



MORLEY COLLEGE LONDON

Safeguarding Policy and Procedure

POLICY OWNER:	Designated Safeguarding Lead (DSL)
FINAL APPROVAL BY:	Governing Body
Policy Category:	Student
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Safeguarding: Statement on Responsibility

1. Safeguarding is everyone’s responsibility.
2. Always report safeguarding concerns using the formal procedure:
 - Preferably the online form: For students or staff
 - Or using the email address
safeguarding@morleycollege.ac.uk
3. **No other form of reporting is adequate or acceptable.**
4. Verbal reporting must be followed up using point 2, by the individual raising the initial concern.
5. Written reporting must take place at the earliest possible moment.
6. If in doubt, uncertain, or questioning – report it.
7. If it doesn’t feel right, there is a possibility it isn’t. Therefore, report it.
8. Reporting staff must not defer their referral to a more senior colleague – if you see/hear/experience it, **you must report it** as outlined in point 2.
9. If someone, anyone is in immediate danger to themselves or to others, phone 999.

This list is not exhaustive and is not the policy. Safeguarding is everyone’s responsibility and all staff at Morley College London are expected to fully understand their responsibilities pertaining to the safeguarding policies and procedures.

Colleagues are expected to have read and refer to the policy. As no policy can provide an exhaustive list of potential circumstances the list above maps out an expectation to report concerns using formal safeguarding processes.

No other form of reporting is adequate or acceptable.

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Terminology

In line with Keeping Children Safe in Education (KCSIE) Working Together to Safeguard Children, **Safeguarding** and promoting the welfare of children is defined as: *protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.*

Abuse: could mean neglect, physical, emotional, sexual, child on child, exploitation, or a combination of these. Further explanations can be found in [Appendix 1](#)

A child: is defined as under the age of 18 years: for students enrolled on a study programme who turn 18 whilst enrolled on this programme, will retain the protections of a child as outlined herein throughout their current period of enrolment. Students 18 and over in receipt of an Education Health Care Plan (EHCP) will retain the same protections furthermore supported as outlined below as a vulnerable adult or adult at risk. An EHCP learner qualifies for support until their 25th birthday. An EHCP must have been approved by our internal ALS team.

A Vulnerable Adult or Adult at Risk is defined as someone 18 years of age or over who is or may need to receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation.

Prevent: The Prevent Strategy has three main objectives: responding to the ideological challenge of terrorism and the threat we face from those who promote it; preventing people being drawn into terrorism and ensuring they are given appropriate advice and support; working with sectors and institutions where there are risks of radicalisation.

Students: For the purpose of this policy and in the context of a post 16 and adult environment, children (including those aged under 5 enrolled in a Morley College London Creche facility), young people and vulnerable adults or adults at risk will be referred to as students with appropriate adaptations applied to the procedures.

Staff: Applies to all those working for or on behalf of the College, full or part time in either a paid or voluntary capacity including, for example, members of the Governing Body, visitors, contractors, sub-contracting partners, supply and franchised staff.

My Concern: Online database where assigned members of the safeguarding team record any student safeguarding concerns. All staff must use the online safeguarding forms (for recording concerns for staff or students) or in an emergency email: safeguarding@morleycollege.ac.uk *My Concern* allows the Safeguarding and Wellbeing Team to monitor incidents, record interventions and create reports for Governors.

Safeguarding Policy

1. Safeguarding Statement

- 1.1 Morley College London recognises our moral and statutory responsibility to safeguard and promote the welfare of children, young people and adults at risk of harm, defined as vulnerable adults, in our care. We endeavour to provide a safe and welcoming environment where students are respected and valued. We are alert to the signs of abuse and neglect and the Safeguarding Policy and Procedures incorporate a wide range of risks we need to safeguard against. This includes the prevention of radicalisation which is listed as a specific safeguarding issue and is addressed by the Government PREVENT strategy.

2. Applicability

- 2.1 The Safeguarding Policy and Procedures apply to all students and staff, in addition to any external individuals and external organisations using the site.

3. Statutory and Regulatory Guidance

- 3.1 This policy has been developed in accordance with the principles and guidance of the following:

National Legislation and Guidance:

- [Children Acts 1989/2004](#);
- [Education Act 2002](#);
- [Working Together to Safeguard Children 2018/2020/2023](#);
- [Keeping Children Safe in Education 2024](#);
- [What to do if a child is being abused 2015](#);
- [Safeguarding Vulnerable Groups Act 2006](#);
- [The Care Act 2014](#);
- [Counter-Terrorism and Security Act 2015](#);
- [Prevent Duty Guidance 2023](#);
- [Data Protection Act 2018](#);
- [UK GDPR requirements](#)

Local:

- Royal Borough of Kensington and Chelsea (RBKC) and Lambeth Safeguarding Children Partnerships
 - RBKC Secondary Heads Collective
 - RBKC Schools Forum and Education Partnership Board
 - RBKC and Lambeth Safeguarding Adults policy and procedures.
- 3.2 Morley College London takes seriously its responsibility to safeguard and promote the welfare of students and to work together with other agencies to ensure that adequate arrangements are in place within our college to identify, assess, and support students who are experiencing harm.

4. Equality and Diversity Analysis Screening:

- 4.1 In accordance with the College's Equality, Diversity and Inclusion Statement, the development of this policy complies with the Equality Act 2010 in ensuring due regard to eliminating discrimination, advancing equality of opportunity and fostering positive relations.

5. Policy Aims

- 5.1 To demonstrate the College's commitment to safeguarding of students, their families and other stakeholders.
- 5.2 To align our policy with Keeping Children Safe in Education in KCSIE.
- 5.3 To provide an environment in which students feel safe, secure, valued, respected and feel confident to, and know how to, approach appropriate adults if they are experiencing difficulties, believing they will be effectively listened to.
- 5.4 To raise the awareness of all staff, of the need to safeguard students and of their responsibilities in identifying and reporting possible cases of abuse, neglect and harm.
- 5.5 To provide a structured framework and procedure which will be followed by all staff in suspected cases of harm, ensuring consistent good practice across the College.
- 5.6 To provide a systematic means of monitoring students known, or thought to be at risk of harm, and ensure we, the college, contribute to assessments of need and support packages for those students.
- 5.7 To develop and promote effective working relationships with other agencies involved with safeguarding.
- 5.8 To promote a culture of vigilance by working together to safeguard students.
- 5.9 To ensure that all staff working for the College, have been checked for their suitability, including, verification of their identity and qualifications, online checks and has a satisfactory DBS check and a single central record is kept for audit.

6. Prevention and Protection

- 6.1 We recognise that the College plays a significant role in the prevention of harm to students by providing students with good lines of communication with trusted adults, wellbeing support as appropriate, supportive friends and an ethos of protection, care, guidance and social justice.
- 6.2 The College community will therefore:
 - Work to establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to.
 - Include regular consultation with students e.g. through student surveys and Learner Voice.
 - Ensure that students know that there is an adult in the College whom they can approach if they are worried or in difficulty.
 - Embed safeguarding across all curriculum provisions, tutorials, student enrichment and induction activities, and any opportunity which will equip students with the skills they need to stay safe and know who to turn to for help.

7. Early Help

- 7.1 Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention.

7.2 Process

A. Identification: Staff should be alert to the potential need for early help for a child who:

- Is disabled or has specific additional needs.
- Has special educational needs.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour.
- Is frequently missing/goes missing from care or home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol use, adult mental health issues, and domestic abuse.
- Is using drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

B. Assessment: If early help is appropriate, the designated safeguarding lead (or deputy DSL for students) will generally lead on liaising with other agencies with the Safeguarding and Wellbeing Manager and setting up an inter-agency assessment as appropriate.

C. Intervention: Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner for a case.

D. Review: All early help interventions should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. These cases will be recorded and updated on My concern by the Safeguarding and Wellbeing Manager, or deputy DSL for students in their absence.

7.3 Staff Responsibilities

- Be aware of the early help process and understand their role in it.
- Be prepared to identify children who may benefit from early help.
- Understand how to initiate an early help assessment.
- Know how to liaise with the Safeguarding team regarding early help cases.

7.4 Record Keeping

All concerns, discussions, and decisions made, and the reasons for those decisions, should be recorded in writing. This includes all stages of the early help process. This must be recorded on My Concern with 'MyConcern Referral' noted on eTrackr in 'causes for concern' with the consent of the student and only as appropriate. This will be uploaded onto My Concern by the Safeguarding and Wellbeing Manager as all other staff will use the reporting forms on My Morley or safeguarding@morleycollege.ac.uk

Etrackr must never be used as the primary recording portal for any safeguarding matters.

7.5 Confidentiality and Information Sharing

Information sharing is vital to safeguarding and promoting the welfare of children and young people. Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when issues are first emerging, or where a child is already known to local authority children's social care.

If a member of college staff becomes aware of an external care-package they do not believe has previously been shared with the college, this must be reported to the Safeguarding and Wellbeing Manager or deputy DSL for students in their absence.

- 7.6 Providing early help is more effective in promoting the welfare of children than reacting later. Morley College London is committed to working alongside other agencies to provide a coordinated offer of early help when additional needs of children are identified.

8. Safe College, Safe Staff

8.1 We will ensure that:

- All staff have information about the College's safeguarding arrangements, Safeguarding Policy and Procedures, the role and names of the Designated Safeguarding Lead and Deputies, the broader centre based safeguarding team and Keeping Children Safe in Education (KCSiE). This will apply to the Governing Body in relation to part 2 of the same guidance.
- All staff will receive Safeguarding, Prevent and Online Safety Training at induction, which is regularly updated and will receive updates on safeguarding, online safety, Prevent as required but **at least annually**.
- All staff and governors have regular safeguarding awareness training, updated by the Safeguarding Team as appropriate, to maintain their understanding of the signs and indicators of abuse and updates to KCSiE.
- The Safeguarding Policy and Procedures, which includes the names of the Safeguarding Team, will be made available via the College website and will be clearly advertised to students, staff and parents/carers.
- The College adopts safer recruitment, selection and pre-employment vetting procedures in line with Keeping Children Safe in Education guidance, legislation and best practice available.
- The College holds a single central register for all staff and volunteers which lists the checks that have been carried out and the date they were completed.
- Morley College London is a safe environment, our 16-18 centres have secure entry and exit points, CCTV in appropriate areas and clear signage about safeguarding procedures.
- There is a safe online environment with robust firewalls and content filtering on the college network, regular updates to cyber security measures and clear guidelines on appropriate behaviour.

9. Roles and Responsibilities

9.1 All College Staff:

- a) Understand that it is **everyone's responsibility to safeguard and promote the welfare of children and vulnerable adults and that they have a statutory role to play in identifying concerns**, sharing information and taking prompt action
- b) Are aware of indicators of abuse ([Appendix 1](#))
- c) Are aware of the Early Help process and understand their role of identifying emerging problems and preventing concerns from escalating.
- d) Know how to respond to a student who discloses abuse and maintain appropriate confidentiality, only involving those who need to know such as the Safeguarding Team and external agencies in Social Care.

