SAFEGUARDING & PREVENT POLICY AND PROCEDURE

Owner	Head of Learner Experience
Approved by	Corporation, March 2020
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1 Policy Statement

1.1 The Working Men's College ("WM College") fully recognises its responsibility to promote safe practice and to protect and safeguard the welfare of everyone working, visiting and studying at the College. We believe that learning and working takes place most effectively within a culture in which all individuals trust the College to keep them safe from harm while at the College and give them information, advice and help to keep themselves safe from harm at other times. WM College believes that everybody working, visiting or studying here has a right to freedom from harm. Everyone working in the College is required to abide by the College's Code of Conduct, which makes it clear that actions which harm others will not be tolerated.

The College recognises its obligations under the Human Rights Act 1998, and the Equality Act 2010 (including the Public Sector Equality Duty).

1.2 WM College is an adult education establishment whose main cohort of learners are aged 18 or over.

The College recognises that those learners who are particularly vulnerable are those that:

- Have a need for care and support learners who are care givers and those with mental health issues as well as tal health, learners with learning difficulties and/or disabilities.
- Those experiencing, or at risk of experiencing abuse or neglect
- Are unable to protect themselves against significant harm or exploitation

WM College recognises its responsibility to take all reasonable steps to protect everyone, with special attention given to young people and vulnerable adults from harm, abuse and exploitation.

Vulnerability is difficult to judge. Staff should always assume that any adult learner they deal with may be vulnerable and treat them accordingly.

1.3 This policy applies to everyone working or studying at the college; full-time, part-time and sessional staff, agency staff, governors, contractors, volunteers, visitors and learners. It applies to its sites at Crowndale Road and to all its provision delivered elsewhere, including community centres and employers' premises.

1.4 This policy applies to individuals or organisations that hire space at the WM College site. Their adherence with this policy will be a condition of use and occupation of the premises and failure to comply would lead to the termination of any agreement. This will be explicit in any hire agreement.

1.5 All staff, governors, contractors and volunteers are required to familiarise themselves with this Safeguarding and Prevent Policy and related practices and procedures upon induction to the College and when updates are notified and circulated. In addition, all staff and volunteers are required to prioritise attendance at College safeguarding training events.

1.6 WM College adheres to the Prevent Duty. Prevent is the government's national counter-terrorism strategy and it aims to stop people being drawn into terrorism. It aims to reduce the risks of radicalisation and ensure people are given advice and support. All colleges have a responsibility to identify the risks of, and protect, everyone from the dangers of, radicalisation and extremism.

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

1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

(UK Government: New definition of extremism - March 2024)

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

Everyone should follow the same approach, and the procedures set out in this document for identifying, raising and addressing concerns about radicalisation and extremism as they would about other safeguarding concerns. (See Section 4)

2 Responsibility for the Policy

2.1 The Lead Person for Safeguarding and Prevent in the College with overall responsibility for the policy is the Principal.

2.2 The policy is approved by governors. A lead governor is appointed to support and work with the College's named Lead Person for safeguarding and to oversee the implementation of the policy.

2.3 The Head of Learner Experience will act as the Lead Nominated Person for Safeguarding in the College and will be responsible for updating the policy annually (or more frequently if legislative or regulatory changes prompt an earlier review) and provide an annual report to governors on its implementation.

2.4 The Head of Learner Experience is responsible for overseeing and managing referrals, training and raising staff and learner awareness, overseeing safe recruitment, and the health & safety and training aspects of the policy. They are also responsible for maintaining contacts with the Local Safeguarding Boards, the Department for Education's Regional Prevent Co-Ordinator and other agencies. In the absence of the Head of Learner Experience, the Curriculum Manager ALS will deputise as the Safeguarding Lead for the College.

2.5 There are three additional Designated Safeguarding Leads who are the first point of contact for staff or learners with concerns. The college also maintains a safeguarding e-mail address, which may be used for reporting incidents. (safeguarding@wmcollege.ac.uk)

The Designated Safeguarding Leads are:

- Curriculum Manager ALS
- Admissions and Learner Services Manager
- Disability Officer

These members of staff together with the Head of Learner Experience will receive enhanced safeguarding and Prevent training to enable them to fully understand and discharge the responsibilities of their roles. Contact details for these staff will be included in learner inductions and displayed prominently in the college centres.

2.6 The Designated Safeguarding Leads are responsible for overseeing and maintaining central registers of safeguarding incidents/concerns and details of vulnerable Learners.

2.7 The Designated Safeguarding Leads are responsible for ensuring that all staff, Governors, contractors and volunteers in the College have received appropriate initial and refresher training and for keeping records of attendance at training events or completion of online training.

2.8 Members of staff must also take personal responsibility for ensuring they are appropriately trained, that they fulfil their referral and reporting obligations under this policy and that this policy is disseminated and implemented consistently throughout the College.

3. Learners' Safety and Well-Being

3.1 All staff must take steps to promote learner wellbeing and safety.

3.2 The potential risks to learners are very broad. A list of some of them is given in Appendix 1. Staff should be aware of these risks and be alert to the possibility that some of their learners may be experiencing some of these problems.

3.3 The College aims to provide a supportive environment which encourages learners to speak out about any problems they may have, whether or not they are connected with their study, and staff will work with the learner to resolve these problems wherever possible.

3.4 The College will ensure that appropriate filtering and monitoring systems are in place as well as appropriate levels of security protection procedures to keep staff and learners safe online. (Refer to ICT Acceptable Use / E-Safety Policies).

