

South Bank Colleges

Safeguarding Policy and Procedures

<i>Originator</i>	<i>Director of Student Engagement and Wellbeing</i>
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1. Purpose

- 1.1 To offer guidance and instructions to all staff, senior leadership team, trustees, volunteers, sub-contractors and contractors to ensure the College commitment to safeguarding and promoting the welfare of young people and vulnerable adults. If any form of abuse is suspected or if a person is identified as being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken.

All staff understand safeguarding our students is **everyone's responsibility** and believe our college should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual student. All staff should remain vigilant and maintain an environment that deters, challenges and prevents abuse as well as inappropriate behaviour.

2. Scope

- 2.1 This policy deals with the protection of young people and all adults at risk. Throughout this policy, reference is made to 'young people and vulnerable adults. This term is used to mean those under the age of 18 years and an adult at risk is deemed to be a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against harm or exploitation. Any person up to the age of 24 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding & child protection legislation.

The college is committed to safeguarding and promoting the welfare of young people and vulnerable adults as defined to.

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

All references to staff or adults comprise of teaching staff, other staff and volunteers working in the organisation, visitors and includes contractors to the organisation with direct contact with students, regardless of position, role or responsibilities.

The term 'safeguarding young people and adults at risk' covers both reactive protection

and a preventative approach to keeping young people and adults safe. Safeguarding and promoting the welfare of young people and vulnerable adults is defined as: protecting young people and vulnerable adults from maltreatment; preventing impairment of physical and mental health or development; ensuring that young people grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all young people and vulnerable adults to have the best outcomes.

A vulnerable student may be identified as a person who:

- Is a Looked After Child
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse
- Has suffered from domestic violence
- Has social or emotional developmental needs
- Has a criminal conviction
- Has a language barrier

2.2 South Bank Colleges recognises that safeguarding and promoting the welfare of young people and vulnerable adults is everyone's responsibility, and that the best interests of the young person and vulnerable adults must be paramount. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of young people and adults at risk of harm in our care, but also a moral duty. It adopts a student-centered approach which operates in the best interests of the young people and vulnerable adult. The policy and procedures focus on how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of violent extremism.

To achieve this, the College will annually review this policy and procedure with the aim of:

- Raising awareness of issues relating to the welfare of young people, adults at risk and the promotion of a safe environment for them to learn within the College.
- Aiding the identification of young people and adults at risk of significant harm, providing procedures for reporting concerns.
- Ensuring that students in need of additional support are identified through enrolment and referred to the Inclusive Learning or Inclusion and Support teams.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- Responding to the safe recruitment of staff.
- All staff working with young people and adults at risk will receive appropriate training in order to familiarise themselves with the College's Safeguarding Policy

and Procedure, relevant statutory guidance, the safeguarding issues and their responsibilities therein.

- All staff to undertake mandatory safeguarding and Prevent training (to include 'Part One of Keeping Children Safe in Education 2024) process every two years. However, continual professional development (CPD) and refreshers will be undertaken by staff on an annual basis.
- All staff with a role in directly working with under 18s will be required to read and understand Part One and Annex A of Keeping Children Safe in Education 2024.

3. Statutory Framework

3.1 South Bank Colleges works to meet legislative requirements and good practice in safeguarding. There are a number of statutory regulations, which place a responsibility on the college to protect young people and adults at risk. This statutory framework includes:

- The statutory guidance Keeping Children Safe in Education September 2024, Working Together to Safeguard Children 2023, the Safeguarding Vulnerable Groups Act 2006, The Protections of Freedom Act 2012 and the Prevent Duty Guidance 2021 are the key documents upon which this policy is based.
- The Children Act 2014, which is fundamental to professionals working with children and young people in the UK.
- The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children and young people.
- The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people.
- The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g., a lecturer or other member of staff) to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies where the young person is in full-time education and the person works in the same establishment as the young person, even if s/he does not teach. The Safeguarding Vulnerable Groups Act 2006 sets out the type of activity in relation to young people and adults at risk for which employers and individuals will be subject.
- The Protection of Freedoms Act 2012 changed the definition of Regulated Activity including who is eligible for a barred list check.

4. Prevent Duty

4.1 In line with the Prevent Duty Guidance for Further Education Institutions in England and

Wales (2021), protecting students from the risk of radicalisation is part of the Colleges' wider safeguarding duties and is similar in nature to protecting young people and susceptible adults from other forms of harm and abuse. Students may be identified as susceptible to radicalisation at any time during their programme of study based on behaviour. The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends' involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

4.2 Statutory *Prevent Guidance for Further Education* summarises the requirements in terms of the following key areas: external speakers and events, partnerships, risk assessment and action plan, staff and student training, welfare and pastoral care and IT Policies.

4.3 Radicalisation refers to the process by which a person comes to support terrorism or other forms of extremism.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy^[footnote 6] and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Extremism is 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. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised. The college should create a culture of zero tolerance for sexism, racism, misogyny/misandry and sexual violence/harassment while also promoting acceptance of LGBTQ+ communities underpinned by the Career Ready Policy and pastoral support system as well as the tutorial and evidence based RSHE citizenship programme and reinforced throughout the whole curriculum.