- e) Will never promise a student that they will not tell anyone about a report of abuse.
- f) Will refer any safeguarding concern to the Safeguarding Team or if necessary, where there is immediate risk to the student, to the police or Social Services.
- g) Should expect to support the Safeguarding Team, social workers and other agencies following a referral.
- h) Always consider the best interest of the student alongside statutory duties. For example, a child cannot reasonably request we do not involve external agencies, a consenting adult can.
- i) Have a responsibility to provide a safe environment in which students can learn.
- j) Will be aware of systems within the college which support safeguarding, which is explained as part of staff induction and attend update training offered during CPD sessions.
- k) Have read the current Keeping Children Safe in Education part one, Morley Safeguarding Policy and Procedures and the Student Charter, behaviour related policies and Intervention Procedures.
- l) Will not discuss safeguarding incidents or cases with other colleagues outside formal processes.

9.2 Student Safeguarding and Wellbeing Team:

The Student Safeguarding and Wellbeing Team are responsible for ensuring:

- a) They are the first point of call for all staff and students reporting concerns.
- b) They are available to listen to students during the college day.
- c) They will offer ongoing support to students.
- d) They will manage a caseload, including record keeping and case notes, ensuring that safeguarding records remain updated.
- e) External agencies are supported with assessment and planning and provided with a report where required.
- f) Students are supported in line their Child Protection Plans, Child in Need plans, Personal Education Plans and EHCPs.
- g) Liaison and first point of call with other agencies that support students and provide early help.
- h) Attendance at conferences and review meetings.
- i) Appropriate referrals are made to external agencies.
- j) Students' confidentiality is respected, and information will only be disclosed to other members of staff on a need-to-know basis.

9.3 Designated staff with responsibility for Safeguarding:

9.3.1 The Designated Safeguarding Lead (DSL) is a senior member of staff from the College's Senior Leadership Team (SLT) who takes lead responsibility for safeguarding.

9.3.2 The College has two primary Deputy Designated Safeguarding Leads (DDSL's) who are trained to the same standard as the DSL: the Head of Student Services (HoSS) is DDSL for students and the Chief People Office (CPO) is DDSL for staff. Whilst there is a broad expectation that the DSL and DDSLs may have to step in for one-another, in the absence of the CPO safeguarding matters relating to staff must be managed by the DSL and respective HR Business Partner.

9.3.3 The DSL and DDSL's carry out their functions necessary to ensure the ongoing safety and protection of students by ensuring that:

- a) The Safeguarding Policy and Procedures are implemented and followed by all staff.
- b) During term time they will be available (during college hours) for staff to discuss safeguarding concerns and will arrange adequate cover for out of hours'/term activities.
- c) Where there is a safeguarding concern, the students' wishes and feelings will be taken into account, to the greatest extent possible when determining what action to take and what services to provide.
- d) Any disclosures or suspicion of abuse are reported to the appropriate agency, including the police where a crime may have been committed.
- e) They liaise with Local Authorities and work with other agencies and professionals in line with Working Together to Safeguard Children.
- f) They, or another staff member, will attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required.
- g) Has an understanding of locally agreed processes for providing early help and interventions and will support members of staff where early help is appropriate.
- h) There are detailed accurate records, either written or using appropriate online software, of all concerns about a student, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from student records until a student's 25th birthday, following which they are securely disposed.
- i) They organise Safeguarding and Prevent induction training, annual updates, with the People Operations Team keep a record of attendance and address any absences.
- j) Undergo training for the role which will be updated every two years and will keep up with any developments relevant to the role.
- k) An annual report is provided to the Governing Body setting out how the College has discharged its duties.
- l) They will refer cases where a member of staff is dismissed or left due to risk/harm to a student to the Disclosure and Barring Service.

9.4 Designated Teacher

The designated teacher will work with local authorities to promote the educational achievement of looked after children, previously looked after and those who have left care through adoption, special guardianship or child arrangement orders. This teacher will be an assigned member of the student's immediate support team, namely the Programme Area Manager or Senior Lecturer.

9.5 The Governing Body

All members of the Governing Body understand and fulfil their responsibilities namely, to endeavour to:

- a) Comply with their duties under legislation and guidance as outlined in Keeping Children Safe in Education, to maintain strategic oversight of policies, procedures, and training and receive assurance from the College's Designated Safeguarding Lead (DSL) that they are effective and comply with the law at all times.
- b) In liaison with the DSL, obtain assurance that the safeguarding policy, staff code of conduct, recruitment, and managing allegation policy and procedures are consistent with Local Authority Safeguarding Children's Partnership Boards and statutory requirements and are reviewed annually, and that the safeguarding policy is publicly available.

- c) In liaison with the DSL, obtain assurance that the College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with students and disqualification by association regulations, by ensuring that there is at least one person on every recruitment panel that has completed safer recruitment training. A member of the Governing body will also complete safer recruitment training every three years.
- d) In liaison with the DSL, obtain assurance that the College has procedures for dealing with allegations of abuse against staff (including the Principal and Chief Executive) and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have if had they not resigned. The college reserves the right to inform DBS if a member of staff resigns during an investigation that is concluded in their absence and would have resulted in dismissal.
- e) Liaise with the Local Authority (LA) on Child Protection issues in the event of an allegation of abuse made against the College Principal and CEO.
- f) Ensure that a member of the Senior Leadership Team has been appointed as the DSL to take the lead responsibility for safeguarding and maintain oversight that on appointment, the (D)DSL's undertake interagency training and DSL 'New to Role' training including update training every two years.
- g) Obtain assurance that all staff are provided with the safeguarding and staff conduct policies and have read Keeping Children Safe in Education part 1.
- h) Obtain assurance that all staff have safeguarding and PREVENT training updated as appropriate.
- i) Obtain assurance that appropriate online filtering and monitoring systems are in place and students are taught about keeping safe online through tutorials.
- j) Ensure, in liaison with the College's Director of Governance, enhanced DBS checks are in place for all Governors.
- k) In liaison with the DSL, obtain assurance that any weakness in Safeguarding is remedied immediately and that appropriate responses to children missing from education are in place.

9.6 The Principal and Chief Executive will ensure that the above policies and procedures, adopted by Governing Body, particularly concerning referrals of suspected abuse and neglect, are followed by **all** staff, as supported by the Senior Leadership Team.

10. Multi-agency Working

- 10.1 Morley College London works in line with statutory guidance *Working Together to Safeguard Children* by working with social care, police, health and other services to promote the welfare of students and protect them from harm. Strong multi-agency and multi-disciplinary working is vital to identifying and responding to the needs of young people and their families and vulnerable adults. This includes providing a coordinated offer of early help, contributing to inter-agency plans and providing additional help to children subject to child protection plans.
- 10.2 The College will allow access to social care workers from the local authority, where appropriate, to conduct, or if considering conducting statutory assessments and will work with the police through *Operation Encompass*. This system ensures that when the police are called to an incident of domestic abuse, where children and young people see, hear, or experience its effects, the police will inform the D/DDSL's to enable support to be given.

11. Transfer of Safeguarding Files

11.1 Students arriving at Morley College London with a live safeguarding case:

11.1.1 The college will collect safeguarding information on students attending Morley in the following ways:

- A. Send a request to schools requesting any information on applicants in the summer preceding enrolment.
- B. Invite Safeguarding Leads from local feeder schools in for a meeting in the week prior to the start of term to receive paper files or further information on students who have enrolled at Morley College London.
- C. Via automatic transfer on MyConcern once a student is enrolled.

11.1.2 When receiving paper files or files via email, the College will send confirmation that they have received the file within 48 hours. These files must be sent via the email address (safeguarding@morleycollege.ac.uk) and then uploaded to MyConcern by the Safeguarding and Wellbeing Manager.

11.1.3 All documentation forwarded by email, sent or received, must be encrypted and password protected for access. Referred to herein as 'secure email'.

11.2 Students leaving Morley with a live safeguarding case:

11.2.1 The College will notify other providers that Safeguarding information is held at Morley for progressing students by:

- A. Notifying the Local Authority SEN and NEET Teams of the names and dates of birth of students who do not have an active application for the next academic year. This is to enable the Local Authority to pass this information on to subsequent providers so they can contact the college to request the file.
- B. Contact the subsequent providers where progression is known either in September or following progression data collection in January of the following year.
- C. Via automatic transfer on MyConcern or by secure email once a student has progressed to another provider.

11.2.2 When transferring paper files or files via secure email, the college will request a receipt (either tracked mail or read receipt) and follow up within 48 hours.

12. Information Sharing, GDPR and Data Protection

12.1 GDPR/Data Protection Act 2018 places duties on organisations and individuals to process information, fairly and lawfully, and to keep the information they hold safe and secure. However, this is not a barrier to sharing information, where to not do so, would result in a student being placed at risk of harm.

12.2 Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children and young people legally classified as children.

12.3 Information sharing is vital in identifying and tackling all forms of abuse. All staff must be aware that they cannot promise to keep a student's secrets which might compromise their safety or well-being.

12.4 The College recognises that matters relating to safeguarding are personal and will respect confidentiality. The Safeguarding Team will only disclose information about a student to other members of staff and supporting agencies on a need-to-know basis.

- 12.5 We will always look to share our intention to refer a student to social care with their parents/carers unless to do so could put the student at greater risk of harm.
- 12.6 Information sharing is also essential for the identification of patterns of behaviour when a student is at risk of going missing or has gone missing, including being missing from education. When multiple children appear associated to the same context or locations of risk, the college will share relevant information, including names of associated students, in a timely and proportionate way with Social Care or the Police.
- 12.7 There are detailed accurate records, either written or using appropriate online software, of all concerns about a student, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from student records until a student's 25th birthday, following which records are securely disposed.

12.8 Holding and Sharing Information

12.8.1 The Designated Safeguarding Lead (DSL) or the DSL's deputies, with support from the Data Protection officer, are equipped to:

- Understand the importance of information sharing in the context of safeguarding and promoting the welfare of children.
- Are familiar with the requirements of the Data Protection Act (DPA) 2018 and the UK General Data Protection Regulation (GDPR).
- Make informed decisions about sharing information, with a clear rationale for these decisions.

12.8.2 When making decisions about holding and sharing information, the DSL or DDSL will:

A. Assess Necessity and Proportionality:

- Consider whether sharing information is necessary for the purpose for which we are sharing it.
- Share only the information that is needed to achieve that purpose.
- Recognise that the college can share personal information lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

B. Document Decision-Making:

- Record the decision and rationale for either sharing information or deciding not to share.
- If the decision is to share, record what information was shared, with whom and for what purpose.
- If the decision is not to share, record the reasons for this decision.

C. Consider the Safety and Well-being of the Child:

- The safety and welfare of the child is the primary consideration in decision-making.
- If there is any doubt about the well-being of the child, the presumption is to share the information.
- This also applies to the child or children of adult students, if we become aware that the student may present a risk to the safety and well-being of their own child, or children.

D. Respect Confidentiality Where Possible:

- Wherever possible, respect the wishes of children or families who do not consent to share confidential information.
- The college may still share information if, in the DSL/DDSL's judgement on the facts of the case, there is sufficient need to override that lack of consent.

E. Consult When in Doubt:

- If in doubt, DSL/DDSLs will consult with each other, the data protection officer or other relevant professionals without disclosing the identity of the person where possible.

F. Consider the Impact:

- Think about the impact of sharing or not sharing information on the child and any other children who may be affected.
- Consider both short-term and long-term impacts.

G. Ensure Information is Accurate and Up to Date:

- Ensure that the information you share is accurate, up-to-date, necessary for the purpose for which you are sharing it, shared only with those who need to have it, and shared securely.