3.5 Online safety risks now include exposure to misinformation, disinformation and conspiracy theories. The College will ensure filtering and monitoring systems are in place to address these risks and will provide staff training on identifying and mitigating such harms.

3.6 Staff must follow college protocols for safe use of AI tools in teaching and assessment, ensuring compliance with DfE guidance on generative AI.

3.7 Annual reviews of filtering and monitoring will include checks against emerging online harms such as AI-generated content, deepfakes, and online radicalisation.

3.8 The filtering and monitoring processes will be reviewed annually, and such reviews will be available for inspection by relevant regulatory bodies

3.9 All staff will be made aware of the reporting processes if:

They witness or suspect unsuitable material has been accessed.

They can access unsuitable material.

Are teaching topics which could create unusual activity on the filtering logs.

There is a failure in the software or abuse of the system.

There are perceived unreasonable restrictions that affect teaching learning or administrative tasks.

They notice abbreviations or misspellings that allow access to restricted material.

3.10 Staff should be aware that learners may not be ready to tell someone they are being abused, exploited or neglected and/or feel they may not recognise their experiences as harmful. For example, learners may feel embarrassed, humiliated or are being threatened. This should not prevent staff from having a professional curiosity and speaking to a DSL if they have concerns about someone.

3.11 The College aims to provide all its learners with the information they need in order to keep themselves safe, through their curriculum teaching and through dissemination of information via noticeboards, bulletins, emails and on-line resources.

3.12 Persistent absence or irregular attendance will be treated as a safeguarding concern. Staff must be mindful and liaise with local authority services where appropriate.

3.13 Following a disclosure of sexual harassment, assault or violence, all staff will take reports seriously and ensure that victims are supported and safe. A victim will be reassured that that they are not creating a problem and they should not feel ashamed for making a report or their experience minimised.

3.14 Where a report of rape, assault by penetration or sexual assault is made, the College will contact the police.

3.15 Where a report has been made to the police, the College will consult the police and agree what information can be disclosed to staff and others, in particular the alleged perpetrator(s) if they are a member of the College community and their parents/carers if they are a vulnerable learner. The College will also discuss the best way to protect the victim and their anonymity.

3.16 The College will discuss with the police appropriate actions in respect of the alleged perpetrator(s) if they are a member of the College community. This will include the right to anonymity, suspension and whether starting a disciplinary process would prejudice the police investigation.

3.17 The College will consider referral to specialist support for the victim and for the alleged perpetrator(s) should they be considered a vulnerable adult.

4. The Prevent Duty

4.1 The College understands its responsibilities under the Prevent Duty and radicalisation risks that surround this and recognises that extremism and exposure to extremist materials and influences are safeguarding concerns.

4.2 The College will respond to the ideological challenge of terrorism and aspects of extremism and the threat it faces from those who promote such views.

4.3 The College aims to provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure that they are given appropriate advice and support.

4.4 The College will maintain relationships and contact with external agencies to ensure that current levels of risk are known and responded to accordingly.

4.5 The College will regularly review and update the Prevent Risk Assessment and Action Plan to ensure that all current local, national and international risks are managed.

See Appendix 3 for process concerning Prevent concerns.

5. DBS Policy and Safe Recruitment of Staff

5.1 All College staff undergo a Disclosure & Barring Service (DBS) check prior to employment, in accordance with the terms of our separate DBS Policy.

5.2 This covers full time, part time and sessional staff, whether permanent, fixed term or temporary, unless they are engaged for fewer than 4 weeks and are an appointed professional discharging their statutory duty.

5.3 Any contractor or volunteer who has or is likely to have unsupervised access to learners under the age of 18 or vulnerable adults will be subject to DBS checking. This will include some learner representatives, to be decided on a case-by-case basis by the Head of Learner Experience.

5.4 Where a concern is raised via the DBS check or the barred list, the appropriate Director would meet with the individual to discuss concerns and take statements. Following the meeting, Head of Learner Experience will make a final decision. Any appeals will be sent to the Vice Principal or Deputy Principal.

5.5 Any member of staff for whom the results of a DBS check are not known when they start employment will be subject to a specific risk assessment prepared by the Recruiting Manager and reviewed by the Head of Learner Experience. The risk assessment will identify appropriate actions to mitigate the risks, such as providing additional supervision and unannounced observations on the staff member. In some cases, it might be appropriate to determine that the staff member is not permitted to be alone with the following Learners or groups of Learners:

- Classes or groups specifically for children or young people under 19
- Classes or groups specifically for vulnerable adults
- Individual children or young people under 19
- Individual adults who may be vulnerable

5.6 Re-checks will be carried out when staff apply for a new position within the College or every three years, whichever is the sooner.

5.7 Safer Recruitment procedures are followed by the College, with all staff involved in chairing recruitment panels undergoing specific training in 'Safer Recruitment.' Job adverts and job descriptions all state that before employment, a DBS check will be required as well as two written references. Offers of employment will only be conditional until satisfactory checks and references have been obtained. In addition, steps will be taken to ensure that all shortlisted candidates provide a career history and satisfactory explanations are received and corroborated as necessary, to explain any career gaps.

5.8 A Single Central Record of staff will be maintained by the HR Manager in line with statutory guidance within Keeping Children Safe in Education (KCSIE).