- 4.4 The College will work with partnerships including the BIS Regional FE/HE Prevent Co-Ordinator and Prevent Programme Co-Ordinator for Lambeth to ensure it is responding to this duty guidance.
- 4.5 All staff working in South Bank Colleges (including visiting staff, volunteers, contractors and students on placement) are required to be able to identify and report instances where they believe a young person may be at risk of harm or neglect including any harm through extremism or radicalisation to the Deputy Designated Safeguarding Lead. All students will be given information about radicalisation and extremism, they will have a safe place to discuss the risk relating to their communities and they will know where to go to ask for help.
- 4.6 Under the Prevent Duty, safeguarding staff will be trained to recognise when it is appropriate to make a referral to the Channel Programme to support students who may be susceptible to such influences and where we believe a student is being directly influenced by extremist materials or influences.
- 4.7 It is unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to violent extremism or terrorism or which is intended to annoy, harass or intimidate another person. This also applies to use of social media systems accessed from college systems.
- 4.8 The college has systems for assessing and rating risks. Risk assessments for planned events, including off-site events, external visitors and speakers to mitigate any risk and clearly set out what is required for any event to proceed. In addition, the college has in place a Disaster Management Plan.
- 4.9 Modern slavery is relevant to the Prevent duty as it is a complex crime and may involve multiple forms of exploitation such as human trafficking, slavery, forced or compulsory labour. An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour. Victims may not be aware they are being trafficked or exploited and may have consented to elements of their exploitation or accepted their situation. If the college thinks that modern slavery has taken place, the case should be referred to the National Referral Mechanism (NRM), via the Police as a 'first responder organisation', so that the relevant competent authorities can fully consider the case.

5. Safeguarding Definitions

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family

or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

The College recognises the following as definitions of abuse for young people and adults at risk of harm, physical, emotional, neglect, sexual abuse and exploitation, emotional abuse and financial.

5.1 Physical Abuse - this may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

5.2 A young person being absent from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with young people and vulnerable adults that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

5.3 Neglect - The persistent 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. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

5.4 Sexual Abuse and Exploitation - sexual abuse involves a young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the young person or vulnerable adult to be aware that the activity is sexual, and the apparent consent of the young person or vulnerable adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

5.5 Emotional Abuse - emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the young person and vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

5.6 Financial Abuse - where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

5.7 Significant Harm - some young people may be in need because they are suffering or likely

to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the young person and vulnerable adult. Harm can also include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young people of all forms of domestic abuse which can include psychological, physical, sexual, financial and emotional. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Domestic abuse can have a detrimental and long-term impact on a young person's health, well-being, development, and ability to learn.

5.8 Serious Violence - All staff should be aware of the indicators, which may signal young people are at risk from, or are involved with serious violent crime. These 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 young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.

5.9 Young people potentially at greater risk of harm, Young people who need a social worker (Child in Need and Child Protection Plans) - Local authorities should share the fact a young person has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the young person's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of young people.

5.9.1 Specific safeguarding issues – all staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns.

5.9.2 Honour-based violence - honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

5.9.3 FGM mandatory reporting duty - from October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. Professionals must make a report to the police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM.

- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

5.9.4 Forced Marriage - forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

5.9.5 Child on Child Abuse – child-on-child abuse is a significant issue (Part 5 of KCSIE). It must never be tolerated, dismissed or ignored. Whilst it is clear that child-on-child abuse disproportionately affects females and the College must have appropriate support mechanisms in place, males, LGBTQ+ and SEND students will also be affected by this issue and staff must be aware of this and prepared to act accordingly.

Child-on-Child abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment. All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL and Safeguarding Co-Ordinator in the Safeguarding Report for Trustees to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Most cases of students hurting other students will be dealt with under our College's Career Ready Standards Policy, however, this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put students at the college at risk.
- Is violent.
- Involves students being forced to use drugs or alcohol.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Involve sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate nude and semi- nude images, pictures or videos (also known as sexting or youth produced sexual imagery)
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and seminude images and/or videos,
- 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, 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.

All staff should be clear as to the college's policy and procedures with regards to child-on-child abuse and sexual abuse and harassment and the important role they have to play in preventing it, ensuring a zero-tolerance culture and responding where they believe young people and vulnerable adults may be at risk.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our tutorial provision helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially and are clear what actions will be taken in response to a disclosure
- Ensuring staff are trained to understand that a student harming a student could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy
- Taking intervention or disciplinary action and imposing a penalty accordingly on a case-by-case basis

5.9.6 Action to be taken in the event of child-on-child sexual violence and sexual harassment

Where any reports are made of child-on-child sexual violence or sexual harassment these must be dealt with seriously and quickly. Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

The normal disclosure protocols apply. Where such an allegation is made, the Safeguarding Team will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support
- The alleged perpetrator: and
- All the other students (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them.

This will be recorded and communicated to all staff that are required to know. Both

victim and (alleged) perpetrator will receive appropriate support mechanisms from the college on a case-by-case basis.

5.9.7 Child Sexual Exploitation - CSE is a form of sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse including via the internet.

5.9.8 Child Criminal Exploitation - Some specific forms of CCE can include young people 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.

Young people and vulnerable adults 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 young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older young people), 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. CSE can occur over time or be a one-off occurrence, and may happen without the young person's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any young person, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

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 young person 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 young people, both male and female and can include young people who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of young people and vulnerable adults: county lines guidance.

5.9.9 Consensual or non-consensual sharing of nude and semi-nude images or videos also known as sexting - if staff are made aware of such an incident (also known as 'youth produced sexual imagery'), they must report it to the Safeguarding Team immediately.

Staff must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Officer.
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the Safeguarding Officer's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident and reassure the student that they will receive support and help from the Safeguarding Officer.

If further detailed information is required read Part five alongside the Departmental advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

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

5.9.10 Upskirting

Changes to the Voyeurism (Offences) Act 2019 criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

5.9.11 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify

those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. The college has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how the college can access a range of advice to help them identify students in need of extra mental health support; this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#).