H. Be Transparent:

- Be open and honest with the child (and/or their family where appropriate) about why, what, how and with whom information will, or could be shared.
- Seek their agreement, unless it is unsafe or inappropriate to do so.

I. Follow Morley's Policies:

- Adhere to Morley's policies, procedures and consult with managers if unsure.

J. Keep a Record of the Decision and the Reasons for It:

- Whether the decision is to share information or not, keep a record of the decision and the reasons for it.

13. Criminal Convictions

13.1 The (D)DSL's will carry out risk assessments of students who declare an unspent or pending criminal conviction as outlined in the criminal convictions guidance within the admissions policies. Having a conviction will not bar someone from studying, as this would be dependent upon the background to their offence(s) and whether they pose a risk to children and vulnerable adults that access the site.

13.2 If an unspent or pending criminal conviction is not declared, then potentially the College could withdraw any offer of enrolment. If a conviction is discovered part way through a programme, this could put at risk the student's enrolment in the interest of safeguarding. Full details of the application process for those with criminal convictions or prosecutions pending can be found in the College's Student General Admission Policy.

14. ID and Lanyards

14.1 All staff, contractors, visitors and guests are required to wear a lanyard when on site, identifying themselves as authorised personnel. Lanyards play a prominent role in keeping the college, staff, and students secure:

- Lanyards make it easier to identify unauthorised visitors and act quickly.
- All students of all ages at the 16-19 centres must wear lanyards.
- Staff should remind students to wear their lanyards often and the reasons why.
- Appropriate measures are in place to ensure that students wear lanyards at all times¹.

14.2 Members of the general public should follow guidance as set out in [*Use of facilities by members of the general public*](#).

¹ Following the induction window, forgotten ID cards will be managed by a "return home and collect it or pay to replace" process, as outlined in [Annex 5](#).

- 14.3 All visitors to all centres should be asked to read the back of the visitor card and confirm they have understood the safeguarding statement. This should be done by the staff member permitting entry to the site for the visitor.
- 14.4 Staff lanyards, and visitor lanyards apply at all centres, including those that are wholly adult learning spaces.

15. Related College Documents

- 15.1 This policy should not be read in isolation and should be read in conjunction with other College policies, available publicly on the [College website](#) or via the [College Policy library](#) for staff.

15.2 Who to contact?

If staff are unsure about how to refer to this policy and procedure, they should seek advice and discuss their concerns with the Safeguarding and Wellbeing Team.

Staff should not seek advice on this policy from colleagues.

Email: safeguarding@morleycollege.ac.uk

16. Monitoring and Reporting

- 16.1 This policy will be approved by the Governing Body, having noted the related procedures and delegating the operational implementation of those to the Designated Safeguarding Lead, the College's Senior Leadership Team and the College's Safeguarding Team.
- 16.2 The Audit Committee will receive termly reports on Safeguarding activity within the College, including notification of any substantial changes to the related procedures.
- 16.3 This policy will be reviewed annually.

Safeguarding Procedures

1. Introduction

- 1.1 The aim of this procedure is to provide a robust framework, to ensure that all staff take appropriate action when they are worried that a student is being abused or at risk thereof, or in danger to life. It is the responsibility of all staff working within the College, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, but they should not discuss this with anyone other than a member of the Safeguarding Team.
- 1.2 All staff must be alert to, and aware of, the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and staff need to take notice not only of major incidents but also other signs which may cause concerns. Further information about the five categories of abuse: physical, emotional, sexual, exploitation and neglect can be found in [Appendix 1](#). Other signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is ill, or an accident has occurred. In these circumstances staff will try to give the student the opportunity to talk. It is fine for staff to ask the student if they are OK or if they can give help in any way.
- 1.3 **An area of concern can also refer to activity a student is undertaking in relation to their course, if this potentially suggests a risk to themselves, other learners including adults with an EHCP and/or may put at risk the ability of staff to safeguard themselves against an allegation of misconduct or gross misconduct.**

2. What to refer to the Safeguarding Team?

- 2.1 Specific safeguarding issues include:
 - Abuse and neglect
 - Adults at risk
 - Unexplainable and/or persistent absences from education
 - Child/Sexual Exploitation (CSE)
 - Criminal Exploitation: county lines, criminal behaviour, and gang involvement
 - Domestic abuse
 - Drugs and alcohol misuse, including legal highs
 - Female Genital Mutilation (FGM)
 - Financial Exploitation
 - Forced marriage (not arranged marriage)
 - Homelessness/missing from home or care/private fostering
 - Honour base violence (so called)
 - Mental health/self-harm
 - Online safety (including unsafe generative use of AI)
 - Parental substance use, mental health and domestic abuse
 - Child on child abuse (sexual violence & harassment, relationship abuse, criminal behaviour, exploitation)
 - Preventing radicalisation and extremism
 - Youth produced sexual imagery (sexting)
 - Absence from education which may indicate or raise concerns of harm
 - Youth produced imagery which has unintended sexual consequences
 - Sexual violence/ harassment/ rape allegations
 - Misinformation, disinformation and conspiracy theories

- 2.1 Further information about the five categories of abuse: physical, emotional, sexual, exploitation and neglect can be found in [Appendix 1](#); further information about the other additional safeguarding concerns can be found in [Appendix 2](#).

3. Students who are particularly vulnerable

- 3.1 To ensure that all of our students receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:
- Looked After Children (LAC) and previously Looked After Children (LAC)
 - Children and Young People with Special Educational Needs or Disabilities (SEND)
 - On Child Protection Plans
 - With EHCPs
 - Children in Need
 - Asylum seekers
 - Refugee or Evacuee status
 - Young Carers
 - Living away from home/private fostering
 - Children in the court systems/Youth Justice Team (YJT)/ pending police investigations.
- 3.2 If staff become aware of students within these specific group, this information should be referred to the safeguarding team immediately.

4. What to do if a student makes a disclosure

- 4.1 A student who makes a disclosure may have provided information on several occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.
- 4.2 During their conversation with a student staff will:
- Listen to what the student has to say and allow them to speak freely.
 - Remain calm and not overact or act shocked. The student may stop talking if they feel they are upsetting the listener.
 - Reassure the student that it is not their fault and they have done the right thing in telling someone.
 - Not be afraid of silences. Staff must remember how difficult it is for the student and allow them to talk.
 - Take what the student is disclosing seriously.
 - Ask open questions and avoid leading questions.
 - Avoid jumping to conclusions, speculation or make accusations.
 - Not automatically offer any physical touch as comfort. It may be anything but comforting to a student who is being abused.
 - Avoid admonishing the student for not disclosing sooner.
 - Tell the student what will happen next.
 - If it is clear prior to disclosure that this is likely to be a safeguarding related discussion, the staff member should request the presence of another member of staff, preferably of the opposite sex. It should be shared with the student that this is in their interest to ensure we have recorded the information accurately.
- 4.3 If the student talks to any member of staff about any risks to their safety or wellbeing the staff member will let the student know that they will have to pass the information on - staff are not allowed to keep secrets.

5. How to make a referral to the Safeguarding Team

My Morley	Place a brief comment into the safeguarding form, which will automatically be sent to the Safeguarding Team , outlining that a safeguarding concern has been raised. When using the staff form, information will be sent to the CPO who will inform the DSL as required.
Email/App:	Use the dedicated email service: safeguarding@morleycollege.ac.uk Or Directly through the MyConcern portal
Telephone:	Duty Management Number per centre: Chelsea 0748 404 2881 North Kensington 0748 404 8223 Stockwell 0748 404 8226 Waterloo 0748 404 8224
In Person:	<ul style="list-style-type: none"> College reception citing the need to make a referral regarding safeguarding. To a safeguarding officer, any member of staff wearing a purple lanyard. All in person referrals must be followed up in writing using the safeguarding form, or safeguarding@morleycollege.ac.uk
After 5pm (Mon-Fri):	<ul style="list-style-type: none"> On weekdays (Mon-Fri), safeguarding responsibility passes to the Duty Manager Duty Manager: numbers above Out of hours managers will have the contact details for DSL to contact for any Safeguarding support.

6. Cross-College contacts

Designated Safeguarding Lead/s	
Designated Safeguard Lead (DSL)	Interim DSL Maggie Hall Permanent post TBC by February 2026
Deputy Designated Safeguarding Lead (DDSL)	<i>Chief People Officer</i> Alison McNamara <i>Head of Student Services</i> Vusa Nkomo
Safeguarding and Wellbeing Team	
Designated Safeguard Lead (DSL) (Interim)	Maggie Hall
Chief People Officer	Alison McNamara (DDSL)
Head of Student Services	Vusa Nkomo (DDSL)
Vice Principal (Curriculum & Quality)/ Centre Principal for Chelsea	Bushra Iqbal
Vice Principal (Higher Education)/ Centre Principal for Waterloo	James Ward
Director of Estates and Facilities	Nigel Garrigan
Safeguarding and Wellbeing Manager	Pembe Kisa
Student Safeguarding and Wellbeing Officers	Asha Dahir Ege Jessica Loannou
EHCP and ALS Manager	Sam Waterman

7. Issues relating to individual student needs and wider safeguarding concerns

Staff should note that wider safeguarding concerns follow a **different referral pathway** and ensure they have read the related policies and procedures (where applicable).

Individual need/related policy	Procedure/Who to contact
Bullying & Harassment <ul style="list-style-type: none"> • Anti-Bullying Policy • Student Charter & Code of Conduct • Student Disciplinary/Positive Behaviour Policy 	<p><i>Head of School (HoS)</i></p> <ul style="list-style-type: none"> • Refer to HoS, who will ensure that incidents are dealt with in a consistent manner • HoS will take a statement and evoke disciplinary action <p>If behaviour is extreme HoS will report to safeguarding team for advice about whether external agencies need to be involved.</p>
Behaviour negatively affecting the learning and wellbeing of others <ul style="list-style-type: none"> • Student Charter & Code of Conduct • Student Disciplinary/Positive Behaviour Policy • Fitness to Study Procedure 	<p><i>Head of School (HoS)</i></p> <ul style="list-style-type: none"> • Will be dealt with by HoS under the college disciplinary policy. • Fit to study policy will be considered. <p>If behaviour is extreme HoS will report to safeguarding team for advice about whether external agencies need to be involved</p>
Violence/Aggressive Behaviour: Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (e.g. knife). <ul style="list-style-type: none"> • Student Charter & Code of Conduct • Student Disciplinary/Positive Behaviour Policy 	<ul style="list-style-type: none"> • Contact Security • HoS to invoke disciplinary • Centre Principal to suspend student if necessary <p>The power to search at Morley College London is limited to requesting students empty their pockets and bags in the company of managers at CLG level and above, with security on hand as required. This should only take place if there are reasonable grounds for suspicion that a student has an illegal or dangerous item in their possession.</p> <p>If any drugs or dangerous items are found, they will be confiscated immediately, and the police will be called if appropriate. If the student is under 18 years their parents/carers will be contacted. The duty manager will record the details on the incident form.</p> <p>If a student refuses to take part in the process, they can be asked to leave the premises. If a student is under 18 they will be asked to return with a parent. Safer Schools officers will be contacted by the DSL as appropriate.</p>
Children and the court system	<p>Morley College London recognises that children may be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. To support young people through this process, we provide access an-appropriate guide:</p>