6. Staff Training and Code of Conduct

6.1 All staff and Governors, and, where appropriate, contractors and volunteers, must be trained in the principles and practice of safeguarding. The training is designed to give staff information on:

- The principles of safeguarding
- What we are safeguarding against and the common indicators of a concern
- How to deal with possible concerns
- How to deal with the issue of confidentiality
- How safeguarding is embedded throughout the organisation
- Safer recruitment (where appropriate)
- The Prevent Duty

Contractors and visitors on site for a short period will receive a short safeguarding guide.

6.2 Compulsory online Safeguarding and Prevent training, including online safety is compulsory for all staff and is emailed pre-employment. HR monitor this as part of the induction process and ensure completion via a certificate. Staff are required to complete by the end of the first week of employment if not completed pre-employment. Managers who recruit staff also undertake online 'Safer Recruitment' training. Designated Safeguarding Lead training, is compulsory for staff with specialist responsibilities under this Policy, or who are involved in policy development.

6.3 All staff are expected to understand and adhere to the **Staff Code of Conduct**, which sets out simple rules for behaviour. Staff receive a copy as part of the induction process. (See Appendix 4.)

6.4 Staff are encouraged to report low level concerns where behaviour towards a learner by another member of staff, a volunteer or a contractor is inconsistent with the Staff Code of Conduct or is concerning but does not meet the safeguarding threshold. Low level concerns which are shared about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

6.5 Staff are encouraged to self-refer where they have found themselves in a situation, which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

6.6 Governors undergo safeguarding training in order for them to fully appreciate and discharge their responsibilities in relation to safeguarding. The lead governor is provided with additional specialist safeguarding training as appropriate.

7. Risk Assessments

7.1 If any member of staff becomes aware or is concerned that a learner who is enrolling or already attending College may have been involved in sexual or violent offences, they should report this to one of the Designated Safeguarding Leads. The Designated Safeguarding Lead will investigate the circumstances surrounding the offences and any subsequent convictions and, where appropriate, liaise with the Senior Leadership Team about the actions to be taken. The College recognises its responsibilities under the Rehabilitation of Offenders Act but will always assess the risk to other learners and staff before making a decision.

7.2 Any Risk Assessment will aim to identify all the risks, assess their likelihood and impact in each case and devise strategies to mitigate them. Risk assessments will be fully documented and retained by the respective Designated Safeguarding Lead.

8. Information, Advice & Guidance for Learners

8.1 Safeguarding and Prevent is covered in the the learners' induction programme as well as the College's Code of Conduct and how to keep themselves safe.

8.2 Safeguarding and Prevent is incorporated into the College's process for observations of teaching & learning and quality monitored annually.

8.3 An internal noticeboard and a safeguarding webpage are maintained for Learners giving contact details for advice on all aspects of personal safety, including both College and external resources.

8.4 The College's ICT Acceptable Use Policy contains advice and rules for both staff and learners, which aim to minimise the risk of cyber-bullying, online financial deception and other online threats such as Prevent concerns.

8.5 A Health & Safety and Safeguarding risk assessment will be completed for learners on work placements and reviewed by the relevant Curriculum Manager. Cases causing concern will be raised with one of the Designated Safeguarding Leads and followed up as necessary.

8.6 Work placement providers will be given information on how to report safeguarding concerns or disclosures that occur during the placement to the College.

8.7 All Risk Assessments for off-site visits with learners will include mitigation of safeguarding and Prevent risks.

9. Reporting Concerns

9.1 All staff, governors, contractors and volunteers must understand their responsibility to be alert to the signs of a possible concern. (See Appendix 2.) If anyone working in the College recognises signs that indicate a safeguarding concern in any other person, they should raise the concern with a Designated Safeguarding Lead at the earliest opportunity, either by phone or by emailing the safeguarding team. Serious concerns or where there is a perceived risk of immediate harm to the individual should be reported directly to a senior manager and/or the Police.

9.2 If a learner makes a disclosure to a member of staff, they should follow the procedures in Appendix 3.

9.3 If a learner discloses historic abuse which has been disclosed previously, the College will treat the situation delicately and signpost the learner to support agencies if they are not already accessing them.

9.4 If an allegation of abuse is made against another learner, the process will be the same, but the Head of Learner Experience will decide whether to invoke the Learner Conduct Policy and Procedures against the alleged abuser following a safeguarding investigation.

9.5 If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the Executive Safeguarding Lead will investigate and consider whether the person who made the allegation is in need of support, for example, this was a cry for help. In this case, an appropriate referral will be made.

9.6 If the investigation shows a report is deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made it.

10. Allegations against a member of staff

10.1 Allegations raised against a member of College staff, including agency teachers, volunteers and contractors, will always be treated seriously. If a member of staff receives such an allegation or has concerns, this must always be referred to the Executive Designated Safeguarding Lead or in their absence, the Deputy Principal.

10.2 If the allegation concerns a senior manager, then the concern should be raised with the Principal and if the allegation concerns the Principal personally, it should be made to the Chair of Governors, who will be able to request advice from external sources as necessary.

10.3 Any allegations made directly to HR will be reported to the Executive Designated Safeguarding Lead.

10.4 The following procedures will be followed to look after the welfare of the learner involved and to investigate and support the person who is the subject of the allegation:

(i) Where it is identified that a learner has been harmed or that there may be immediate risk of harm, or if the situation is an emergency, the College's safeguarding referral procedure should be followed. An immediate contact made with social services, where appropriate, and/or the police. The necessary steps will be taken quickly to ensure the safety of the learner in question and any other individual(s) considered at risk, which could include the staff member against whom an allegation has been made.