Specific Safeguarding issues also include the following:

- Young person absent from education
- Young person missing from home or care
- Domestic violence
- Drug or alcohol abuse
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate crimes
- Missing young people and vulnerable adults
- Private fostering
- Relationship abuse
- Trafficking

In addition, given the local context of the London Borough of Lambeth, the college recognises that students will have risk factors around county lines, serious youth violence including grooming, exploitation, radicalisation and money laundering.

The college also takes into consideration the localised risks of other boroughs where students might be studying e.g., partnerships and subcontracted provision.

5.9.12 Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

6. Equality and Diversity

The college has an equality and diversity policy as well as an EDI committee. The college has a duty (The Public Sector Equality Duty, PSED) to have due regard to the need to eliminate

unlawful discrimination, harassment and victimisation, as well as any other conduct that is prohibited under the Equality Act.

The college is committed to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry and racism.

The college is committed to focusing on key issues of concern and how to improve pupil and student outcomes. The college recognizes that some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.

7. Governing Body Responsibilities

- 7.1 The Governing Body at South Bank Colleges has specific responsibility for ensuring that the College monitors the impact of its work. KCSIE 2023 outlines that all trustees and trustees receive appropriate safeguarding and child protection (including offline and online) training at induction and regular updates e.g., briefings and meetings.

Trustees are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their trustees who do not already have one. Governance is not a regulated activity and so trustees do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity. The college should also carry out a section 128 check for trustees, because a person subject to one is disqualified from being a governor. Using the free Employer Secure Access sign-in portal via the Teaching Regulation Agency's (TRA) Teacher Services' web page, the college can check if a person they are recruiting as a governor is barred as a result of being subject to a section 128 direction.

The Governing body ensures the college:

- Provide a safe environment for young people and adults at risk of harm to learn in.
- Identify those that are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Ensure appropriate IT filters and monitoring systems are in place to ensure online safety.
- Take appropriate action to see that students and children in the nursery are kept safe at the College, and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.

- Work effectively with others as required by Keeping Children Safe in Education 2023.
- Listen to the voice of the young person or vulnerable adult and always act in the interest of the young person or vulnerable adult.
- Ensure appropriate safeguarding responses for young people who go missing from college.
- Ensure there is an effective Safeguarding Policy in place together with a Staff Code of Conduct which include staff/student relationships and communications including use of social media.
- Understand that additional barriers can exist for young people with special educational needs (SEN) and disabilities when recognising abuse and neglect in this group
- Appoint a designated Safeguarding Governor.
- Ensure that the college contributes to multi-agency working (local authority, clinical commissioning group and Chief of Police) in line with statutory guidance [Working Together to Safeguard Children](#).

7.2 Approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:

- Maintaining awareness of progress across the College and/or issues relating to the welfare of young people and adults at risk of harm.
- Being reassured by the Principal and DSL manager that systems are in place and effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known.
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students through College activities are in place including referral to Designated Officer in the local authority.
- Ensuring safe recruitment of staff, supply staff, volunteers.
- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding and prevent.
- Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been if they had not resigned.

In developing policies and procedures, the Governing Body will take account of guidance issued by the Department for Education, Keeping Children safe in education, Sep 2023, Education Inspection Framework [Ofsted's Education Inspection Framework](#) and other relevant bodies and groups. In addition to the Framework and Inspections Handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills. [Inspecting safeguarding in early years, education and skills settings](#).

Governing bodies and proprietors should also be aware of their obligations under the Human Rights Act 1998-21, the Equality Act 2010-22 (including the Public Sector Equality Duty) and

their local multi-agency safeguarding arrangements). Sections 82-93 of [Keeping Children safe in education 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/Keeping_Children_safe_in_education_2022.pdf) detail the specific elements of these laws that the college should be mindful of.

7.3 Designated governor with responsibility for Safeguarding and Prevent

The designated Safeguarding and Prevent Governor is responsible for liaising with the Principal and Senior Designated staff members over matters regarding Safeguarding and Prevent including:

- Ensuring the College has procedures and policies in place which are consistent with guidelines
- Ensuring the governing body considers the College Policy on Safeguarding each Year
- Ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including, but not limited to a report on the training that staff have undertaken
- Ensuring that the governing body is informed of the Prevent duty in relation to the college

The Designated Safeguarding and Prevent Governor is responsible for overseeing the liaison between agencies, e.g., police, social services in connection with allegations against the Principal, the Senior Designated staff member and the staff member with lead responsibility. 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 should receive appropriate training.

The College recognises its duty under the *Counterterrorism and Security Act* (2015) to have due regard to the need to prevent people from being drawn into terrorism.

8. Staff Roles and Responsibilities

8.1 Designated Member of Staff with lead responsibility for safeguarding

The Designated Safeguarding Lead is the Director of Student Engagement and Well-being, a member of the Senior Leadership Team (SLT). The Deputy Designated Safeguarding Lead is the Safeguarding and Welfare Manager. Whilst the activities of the designated safeguarding lead will be delegated to the deputy, the ultimate lead responsibility for safeguarding and child protection remains with the designated lead and they will ensure appropriate and robust systems are in place that will co-ordinate reporting, monitoring, referral and support procedures.

The designated member of staff with lead responsibility has a key duty for raising awareness across all staff of issues relating to the welfare of young people and adults at risk studying within the College.

