



SAFEGUARDING & PREVENT POLICY
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SAFEGUARDING (INCLUDING CHILD PROTECTION) & PREVENTING EXTREMISM AND RADICALISATION (PREVENT) POLICY

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1.INTRODUCTION: 'SAFEGUARDING IS EVERYBODY'S RESPONSIBILITY'

We commit to ensuring that Croydon College and its Governing Body:

- Provides a safe environment for young people and vulnerable adults
- Identifies young people and adults who are or may become vulnerable who are suffering, or likely to suffer, significant harm, and ensures they are kept safe
- Safeguards young people and adults from being drawn into committing terrorist-related activity.
- Promotes the welfare of young people.

The Governing Body will approve and annually review policies and procedures with the aim of:

- Ensuring a 'whole College' approach to safeguarding
- Raising awareness of issues relating to the welfare of young people and adults who are or may become vulnerable and promoting a safe environment for these students when learning within the College or online
- Aiding the identification of young people and adults who are or may become vulnerable who are at risk of significant harm, and providing procedures for reporting and addressing concerns
- Ensuring staff understand their safeguarding responsibilities
- Establishing procedures for reporting and dealing with allegations of abuse.
- Ensuring the safe recruitment of staff and the maintenance of a single central record.
- Ensuring that individuals at risk of being drawn into terrorism are identified and are referred to the Prevent and Channel Coordinator for appropriate support.

In developing the policies and guidelines, the Governing Body will consult with, and take account of, guidance issued by the Department for Education, the Croydon Safeguarding Children Partnership, and other relevant bodies and groups. The Governing Body will act in accordance with guidance provided in the Department for Education's publication '[Keeping Children Safe in Education 2021](#)' plus '[Working Together to Safeguard Children 2018](#)'.

This policy applies to all persons acting on behalf of or engaged in activities associated with Croydon College including, for example, members of the Governing Body, staff employed by the College group, visitors to, and contractors working at, College premises.

The Governing Body has strategic leadership responsibilities for the College's safeguarding arrangements and as such will appoint a Governor with specific responsibility for Safeguarding and Prevent. They can be contacted by email via the clerk to the corporation. Any concerns about the conduct of staff, including contractors, should be taken to the Designated Safeguarding Lead or the Head of HR. Any concerns about the Principal(s), Head of HR or the Designated Safeguarding Lead should go to the Chair of Governors, via the clerk.

Croydon College is required to make the Education and Skills Funding Agency (ESFA) aware if it is the subject of an investigation by the local authority or the police. The Designated Safeguarding Lead will provide the required information by email.

2. PURPOSE

Croydon College has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of young people and adults who are or may become vulnerable and who receive education and training at the College.

Throughout this policy reference is made to, "*young people and vulnerable adults*". This term is used to mean "those under the age of 18" and adults who are or may become vulnerable over the age of 18. The Governing Body recognise that some adults are also vulnerable to abuse, accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults.

Safeguarding and promoting the welfare of young people is a broader term than child protection. It includes protecting young people from maltreatment, preventing impairment of health or development and ensures young people can grow up in safe circumstances.

Child protection is part of this definition and refers to activities undertaken to prevent young people suffering or likely to suffer, significant harm.

When operating this policy Croydon College uses the following accepted Government definitions of extremism and radicalisation which are:

Extremism : 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

Radicalisation: 'the process by which a person comes to support terrorism and forms of extremism leading to terrorism'.

3. PREVENTING EXTREMISM AND RADICALISATION

As part of wider safeguarding responsibilities College staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Local authority services, and police reports of issues affecting learners in other colleges or settings
- Learners voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths and cultures
- Use of extremist or "hate" terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our Equality Strategy views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Making remarks about being at Extremist Events or Rallies outside college
- Usage of the multi faith room*

*The College acknowledges and respects that staff and students hold a variety of faiths and beliefs and therefore provides a multi faith room at the Croydon campus to enable users to pray and reflect during the College day. However, the College also recognises that such spaces can, on rare occasions, be used as an opportunity to promote extreme views and to radicalise others and therefore restricts access to this facility to the opening times of the Common Room. At the Coulsdon campus there is a 'quiet room' that can be used for quiet prayers and reflection but is not a designated multi faith space.

