622 424

Harrow/Hillingdon Early Intervention Service 01895 627 760

CFACS (Child, Family & Adolescent Consultation Service) 01895 256 521

Police Insp (insp Uxb Town Centre) 0207 161 8170

Richmond Police station 020 8607 9199

Brent Children's social care 0208 937 4300

Hillingdon 16+ Duty 01895 277 637

Hillingdon CAMHS 01895 256 521

Richmond CAMHS 020 3513 5000

Southall Black Sisters 0208 571 0800

Harrow Prevent Coordinator Samia Malik 0208 420 9385

Brent Prevent Coordinator Kibibi Octave 0208 937 4225

Hillingdon Prevent co-ordinator Fiona Gibbs 01895 277 035

In extreme circumstances (e.g. where there is a suicidal threat) the police or an ambulance will be called immediately on the 999-emergency number.