The post holder is required to have training in safeguarding issues and inter-agency working, receive refresher training every two years and keep updated annually on safeguarding information and knowledge. The designated lead member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Providing all staff and leaders with regular updates on safeguarding at least annually
- Being able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc (even where that concern does not lead to a referral).
- Ensuring the Safeguarding Policy is updated and reviewed annually and approved by trustees.
- Ensuring that parents/carers of young people and adults at risk within the College are aware of the College's Safeguarding Policy.
- Developing effective working relationships, follow policy and work collaboratively with Safeguarding Partners to consist of three agencies: local authorities, clinical commissioning groups, and chief officers of police. These will replace LSCBs (Local Safeguarding Children's Boards).
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for pupils.
- Ensuring that staff who are liaising with employers and training organisations that receive young people or vulnerable adults from the College on long term placements have appropriate safeguards are put in place.
- Ensuring safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), obtaining references and recruitment in accordance with Department of Education guidance.
- Highlighting as part of the shortlisting process that the college, specifically HR, will carry out an online search as part of our due diligence of the shortlisted candidates. This can then be explored with the candidate at the interview. The college will inform the shortlisted candidates that online searches may be undertaken.
- Providing training on a range of safeguarding issues including online safety in tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help young people and vulnerable adults to develop their self-esteem and to promote their resilience. This should include covering relevant issues through Relationships Education and Relationships and Sex Education delivered through Personal, Social, Health and Economic (PSHE) education. Relationships and Sex and Health Education will be compulsory from September 2020. The college has flexibility to decide how they discharge

their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#).

- Ensuring that staff receive basic training in Safeguarding and Prevent issues appropriate to their roles and are aware of the College safeguarding procedures.
- Ensuring that the college consults with the LADO (Local Authority Designated Officer) regarding allegations against staff.
- Ensure that Health and Safety procedures are in place for students, including offsite students on excursions or trips.
- Providing annual safeguarding reports to the Board of Trustees.
- Will work with trustees and IT Services to ensure that standards are met in regard to filtering and monitoring of IT use

8.2 Other Designated staff with responsibility for safeguarding

Within the Student Services Team and college there are several staff members who are trained in safeguarding and there is also a Designated Lead for supporting Looked After Children, this is the Safeguarding and Welfare Manager. These staff members form the Safeguarding Team and are responsible for monitoring and managing incidents or concerns and liaising with safeguarding agencies. The College Governing Body receives an annual report from the Director of Student Engagement and Wellbeing to review how the duties have been discharged and ensure that the College is meeting its statutory requirements. Names of these staff are in Appendix B. These designated staff:

- Report to the member of staff with lead responsibility
- Know how to make an appropriate referral
- Are available to provide advice and support to staff on issues relating to safeguarding and Prevent
- Are available to listen to young people, LAC's and adults at risk studying in the College
- Deal with individual cases, including attending case conferences and review meetings as appropriate

8.3 Allegations against a staff member, supply staff or volunteer

If you have concerns about a member of staff, supply staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to young people or vulnerable adults, speak to a member of Human Resources department in the first instance who will notify the DSL or DDSL (the Safeguarding and Welfare Manager). If the concerns/allegations are about the DSL, speak to the Head of Human Resources or Principal. Where there are concerns about the principal, this should be referred to the Chair of Trustees. The College will consult with the Local Authority Designated Officer (LADO) regarding allegations against staff. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and

whether it is necessary to involve the police and/or young person's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to young people or vulnerable adults or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

Dependent on the nature of the allegation a decision to suspend pending further investigation may apply as set out in the College Disciplinary procedure. In this instance a member of SLT and HR will meet with the accused to inform them of this decision and make arrangements to immediately escort them off of the College premises as soon as possible after speaking to the designated officer (and the police or social care services, where necessary). Where the police and/or social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If immediate suspension is considered necessary, agree and record the rationale for this with the Head of Human Resources. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

Following a formal investigation, a report will be written - if it is decided that no further action is to be taken about the subject of the allegation or concern, the member of staff will be notified in writing by the case manager and any recommendations will be followed up. It would also be appropriate to update all parties involved with the outcome of the formal investigation and/or any subsequent recommendations.

If it is decided that further action is needed, a report detailing the findings concluding the recommendation for a disciplinary hearing will be submitted by the case manager. The appropriate steps will be taken in line with section 8 of the Disciplinary Procedure will be adhered to.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the young person/persons involved about the allegation as soon as possible if they do not already know (following agreement with social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the young person/persons involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

Supply staff - In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, for example supply teachers. Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations

are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or social services. The college will usually take the lead as agencies do not have direct access to young people or other college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. When using an agency, schools and colleges should inform the agency of its process for managing allegations.

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person.

8.4 Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The student must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need-to-know basis. Fears about sharing information **must not** be allowed to stand in the way of the need to promote welfare and protect the safety of young people and vulnerable adults.

South Bank Colleges is committed to protecting the rights and privacy of individuals, including students, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018 and complies with the requirements of the Data Protection Act 1998 that allows for disclosure of personal data where this is necessary to protect the vital interests of the students.

The college should not under the GDPR as supplemented by the Data Protection Act 2018 provide students' education data where the serious harm test under that legislation is met. Therefore, in a situation where a young person is in a refuge, this could mean that the college can withhold education data under the GDPR and should do so where the serious harm test is satisfied.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of young people and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a young person in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk.
- for schools, not providing pupils' personal data where the serious harm test under the

legislation is met. For example, in a situation where a young person is in a refuge or another form of emergency accommodation and the serious harm's test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

8.5 Duty of Care

Staff are accountable for the way in which they exercise authority, manage risk, use resources and actively protect students from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of the College. Staff behaviour should demonstrate integrity, maturity and good judgement.

8.6 Breach of Trust

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the young person. Where a sexual relationship exists between a staff member and a student aged over 18 or over, it is required that the staff member discloses this to HR immediately.