	<p>Young witness booklet for 12- to 17-year-olds</p> <p>This guide explains each step of the process, support available, and special measures that are available. Staff should be aware of these resources and offer them to children who may need to attend court.</p> <p>Additionally, making child arrangements via the family courts following separation can be stressful for children. We offer support to students going through this process through our safeguarding team.</p>
First Aid	<ul style="list-style-type: none"> • Additional Learning Support and Student Services Teams • First Aider
Medical Needs	<ul style="list-style-type: none"> • Additional Learning Support and Student Services • Duty Manager • First Aider
<p>(SEND) Students with Special Education Needs and disabilities</p> <ul style="list-style-type: none"> • Additional Learning Support Policy 	<p>Additional Learning Support and Learner Services Teams</p> <ul style="list-style-type: none"> • Vice Principal Student Engagement • Head of Student Services • ALS Manager <p>Students with SEN and disabilities can face additional safeguarding challenges. The expectation would be that Additional Learning Support would act as their first line of contact. This is particularly important for those students with communication barriers. Learning Support will monitor and support these students to ensure appropriate identification.</p> <p>Assessing Risk - where risk is identified a risk assessment must be completed by Additional Learning Support prior to enrolling students on a programme of study. The assessment must be in the form of a support plan and clearly outline the actions and measures in place to measure the risk. Risks might include: Medical, Physical, SEMH (Social, Emotional and Mental Health)</p> <p>Additional Resources</p> <p>For more information on safeguarding children with special educational needs and disabilities, please refer to the following NSPCC resources:</p> <ul style="list-style-type: none"> • Protecting children with SEN and disabilities • Safeguarding deaf and disabled children and young people <p>These resources provide valuable guidance on the specific vulnerabilities and safeguarding considerations for these groups of children and young people.</p>
Safeguarding LGBTQ+ Children and Young People	<p>Morley College London recognises that gender identity and sexual orientation are complex and</p>

	<p>personal matters. We are committed to supporting all children and young people, respecting their individual identities, and ensuring their safety and wellbeing.</p> <p>The Safeguarding and Wellbeing Team and the Student Experience Team actively encourage students to participate in the Student Voice and access either team for support or referral to wider agencies:</p> <p>safeguarding@morleycollege.ac.uk wellbeing@morleycollege.ac.uk</p>
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8. Allegations

8.1 Allegations against Staff

8.1.1 If you have a safeguarding concern about a member of staff working with students which indicates that they have:

- behaved in a way that has harmed or may harm a student.
- behaved towards a student in a way that indicates they would pose a risk of harm.
- possibly committed a criminal offence against or related to a student.
- behaved or may behave in a way that indicates they may not be suitable to work with students.
- This must be reported immediately using the safeguarding form for staff on My Morley: [Safeguarding Form](#)

8.2 Low-level concerns and College response arrangements

8.2.1 If staff have a safeguarding concern or an allegation about another member of staff (including agency staff, volunteers, or contractors) that **does not** meet the harm threshold then this must still be reported immediately using the staff safeguarding report form on My Morley, however insignificant it may seem.

8.2.2 What is a low-level concern?

Low-level concerns may include but are not limited to allegations against staff and whistleblowing, acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media that is:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the college to refer to the local authority
- Low-level concerns are part of a spectrum of behaviour. This includes:
 - Inadvertent or thoughtless behaviour
 - behaviour that might be considered inappropriate depending on the circumstances.
- behaviour which is intended to enable abuse or discrimination.

8.3 Allegations against members of the Safeguarding Team or Senior Leadership Team

8.3.1 Allegations against a member of the Safeguarding Team should be reported to the DSL.

8.3.2 Allegations against the DSL should be made to Deputy DSL for Staff, the Chief People Officer.

8.3.3 Allegations against members of the Senior Leadership team should be made directly to the Chief People Officer (CPO).

8.3.4 Allegations against the CPO should be made to the Chief Executive Officer and Principal.

8.4 Allegations against the Principal/Chief Executive Officer or Governors

8.4.1 The College has an appointed Governor with special responsibility for Safeguarding, any concerns about the CEO/Principal should be reported immediately to them and to the college Safeguarding Lead for staff.

8.4.2 Governors can be contacted directly or via The Director of Governance.

8.4.3 The Chair of the Governing Body will act as the case officer. If it is felt an investigation is necessary, the Chair will discuss the case with the LADO (Local Authority Designated Officer) and appoint an investigating officer; either another Governor or an external investigating officer depending on the seriousness of the allegation.

8.4.4 The Chair will keep the LADO informed of the investigation and follow advice.

8.4.5 Referrals to the LADO in such circumstances will be to the Lambeth LADO in line with the college's main address.

8.4.6 Allegations against governors will be managed through the Director of Governance & the CEO.

8.5 Public Interest Disclosure (Whistleblowing)

The College operates in an ethical and committed way and has a Public Interest Disclosure (Whistleblowing) Policy and Procedure to provide employees with a means for raising genuine concerns. Staff can also use the NSPCC helpline number 0800 028 0285

9. Safeguarding Children Younger than 16 (Visiting Children)

9.1 Significant care should be taken as these children are more vulnerable than other students because of their young age:

- a) Where young people are on the role of another education establishment there should be protocols in place between the College Designated Safeguarding Lead and the Designated Officers at these establishments for communication regarding safeguarding incidents should they arise. This would pertain to a visiting school for example.
- b) Visiting children will be appropriately supervised and registered by qualified staff in all areas.
- c) All visiting children from schools will be in attendance in their school uniforms and will always be accompanied by their own school staff.
- d) The College will provide an identified area under supervision where visiting students can be appropriately contained for the duration of their visit. These students will never be unaccompanied in the college spaces.
- e) Children visiting an Open Event without a parent, carer or guardian will fall under the reasonable care of the college whilst on college premises.
- f) Exhibitions which contain content which could be deemed offensive by some, or is of a sexual nature, must clearly state so in the exhibition in such a way, that some can decide not to view that part of the exhibition or event.
- g) Exhibitions in the 16-19 centres, must have such content in a separate and closable space, to be locked off to visiting children from other organisations such as partner schools.
- h) The hosting of external organisations such as a Saturday supplementary school does not preclude Morley College London from its statutory safeguarding responsibilities. However, the primary safeguards are the responsibility of the

visiting organisation. Any incidents which occur whilst on Morley property, must be reported using the safeguarding procedures outlined herein.

- i) The creche facilities at both the Waterloo and North Kensington Centres have their own safeguarding lead in the creche managers for each site.
- j) These managers hold the primary and immediate safeguarding responsibilities for these children, but all previously outlined safeguarding structures and seniority of safeguarding leads for Morley College London, apply.
- k) Adult student parents must not be permitted to take their small children into college secure areas at the North Kensington Centre.
- l) At no time should non-creche college staff 'look after' these children if asked to do so by adult parent students.
- m) Where possible, the college can extend access to creche facilities to support study.

9.2 Only creche staff have a caring responsibility for these children alongside their parent

10. Safeguarding LGBTQ+ Children and Young People

10.1 Morley College London recognises that gender identity and sexual orientation are complex and personal matters. We are committed to supporting all children and young people, respecting their individual identities, and ensuring their safety and wellbeing.

10.2 **Key Points:**

- **Increased Vulnerability:** LGBTQ+ children and young people can be more vulnerable to abuse, neglect, and exploitation, including bullying, social isolation, and online risks.
- **Increased Risk:** statistically LGBTQ+ individuals under the age of 25 are more likely to be exposed to risks of self-harm and substance use.
- **Individual Support:** Each LGBTQ+ child or young person may have unique needs and experiences. Our approach is to provide individualised support that respects their identity and ensures their safety.
- **Confidentiality:** We respect the privacy of all children and young people regarding their sexual orientation and gender identity. Disclosure of such information will be handled sensitively and confidentially, in line with our safeguarding procedures.
- **Gender Exploration:** We recognise that some children and young people may question or explore their gender identity. This is a normal part of development for some individuals. Our role is to provide a safe, non-judgmental environment for this exploration.
- **Non-Discrimination:** Discrimination against LGBTQ+ children and young people is not tolerated. Such individuals are also protected under the Equality Act of 2010 and therefore such discrimination against the law. We are committed to creating an inclusive environment for all.
- **Staff Training:** All staff should receive training on LGBTQ+ issues and how to support LGBTQ+ children and young people effectively and sensitively.
- **Parental Involvement:** We work with parents and carers to support LGBTQ+ children and young people, while always prioritising the child's wellbeing and wishes.
- **Referrals:** When necessary and appropriate, we will refer LGBTQ+ children and young people to specialised support services, through our Morley College London wellbeing team.

10.3 **Specific Considerations for Gender Questioning Children and Young People:**

- The college uses the term "gender questioning" to refer to children and young people who are exploring their gender identity.

- The college respects everyone's chosen name and pronouns, in line with their wishes and wellbeing.
- Any decisions regarding social transition at college will be made on a case-by-case basis, involving the child, their parents/carers (where appropriate), and relevant professionals.
- The college does not promote any view on gender identity. Our role is to support the child or young person and ensure their safety and wellbeing *consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.*

10.4 The Safeguarding and Wellbeing team and the Student Experience Team actively encourage students to participate in the Student Voice and access either team for support or referral to wider agencies.

11. Use of Facilities by the General Public

11.1 Morley College London hosts many public events across all its sites and retains statutory responsibility for its students during such events attended by members of the public.

- a) College staff will be present in areas that members of the public are in attendance, including public access areas.
- b) Posters will be displayed throughout the centre to inform members of the public, students, and staff of who to approach if they have a concern.
- c) The centres have CCTV that is routinely monitored by Estates staff.
- d) The Duty Manager will notify the Safeguarding and Wellbeing Team of any safeguarding concerns should they arise during an event, reported in the usual way outlined herein.
- e) Exhibitions that contain content which could be deemed offensive by some, or is of a sexual nature, must clearly state so in the exhibition in such a way, that some can decide not to view that part of the exhibition or event.
- f) Exhibitions in the 16-19 centres, must have such content in a separate and closable space, to be locked off to visiting children from other organisations such as partner schools.

11.2 Organisations using College Premises

Any organisations renting or hiring any part of the college premises for activities involving children should have appropriate safeguarding and child protection policies in place which should be included in any lease or hire agreement. These organisations should adhere to the Keeping Children Safe in Out of School Settings guidance April 2022. Any allegations received by the College regarding any of these activities should follow this safeguarding policy including informing the LADO.

11.3 Safeguarding Briefing Card

All visitors to the college will be asked to read and confirm the safeguarding statement on the back of the visitors' card. This includes the safeguarding email address to be used to report a concern.

This applies to:

- Temporary and Franchise staff
- Work Experience and Placements
- Commercial Services
- Third Party Hire
- Apprentices
- Distance Learning

12. Work Experience and Placements

12.1 The Work Placement Officer will:

- Give all work placement providers safeguarding information.
- Ensure all employers sign a workplace agreement form to say that they have read and understand their duty to safeguard Morley College London's learners
- Some settings, e.g. early years, will require site visits and risk assessments.

12.2 The Safeguarding Policy and Procedures apply to all learners on or offsite. Where employer related concerns are raised, the Safeguarding Team will liaise with the relevant Head of School, and Work Experience Coordinator to decide on the appropriate course of action.