4. PROMOTING BRITISH VALUES

In line with the provisions of s.78 of the Education Act 2002 the College promotes fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. This promotion takes place through:

- Lessons and progress reviews
- The manner in which students are treated by staff
- The election of student representatives and a Student Executive Team
- The standards of behaviour and respect students are encouraged to adopt through the 'Student Code of Conduct' and the ['Positive Behaviour Policy'](#)
- The underlying messages delivered to students at student representative meetings and the Student Executive meetings
- The displays in classrooms, corridors and across the College
- The manner and consistency with which students' views and behaviours are challenged should they conflict with this

5. SAFER RECRUITMENT

All staff are subject to checks through the Disclosure and Barring service (DBS). This service carries out criminal record checks to identify unspent convictions of potential staff as per the Rehabilitation of Offenders Act (ROA) 1974. In addition, staff will have two references requested prior to employment. Where suitability checks are delayed a risk assessment will be undertaken and staff will be unable to work unsupervised.

All staff are issued with the Staff Code of Conduct and professional boundaries form part of the Safeguarding induction.

Staff working with under 18's should not place themselves, or their students, in vulnerable situations. Consideration must always be given to both the environment and the staff members own behaviour to minimise risk. Staff should avoid, where possible, lone working with a student.

January '21 Update to KCSiE relating to the change in EU workers following BREXIT:

- From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Advice about how information about a teacher's past conduct may be obtained can be found at paragraph 172
- Para -172 - Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges (set out in paragraphs 154 and 160). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK.

In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available: • criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions • obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability. Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: Recruit teachers from overseas. 173. Some overseas qualified teachers can apply to the Teaching Regulation Agency (TRA) for the award of qualified teacher status (QTS) in England.

6. GUEST SPEAKERS AND VISITORS

Croydon College values the opportunities presented by external speakers for students to experience diverse opinion and to enter into debate. This is seen as an essential part of both personal and academic development.

The College values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.

The College values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal guidelines.

The College recognises and supports the moral and legal frameworks of the society and

community within which it works.

The College will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive “street”, misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.

The College will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence.

All visitors are required to report to Reception and any organisation requesting to distribute leaflets on campus must seek approval from the Designated or Deputy Designated Safeguarding Lead prior to distribution. Other than the promotion of College business, staff and students must also request the permission of the Designated or Deputy Designated Safeguarding Lead before distributing leaflets.

For further information please refer to the Events Procedure.

7. SAFEGUARDING STUDENTS AGED 14-16

The College recognises the additional vulnerabilities of younger students and staff are aware of their responsibility to act immediately and appropriately if a disclosure is made. Link schools and Local Authorities must be informed immediately if a disclosure is made to ensure a collaborative and transparent approach.

8. WORKBASED LEARNING

All learners on Workbased Learning programmes receive an induction, which includes raising awareness of the College's commitment towards Safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Safeguarding Team. The understanding of all aspects of Safeguarding, preventing extremism and radicalisation and safe working practices is checked at each review and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's well-being is safeguarded by the work placement assessors. The College has arrangements in place to ensure that, prior to work related work commencing:

- Pre-placement Health and Safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant College policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

9. WORK EXPERIENCE

All work placement providers will be given safeguarding information at the time of placement.

10. PARTNER DELIVERY (DISTANCE LEARNING SUBCONTRACTS FOR 19+ LEARNERS)

All learners on courses delivered by a Croydon College partner receive details of the support services offered by the subcontractor. The College has arrangements in place to ensure that, prior to a course commencing subcontractors:

1. Submit their safeguarding & prevent policies
2. Submit their insurance certificates
3. Submit a checklist confirming that delivery staff have received safeguarding and PREVENT training

11. ESOL AND INTERNATIONAL STUDENTS

The College will ensure that for students where English is not their first language an induction on safeguarding is delivered so they gain a full understanding. There will be a strong focus on the promotion of values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

12. STUDENTS WITH A LEARNING DIFFICULTY OR DISABILITY

Students with learning difficulties and/or disabilities can face additional safeguarding challenges. The College will ensure that students who have a learning difficulty or disability are made fully aware of the safeguarding procedures during their Additional Learning Support (ALS) assessment. This will ensure that the information is delivered and adapted so it is accessible and meets their individual need. Information on how to contact a safeguarding officer will also be adapted when required; a safeguarding e-mail address is available. The expectation would be that their learning support staff or tutor would act as their first line of contact. This is particularly important for those students with communication barriers.