8.7 College Safeguarding Recording

- All safeguarding concerns are either identified by, or referred through to, DDSL or a member of the safeguarding team by members of staff, students, (either self-referring or bringing concerns about peers), parents/carers, employers or volunteers.
- The referrals are made from students and parents/carers directly to the DDSL or by emailing safeguarding@southbankcollege.ac.uk
- All college staff must log their concerns onto the CPOMs system and follow up with a call to the DDSL if the concern is urgent, meaning the young or vulnerable person is in immediate risk of harm.
- The Safeguarding Team will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.

- The Safeguarding Team will take advice from the Safeguarding Manager, Deputy DSL or DSL on complex cases and where there are concerns about threshold levels for referrals.
- The college also focuses on record keeping around low-level concerns that do not meet the harm threshold and ensure that this closer focus on early intervention is included in safeguarding training for all staff.
- All cases are recorded in CPOMs.
- A termly and annual Safeguarding Report is devised for Trustees with detailed analysis of safeguarding disclosures which feeds into planning for training needs and preventative work with students.

9. 14-16s in College

- The College will ensure that all 14–16-year-olds are cared for and have their wellbeing needs met appropriately. (See appendix D)
- Where young people are on roll of another education establishment there will be protocols in place between the College and the designated officers at these establishments for communication regarding unexplained absence or other concerns.
- There will also be liaison with the parent and the schools.
- Young people will be appropriately supervised and registered by qualified staff in all areas of the provision.
- Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

10. SEND students in College

Students with SEND are more likely to be abused and/or neglected, be at risk from bullying/cyber-bullying and peer group isolation. The College will monitor and support these students through college staff and support structures in order to ensure these students are appropriately identified and supported. (See appendix C)

11. Early help

Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. KCSIE outlines that young people may not feel ready or know how to tell someone they are being abused. Where young people would benefit from coordinated early intervention, an early help inter-agency assessment should be arranged. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education) provides detailed guidance on the Early Intervention process. The Safeguarding Team will be responsible for identifying and implementing any early help

measures which are required.

The college has a close focus on record keeping around low-level concerns and ensures that this closer focus on early intervention is included in their safeguarding training for all staff.

Following the guidance within the Working together to safeguard children 2023, all relevant parties must attend core and multi-agency meetings. If any required members of the meeting are absent then the intervention may not progress for the young person and another meeting would be arranged, this can put the child at further risk. The college will attend all meetings for to keep young people and children safe.

Any young person may benefit from early intervention, but all college staff should be particularly alert to the potential need for early help for a young person who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the young person, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered young person

12. Online Safety and E-safety

The DSL takes overall responsibility for understanding the filtering and monitoring systems and processes in place. All staff will understand their expectations, role and responsibilities around filtering and monitoring as part of the safeguarding training.

The College will filter and monitor all internet usage within the College in a responsible and transparent way to ensure and maintain the safety of staff and students. The breadth of issues classified within online safety is considerable and ever evolving. 4 'areas of risk categories' are:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, these can be reported to the Anti-Phishing Working Group (<https://apwg.org/>)

Staff should report to the Safeguarding Team the use or access of unacceptable content from online or network sources.

Education at home

Where students are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: [safeguarding-in-schools-colleges- and-other-providers](#) and [safeguarding-and-remote-education](#)

Staff training

The college should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure students are taught about safeguarding, including online safety, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

13. Wearing of ID Passes

In order to ensure that anyone accessing the College is provided with a safe environment, it is a requirement that all staff, students and visitors visibly wear ID badges on the College lanyards provided in all areas of the college, both inside and outside the college environment.

- No college services will be provided to any person not wearing their lanyard and ID pass.
- All teaching staff are required to check that their students' ID passes are worn at the start and at the end of all teaching sessions.
- Any student who has forgotten or lost their ID pass must get a temporary ID from Customer Services. If any student records three temporary ID pass requests in any one term this will be recorded on Promonitor for LDCs and tutors to take appropriate action with the student.

14. Contextual Safeguarding and Local Circumstances

South Bank Colleges believes all students have the right to be able to access and enjoy a high-quality teaching, learning and assessment with a rich learning experience that both enhances and increases their life chances. The College serves the needs of students from a

range of backgrounds including higher proportions of:

- Students from socio-economically deprived areas
- High needs SEND students
- LACs/Care Leavers and Young Carers
- South Bank Colleges also faces on-going challenges with serious youth violence

The College will be aware of local context and will mitigate against these risks through liaison with key safeguarding partners. It will ensure that all staff have an effective understanding of these issues, and all safeguarding training will acknowledge and reference this local context to ensure that they are adequately prepared to manage such issues if they arise.

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is set out in the advice linked in paragraph 90.

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

The PSED helps schools and colleges to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

15. LAC and Care Leavers

The College will work in close collaboration with the Virtual Schools and Social Services to ensure that all Looked After Children (and previously LAC) are identified and offered appropriate support mechanisms. (See appendix E)

The Designated Member of Staff for LAC students is the Safeguarding Manager.

16. Partnership and Information Sharing

The College will work in conjunction with the local authority and any other external agencies such as the Police to ensure information is passed appropriately, where there are safeguarding concerns and information sharing protocols are well established.

All safeguarding referral protocols will reflect the guidance laid down in Part 1 of Keeping Children Safe in Education 2023, including Prevent referrals to Channel.

The Government's [information sharing advice for safeguarding practitioners](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice) includes 7 'golden rules' for sharing information, and is used by the college to support staff who have to make decisions about sharing information. Information Sharing: Advice for Practitioners Providing safeguarding services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Link is below:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

The Counterterrorism and Securities Act (2015) places additional responsibilities on Further Education Colleges to include working with multi-agencies as part of the Channel process.