(ii) An Investigating Officer in the College will be appointed by the Head of HR and Deputy Principal. Where the Principal is the subject of an allegation, the Chair of Governors will be required to investigate.

(iii) The Executive Designated Safeguarding Lead will inform the Designated Safeguarding Governor of the allegation and investigation.

(iv) Where they have been contacted, the Local Authority will appoint someone from their Safeguarding Team to advise on whether the Police or Children/Adult Services should be involved and will offer guidance regarding suspension.

(v) Suspension will not be an automatic response when an allegation is reported. The Head of HR will consider carefully whether the circumstances warrant an immediate suspension from the College or until the investigation is complete.

(vi) The Disciplinary Procedure will be followed if an allegation is found. If the outcome is 'gross misconduct', the College will inform the Disclosure and Barring Service.

(vii) If a member of staff is dismissed or resigns before the disciplinary process is completed, they will be informed of the College's duty to formally report the situation to the Disclosure and Barring Service.

10.5 If an allegation against a member of staff is determined to be unsubstantiated, unfounded, false or malicious, the Executive Safeguarding Lead will investigate and consider whether the person who made the allegation is in need of support, for example, this was a cry for help. In this case, an appropriate referral will be made.

10.6 If the investigation shows an allegation against a member of staff is deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made it.

10.7 Where a safeguarding allegation is made by a member of staff against another member of staff, the procedures outlined above will apply with exception that HR will lead the management of any investigation.

11. Record Keeping and Data Protection

11.1 Staff can play a vital role in helping a person in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a person that gives cause for concern should be reported to a Designated Safeguarding Lead as soon as possible. It is important that records are factual and reflect the words used by the individual. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential, and staff should know only on a 'need to know' basis

11.2 The following information should always be recorded by the member of staff:

- Learner's name and date of birth or ID number
- Learner in normal context, e.g. behaviour, attitude, (has there been an extreme change)
- The incident(s) which gives rise for concern with date(s) and times(s)
- A verbatim record (as far as practical) of what the learner has said
- Action taken

These basic details are vital to the information gathering process and do not constitute an investigation. Written information should be passed to a member of the Designated Safeguarding Team.

11.3 The Safeguarding Team will keep:

- a confidential central register of safeguarding incidents/concerns concerning learners
- a separate confidential register or safeguarding incident/concerns concerning staff accessible only to the Principal and the HR Manager
- a separate confidential register of allegations involving members of staff accessible only to the Principal and the HR Manager
- a confidential formal record of all investigations into serious safeguarding concerns
- a confidential file of safeguarding risk assessments
- a confidential list of vulnerable Learners

11.4 The HR Manager must keep a Single Central Record of all required pre-employment checks completed, which should be checked annually by the Governor with safeguarding responsibilities

11.5 Under the College's Data Protection Policy, and to comply with the Data Protection Act 2018 and the UK General Data Protection (UK GDPR), personal data must not be passed to anyone outside the College without their permission, with the exception of:

- funding bodies, for their prescribed purposes,
- the Police, where a crime has been, or is likely to be committed
- the immediate welfare or safety of a person is at risk
- Department for Education (DfE)
- Department for Business, Innovation, and skills (BIS)
- Ofsted
- Department of Health (DH)/Primary Care Trusts (PCT)

In the event of a concern where the safety of a learner is at immediate risk, the College may share information with appropriate practitioners to resolve the immediate issue. College's Data Protection Officer can provide further advice. Contact them at datarequest@wmcollege.ac.uk

11.6 No member of staff will disclose the whereabouts, or even the presence in the building, of a learner, to anyone, even someone claiming to be their relative or friend. In an emergency a staff member may offer to pass on a message if they are here but cannot disclose whether they have been successful or not.

12. Subcontracted Provision

12.1 Where the College carries out subcontracted provision on behalf of another provider, it must ensure that any safeguarding concerns about the provider's learners are raised immediately with their Designated Safeguarding Lead. This is particularly important in the case of provision for learners of statutory school age, referred to us by their school. At the time of approval of this policy, no school provision is delivered at the College.

13. External Agencies

13.1 The Designated Safeguarding Leads are responsible for maintaining contact with the three safeguarding partners within Camden (local authority, clinical commissioning group and the police) and other local agencies for determining whether and when a referral is appropriate or necessary. This collaboration is intended to ensure that support is made available to those who need it, and that assistance and advice are available to the College where necessary.

13.2 The College has a legal duty to refer to the Disclosure and Barring Service (DBS), any member of staff who has harmed, or poses a risk of harm, to a vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been dismissed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or dismissal of the individual. The College will abide by this statutory requirement and will refer any such instances to the DBS without further reference to the individual.

13.3 When using an agency, the College will inform the agency of its process for managing allegations and will keep them up to date with policies.

13.4 Procedures for dealing with safeguarding concerns that involve a member of staff supplied by agency will be the same as those for staff directly employed with the understanding that the agency will be fully involved and co-operate with any external agencies such as the LADO, police or social services.

13.5 **Local Support Contact Details for Safeguarding and Prevent Concerns**

Local support contact details for safeguarding and prevent concerns are listed in Appendix 6

14. External Speakers/Visitors

14.1 In order for the College to effectively filter inappropriate guests/external speakers, staff must follow the External Speaker Policy and Procedure.

The process will allow for the designated staff responsible for them to seek permission in advance of any planned event.