All relevant College staff working with young people and adults who are or may become vulnerable will receive training which adequately familiarises them with safeguarding young person and adult issues, their responsibilities and relevant College guidelines and policies, updated bi-annually. The College will ensure there are designated and trained senior management and Safeguarding Officers; these staff will receive update training every year.

The College will refer concerns that a young person or vulnerable adult might be at risk of significant harm to appropriate external agencies. Further information can be obtained from the [Special Educational Needs and Disabilities \(SEND\) Policy](#).

13. MENTAL CAPACITY

Students are deemed to have 'capacity' unless shown otherwise through a formal process.

14. TYPES OF ABUSE

The Governing Body recognises the following as definitions of abuse: "Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when a young person or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it" taken from guidance document '*Working Together to Safeguard Young People*'. It is every young person and adult's right to live free from abuse in accordance with the principles of respect, dignity, autonomy, privacy and equity.

This could include young people and adults with learning disabilities, mental health problems, and people with a physical disability or impairment. Their need for additional support to protect themselves may be increased when complicated by additional factors, such as domestic violence, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems social or emotional problems, poverty or homelessness.

The following categories of abuse are not mutually exclusive and a young person or vulnerable adult may be subjected to more than one type of abuse at the same time, whatever the setting.

It is important to recognise that some young people or adults who are or may become vulnerable may reveal abuse themselves by talking about or drawing attention to physical signs or displaying certain actions / gestures. This may be their only means of communication.

It is important for staff to be alert to these signs and to consider what they might mean. It is important that all staff are aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely, but not limited to, bullying, gender based violence/sexual assaults and sexting.

14.1. DEFINITIONS OF ABUSE

14.1.1. Physical Abuse

- Hitting, slapping, scratching, shaking, throwing
- Pushing or rough handling
- Poisoning, burning or scalding, drowning, suffocating
- Assault and battery
- Restraining without justifiable reasons
- Inappropriate and unauthorised use of medication
- Physical harm caused by feigning the symptoms of, or deliberately inducing injury in a young person or vulnerable adult
- Using medication as a chemical form of restraint
- Inappropriate sanctions including deprivation of food, clothing, warmth and health care needs

14.1.2. Sexual Abuse

- Sexual abuse which involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person is aware of what is happening, the risks involved or the consequences
- Rape or attempted rape
- Sexual assault and harassment
- Non-contact abuse e.g. voyeurism, exposing children to pornography, grooming (including via the internet), accessing or creating indecent images of children.

14.1.3. Psychological & Emotional Abuse

- Persistent emotional maltreatment
- Emotional and verbal abuse
- Humiliation and ridicule which may convey that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person
- Threats of punishment, abandonment, intimidation or exclusion from services
- Isolation or withdrawal from services or supportive networks
- Deliberate denial of religious or cultural needs
- Removing opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Failure to provide access to appropriate social skills and educational development training
- Imposing age or developmentally inappropriate expectations
- Interactions beyond the person's developmental ability, overprotection, limitation of exploration or learning, prevention of normal social interaction
- Seeing or hearing ill-treatment of another, serious bullying (including Cyber bullying) causing the person to frequently feel frightened or in danger
- Exploitation and corruption

14.1.4. Neglect and acts of omission

- Failure to meet medical, physical care and psychological and emotional needs
- Failure to access care or equipment for functional independence
- Failure to ensure adequate supervision including the use of inadequate care-givers or the failure to ensure access to appropriate medical care or treatment
- Failure to provide access to appropriate health, social care or educational services
- Failure to provide adequate food, shelter, heating, lighting and clothing (including exclusion from home or abandonment) etc.
- Failure to protect from physical or emotional harm or danger
- Failure to give prescribed medication
- Failure to give privacy and dignity
- Professional neglect

14.1.5. Financial

- Misuse or theft of money
- Fraud and / or extortion of material assets
- Misuse or misappropriation of property, possessions or benefits
- Exploitation, pressure in connection with wills, property or inheritance

14.1.6. Discriminatory Abuse

- Discrimination demonstrated on any grounds including sex, race, colour, language, culture, religion, politics or sexual orientation
- Discrimination that is based on a person's disability or age
- Harassment and slurs which are degrading
- Hate crime

14.1.7. Peer on Peer Abuse

All staff should be aware that young people can abuse other young people. The College recognises that even if there are no reported cases it is likely that this type of abuse is occurring and has a 'zero tolerance' approach to such abuse. We aim to create a safe environment and recognise that this type of abuse should never be passed off as 'banter' or 'just having a laugh'.