17. Use of Reasonable Force by staff on students

Keeping Children Safe in Education 2023 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard students. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, to more extreme circumstances as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

The College has adopted the Department for Education's guidance on the use of reasonable force in schools, which is made available to all members of staff within the College. <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

18. When to call the Police and the need to have an appropriate adult present during Police Investigations

The designated lead should liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#). [NPCC- When to call the police](#) to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

The DSL or deputy should ensure there is an appropriate adult present for students aged under 18 while a student is being questioned or detained by the police. The appropriate adult (usually a parent, guardian or social worker). Pace Code C 2019 details the role a person undertakes when acting as the “appropriate adult” (usually a parent, guardian or social worker).

It includes an expectation that the appropriate adult will “support, advise and assist” the young person, and observe whether the Police are acting properly and fairly to respect (the young person’s rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not.

19. Use of College Premises for non-college activities

Where the college hires or rents out college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), staff should ensure that appropriate arrangements are in place to keep young people safe.

When services or activities are provided by the college, under the direct supervision or management, their arrangements for safeguarding protection will apply. However, where another body provides services or activities separately this is not necessarily the case. The governing body or college should therefore seek assurance that the body concerned has appropriate safeguarding protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the college on these matters where appropriate. The governing body or college should also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Safeguarding Procedures

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1. Procedures for Staff working with Students of all age groups

1.1 There are different procedures to follow for different types of students:

- Under 18 years old on programmes at main sites (students 16–17 years old)
- Under 16 years old on any school linked programmes
- Under 16's who are on full-time programmes that may or may not be attached to a school i.e., Home Educated
- Apprentices
- Under 18 years olds in the College who are not enrolled as students – e.g., work placements from school or visitors to open days etc.
- Adults at risk of harm
- Children in the Nursery

If in doubt, contact the Safeguarding team for advice, (contact details at the end of this document).

1.2 Under 16-year-olds on any School Link programme, formal taster event, or work experience within college

- All participating schools must have signed the school/college contract which includes safeguarding practice, notification of vulnerability, travel arrangements, attendance monitoring/reporting and out of class supervision or workplace supervision as appropriate.
- All school link pupils must be enrolled/registered at the College and details of emergency contact recorded.
- For young people on a school link programme, the referral must go back to the Safeguarding Coordinator at the school they normally attend to discuss the referral and agree actions.
- When dealing with a disclosure follow section: Students aged 16 – 17 years old.
- The Safeguarding Team have a list of School Safeguarding Coordinators and will pass on the disclosure to be actioned under their procedures.
- Pastoral support to be actioned within the school.

1.3 Students 16-17 years old

Where a student aged under 18 years old divulges information or staff become concerned that the young person is at risk of abuse, the following action will be taken:

- Staff will advise the student that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse.
- A written record of the concern will be made where possible and recorded on CPOMs.
- Referral to a member of the Safeguarding Team will be made immediately and in a conversation with the Safeguarding Officer.
- Student's wishes regarding action to be taken will be noted where possible. However, the student will be made aware that this will not affect the final

decision to make a referral.

- There is no need to involve other members of staff (including line managers) as this reduces confidentiality.
- Make student aware of services within the College, which may be able to help them address the situation and offer support.
- Where possible the Safeguarding Officer will consult the student regarding the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible.
- Where action is decided upon, which necessitates contacting Social Services or College procedures for referral will be followed within 24 hours of the Safeguarding Team receiving the referral.
- Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner. Records should 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.
The Safeguarding Lead and Manager will be informed immediately of any referrals received/made.

1.4 Apprentices

Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding. Placement Officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with Students. Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details. When dealing with a disclosure, follow referral procedure for Students aged 16 – 17 years old, or adult at risk of harm dependent upon their age. Organisations seeking subcontracted work have to submit their policies and procedures.

1.5 Under 18-Year-olds in the College who are not enrolled as Students

For young people who are not enrolled at the College, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via the Safeguarding Lead and Coordinator if they are on site. Where there is no organisational contact available, the referral will be made direct to Social Services.

A report of the disclosure and any action taken must be recorded and the Safeguarding Lead and Manager informed.

1.6 Adults at risk of harm

Members of staff hearing allegations, follow the procedure for 16 - 17-year-olds. Do not promise confidentiality and explain what might happen as a result of disclosure. The adult has a right to make their own decisions if they are competent to do so in line with the Mental Capacity Act 2005. If their competency is in doubt, contact a member of the Safeguarding Team for advice.

A report of the disclosure and any action taken must be recorded and the Safeguarding Lead and Manager informed.

1.7 Children in the Nursery

- Report to Nursery Manager or in her absence a member of the Safeguarding Team.
- All referrals to meet Early Years Ofsted expectations.
- A report of the disclosure and any action taken must be recorded and the Safeguarding Senior Lead informed.

1.8 Next Steps

Taking into account all the information available, the lead Safeguarding Manager and Team will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Social Services.
- Make a referral to Social Services (any member of staff can make a referral to social services, and this must be reported to the Safeguarding Team)
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

Staff will only be given information regarding a safeguarding case on a need-to-know basis. The safeguarding team will however confirm that your concern has been actioned.

2. Recruitment and Selection Procedures

South Bank Colleges has a responsibility to ensure safe recruitment and employment practices. All staff are checked appropriately before they start employment, including a Disclosure and Barring Service (DBS) check. The safeguarding regulations state that:

- a person who is barred from working with children, young people or adults at risk will be breaking the law if they work or volunteer, or try to work or volunteer with those groups
- an organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law

The College's recruitment and selection procedures include the following requirements:

- The post should be clearly defined and the key selection criteria for the post should be identified.
- Vacancies should be advertised widely, as appropriate, in order to ensure a diversity of applicants.
- Applicants are required to complete an application form and sign to declare the information they have provided is to be true.
- The chair of the interview panel will ask questions in respect of areas of concern and ensure the right people are selected for employment.
- Evidence of qualifications and Identity is obtained, including the eligibility of

the candidate to work in the UK.