An External Speaker Consent Form is the mechanism for staff to inform the College of an intended attendee. This notification should be submitted to the Head of Learner Experience at least 10 working days prior to the event. If the individual is considered to pose any potential for controversy, a similar notification would be submitted to Camden Council and the Metropolitan Police Service at least 5 working days before the event. This is to allow sufficient time for the respective agencies to consider the information received and supply appropriate feedback.

15. Implementation, monitoring, reviewing and evaluation

The scope of this Safeguarding & Prevent Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures, and this policy should read alongside the following policies and protocols:

Disclosure & Barring Service (DBS) Policy & Procedure
Staff Recruitment & Selection Policy & Procedure
Volunteer Policy

Employee Grievance Policy & Procedure
Employee Disciplinary Policy & Procedure

Code of Conduct for Staff
HR Induction
Dignity at Work Policy
Staff Facing an Allegation of Abuse Policy
Whistleblowing Policy & Procedure

Health & Safety Policy
ICT Acceptable Use / E-Safety Policy
Data Protection Policy
Venue Hire Policy
Student Conduct Policy & Code of Conduct
Quiet Room Protocol
Work Experience Placements Guidelines
Fitness to Learn Policy & Procedures

Duty Manager Role and Responsibilities

16.

APPENDIX 1: Potential Risks to Learners

The following are some specific safeguarding and prevent issues that we are required to protect learners from:

- neglect
- physical abuse
- emotional abuse
- sexual violence / assault
- sexual harassment (including not limited to comments, 'jokes', taunting, physical behaviour, online)
- abuse in intimate personal relationships between peers
- non consensual sharing of nude or semi nude images
- sharing of unwanted explicit content
- upskirting (taking a picture under a person's clothing without their permission or knowledge)
- gender-based violence/violence against women and girls
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- peer-on-peer abuse, such as sexual violence and harassment, physical abuse, and initiation/hazing type violence and rituals
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic abuse (controlling, coercive, threatening behaviour, violence or abuse by intimate partners or family members regardless of gender or sexuality)
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting
- homelessness
- so-called honour-based abuse
- modern slavery

- mental health impacting on behaviour and education
- other issues not listed here but that pose a risk to children, learners and vulnerable adults

More information and guidance on these issues may be found via the Gov.uk website.

Other safeguarding issues may become apparent through:

Risky Behaviour:

- Drugs and alcohol
- Self-harm

Financial abuse:

- Online fraud, e.g. phishing
- Door-to-door sellers
- Internet scams

APPENDIX 2: Abuse and Neglect

The Department for Education publication "Keeping Children Safe in Education" published in April 2015 and last revised in September 2022 identifies the following types of abuse and neglect:

Note that this guidance refers to children but the majority of abuse and neglect listed below would constitute a safeguarding concern when applied to adults, particularly where the adult is vulnerable.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may

involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

There are other ways of categorising abuse and a huge degree of overlap between the different types. Some signs of abuse can be caused by any or all of these. Abuse can be in person or it can be through another medium, e.g. online.

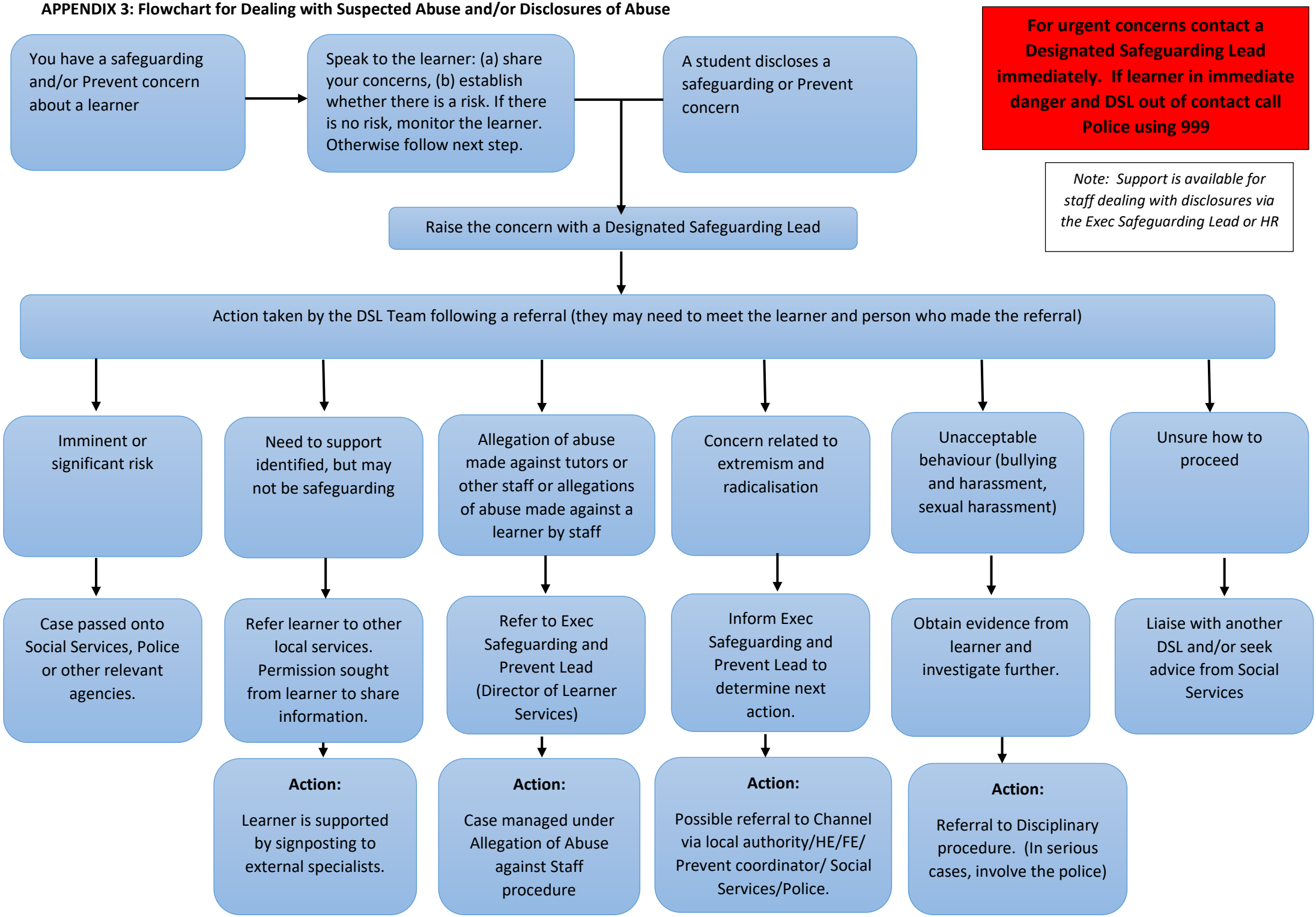
There are many different signs of abuse. Examples which could cause concerns of current abuse are:

- Any unexplained mark or bruise
- Any major changes in behaviour
- Any comment which may give cause for concern
- Any unexplained soreness or marks on the body
- Any deterioration in person's well-being
- Any inappropriate sexual language or sexual behaviour

However, none of these signs are conclusive proof of current abuse. Any of these examples may be caused by historical abuse or a variety of other reasons.

Disclosure is when a person, most likely a learner, gives someone working in the College: staff, governors, contractors and volunteers, some information which leads them to suspect abuse is currently taking place. This information is most likely to be confused and tentative.

APPENDIX 3: Flowchart for Dealing with Suspected Abuse and/or Disclosures of Abuse



APPENDIX 4: Working Men's College Code of Conduct for Staff

CODE OF CONDUCT FOR STAFF

- Principles
- College Values
- Working with Others
- Our behaviour

Code of Conduct for Staff

WMC – The Camden College seeks to provide a safe and supportive environment where the welfare and health & safety of staff and learners is paramount. We should seek to act professionally at all times, but we recognise that tensions and misunderstandings can occur in the context of interaction between staff and learners.

This guidance aims to help safeguard you and learners and reduce the risk of conduct which could be mistaken and lead to allegations being made against individuals.

This document does not replace nor supersede any established College policies or procedures.

PRINCIPLES

- The welfare of all learners is paramount.
- We are responsible for our own actions and behaviour. We should avoid any conduct which would leave any reasonable person to question our motivation and intentions.
- We should understand our responsibilities to safeguard and promote the welfare of learners.
- We should work and be seen to work in a transparent way.
- We should report any incident which may give rise to concern to our line manager or to the Safeguarding Lead or Officers.
- Staff who breach this code of conduct may be subject to the College's disciplinary procedures.
- We should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, sexual orientation or gender status.
- We will work to promote the College Values, ensuring on a day to day basis that we incorporate these Values into Our professional behaviour.

COLLEGE VALUES

Learner Centred: We strive to enable all learners to achieve their potential and to enjoy their learning with us. We listen to our learners and are adaptable, flexible and responsive to learner needs.

Continuous Improvement & Excellence: We constantly review what we do and how it could be improved to ensure that we get better.

Respectful: We promote equality and celebrate diversity. We respect differences and treat people as individuals. We are understanding of each other's values, cultures and beliefs and observe these in our interactions with each other.

Collaborative: We work together to meet our common goals, valuing each other's contribution. We share and celebrate the talent, skills, knowledge and experience of every person at WMC.

WORKING WITH OTHERS

We have a duty of care towards our learners and are accountable for the way in which they use our authority and position of trust. This duty can be best exercised through the development of caring but professional relationships.

We should:

- Treat all learners with respect and dignity.
- Always put the welfare of the learner first.
- Understand that systematic use of insensitive, disparaging or sarcastic comments such as those that refer to a person's intelligence, gender, sexual orientation or ethnicity in any way are unacceptable.
- Not swear or use offensive or discriminatory language.
- Never make sexual remarks to a learner or discuss our own personal sexual relationships.
- Avoid any communication which could be interpreted as sexually provocative.
- Work in an open environment avoiding private or unobserved situations and encourage open communication.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Always challenge inappropriate language from learners or colleagues.
- Never allow allegations made by a learner to go unrecorded or not acted upon.
- Never give out our own personal details or a learners personal details to other learners.

OUR BEHAVIOUR

We should adopt high standards of personal conduct at all times:

- Our clothing should reflect a professional appearance and should be suitable for the occupational area in which we are working.
- Never act in a way that could be perceived as threatening.
- Accessing or bring in images or pornography i.e. sexualised images without artistic merit on site is never acceptable, regardless of format.
- Storing or disseminating such material on site or sharing links to such material via College equipment / services is forbidden and if proven is highly likely to lead to disciplinary action.
- Never engage in inappropriate verbal or written communications about the College, staff members, learners or customers. Where a staff member is found to have said or written something that is defamatory towards the College, staff members, learners or customers they may be subject to the College's disciplinary procedures.
- When communicating with learners electronically, we should only use college phones, college email or official college internet site

APPENDIX 5: Role of the Designated Safeguarding Lead

The College will appoint an appropriate senior member of staff, who is part of the leadership team, in the role of Executive Designated Safeguarding & Prevent lead.