Peer on peer abuse can take the form of:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate relationships between peers
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos - guidance on how to respond to this can be found [here](#).
- 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;
- upskirting (now noted as a criminal offence).

The College will take all allegations of peer on peer abuse seriously, supporting all parties and following the [Positive Behaviour Policy](#). This may include a restorative justice approach.

Serious Violence

All staff should be aware of indicators that may signal a young person is at risk from, or involved in, serious violent crime. These may include increased absences from College, changes in friendship groups or relationships with older individuals, decline in performance, signs of self harm or significant change in wellbeing, signs of assault or unexplained injuries.

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

Both CSE and CCE are forms of abuse and both occur where an individual or groups takes advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into sexual or criminal activity. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one off or a series of incidents over time and range from opportunistic to complex organised abuse.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in transporting illegal drugs from one area to another. Exploitation is an integral part of county lines. Staff should be aware that offenders will often try to recruit young people from schools and colleges. Missing education is a prime indicator for potential involvement.

Further advice can be obtained from the Home Office's [Preventing youth violence and gang involvement](#) and [its Criminal exploitation of children and vulnerable adults: county](#)

[lines](#) guidance.

Domestic Abuse ([Domestic Abuse Act 2021](#))

Domestic Abuse is defined as “Any incident or pattern of incidents of controlling, coercive, 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. Abuse can be direct or indirect (e.g., through a child).”

Exposure to domestic abuse can have a serious, long lasting, emotional and psychological impact on young people. Operation Encompass directly connects the police with the DSL or DDSL to notify us if a student is in the home when police attend a domestic abuse incident.

14.1.8. Trafficking and Sexual Exploitation

The Safeguarding procedure will raise staff awareness of the increased concerns of trafficking and sexual exploitation with reference to the '[Safeguarding Children and Young People from Sexual Exploitation: Supplementary guidance to Working Together to Safeguard Children \(2013\)](#)' and the non-statutory duty designed to help local authorities when dealing with cross-border child protection cases under the 1996 Hague Convention, implemented in the UK on 1 November 2012.

14.1.9. Photography, Images and video

Staff should not use personal devices such as mobile phones or cameras to take photos or videos of students and should only use work-provided equipment. However, in exceptional circumstances (if opportunities would be missed due to the time delay of accessing College equipment) staff may use their personal devices to record learning, achievement and/or celebrations. If this happens, it is the staff member's professional responsibility to forward all photos/video to the marketing department and to permanently delete the original from their personal device as soon as possible and before leaving College that day. Students will identify on their learning agreement as to whether they give consent for their photograph or video footage to be taken. Particular care should be taken when photographing 14-16 year olds or those in the discrete SEND provision. If concerned please seek advice from the DSL or DDSL.

14.1.10. Bullying, including cyberbullying

- Physical bullying is bullying that takes the form of physical abuse, such as pushing, shoving, hitting, fighting, spitting, and tripping.
- Emotional bullying is bullying that involves insults, derogatory remarks, name calling, and teasing. Also included are attempts to ostracize the victim, such as being left out or ignored, which is sometimes referred to as social bullying, as distinguished from verbal bullying. Emotional bullying can be done in person or through cyberbullying
- Face-to-face bullying is bullying in which students confront each other in person.
- Cyberbullying is bullying that takes place online, through either email, chat rooms, social networking services, text messages, instant messages, website postings, blogs, or a combination of means. Cyberbullies may conceal their identity so that their victim experiences an anonymous attack.
- The content of cyberbullying can consist of all of the types of content including posting insulting and derogatory comments about someone or sending such comments to someone; sending mean or threatening messages; gossiping about someone online including posting sensitive or private information;

impersonating someone in order to cast that person in a bad light; and excluding someone from an online page or group. Unwanted contact, also known as harassment, is another form of cyber bullying.

- Bullying is repeated and intentional behaviour and can have a devastating effect and must be addressed immediately.

14.1.11. Sexual Imagery (previously known as sexting)

The Safeguarding procedure will raise staff and student's awareness of the implications self-generated indecent images can have and the procedures that need to be followed when deal with such cases in line with police guidelines

- The implications of opening offensive images on a computer;
- Images should never be viewed or printed and the device secured;

14.1.12. Definition of 'sexual imagery'

There are a number of definitions but for the purposes of this advice sexual imagery is simply defined as:

- Inappropriate offensive images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent.
- These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know.