- Employment/educational references are required for successful candidates.
- The successful candidate's application form is reviewed by Human Resources and any gaps in employment or other missing information is followed up.
- Enhanced Disclosure and Barring Service (DBS) disclosures are undertaken for all employees, which are treated sensitively and confidentially.
- Where a DBS disclosure have not been received before a candidate is due to start employment then a risk assessment will be undertaken and assessed to ensure that it is appropriate for the candidate to start work. The risk assessment can only be assessed and signed off by the Director of Human Resources.
- It is important to be sure that the person is who they claim to be and to verify their identify, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the [GOV.UK](https://www.gov.uk) website.
- Highlighting as part of the shortlisting process that the college, specifically HR, will carry out an online search as part of our due diligence of the shortlisted candidates. This can then be explored with the candidate at the interview. The college will inform the shortlisted candidates that online searches may be undertaken.

Separate barred list checks must only be carried out in the following circumstances:

- For newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out); or,
- Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 213 have been carried out).

3. Training and Updates

South Bank Colleges has a duty to promote safeguarding issues and measures to staff and ensure they:

- Analyse their own practice against established good practice and assess risk to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Follow the guidance for staff.
- The Designated Senior Lead for Safeguarding is required to attend training in safeguarding and receive refresher training at least every two years.
- Other designated safeguarding staff are required to have training in safeguarding and inter-agency working and receive refresher training at least every two years.
- All staff should renew the college mandatory training for safeguarding and Prevent every two years.
- All staff working directly with young people and adults at risk will undertake appropriate annual training on safeguarding to raise awareness of current issues and Legislation. All staff will be trained to understand the particular safeguarding risks for Looked After Children.
- All staff to renew their DBS every 3 years or to sign up to the Update Service, this will be prompted by HR.
- All staff will complete an annual review of safeguarding status.
- All staff will receive an induction which will include safeguarding, prevent and the Code of Conduct.
- All other staff will undertake appropriate training on safeguarding.
- Safeguarding training is mandatory for all staff. Refusal to undertake safeguarding training, will be a matter of gross misconduct, and may lead to dismissal.

4. Review

South Bank Colleges' Safeguarding Policy and Procedure is reviewed annually, and its provisions monitored by the College Leadership Group, DSL and the Human Resources Department. The review process includes analysis of monitoring data, consultation with and feedback from students, staff and other stakeholders to determine the impact of the policy and any action required.

Appendix A – Guidance on appropriate boundaries

The following situations are never appropriate while working with students:

- Drinking Alcohol
- Following, sharing or interacting with a student or apprentice via own personal social media e.g., WhatsApp, Facebook, Snapchat, Instagram or Twitter (X)
- Any illegal activity with a student
- Having any form of sexual relationship with a student
- Accepting money or gifts from a student
- Lending money to students
- Giving a student a lift home
- Telling a student your home address, home telephone number, or mobile number
- Taking a student to your home/ Going to a student's home
- Promising to keep any information they disclose confidential
- Arranging to meet a student outside of work hours or on non-college business
- Physical contact should be avoided unless for the purpose of professional assistance such as with a student's self-care
- Talking about a student/member of staff in a public space where the conversation can be overheard
- Talking about a student's private business in front of other students
- Discussing a student with another member of staff other than your line manager or other staff who have direct responsibility for that student, without their consent
- Giving out any information over the telephone about students, without their consent
- Sending e-mails or other communication containing a student's name without their consent
- Using a personal email, phone or social media site to communicate with students
- Storing data on students in an unlocked drawer/cabinet/filing system

- Disposing of student data in an unsecured manner
- Taking responsibility for a student's personal property

Appendix B – Safeguarding Responsibilities/Contacts

Safeguarding Responsibility	Name	Job Title	Contact Details
Senior Lead for allegations against staff	Monica Marongiu	Principal – Lambeth College	T: 0207 501 5258 E: mmarongiu@southbankcolleges.ac.uk
Senior Lead for allegations against staff	Wayne Wright	Principal – South Bank Technical College	T: 0207 501 5474 E: wwright@southbankcolleges.ac.uk
HR Lead for Safeguarding	Kishan Narayan	HR Manager	T: 0207 501 5486 E: knarayan@southbankcolleges.ac.uk
Designated Senior Member of Staff Lead for Safeguarding	Elaine Smith	Director of Student Engagement and Well-being	T: 0207 501 5116 E: esmith@southbankcolleges.ac.uk
Deputy Designated Safeguarding Lead and Safeguarding Manager/DMS for Looked After Children	Gemma Dickson	Safeguarding and Wellbeing Manager	T: 0207 501 5324 E: gdickson@southbankcolleges.ac.uk
Safeguarding Officer	Collette Murray	Safeguarding and Wellbeing Officer	T: 0207 501 5417 E: cmurray@southbankcolleges.ac.uk
Safeguarding Officer	Sanjeve Rupal	Safeguarding and Wellbeing Officer	T: 0207 501 5635 E: srupal@southbankcolleges.ac.uk
Safeguarding Officer	Mari Wright-Grant	Safeguarding and Wellbeing Officer	E: Mwright-grant@southbankcolleges.ac.uk
Safeguarding Officer – ESOL/LAC	Maria Livramento	ESOL/LAC Student Support Officer	T: 0207 5015357 E: mlivramento@southbankcolleges.ac.uk
Safeguarding Governor	Sue Dare	Designated Safeguarding Governor	T: 027 501 5602 E: sdavidson@lambeth.ac.uk (Principal's office)

Appendix C

Students with Special Educational Needs and Disabilities

Studies have shown that students with SEND are 3.8 times more likely to be neglected or physically abused, 3.1 times more likely to be sexually abused and 3.9 times more likely to be emotionally abused. In fact, findings show that 31% of students with SEND suffer abuse compared with 9% of the rest of the population. Further to this, students with SEND are also at a higher risk of experiencing multiple abuses and of enduring multiple episodes of abuse.