The Executive Designated Safeguarding and Prevent lead takes lead responsibility for safeguarding and child protection (including online safety). This will be explicit in the role holder's job description. This person will have the appropriate status and authority within the College to carry out the duties of the post. They are given the time, funding, training, resources and support to provide advice and support to other staff on welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children and adults.

Deputy Designated Safeguarding Leads

The College will appoint one or more deputy designated safeguarding leads who will be referred to as Designated Safeguarding Leads. The deputies will be trained to the same standard as the Executive Designated Safeguarding and Prevent lead and the role is explicit in their job description. Whilst the activities of the Executive Designated Safeguarding and Prevent lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding, remains with the Executive Designated Safeguarding and Prevent lead and this responsibility will not be delegated.

Managing Referrals

The Designated Safeguarding and Prevent leads, will:

- refer cases of suspected abuse to the local authority adult or children's social care as required.
- support staff who make referrals to local authority adult or children's social care.
- refer cases to the Channel programme where there is a radicalisation concern as required.
- support staff who make referrals to the Channel programme.
- refer cases where a person is dismissed or left due to risk/harm to an adult or child to the Disclosure and Barring Service as required.
- refer cases where a crime may have been committed to the Police as required.
- manage concerns/allegations, against staff (including volunteers) that might indicate they would pose a risk of harm to adults or children and refer allegations to the designated officer(s) at the local authority

Work with others

The Executive Designated Safeguarding & Prevent Lead will:

- act as a point of contact with the three safeguarding partners (Local Authority, Police & Clinical Commissioning Group within the Local Authority).
- liaise with the Principal to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for safeguarding concerns in cases which concern a staff member.
- liaise with staff (especially support staff, IT Technicians, and the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The Executive Designated Safeguarding & Prevent (and any deputies) will:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.
- In addition to the formal training set out above, their knowledge and skills will be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority adult and children's social care referral arrangements.
- ensure each member of staff has access to, and understands, the College's Safeguarding and Prevent Policy and Procedures
- are alert to the specific needs of vulnerable learners, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and UK GDPR.
- understand the importance of information sharing, both within the College, and with the three safeguarding partners, other agencies, organisations and practitioners.
- can keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the College with regard to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting adults and children from the risk of radicalisation.

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep adults and children safe whilst they are online at the College.
- can recognise the additional risks that children and adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND adults and children to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

Raise Awareness

The Executive Designated Safeguarding and Prevent lead will:

- ensure the College's Safeguarding Policy and Procedures are known, understood and used appropriately.
- ensure the College's Safeguarding Policy and Procedures are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing bodies and Principal regarding this.
- ensure the College's Safeguarding Policy and Procedures is available publicly
- link with the safeguarding partner to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Statutory Guidance documents for all staff on which the Safeguarding & Prevent Policy and Procedures is based:

Keeping Children Safe in Education

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Ofsted Inspecting safeguarding in early years, education and skills settings

https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills/inspecting-safeguarding-in-early-years-education-and-skills

Revised Prevent duty guidance: for England and Wales

https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

APPENDIX 6: Local and national support contact details for safeguarding and prevent concerns

- Camden Council Adult Social Care Information & Access team,
  telephone: 020 7974 4000 and select option 1
  Emergency Duty Team on 0207 974 4444 or contact emergency services on 999
  Email: adultsocialcare@camden.gov.uk
  Website: www.camden.gvo.uk/adult-social-care
- Camden Children and Families Contact Service
  Duty Manager 020 7974 3317. Out of hours 020 7974 4444
  Email LBCMASHadmin@camden.gov.uk
- Age UK Camden 020 7239 0400 / www.ageuk.org.uk
- MIND Camden 020 7241 8999 / www.mindincamden.org.uk
- Samaritans 116123 (Freephone)
- North London Rape Crisis (Solace Women's Aid) 0808 801 0305 (not 24 hrs) / www.solacewomensaid.org
- Sexual Assault Referral Centre (SARCs) -
  08088 010818 / www.thesurvivorstrust.org/sarc
- (SARCs offer confidential and non-judgemental advice to victims and survivors of sexual assault and abuse regardless of when the incident occurred.)
- Male Survivors Partnership - https://malesurvivor.co.uk/ - Helpline: 0808 800 5005
- NSPCC Helpline, telephone 0808 800 5000
- Childline, telephone 0800 1111

Camden Early Intervention Service - Service Manager: Elaine Greer
Phone: 020 3317 6590
Email: cim-tr.CamdenEIS@nhs.net
Opening hours: Monday to Friday, 9.00am - 5.00am.