No two cases will be the same and it is therefore necessary to carefully consider each case on its own merit apply a consistent approach when dealing with an incident to help protect staff, the College and the student. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response. All staff and students should be familiar with the seriousness of sharing sexual imagery and the safeguarding procedures should such situations arise.

14.1.13. Private Fostering

A private fostering arrangement is one that is made privately, without the authority of the local authority for the care of a child under the age of 16 or 18 if disabled, by someone other than a parent or close relative. These young people may be vulnerable, particularly if they have come from another country. In some cases they are affected by abuse and neglect, or be involved in trafficking or child sexual exploitation. There is a mandatory duty to inform the local authority of children in such arrangements.

14.1.14. When a Child is Missing or their Whereabouts is Unknown

All students under 18 or who are vulnerable adults who go missing or their whereabouts are unknown will be reported to the Police. If the student is deemed to be at immediate risk the Safeguarding Officer will ring 999 on the day of referral. If not in immediate risk they will report to the police by ringing 101 within 10 days. Any relevant information that might help to find or support the child will be shared. If the student is a looked After Child, a Care Leaver or an Unaccompanied Young Person the College will immediately contact the Police and Social Services.

The College is required by law to report on the attendance of international students to UK Visas and Immigration, the College will report non-attendance in the following circumstances:

- Attendance drops below 90%, including absence due to lateness
- Failure to enrol on a course or withdrawal from a course
- Unauthorised absences of greater than 2 consecutive weeks OR 10 missed contacts
- Change of course
- Other significant circumstances which may affect their visa conditions

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation (FGM) and forced marriage.

14.1.15. Female Genital Mutilation

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice is illegal and must be reported to the Police as soon as possible.

The [Female Genital Mutilation Act 2003](#) was brought into force on 3 March 2004 and makes it an offence for the first time for UK nationals or permanent UK residents to carry out female genital mutilation (FGM) abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

FGM is extremely harmful. It is not like male circumcision. It causes long-term mental and physical suffering, difficulty in giving birth, infertility and even death. It cannot be justified as a cultural or religious practice. Leaders of all the main faiths have spoken out against it. Girls under 15 are at most risk. Concerns regarding any students must be reported to the Police and the Safeguarding team.

14.1.16. Hate Crime

Hate crime is an act of violence or hostility directed at people because of who they are or who someone thinks they are. Incidents of hate crime should be reported through a Confidential Comment on MyPT.

The College has adopted the IHRA definition of antisemitism: *'Antisemitism is a certain perception of Jews, which may be expressed as hatred towards Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities'*.

14.1.17. Online Harassment

Online harassment is unwanted conduct on any digital platform encompassing threats, stalking and/or coercion that makes people feel upset, threatened, coerced, humiliated or discriminated against. Incidents of online harassment should be reported through a Confidential Comment on MyPT.

14.1.18. Sexual Harassment and Violence

Sexual harassment is when someone behaves in a way that makes a person feel distressed, intimidated or offended and the behaviour is of a sexual nature. This includes: sexual comments and jokes, unwelcome sexual advances, inappropriate touching, displaying photos or pictures of a sexual nature and sending emails or messages with sexual content.

The ['Sexual Violence and Sexual Harassment between Children in Schools and Colleges'](#) Department for Education guidance (September 2021) gives advice on

how to deal with these situations, please refer any concerns through a Confidential Comment or by emailing stopsexualabuseandviolence@croydon.ac.uk or stopsexualabuseandviolence@coulsdon.ac.uk

on MyPT. If immediate intervention is required, please contact the safeguarding team.

14.1.19. Forced Marriage

Forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. It is an entirely separate issue from arranged marriage, and the two things should not be confused. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage are usually experiencing emotional and/or physical abuse at home.

The majority of forced marriages involve a young female victim, but young men can also be victims. Around one-third of the cases handled by the FMU (Forced Marriage Unit) involve children under 18 years of age.

Concerns regarding any students must be reported to the Safeguarding team without delay. Staff must be aware there may be only one opportunity to speak to a potential victim of forced marriage, so an appropriate initial response is vital. The victim's family, friends or members of the community **MUST NOT** be informed. The victim has sought help and this will likely increase the risk to the victim significantly. Forced marriage is closely linked to honour-based violence and honour killings. All those involved will want to bear in mind that mediation as a response to forced marriage can be extremely dangerous. There have been cases of victims being murdered by their families during mediation. Mediation can also place someone at risk of further emotional and physical abuse.