Appendix 1: Abuse, Neglect and Exploitation

Abuse, neglect and exploitation are forms of maltreatment – a person may abuse, neglect, or exploit a child by inflicting harm, by failing to act to prevent harm or using an imbalance of power to coerce, manipulate or deceive a child for the advantage of the perpetrator or facilitator. Children may be abused in the family, an institutional or community setting, by those known to them or by a stranger including via the internet. They may be abused by an adult or adults, or by another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse, neglect and exploitation can happen over a period but can also be a one-off event. Child abuse, neglect and exploitation can have a major long- term impact on all aspects of a child's health, development, and well-being.

Neglect

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision, or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often suffer from other types of abuse. Neglect is not always easy to identify, and it is important that staff remain alert and not miss opportunities to take timely action. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing, or warmth for the child. Neglect may occur during pregnancy because of maternal drug or alcohol use.

Indicators of neglect can include:

- Living in a home that is indisputably dirty or unsafe
- Being left hungry or dirty
- Left without adequate clothing, e.g. not having a winter coat
- Living in dangerous conditions, i.e. around drugs, alcohol, or violence
- Students who are often angry, aggressive, or self-harm
- Students who fail to receive basic health care
- Parents who fail to seek medical treatment when their child is ill or injured

Physical abuse

Physical abuse is deliberately physically hurting a child, and other human being. It might take a variety of forms, including hitting, pinching, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating. Physical abuse can happen in any family and occur outside of the family environment. Children may be more at risk if their parents have problems with drugs, alcohol, and mental health, or if they live in a home where domestic abuse happens and where they see, hear, or experience its effects. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Some of the following signs may be indicators of physical abuse:

- Frequent injuries
- Unexplained or unusual fractures or broken bones
- Unexplained, bruises, cuts, burns, scalds, bite marks.

Emotional abuse

The persistent emotional maltreatment of a child or vulnerable adult. It is also sometimes referred to psychological abuse and it can have severe and persistent adverse effects on the child's emotional development and a vulnerable adult's security and wellbeing. It may involve conveying to a child or individual that they are worthless or unloved, inadequate and not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what

they say or how they communicate. Emotional abuse may involve serious bullying - including online bullying through social networks, online games or mobile phones, by peers. The following signs may be indicators of emotional abuse:

- Withdrawn, fearful, anxious about doing something wrong.
- Parents or carers who withdraw attention from their child, giving the 'cold shoulder'.
- Parents or carers blaming their problems on their child.
- Parents or carers who humiliate their child, for example, name calling or making negative comparisons.
- The above descriptors apply to vulnerable adults.

Sexual abuse

Is any sexual activity with a child and with a vulnerable adult against their will. Many victims of sexual abuse do not recognise themselves as such and may not understand what is happening or understand it is wrong. Sexual abuse can have a long-term impact on mental health. Sexual abuse may include physical contact including assault by penetration (for example rape or oral sex rape) or non-penetrative acts such as masturbation, kissing, rubbing, or touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images, being forced to look at or watch sexual images and activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The following signs may be indicators of sexual abuse:

- Knowledge or interest in sexual acts inappropriate to their age.
- Use of sexual language or sexual knowledge that you wouldn't expect them to have.
- Asking others to behave sexually or play sexual games.
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections, or underage pregnancy.
- Reporting or repeating sexually charged conversations they have had with adults in a position of responsibility.

Exploitation

Exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another 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.

Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse where children are sexually exploited for money, power, or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Consent cannot be given, even where the child may believe they are voluntarily engaging with sexual activity with the person who is exploiting them. Child Sexual Exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care, and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Older boyfriends or girlfriends
- Sexually transmitted infections or pregnancy
- Changes in emotional well-being

- The use, and misuse of drugs and alcohol
- Missing for periods of time or regularly returning home late
- Unexplainable and/or persistent absences from education

Criminal exploitation (County lines)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs, groom and exploit children and young people to carry drugs and money from urban areas to suburban areas and rural areas, market and seaside towns. Key to identifying potential involvement in county lines is missing episodes when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse county lines exploitation can:

- Affect young people (male or female) under and over the age of 18.
- Still be exploitation even if the activity appears to be consensual.
- Involve force, enticement-based methods of compliance and if often accompanied by violence or threats of violence.
- Be perpetrated by individuals, groups, males, females, young people and adults.
- Be typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, power imbalance can be due to other factors such as gender, cognitive ability, physical strengths, status, and access to economic or other resources.

Guidance for frontline professionals on dealing with county lines:

[County lines exploitation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/county-lines-exploitation)

Financial Exploitation

Financial exploitation refers to the misuse or misappropriation of a child's or vulnerable person's money, property, or resources. It involves taking advantage of an individual's vulnerability for financial gain.

Common Examples:

- **Money Mules:** Children or young people are recruited to transfer money through their bank accounts, often unknowingly participating in money laundering.
- **Online Scams:** Manipulating young people into sharing bank details or making purchases with stolen credit cards.
- **Benefit Fraud:** Using a child's identity to claim benefits fraudulently.
- **Forced Labour:** Coercing young people to work for little or no pay, often in illegal or dangerous conditions.
- **County Lines:** Exploiting children to transport and sell drugs, often involving financial control.

Warning Signs:

- Unexplained money or expensive items
- Secretive behaviour about finances
- Sudden changes in bank account activity
- Loss of control over personal finances
- Reluctance to discuss financial matters.

Early identification and intervention are crucial to protect vulnerable individuals from financial exploitation. All staff must report any suspicions of abuse, neglect, or exploitation immediately.

Appendix 2: Additional Safeguarding Concerns

There are also several specific safeguarding concerns that we recognise our students may experience.

Vulnerable adults

An vulnerable adult is defined by the Department of Health and KCSIE as a person aged 18 years or older who is or may need community care services by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Characteristics/factors that might make someone more at risk of harm include:

- Not having the mental capacity to make decisions about their own safety – including having fluctuating mental capacity associated with mental illness.
- Communication difficulties
- Physical dependency – being dependent on others for personal care and activities of daily life.
- Low self-esteem
- Experience of abuse
- Childhood experience of abuse
- Being cared for in a care setting where they are more or less dependent on others.
- Not getting the right amount or the right kind of care that they need
- Living in a family with multiple social and emotional challenges.
- Isolation and social exclusion
- Stigma and discrimination
- Lack of access to information and support
- Being the focus of anti-social behaviour.

A vulnerable adult is someone who is unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. One way to evaluate whether someone can take care of themselves is to assess their mental capacity to make decisions about their own safety. In the safeguarding context, mental capacity is the ability of a person to:

- Understand the implications of their situation and the risks to themselves.
- Act themselves to prevent abuse.
- Fully participate in decision making about interventions involving them, be they life-changing events or everyday matters.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children and young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Advice on identifying children who are affected by abuse is available at: https://www.nspcc.org.uk/what-is-child-abuse/spotting-signs-child-abuse/
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Drugs and alcohol use, including legal highs.

It is not uncommon for teenagers to try drugs or drink alcohol in their teenage years. For some they may experiment and make the positive choice not to participate but, there are also those who become dependent on drugs or alcohol. It's important to know the difference between drug abuse and addiction. If you become concerned that a student is harming themselves or at risk of harm through alcohol or substance misuse. This can include being parented or being cared for by an adult that abuses drugs or alcohol then refer to the Safeguarding Team.

Do NOT refer to safeguarding IF the student:

- Is under the influence of drugs or alcohol (follow disciplinary procedure). **HoS should be informed and the student asked to leave site.**
- Requires medical attention - **contact a first aider and phone 999**
- Is in possession of drugs or alcohol - **contact Duty Manager and security.**
- The student should **then** be referred to safeguarding and wellbeing.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female organs. It is illegal in the UK and a form of child abuse with long-lasting consequences.

FGM mandatory reporting duties for teachers

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out by calling 101. Unless the teacher has good reason not to, they should discuss such cases with the safeguarding team. The duty does not apply in relation to at risk or suspected cases.

Information on when and how to make a report can be found at:

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK](https://www.gov.uk/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information)
(www.gov.uk)

Forced Marriage

A forced marriage is a marriage in which one entered without full and free consent, of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Forced marriage must not be confused with arranged marriage (into which all parties are consenting adults). Threats can be physical or emotional and psychological. A lack of full consent can be where a person does not consent or where they cannot consent (if they have learning difficulties for example) or are underage. Some communities use religion and culture as way to coerce a person into marriage. College staff should never attempt to intervene directly.

Refer to the safeguarding team who will contact the Forced Marriage Unit 200 7008 0151.

Further information can be found at:

<https://www.gov.uk/guidance/forced-marriage#forced-marriage-unit>

So called 'Honour-based' Abuse (HBA)

Honour based violence (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and staff should refer their concerns to the safeguarding team who will activate the local safeguarding procedures, using national and local protocols for multi-agency liaison.

Homelessness/Children missing from home

Students may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children or young people that go missing are at risk of serious harm. There are concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, violent crime, gang exploitation, or drug and alcohol misuse.

Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The homeless reduction Act 2017 places new duties on the LA to provide those who are homeless or at risk of homelessness to have an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. It should also be recognised that some 16- to 17-year-olds could be living independently from their parents or carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency; the safeguarding team will ensure that appropriate referrals are made based on the student's circumstances.

Private fostering – occurs when a child under the age of 16 (18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff. The Safeguarding Team will need to be notified and will inform the local authority who will check if the arrangement is suitable and safe.

Online Safety

Our students increasingly use electronic equipment regularly to access the internet and share content and images via social media sites such as Instagram, X, Tic-Toc, Snapchat and many other. Unfortunately, some adults and other young people use these technologies to harm others. The harm might range from sending hurtful or abusive electronic messages, to inappropriate use of generative AI, to grooming and enticing students to engage in sexual behaviour such as webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

The College uses a software to block material at source that the College does not wish students or staff to view. It also uses a reporting mechanism of key words, to enable the Safeguarding and Wellbeing Team to identify and discuss potential on-line abuse or misuse and any indicators of safeguarding and wellbeing concerns. The Designated Safeguarding Lead and Safeguarding and Wellbeing team will work alongside HOS and PAMs to provide students with a safe online environment in which to learn.

Parental substance abuse, mental health and domestic abuse

The term 'toxic trio' has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and young people has occurred. These issues are viewed as indicators of increased risk of harm.

Peer on Peer Abuse

In most instances, the conduct of students towards each other will be covered by our behaviour and disciplinary policies. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Peer on peer abuse can take on many forms this can include:

- *Domestic Abuse* – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse.
- *Child on Child Sexual abuse and sexual violence* - In line with 'Working Together to Safeguard Children 2023', early help is crucial in addressing child-on-child sexual violence and sexual harassment. The principles of early help should be applied.
 - Sexual violence can include rape, assault by penetration and sexual assault.
 - Sexual Harassment - unwanted conduct of a sexual nature.
- *Child Sexual Exploitation* – children under the age of 18 may be sexually abused in the context of exploitative relationships and situations by peers who are also under 18.
- *Coercive Control* - a pattern of behaviour that seeks to take away the victim's liberty or freedom, to strip away their sense of self. Including but not limited to: Isolation from friends, family and support networks; monitoring of time and movements; control over aspects of everyday life, such as where a person can go, who they can see, what they can wear and when they can sleep; and humiliating, degrading or dehumanizing the victim.
- *Harmful Sexual Behaviour* – children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- *Serious Youth Violence* – Any offence of the most serious violence or weapon enabled crime, where the victim is aged 1-19, i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.
- *Up-skirting* – where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing for sexual gratification or to cause victim humiliation, distress, or alarm.
- Taking unwanted photographs of others for sexual gratification, and/or the purpose of humiliation by distribution.