The College recognises that as well as threats to the welfare of students from within their families, students may be vulnerable to abuse or exploitation outside their homes and from other students. Staff will remain vigilant and alert to these potential risks.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
- Students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.
- Some students may not recognise the abuse
- Students might not be able to ask for help
- The student may rely on their abuser to meet their needs – making it even more difficult to speak out
- Parents and professionals may miss signs of abuse/neglect, mistaking them as part of a student's condition
- Professionals working with students with SEND may not be trained to spot the signs of abuse and neglect
- Students with disabilities and their families may feel isolated or without support due to a limited number of accessible services, meaning they may not know where to find help
- Abusers may try to excuse their behaviour, blaming it on the difficulties of caring for a student with SEND
- Professionals who work to support parents' ability to meet their student's additional needs may overlook parental behaviours that are not adequate

At South Bank Colleges, additional measures are in place to ensure the effective safeguarding of students with SEND. These include:

- An inclusive curriculum that is relevant and appropriate to meet the needs of all learners.
- Outstanding quality first social and emotional teaching through our tutorial programme to teach SEND students about how to keep themselves safe.
- Targeted social and emotional intervention programmes to build positive relationships with staff and peers
- Explicit teaching of all social and emotional skills through the curriculum
- Key adult methodology embedded into daily classroom practice

- Use of non-verbal methods of communication to communicate when help is needed
- Daily 'check-in' sessions for the most vulnerable students
- Working in partnership with parents building close relationships with them to offer bespoke support
- Established links with external agencies (e.g., Early Intervention, Local authority, Social Services) to enable rapid identification of changes in behaviour and presentation and enable effective early intervention

Appendix D

14-16 students

The overall responsibility for the safeguarding of 14-16 students remains with the referring school or authority. This does not, however, negate the responsibility placed on staff to act immediately and appropriately if a disclosure is made. Schools and Local Authorities must be informed immediately to ensure a collaborative and transparent approach. The first point of contact is the Director of YPE who will liaise with the relevant school/referring agency and the College's Lead Designated Safeguarding Officer.

We recognise there can be additional safeguarding challenges due to their age and additional protocols are in place.

Additional Procedures and Protocols

- All students under 16 will receive a tailored induction that will include: Safeguarding and welfare support, support for curriculum issues, the rules for under 16s whilst at College, the tutorial programme, attendance and absence reporting, life at College and the different groups of students, the virtual learning environment and working on-line, and study support
- Dependent on the tailor-made programme, students may attend a tutorial programme delivered within the curriculum and will cover topics including staying safe, prevent, safe sex and healthy relationships, consent, drugs, alcohol. Parents can consent for their son/daughter not to attend certain topics
- All students will have a named tutor who will be aware of the specific safeguard requirements for under 16s
- All under 16 students are required to check in with the administrator at the start of their college day
- All non-attendance at the beginning of the College Day will be followed up with the student and parent/carers and the school

Appendix E

Looked-after and previously looked-after students

Looked after and previously looked after students are very vulnerable. The most common reason for young people becoming looked after is as a result of abuse and/or neglect. Southbank Colleges seeks to minimise disruption to all students' education and positively advocates for Looked After Children.

As part of their role, the Designated Safeguarding Lead will:

- Work closely with the teachers and managers to ensure that any safeguarding concerns regarding Looked After and previously Looked After Children are quickly and effectively responded to
- Check that Looked after children are registered in college on the days on their timetable via the bespoke LAC report which is produced daily at 9.45am and shows the registration mark for all LAC learners on a given day. For any learners who have not registered for their class, a call to their carer will be made to find out why the young person is not in college.
- Ensure that appropriate staff have the information they need in relation to a young persons Looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.
- Work with virtual school heads to promote the educational achievement of looked- after and previously Looked After Children, including discussing how student funding can be best used to support Looked After Children and meet the needs identified in their personal education plan
- Ensure they have information about the young person's care arrangements and the levels of authority delegated to the carer by the local authority looking after him/her.

When the college is considering excluding, either for a fixed term period or permanently, a looked after student we will undertake an informed (multi-agency where other professionals are involved) risk-assessment prior to making the decision to exclude. A discussion will also take place with the named social worker for the young person where the exclusion will be to the home to ensure that any risk is assessed and speak to area Inclusion partnership for support if required.

Appendix F

Glossary of Acronyms used in the policy and procedures.

CCE	Child Criminal Exploitation
CPOMS	Child Protection Online Management System
CSE	Child Sexual Exploitation
DBS	Disclosure & Barring Service
DSL	Designated Safeguarding Lead
EDI	Equality, Diversity, and Inclusion
EHCP	Education Health Care Plan
FE	Further Education
FGM	Female Genital Mutualisation
GDPR	General Data Protection Regulation
HBV	Honor Based Violence
HR	Human Resources
KCSIE	Keeping Children Safe in Education
LAC	Looked after children
LADO	Local Authority designated Officer
PSED	Public Sector Equality Duty
PSHE	Personal, Social, Health, Economic
RSHE	Relationships, Sex & Health Education
SEND	Special Education Needs & Disabilities
SLT	Senior Leadership Team
TRA	Teaching regulation Agency
WTTSC	Working Together to Safeguard Children