Victims should be reminded of their rights – they have the right to choose who they marry and the right to make decisions about their lives.

The Designated Safeguarding Lead will contact the Forced Marriage Unit, they have a public helpline that provides confidential advice and support to victims, and to practitioners handling cases of forced marriage.

14.1.20. Parental Involvement

The Safeguarding Team will contact parents/carers of students under the age of 18 to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referrals to children's social care, unless it is deemed that it may place the student at greater risk or advised not to by the Single Point of Contact (SPOC) at Croydon LA.

Where possible the College Safeguarding Officers will keep the parent/carer informed of actions and progress.

14.1.21. On-line Safety

On-line Safety covers issues relating to young people as well as adults and their safe use of the Internet, smartphones and other electronic communications technologies, both in and out of College. It includes awareness raising for all members of the College community on risks and responsibilities and is part of the 'duty of care', which applies to everyone working with young people and vulnerable adults.

All members of staff will be made aware of the importance of good e-Safety practice in the learning environment in order to educate and protect the young people and vulnerable adults in their care. Training will be included within the College induction programme for students.

Staff awareness will be raised about managing their own professional reputation online, including how to demonstrate appropriate online behaviours compatible with their role. Personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour will be outlined in the [Information and Technology Monitoring Policy](#). Staff should only use official College provided email accounts to communicate with students and parents/carers.

Safe and responsible use of the Internet and technology will be reinforced across the curriculum and subject areas. Students will be advised never to give out personal details of any kind which may identify them and / or their location outlined in the Student's Acceptable Use of IT Guidelines. Particular attention to On-line Safety education will be given where students are considered to be vulnerable.

The Designated or Deputy Designated Safeguarding Lead will be informed of any On-line Safety incidents, and any incidents involving Child Protection or vulnerable adult concerns will then be escalated appropriately. Any material that the College believes is illegal will be reported to appropriate agencies such as [Internet Watch Foundation \(IWF\)](#), Croydon Police or [CEOP \(Child Exploitation & Online Protection Centre\)](#).

The College will record e-Safety incidents and manage concerns in accordance with the [Positive Behaviour policy](#) where appropriate.

15. DESIGNATED STAFF WITH SPECIFIC RESPONSIBILITY FOR SAFEGUARDING YOUNG PEOPLE AND ADULTS WHO ARE OR MAY BECOME VULNERABLE

15.1. Governing Body

The Governing Body has a designated governor with specific responsibilities for the safeguarding of young people and vulnerable adults. The designated governor will receive appropriate Safeguarding training.

The designated governor is responsible for liaising with the Principal and the Designated Safeguarding Lead over matters regarding safeguarding young people and vulnerable adults', including:

- Ensuring that the College has guidelines and policies which are consistent with Croydon's safeguarding young people and vulnerable adult procedures.
- Ensuring that each year the governing body reviews the College policy relating to the safeguarding of young people and vulnerable adults.

The designated governor is responsible for overseeing the liaison between external agencies such as the police and social services – as defined by the Croydon Safeguarding Children Partnership in connection with allegations against the Principal or the Designated Safeguarding Lead. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the designated governor shall receive appropriate training and refresher training every year. The Governing Body will receive an annual report.

15.2. Senior Management

The College has a designated member of the Executive Team to take lead responsibility for safeguarding young people and vulnerable adults' issues.

15.3. Designated Lead (DSL)

The post holder has a key duty regarding the promotion of a safe environment for the young people and adults who are or may become vulnerable whilst learning within the College and for ensuring that relevant staff are aware of their duties and obligations. The post holder will ensure that deficiencies in procedural policy identified by the Croydon Safeguarding Children Partnership (or other agencies) are brought to the attention of the Governing Body at the earliest opportunity.

The post holder has received appropriate training in safeguarding young people and vulnerable adult issues as required by the Croydon Safeguarding Children Partnership, and will receive refresher training every two years. In addition the Deputy DSLs will receive training to the same level.