The term peer-on-peer abuse can refer to all these definitions and a student may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation type violence or criminal activity). Peer on peer abuse can also include engaging peers in seemingly college related activity which leads to a student engaging in activities they are reluctant to, and/or they do not fully understand. This may, but not exclusively be prevalent for students with an EHCP.

Any concerns, disclosures or allegation of child-on-child abuse in any form should be referred to the Safeguarding Team. Where there is a report of rape, assault by penetration or sexual assault made, all investigation will be stopped and passed onto the police. Further guidance published by the NSPCC on when to call the police can be found via the link below:

[when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npscc.police.uk\)](https://www.nspcc.police.uk/when-to-call-the-police--guidance-for-schools-and-colleges.pdf)

If a student's behaviour negatively impacts on the safety and welfare of other students, then safeguards will be put in place to promote the wellbeing of the students affected. Further actions could include a disciplinary hearing, robust risk assessments and targeted work for students identified as being a potential risk to other students and those identified as being at risk.

Unexplainable and/or persistent absences from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

The College has an Attendance and Punctuality Policy and Procedure. It is essential that tutors intervene early, support mechanisms are activated, and the College will feedback data on withdrawn students to the local authority at the point of withdrawal. This will be done by the Safeguarding and Wellbeing Manager on instruction from the DSL.

Youth produced sexual imagery (sexting)

The practice of children (under the age of 18) sharing images and videos via text message, email, social media, or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy, or print the youth produced sexual imagery but refer to the Safeguarding Team.

A member of the Safeguarding and Wellbeing Team will hold an initial review meeting with appropriate school staff and subsequent interviews with the students involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the student at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children’s Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children’s Social Care/Police if.

- The incident involves a child.
- There is good reason to believe that a young person has been coerced, blackmailed, or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs and/or EHCP)

- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the DSL, to respond to the incident without escalation to Social Care or the police.

Students who are particularly vulnerable - Students with Social Workers:

Looked After Children (LAC), previously looked after children, care leavers and unaccompanied asylum seekers, Children in Need and those on Child Protection Plans.

The most common reason for children becoming looked after is a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable. The Safeguarding Team will record information in relation to a child's looked after status (whether they are looked after under voluntary arrangements or with consent from parents or on an interim or full care order). When dealing with looked after children and previously looked after, it is important that all agencies work together, and prompt action is taken to safeguard these children. If staff become aware that a child becomes looked after it is important that they highlight this to the safeguarding team.

- **Designated Teacher and Heads of Curriculum** - The DSL is by default the college designated teacher and is responsible alongside the Heads of Curriculum for promoting their educational achievement. A named individual who works with the student directly and is a PAM or Senior Lecturer can be a named designated teacher.
- **The Student Safeguarding and Wellbeing Team** - will provide ongoing support to learners, acting as a first point of contact for external agencies and will co-ordinate meetings on behalf of the College. This will be managed by the Safeguarding and Wellbeing Manager.
- **All staff** are responsible for ensuring that they attend PEP/Review meetings when requested by the Safeguarding Team. The expectation would be that if staff are unable to attend the HoS will attend in their place.

Young Carers

A carer provides unpaid care for a family member or friend who has a long-term physical or mental health problem, disability, or a drug or alcohol dependency. Some are the main carers in the household; others supplement the caring undertaken by other members of the family.

The caring tasks can include:

- **Domestic tasks** (e.g. cooking, cleaning, shopping).
- **Personal care** (e.g. helping with mobility, washing, dressing, giving medicine).
- **Emotional support & supervision** (e.g. watching over someone, providing company and a 'Listening ear').
- **Sibling care:** Looking after an ill or disabled sibling or a non-disabled sibling where an ill or disabled parent is unable to provide care.
- **Communication support** (e.g., interpreting, answering phone or door)
- **Financial management:** (e.g. budgeting, paying bills)

Many young carers do not realise that they are carers until they perceive the impact of their responsibilities upon their lives. Even if that impact causes significant discomfort or problems,

many young people with not identify themselves as carers. For this reason, Young Carers are designated by OFSTED as a vulnerable group of students and they recommend their identification and support as best practice, making necessary adjustments where able.

If you become aware of a student with a caring responsibility inform the Safeguarding Team who will offer ongoing mentoring and referral to external agencies if appropriate.

A student who is collecting younger siblings from school is not automatically a young carer. But this coupled with absent parents, and activity as outlined above would constitute an intervention related to their responsibilities.

Appendix 3: Local and National Help and Advice

Help in a crisis:

- Contact your own **GP** (Doctor)
- Visit the **Accident and Emergency** (A&E) department
- Contact the **NHS First Response** Team on 111, option 2, to speak directly with a mental health professional
- Call the **Samaritans** (24-hour helpline) on 116 123

National Services

Service	Provision	Contact Details
Childline	Free confidential support, 24 hours a day for anyone under 19, online or on the phone.	Telephone: 0800 1111 Website: www.childline.org.uk
The Mix	Confidential information and support for young people under 25 on a wide range of issues via online and free confidential helpline	Telephone: 0800 808 4994 Website: http://www.themix.org.uk/
Papyrus	Help and advice around suicide prevention for young people and anyone worried about a young person	Telephone: 0800 068 4141 Website: www.papyrus-uk.org
Beat eating disorders	Working to beat eating disorders	Telephone: 0808 801 0711 Website: www.beateatingdisorders.org.uk
Mermaids	Emotional support for transgender and gender diverse young people, their families and professionals working with them	Telephone: 0344 334 0550 Website: www.mermaidsuk.org.uk
Centrepoint	Support for ages 16-25 who are homeless, sofa surfing or at risk	Telephone: 0845 466 3400 Website: www.centrepont.org.uk
Samaritans	Free confidential support, 24 hours a day, call free from any phone, anytime	Telephone: 116 123 Website: www.samaritans.org
Young Minds	Information for young people, parents, and professionals around the wellbeing and mental health of children and young people.	Telephone: 0808 802 5544 Website: www.youngminds.org.uk
HeadMeds	Information for young people about mental health medication	Website: www.headmeds.org.uk

Shore Space	Child-on-child sexual violence and sexual harassment, Lucy Faithfull Foundation's 'Shore Space'. which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.	Website: https://shorespace.org.uk/
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Annex 1: Prevent Duty

This Prevent Policy applies to everyone working at or enrolled at Morley College London. It is designed to provide a clear framework for all staff to respond to safeguarding concerns for those students who may be vulnerable to the message of extremism.

The purpose of this policy is to:

- Ensure an awareness of Prevent within the College
- Provide a clear framework to structure and inform our response to radicalisation.
- To provide a framework to embed British Values into the curriculum.
- Recognise current practice which contributes to the Prevent agenda.

Background Information

Prevent is one of four strands of the Government’s counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a risk to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is the heart of Prevent, which aims to divert people away from being drawn into terrorist activity. Prevent happens before any criminal activity takes place by recognising, supporting, and protecting people who might be susceptible to radicalisation. The Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges.

Definitions

British Values of democracy, rule of law, liberty and respect and tolerance of different faiths and beliefs.

CONTEST is the government’s counter-terrorism strategy and places a legal duty on certain bodies in the exercise of their functions, to have ‘due regard to the need to prevent people from being drawn into terrorism’. The four elements are, Prevent, Pursue, Protect, and Prepare. It aims to stop people becoming terrorists or supporting terrorism.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Ideology is a set of beliefs.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism or criminal involvement.

CHANNEL is a key element of the Prevent strategy and is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners the police and the local community to:

- Identify individuals at risk of being drawn into terrorism.
- Assess the nature and extent of that risk.
- Develop the most appropriate support plan for those concerned.

Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. It about early intervention to protect and divert people away from the risk they face before illegality occurs.

Understanding and recognising risks and vulnerabilities of radicalisation

The following information relates to the Prevent duty, which aims to safeguard vulnerable individuals from being drawn into terrorism. Our college approaches this duty with sensitivity, ensuring that it does not stigmatize, isolate or alienate students. We are committed to promoting open dialogue, critical thinking, and a safe space for discussing diverse views.

Students may become susceptible to radicalisation through a range of social, personal, and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that all college staff can recognise those vulnerabilities.

The ways in which students can be radicalised include:

- Via family members and friends.
- Direct contact with extremist groups.
- Contact via the internet.
- Indirect influence by media communication. For example, becoming radicalised by a particular view and interpretation of world events.

Safeguarding our students from radicalisation is no different from safeguarding them from other forms of harm. Additional indicators for vulnerabilities to radicalisation include:

- *Identity Crisis* – distant from cultural/religious heritage and experiences discomfort about their place in society.
- *Personal Crisis* – experiencing family tensions a sense of isolation; low self-esteem; may have discounted from friendship group and become involved with a new and different group of friends; may be searching for answers to identity, faith and belonging.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.
- Direct contact with extremist groups.
- Contact via the internet.

Examples of extremist causes that have used violence to achieve their ends include:

- Animal rights.
- The far right.
- Internal terrorism.
- International terrorist organisations.

Roles and Responsibilities

This policy is integral to our Safeguarding Policy and should be applied as an extension the College's current and established safeguarding procedures.

We have a filtering and monitoring process in place to ensure that our students are staying safe online.

College Leadership and Governance

All board members have a legal responsibility under the Prevent Duty to make sure they have undertaken training in Prevent, additionally they should obtain assurance from the DSL that:

- All College staff have undertaken training in Prevent Duty
- All College staff are aware of how to make a referral to the Safeguarding Team
- All College staff exemplify British Values into their teaching.
- Policies and procedures are in place to implement the Prevent Duty.

Prevent Lead for the College, Supported by the Safeguarding Team

The DSL responsible for ensuring:

- that our Prevent Policy is implemented across the College.
- that any concerns are shared with the relevant organisation, in order to minimise the risk of our learners becoming involved with terrorism.
- all new members of staff will receive Prevent training as part of their induction training.
- referrals are made to CHANNEL if appropriate.
- the Governors are presented with a termly report to discuss Safeguarding and Prevent concerns raised and changes to the Duty that affect the College.

All staff

All staff at the College have a responsibility to:

- create an ethos that promotes British Values, to create an environment of respect, equality and diversity and inclusion.
- attend Prevent training in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns.
- report any concerns around extremism or radicalisation via the safeguarding procedures.
- support the development of staff and learner understanding of the issues around extremism and radicalisation.
- participate in engagement with external organisations as appropriate.

Teaching and Learning

To provide a curriculum that promotes British Values, by undermining extremist ideology and supporting the learning voice. This will be achieved through:

- embedding British Values, equality, diversity and inclusion, wellbeing, and community cohesion throughout the curriculum.
- promoting social and emotional aspects of learning.
- a curriculum adapted to recognise local needs, challenges extremist narratives and promote universal rights.
- encouraging active citizenship and learner voice.