Camden Domestic Violence Support
Email: camdensafetynet@camden.gov.uk
Website: www.camden.gov.uk/domesticviolence
Phone: 020 7974 2526

ASB Support offers practical and emotional support to those affected by Anti-Social Behaviour and can be contacted on 020 7506 3224

Safer Neighbourhood Teams:
St Pancras and Somers Town – Sgt Dean Kirby – 020 8721 2810
StPrancras.Somerstown.SNT@met.police.uk

Kentish Town – Sgt Joseph Johnson – 020 8721 2695
KentishTown.SNT@met.police.uk

Local police stations:
Islington Police Station, 2 Tolpuddle Street, N1 0YY
Kentish Town Police Station, 10-12A Holmes Road, NW5 3AE

Camden Council Hate Crime Concerns
CommunitySafety@camden.gov.uk

PREVENT CONCERNS
DfE FE/HE Regional Prevent Coordinator for London
Jennie Fisher - Counter Extremism Division
Email: jennie.fisher@education.gov.uk
Mobile: 07880 469588

Camden Council Prevent Contact
prevent@camden.gov.uk

Prevent Coordinator / Education Officer – Jane Murphy
Jane.murphy@camden.gov.uk

Met Police Prevent Contacts:

SO15Mailbox-.LocalOpsNorthWestTeam1@met.police.uk

Appendix 7: Video Conferencing Protocols for online teaching, learning support and interviewing

Video Conferencing Protocols for online teaching, learning support and interviewing

Do:

- All 1:1 online activity with under 18s (e.g. pre-course interviews) or vulnerable adults **MUST** be agreed with parents / carers prior to the 1:1 taking place. The 1:1 must then take place only at the days / times agreed with parents. Parents and carers or other responsible named adult should be present in the house at the time. Take detailed notes of the discussion points in case of any concerns raised at a later date.
- Where possible, agree protocols with parents / carers about expectations for learners or potential learners including appropriate dress and topics for discussion.
- **If at any time you feel uncomfortable during a 1:1 call, with something done or said, you should end the call as soon as possible and report any concerns to your line manager and / or safeguarding.** Examples may include: learner inappropriately dressed or making inappropriate comments.
- **If a learner makes a safeguarding disclosure at any time during a 1:1 call or online class, report to a member of the safeguarding team as soon as possible.** Where a disclosure happens during a group session, do not attempt to discuss what has been said any further. Tell the learner that you have heard what they said and that you will ask someone to contact them to see if they can help with the matter. If the learner wishes to tell you about the issue first, do so outside of the group session.
- **If a learner behaves inappropriately including sharing inappropriate material during a group online session, warn them that their behaviour is unacceptable, and they will be blocked in the group if they continue.** If they continue, the tutor should end the session with the whole group then report the behaviour to their line manager for guidance. The line manager will apply the disciplinary process as appropriate and the safeguarding team if appropriate.
- **If a learner shares illegal material* during a group online session, the session must be ended immediately to protect everyone in the group.** The incident should be reported immediately to the safeguarding team. All illegal material* to be reported via the Internet Watch Foundation (iwf.org.uk) and the Police contacted. The Safeguarding team/Duty Manager/Director will support with this. The Learner Disciplinary process will be applied.
- Encourage learners to maintain an awareness how they conduct themselves in online sessions, including adhering to the WM College Code of Conduct.
- Conduct yourself in a professional manner throughout calls with colleagues or learners - you remain an employee of WM College throughout the call.
- Conduct video calls to learners, colleagues or external partners from an appropriate location. If you do work from your bedroom, blur your background or, where that is not possible, think about what can be seen in the background, e.g. move very personal items.
- Position yourself away from where your children, spouse, housemates or pets are.
- Be punctual and courteous. Language must be professional and appropriate. Introduce yourself and take note of other attendees' so you can address them by name. Turn your phone to silent. Treat this just like you would a face-to-face meeting with a learner, colleague or other external partner.
- Test your audio and/or video before a scheduled call.
- Live classes should be kept to a reasonable length of time, or the streaming may interfere with other activity.
- Look at your screen, pay attention to others and when speaking make sure to look at your camera.
- Check what you can see when you first log in as this is what others will see.
- Mute your microphone when not needing to talk to avoid any background noise.
- Ensure all learners have left the session before you leave, and you end the meeting for all.

Don't:

- If a face-to-face meeting would be inappropriate then do not conduct that meeting as a video call.
- Multi-task: your audience will be aware.
- Shout; the other participants will tell you if they cannot hear.
- Click your pen, tap on your desk or anything else annoying or distracting.
- Eat or drink, other than water / tea / coffee
- Leave multiple applications open during the call as it may affect the quality.
- Wear stripes or heavy patterns creating pixilation of images.

Useful further guidance

Safeguarding Policy - Policies

Learner Code of Conduct

*Illegal material = Child sexual abuse content or non-photographic child sexual abuse images

Appendix 8

Sexual Harassment Statement

WM College has a zero-tolerance approach to sexual harassment in any form as any incident can impact people's lives.

Sexual harassment is likely to violate a person's dignity and/or make them feel intimidated degraded or humiliated and/or create a hostile, offensive or sexualised environment.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline both inside and outside of the College.

Sexual harassment can include but is not limited to:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, including on social media
- Sexual "jokes" or taunting
- Physical behaviour such as deliberately brushing against someone, touching someone inappropriately, revealing private body parts, staring intrusively
- Displaying pictures, photos or drawings of a sexual nature
- Taking a picture under a person's clothing without their permission or knowledge
- Non-consensual sharing of nudes and semi-nude images and/or videos
- Sexualised online bullying
- Sexual exploitation; coercion and threats

WM College takes reports of sexual harassment seriously.

No one should feel ashamed to come forward or feel they are wasting the College's time. Anyone reporting an experience of sexual harassment will be supported and kept safe.

If you see it or experience it, REPORT IT

Learners:

Speak to a member of staff or contact the Safeguarding Team.

safeguarding@wmcollege.ac.uk

Staff:

Speak to a member of the HR team or the Principal