15.4. Safeguarding Team

The College's DSL, DDSLs, Safeguarding and Wellbeing Coordinator(s), Senior Safeguarding Officer and Safeguarding and Wellbeing Officer(s) have responsibilities which include:

- Ensuring appropriate cover is in place including during the College term; emergency telephone number is manned each day from 9am to 5pm: Croydon 07970393393, Coulsdon 07864984211.
- Ensuring the safeguarding email inbox is checked on a daily basis: safeguarding@croydon.ac.uk and safeguarding@coulsdon.ac.uk
- Ensuring the sexual violence and abuse email inbox is checked on a daily basis: stopsexualabuseandviolence@croydon.ac.uk and stopsexualabuseandviolence@coulsdon.ac.uk
- Ensuring regular communication between Croydon and Coulsdon campuses to ensure a consistent approach.
- Overseeing the referral of cases of suspected abuse or allegations to area services and police. Providing advice and support to staff on issues relating to safeguarding young people and vulnerable adults.
- Maintaining an accurate record of any referral, complaint or concern relating to any young person or vulnerable adult (even where such a concern does not lead to a referral) and ensuring that these records are kept securely. These records will include:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
- Liaising with Children's Services and other appropriate agencies such as Police, Social Services, and the Prevent Coordinator etc.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for their pupils.
- Where appropriate liaising with residential care establishments.
- Liaising with employers and training organisations that receive young people and adults who are or may become vulnerable from the College on long term placements to ensure that appropriate safeguards are put in place.
- Ensuring that staff receive basic training in safeguarding young people (including online safety) and vulnerable adult issues and are aware of the College procedures

- Being available to provide advice and support to other staff on issues relating to safeguarding young people and adults who are or may become vulnerable and to listen to young people and adults who are or may become vulnerable studying at the College
- Dealing with individual cases, including attending case conferences and review meetings as appropriate

- Undertaking training in safeguarding young people and vulnerable adult's issues and inter-agency working, as required by the Croydon Safeguarding Children Partnership, and will receive refresher training every two years.

16. DEALING WITH DISCLOSURE OF ABUSE AND PROCEDURE FOR REPORTING CONCERNS

A member of staff may suspect that a learner is being abused or is at risk of significant harm. A learner may disclose to a member of staff that s/he is being abused.

In these circumstances the following procedure should be followed.

16.1. Significant concerns:

If a member of staff has concerns about a learner and believes that they are being abused, at risk of immediate harm, at risk of being radicalized or are missing, the member of staff should speak to a member of the Safeguarding team who will liaise with the DSL and consider and advise whether the College should register the concern.

16.2. Disclosure of Abuse

If a disclosure is made or abuse is suspected, staff should

- Listen carefully and stay calm
- Question without pressure to be sure that what is being said is properly understood by the member of staff
- Reassure the individual concerned that s/he has done the right thing
- Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it.
- Note the main points promptly and carefully
- Make a note of the date, time and place, what the individual said /did, the questions asked by the member of staff
- Contact the Safeguarding Team by calling the emergency number or via a Confidential Comment on MYPT/Proportal or by visiting Student Services.

Staff must not:

- Ask leading questions or put words into the mouth of the disclosing individual
- Investigate concerns/ allegations
- Promise confidentiality

16.3. Reporting to designated staff

Staff should report concerns, suspicions or disclosures of abuse, risk of radicalisation or missing students immediately to the Designated or Deputy Designated Safeguarding Lead.

16.4. Reporting and dealing with allegations against staff

An allegation made against a member of staff might indicate:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person
- Possibly committed a criminal offence against or related to a child/young person
- Behaved towards a child/young person or children/young people in a way that indicates he or she may pose a risk of harm to children/young people
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people

The response to such an allegation might lead to:

- police investigation of a possible criminal offence
- enquiries by Children's or Adult Services about whether there is a need for