Referral and intervention process:

Any member of staff at Morley College London who has any concerns regarding radicalisation should report these immediately to the Safeguarding Team:

Via:	Online Safeguarding form via My Morley.
Email:	Safeguarding@morleycollege.ac.uk

ANNEX 2: External Lettings and Speakers Assessment Procedure

1. External Lettings

Any organization hiring facilities at Morley must be assessed under this External Lettings Assessment Procedure. The majority of bookings requests will be straightforward and can be handled entirely at a local (MIS or Stockwell Student Services team)) level. However, some may be complex and may require referral for further consideration. The referral process will only apply in a minority of circumstances – to events or speakers deemed to be higher-risk.

Assessment of proposed external letting

Prior to the confirmation of any letting the MIS rooming or Stockwell Student Services team will be responsible for assessing the organization against the following External Letting Initial Assessment questions:

- *Question 1:* Has the organization or any speaker involved in the event, to the best of the College’s knowledge, previously been prevented from speaking at Morley College, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the College’s External Speaker Code of Conduct?
- *Question 2:* Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct?
- *Question 3:* Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?

If the answer to all three questions is NO:

The MIS rooming or Stockwell Student Services team can confirm the letting in the normal way. (It is required that any external speaker be sent a copy of the External Speaker Code of Conduct). The team making the booking will record the details on the External Speaker log.

If the answer to any of the questions is unclear:

The team dealing with the booking must seek guidance from the Designated Safeguarding Lead, whose responsibility it will be to further review the proposed letting against the questions above.

Ultimately, if the answer to any of the questions is YES:

It will be the responsibility of the event organizer, to submit a referral to the Designated Safeguarding Lead using the External Speaker Assessment Referral Form.

In cases where the event/speaker will proceed the letting can be confirmed in the normal way subject to confirmation that any conditions required by the College have been accepted, including that any external speaker has received a copy of the External Speaker Code of Conduct and agrees to be bound by it.

2. External Speakers

Aim

This process details our approach to ensuring that we are protecting both staff and students and the reputation of Morley College London whilst following the legislation that we are responsible for upholding. This procedure is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have “due regard to the need to prevent people from being drawn into terrorism.

Objectives

The objectives of this procedure are:

- To provide an environment where freedom of expression and speech are protected, balanced with the need to ensure that our community is free from harm and that incitement to hatred is never acceptable.
- To provide a supportive, inclusive and safe space for students
- To provide clearly defined and effective procedures to ensure that the law is upheld.
- To collaborate with others to reach sound, evidenced judgments about proposed external speakers ensuring that the College can meet their legal obligations
- To encourage and provide a balance of opinion at any academic discussion or debate
- To communicate to all students, volunteers, staff and visitors, that it is our mutual responsibility to comply with equality and safeguarding and that both Morley College London and the individual can be held liable if they contravene the law.
- To provide clear instructions for organising an event with an external contribution e.g. a speaker or representatives, and guidance for researching an external speaker.

External Speaker and their Responsibilities

- Any external speaker hosted by the College or within any of its associated premises must be aware of, and comply with, the [External Speaker Code of Conduct](#).
- It is the responsibility of the person who is organising the event to ensure that the speaker receives the Code of Conduct and has their attention drawn to its contents.
- It is also the responsibility of the person who is organising the event to ensure that the provisions of the External Speaker Assessment Procedure are duly followed.
- Where the team making a room booking at the request of the organizer is aware the event involves an external speaker, they must seek confirmation that the organiser has undertaken an external speaker assessment in accordance with the procedure

External Speaker Initial Assessment Form

Part 1: Event Organiser details:
Name:
Curriculum Area or Professional Service Area:
Contact details (tel no. and email):
Part 2: Proposed event details:
Speaker's name: Speaker's role: Speaker's organisation:
Proposed event title: Proposed event date: Event description (max 100 words, include topics to be discussed):
Part 3: Assessment of Proposed External Speaker (s)
<p>Prior to the confirmation of any external speaker or organisation, the event organiser will be responsible for assessing them against the following set of questions:</p> <p><u>Question 1:</u> Has the speaker/organisation previously been prevented from speaking at Morley College London, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct?</p> <p><u>Question 2:</u> Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct?</p> <p><u>Question 3:</u> Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?</p> <p><u>Question 4:</u> Does the external speaker go by any other names? If yes, please list other names.</p> <p><u>Question 5:</u> Is the speaker affiliated to any other organisation? If yes, name the other organisations.</p>
If the proposed speaker is unable to attend who will be his/her/their deputy? Name and title of deputy:

Contact number of deputy:

Is this a registered charity? If yes, please give registered charity number:

Is there any known or likely media interest in the proposed event?

If the answer to all questions is NO:

The event organiser can submit this form to Marketing and Communications, confirm the external speaker and proceed with organising the event:

If the answer to any of the questions is unclear:

The event organiser must seek guidance from the DSL/Vice Principal (Student Engagement) whose responsibility it will be to further review the speaker(s) against the questions above.

Ultimately, if the answer to any of the questions is YES:

It is the responsibility of the event organiser to submit a referral to the DSL/Vice Principal (Student Engagement) for consideration. To make a speaker referral submission:

1. Complete all sections of the form below with as much detail as possible.
2. Send the form as an attachment to the DSL/Vice Principal (Student Engagement)

In all cases where the event will proceed please:

- Complete an [Event Support Form via Emma](#) (The Marketing and Communications team will add the event to the external speaker log as well as respond to any requirements outlined on the form)
- Book rooms with Rooming [via Emma](#)
- Send the speaker a copy of the [External Speaker Code of Conduct](#).

Initial assessment completed by:

Name.....

Date.....

Please keep this form safe so that it can be referred to should a query arise

External Speaker Referral Form



Part 1: Event Organiser details:

Name:

Curriculum Area or Professional Service Area:

Contact details (tel no. and email):

Part 2: Proposed event details:

SPEAKER DETAILS

Speaker(s) name:

Speaker(s) contact address:

Speaker(s) contact phone number:

Speaker(s) email:

Speaker(s) website/Social Media handles:

Speaker(s) organisation (if applicable):

Organisation details (address, website, company number, social media handles):

Does the speaker or members from the organisation they represent have a reputation for causing disruption at venues: YES / NO

Are there likely to be any health and safety or public order issues that may occur as a result of this event: YES / NO

EXPANDED ASSESSMENT OF PROPOSED EXTERNAL SPEAKER(S)

Provide an explanation of the following questions from the Initial Assessment you answered Yes to:

- i. Has the speaker previously been prevented from speaking at Morley College, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct?
- ii. Does the proposed topic or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct?

iii. Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?

iv. **Has the speaker or the organisation been checked against the Proscribed List**
<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

EVENT DETAILS

Event title:

Event description (max 100 words, include topics to be discussed):

Has speaker presented the same or similar topic before? YES / NO

If Yes, has the topic met regionally or nationally with any criticism or hostility when it has been hosted before?

Is the speaker requesting special conditions such as a closed meeting, tickets or segregation? YES / NO

If Yes, what has been requested:

Has any pressure (either directly or indirectly) been undertaken by any person to run or not to run this event? Is there community pressure to run the event or has there been objections by some people to run it? YES / NO

If Yes, provide additional details:

Part 3: Response to external Speaker Referral Form:

A. The event may proceed subject to the following conditions:

B. The event may not proceed because:

DSL/Vice Principal (Student Engagement)

Date

External Speaker Code of Conduct

Morley College London expects external speakers to act in accordance with the law and not to breach the lawful rights of others.

Set out below are examples of the College's expectations. This is not intended to be an exhaustive list of unacceptable conduct by external speakers.

During the course of the event at which he or she participates, no speaker shall:

- Act in breach of the criminal law.
- Incite hatred or violence or any breach of the criminal law.
- Encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism.
- Spread hatred and intolerance.
- Discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age.
- Defame any person or organisation.
- Raise or gather funds for any external organisation or cause without express permission of the College.

During the course of the event at which he or she participates, all speakers shall:

- Present ideas and opinions, in particular those that may be contentious or potentially offensive, in the spirit of academic debate, being open to challenge and question
- Follow the College's policy on and instructions relating to health and safety.

The College reserves the right to not permit an external speaker to speak at or attend an event, to refuse to permit an event and/or to halt an event at any time if it reasonably considers there may be a breach of this code of conduct or of any legal obligation.

Segregation

Colleges have duties under the Equality Act 2010 as education providers, employers and service providers; they must not unlawfully discriminate against students, employees and other individuals to whom services are provided.

Segregation by sex is not permitted in any academic meetings or at events, lectures or meetings provided for students, or at events attended by members of the public or employees of the College or the students' union. Segregation is therefore not permissible for any event covered by the External Speaker Procedure and this Code of Conduct.

The only exception to this is events that are for the purpose of collective religious worship.

Annex 3: Self-harm Procedure

Purpose

In keeping with the College’s values, vision and aims, this policy and procedure aims to guide staff in how best to support students who self-harm, ensuring consistency throughout the College.

What is self-harm?

The term self-harm is often used as an all-encompassing term referring to suicidal thoughts, attempted suicide, and self-injury. These can be sub-grouped into the following:

- Harming Behaviour: could result in long-term harm e.g. over/under eating, drug use, binge drinking.
- Self-injury: deliberately harming or injuring oneself e.g. cutting, burning, hair pulling and other acts of self-mutilation. This can also include head-banging against a surface/wall, and self-punching and hitting. Self-injury is seen as a coping mechanism with the aim of relieving emotional distress. Although self-harm is relied upon as an attempt to cope and manage and may not be intentionally suicidal, it must be recognised that the emotional distress that leads to self-harm can also lead to suicidal thoughts and actions.
- Suicide: is an intentional, self-inflicted, life-threatening act resulting in death from several means.
- Suicidal intent: is indicated by evidence of premeditation (such as saving up tablets), taking care to avoid discovery, failing to alert potential helpers, carrying out final acts (such as writing a suicide note) and choosing a violent or aggressive means of deliberate self-harm allowing little chance of survival.
- Students with Special Educational Needs and Disabilities (SEND): can display what are perceived by others as self-harming behaviours, but there may be other functions of the behaviour to consider e.g. to achieve certain levels of stimulation. By definition, young people with learning disabilities have impaired communication and it is not uncommon for a young person to hit or bite themselves, when feeling frustrated or not understood. Or it may be to enlist help, e.g. physical pain such as an ear infection, may be expressed by hitting their ear. It is therefore important to find out what is being communicated with this behaviour.

What to do if a student has disclosed that they have self-harmed?

It is essential that you assess the immediate risk the student may be in:

- **First resolve the physical issue and treat as a FIRST AID incident.** If the student requires medical attention, contact a First Aider. They will assess any injuries and provide appropriate treatment if the injuries are minor. A referral to accident and emergency may be necessary, if the harm is considered a danger to an individual’s health, either mentally or physically. The parents must be informed unless staff feel that informing the parents will put the student at risk. For adult students, next of kin should be contacted following a referral to hospital and emergency services.
- **If the student does not require medical treatment:** then staff should follow the safeguarding procedure. It is vital to make a written log of all incidents of self-harm on the college safeguarding form, or by the safeguarding email. This will be sent directly to the Safeguarding and Safeguarding and Wellbeing Team who will access the My Concern portal.

Good practice guidelines

Listen

- To what the student says in order to check whether they want help and if so, what help is required.
- Respect their choices, do not impose your own agenda onto the student, unless they are a danger to themselves or others.
- Remain calm and non-judgemental.
- Staff must not take the responsibility of resolving the underlying issues or stopping the self-harming behaviour.
- Do not make promises of confidentiality, let the student know that the information will need to be shared with the Safeguarding and Wellbeing Team.
- Try to contain your own anxiety, remember that self-harm is a coping strategy, if you insist, they stop, you may be removing the only coping mechanism they have.
- Beware of escalating the issue out of proportion.
- Remember the impact of self-harming behaviour on other students and provide support if necessary.

Respond

- Contact the nearest college First Aider via the Duty Manager.
- If there is risk of suicide or life-threatening self-harm, the student needs to be referred to A & E
- Make a record of the incident on the safeguarding form, or my email which will automatically be sent to the Safeguarding and Wellbeing Team to record on My Concern.
- Remember to look after yourself whilst supporting someone else.
- Take care of your own emotional wellbeing and seek support if necessary.
- Maintain boundaries, for example it is unrealistic for you to be on call for someone in need all the time.

Role of the Safeguarding and Wellbeing Team

When a disclosure of self-harm is made, it will be assessed by a member of the Safeguarding and Wellbeing Team, who will decide on the appropriate course of action. Decisions around threshold will be made, in line with the College's Safeguarding Policy, parents will be spoken to, unless doing so will place the student at risk.

The student will either be referred to the GP, A&E, MASH, CAMHS or an in-house member of the Safeguarding and Wellbeing team.

This will depend on an assessment of the current risk the student is exposed to. All students, where a concern has been raised, will be monitored, and reviewed and in some instances, the fitness to study procedure will be implemented.

Fitness to Study

All staff should be aware that, after a crisis situation or absence from college for mental health recuperation, the student will need to attend a meeting to assess their fitness to return to study.

Annex 4: Sexual Harassment and Violence

When referring to sexual harassment we mean unwanted conduct of a sexual nature that can occur online and offline. Whilst not intended to be an exhaustive list, sexual harassment can include sexual comments, such as, telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual “jokes” or taunting.

Morley College London recognises that sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. In most instances, the conduct of students towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. All reports of sexual harassment will be investigated and followed up with disciplinary action where necessary and if proven.

Sexual Harassment MUST be reported using our safeguarding reporting procedures.

Sexual Violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent* to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

Consent is providing permission for something to happen or agreeing to do something with a full awareness and understanding of the facts and without coercion. In cases of sexual activity, consent cannot be presumed but must be explicitly given each time verbally or non-verbally.

Consent cannot be deemed to have been given if it is provided under pressure, or in situations where someone is not capable of providing it such as when they are drunk, under the influence of drugs, asleep, unconscious, are physically or mentally unable to make a choice and understand the consequences.

Consent can be withdrawn at any time.

Reports of sexual violence

A student should never be given the impression that they are creating a problem by reporting sexual violence. It is essential that students reporting sexual violence are protected, offered appropriate support and every effort is made to ensure their education is not disrupted.

- The police will be important partners where a crime might have been committed. Where a report of sexual violence is made, the starting principle is that this should be referred on to the police.

- Where a student under 18 has been harmed, is at risk of harm, or is in immediate danger, a referral will be made to children's social care.
- Parents or carers will be informed unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a student under 18 at additional risk.
- Where a report is made to children's social care and/or the police, then, the College will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

Risk assessment

The Safeguarding Team will make an immediate risk and needs assessment, this will consider:

- the victim, especially their protection and support
- the alleged perpetrator; and
- the expectations regarding their behaviour and any restrictions the College thinks are reasonable and proportionate with regard to the perpetrator's timetable.
- how best to keep the victim and alleged perpetrator apart on college premises and on transport to and from college where appropriate
- all the other students and staff at the College.

Responding to the report

There may be reports where the students concerned attend two or more different schools or colleges. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important.

If a police investigation is commenced, the College will consider whether an internal investigation is required or if already underway, whether the internal investigation should be paused whilst the police investigation is undertaken.

In all but the most exceptional of circumstances, sexual violence is likely to constitute a serious breach of discipline (gross misconduct) and lead to the view that allowing the perpetrator to remain in the same college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where the perpetrator is going to remain at the College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Annex 5: Visible ID Procedures

1. College Statement

The College operates a visible ID procedure for all staff, Governor, students, contractors, commercial and professional visitors to the College. This enables the College to ensure that only authorised persons are admitted to the buildings to maintain a safe and secure environment.

All students, staff and Governors must wear their College lanyards around their necks at all times to confirm at a glance that they are a registered member of the College community. At the Waterloo centre, the college’s provision is based solely on adult learning and access to the site for students and visitors is managed differently. A risk assessment has been completed to manage and mitigate any risks.

This policy is a key measure to support our Safeguarding and Prevent strategies.

2. Scope

The procedure applies to all staff, Governors, students, contractors and professional visitors to the College. The policy details the type of identification required and the procedures for staff, Governors, student, contractors and visitor groups.

3. ID and Lanyard Colours

Lanyard colour	Category of Individuals
Black with white text	All Staff
Black with orange text	Governors
Purple	Safeguarding Team
Blue	Students - Waterloo
Pink	Students - Chelsea
Green	Students - North Kensington
Orange	Students – Temporary Pass, all centres
Red	Visitors
Yellow	On site contractors

4. Staff Wearing of ID and College Lanyards

Staff and Governors **must** wear their college issued lanyards (other lanyards are not to be worn) at all times as role models for our student body. The only exception is while engaged in practical activity where entanglement or other risks have been identified.

All staff are required to implement this policy and the following guidelines are illustrative, although not exhaustive, of expected actions:

- Staff should wear their college lanyard and ID at all times, except when engaged in practical activity where entanglement or other risks have been identified
- Teaching staff and ALS staff should not permit any learner into the classroom who is not wearing their lanyard

- Students who wish to use the services of the Library/LRCs, Student Services or the canteen facility must be wearing their lanyard in order to be served
- Students must always remove their lanyards when undertaking practical tasks where entanglement or other risks have been identified by the tutor. Lanyards must be put on again before leaving the teaching space
- Security staff and members of the management team will conduct lanyard spot checks at specific points in the year
- Line Managers will conduct regular spot checks in their department to ensure staff and students are wearing lanyards.

5. Replacement ID Cards for Students

All enrolled students will be given an ID card, lanyard and card holder when they have fully completed their enrolment / their first day at college.

- 5.1 If a full-time **day time** student loses or forgets their ID card, they should report to the student services desk and their ID checked on eTrackr. They will be issued with an orange lanyard and temporary student day pass which will be recorded in the spreadsheet on Sharepoint. The student will sign out the pass and be required to sign it back in at the end of the day.
- 5.2 If an **evening class** student forgets their ID card, they must sign in at reception, their ID should be checked on eTrackr and a visitor sticker will be issued.
- 5.3 If a student loses or forgets their ID card more than 3 times, they will not be allowed into the College unless they pay for a new ID. The cost for replacement ID cards is £5. Payable at Student Services. However, if the student is vulnerable and in receipt of financial support then payment can be waived at the discretion of the Centre Principal.
- 5.4 If, after receiving a replacement ID, a student forgets their card a further 3 times they will be required to attend a meeting with the Enrolment Manager. The purpose of this meeting is to review the Safeguarding and Prevent Policy with the student, to emphasise the importance of the ID policies. Should any disciplinary or safeguarding concerns be identified in this meeting, they will be escalated accordingly.
- 5.5 For students who forget their ID cards but are attending an examination:
 - Student services will contact the Exams Team/check ProMonitor to confirm the student has an examination that day
 - The student will be issued with a temporary day pass
 - Student Services will issue the student with a print out of their Enrolment Confirmation Letter to take to the exam as evidence of identification

6. Staff or Governors who forget their ID cards

Staff or Governors who forget or lose their ID will be required to sign in as a visitor and will be issued a *blue* 'TEMPORARY' lanyard and day pass by HR. The temporary lanyard and card must be returned at the end of the day.

7. Contractors

Contractors' lanyards and ID passes will be issued by Estates. Contractors' lanyards are *Yellow*, printed with black text 'CONTRACTOR'. Contractors must wear their lanyards at all times. The only exception is while engaged in practical activity where entanglement or other risks have been identified. Lanyards must be returned to the estates office when the contractor has finished.

8. Visitors

Visitor lanyards and ID passes will be issued at the College Reception/student services. Visitors' lanyards are RED. Details of the visitor must be shared with the student services team prior to the visitor arriving wherever possible.

Details required:

- Visitors name
- Name of the person they are visiting

Visitors must be collected from and escorted back to the College Front Desk at the end of the meeting.

There are exceptions where visitor identification badges will not be issued which include:

- 1) When a planned event is held that is open to the public e.g., Open Event. Registration however is completed upon arrival.
- 2) To service providers such as mail delivery, delivery drivers who drop off resources to the kitchens etc.
- 3) A pre-planned group event hosted by the College Marketing Team, where delegate badges will have been pre-prepared.

9. Visible ID for those who wear coverings which obscure their face

Some staff or students may wish to wear head, body or face coverings for religious or medical i.e. skull caps, Niqab (face veil), Burka (full body covering) or a hat for those who are suffering hair loss due to a medical condition and the College aims to accommodate their preferences wherever possible. However, staff and students have no absolute right for their wishes to be met and the needs of the College to implement a policy which ensures visible identification must be balanced with the beliefs of the individual.

- ***Wearing headwear for religious or medical reasons.***

Staff and students who wish to do so may choose to cover their hair for religious or medical reasons (e.g. by means of a headscarf, skull cap or turban). Should this change their appearance in such a way that the photograph on their ID badge does not bear a resemblance then a new photograph should be taken and the badge must be issued.

- ***Wearing a Niqab or Burka.***

The College considers that being able to see someone's face when they communicate is fundamental to effective communication. For this reason clothing that covers the face is not permitted, in any employed or voluntary role in the College. It is also necessary for a full face photo to be taken for all ID badges.

- ***Wearing of hoods and baseball caps/hats***

The expectation is that all students will remove hoods and caps before entering the classroom in order to be ready to learn and demonstrate work readiness. The only exception to this rule is if students have a learning difficulty or disability and this behaviour forms part of a reasonable adjustment. This is expected to be managed within the class by the tutor.

However, some students may wish to wear facial coverings. In these cases, the photograph for the ID badge should be taken in a private room by an appropriate female members of staff. For students, face coverings may be worn in general areas of the College, however within the classroom environment these must be removed.

10. Withdrawn or excluded students

When a student withdraws or is excluded from the College they must be asked to return their badge and lanyard before leaving the building; this is the responsibility of the Centre Principal. There will be occasions when a student withdraws and does not return to the College. In these circumstances the student will be contacted and asked to return their badge, should the badge not be returned a note will be added to E-trackr and the student card and account will be deactivated.

11. Unknown and uninvited visitors

All staff should respectfully challenge any person in college not wearing a visible lanyard or delegate badge. Anyone without a lanyard who is seen unaccompanied within the College should be approached and escorted back to Reception by a member of staff and asked to sign in as a visitor or to be issued with a 'TEMPORARY' day pass and lanyard. A member of the Security Team should be summoned should this unidentified person refuse to comply.