protection or some other action

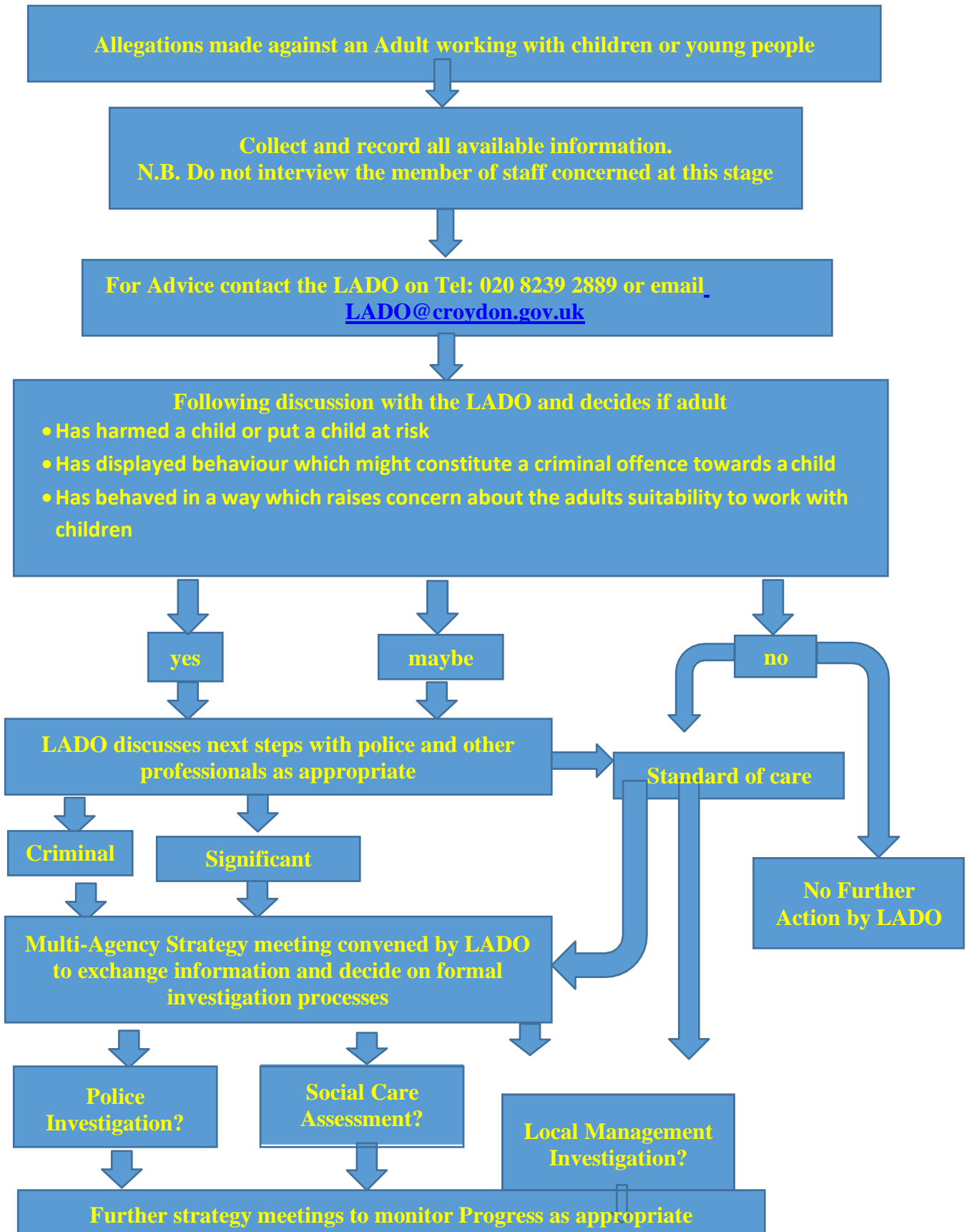
- the possibility of disciplinary action or dismissal by the employer

Due to the potential seriousness of such an allegation the case must be **immediately referred** to the Designated Safeguarding Lead who, in liaison with the Head of Human Resources, will contact the LADO. Allegations must not be discussed with the alleged perpetrator.

NB. The College recognises that it retains the lead responsibility for supply staff as they are 'working under supervision, control and direction' of the College Governing Body and as such will be subject to the same process.

Croydon Safeguarding Children Partnership Process:

Allegations against Adults Who work with Children Flow Chart



17. WHISTLEBLOWING

The College is committed to operating in an ethical and principled way. The College has a [Whistleblowing Policy](#) to provide employees with a means for raising genuine concerns. Where a member of staff does not feel able to raise an issue with their employer or feels that genuine concerns are not being addressed, other whistleblowing channels are open to them:

- General advice can be found at : www.gov.uk/whistleblowing
- The NSPCC whistleblowing hotline – 0800 028 0285 or email help@nspcc.org.uk

18. GDPR AND RECORD KEEPING

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping young people safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of young people.

Safeguarding records created by college staff will be logged electronically under confidential comments on MyPT/Proportal and documents stored in a restricted access drive. Any documents relating to a student, which cannot be stored electronically will be stored in a locked cabinet at each site with access only to those with direct safeguarding responsibility. This ensures cases can be picked up by other officers should someone be absent.

All records should be kept until a young person's 25th birthday.