



Safeguarding and Child Protection Policy

Document Information

Issue Date		21 st August 2016
Last Review Date		December 2019
Version/Issue Number		10.0
Document Status		Live
Effective From Date		1 st September 2016
Scope of Document	This policy applies to students, staff, contractors, consultants and other workers at LCBT.	
Objective	To outline the colleges procedures for safeguarding and child protection.	
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1. Principles

As a Training provider we have a statutory duty to safeguard and promote the welfare and safety of our learners in accordance with the Department for Education's (DfE) 'Keeping Children Safe in Education' statutory guidance for Schools and Colleges, September 2019; and applies to all learners within the Apprenticeships, Classroom Based and Subcontracted provisions.

In keeping with the 'Working Together to Safeguard Children' guidance for inter-agency working, LCBT will take action to address any concerns which we have identified, by working in partnership with other organisations where appropriate.

We believe 'It could happen here' and all LCBT staff undergo appropriate training to enable them to demonstrate the high standards necessary to safeguarding children and vulnerable adults and consider a safe learning environment is an inclusive learning environment.

LCBT's Safeguarding and Child Protection Policy clearly sets out the procedures which must be followed by all staff and volunteers; and inform visitors and parents of the actions which may be taken when a complaint, allegation or safeguarding concern is reported or identified.

LCBT aims to continually assess the safety and wellbeing of its learners and apprentices through the identification of emerging risks and safeguarding concerns faced by children and vulnerable adults, internally and externally to college; and demonstrate a strong commitment to equality of opportunity through actively promoting the fair treatment of all regardless of faith, belief or any other protective characteristics.

LCBT has a zero tolerance approach to discriminatory and derogatory language/ behaviour and encourages all learners and apprentices to develop and demonstrate skills and attitudes which allow them to contribute positively in education, employment and citizenship. LCBT also promotes core British Values such as democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs.

LCBT procedures are for ID badges to be worn by staff and learners at any time, individuals must tap in and out of the building. All visitors must wear a visitors badge and sign in and out at reception.

LCBT believe that a range of other college policies are central to many aspects of the Safeguarding Young children and Vulnerable Adults Policy and should therefore be read for further guidance.

Other policies include:

- Staff Code of Professional Conduct
- Whistle Blowing Policy
- Anti-bullying and Harassment Policy
- Health and Safety Policy
- Safer Recruitment Policy
- Single Equality and Diversity Policy

- Social Media Policy
- Restraining of Learners and Confiscation of Belongings Policy

2. Scope

This policy applies to all those who come into contact with learners. All LCBT staff and volunteers have a duty to comply with this policy.

The Safeguarding Children and Young Peoples Policy covers:

- Young people (this term is used to mean those under the age of 18).
- Vulnerable Adults who receive support from a care professional.

3. Providing a Safe and Supportive Environment

3.1 Safer Recruitment and Selection

LCBT pays full regard to DfE guidance 'Keeping Children Safe in Education, September 2019 and will ensure that all appropriate measures are applied during the stages of safer recruitment and selection of staff.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews (with at least one of the interview panel being trained in Safer Recruitment) and, where appropriate, undertaking checks on Disclosure and Baring Service (DBS) status and right to work and remain in the UK.

Statutory procedures, underpinned by DfE guidance, are that:

- a DBS check is obtained for all new appointments to the college's workforce.
- LCBT will keep a single central record (SCR) detailing a range of checks carried out on their staff.
- all new appointments to the college workforce who have lived outside the UK are subject to additional checks as appropriate; where new appointments are awaiting DBS clearance, risk assessments will be conducted in the interim.
- LCBT will satisfy itself that supply staff have undergone the necessary checks.
- Identity checks will be carried out on all appointments to the college workforce.
- Declarations on a DBS will be discussed by Staff member and Exec Board member. Risk assessment will be completed if employed

- DBS is reviewed every 3 years
- Any convictions that deem the employee unsuitable will be dealt with under disciplinary

3.2 Safe Practice

LCBT expect all staff to adopt safe and professional working practices. All staff and volunteers should be responsible for their own actions and behaviour and should avoid any conduct which would lead any person to question their motivation and intentions. Staff and volunteers are expected to:

- Adopt a listening and open door culture whilst working in an open and transparent way.
- Report and/or take advice from college management over any incident which may give rise to concern.
- Record any incidents or decisions made by updating the Safe team using a CP1 referral.
- Apply the same professional standards in accordance to the single Equality and Diversity policy.
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- Undertake appropriate risk assessments for their work area.

3.3 Safeguarding Information for learners

LCBT is committed to promoting awareness on the types of behaviour which is deemed as unacceptable and how to stay safe.

Learners are informed of the safeguarding team and its responsibilities including whom they might talk to if they have concerns regarding their safety and wellbeing. Safeguarding information is promoted on induction, in the learner Handbook, within the college and the college website.

LCBT values the views and feedback of learners to help drive improvements across the college and actively listens to learner views through Learner Voice activities and the colleges Praise, Complaints and Suggestions Policy.

LCBT integrates its core values and British Values across all curriculum areas and college services. Key policies such as the E&D policy; Learner Disciplinary and Behaviour policy; Harassment and anti-bullying policy; Praise, Complaints and Suggestions Policy and Social Media policy aims to reinforce how LCBT promote the British Values listed below:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those with different faiths and beliefs

LCBT Values:

Our values are our guiding principles and are integrated into everything we do.

- **Resilience:** We face difficulties, challenges and setbacks as opportunities to grow
- **Courage:** Even when we are fearful of our next steps, we move forward anyway
- **Integrity:** We always strive to do the right thing. We are incorruptible, honest, even when nobody is watching
- **Inclusivity:** We embrace everyone, we believe everyone has the right to belong and not be excluded
- **Innovation:** We believe it is our responsibility to unleash talent
- **Passion:** Our passion for industry is the fuel that provides us with the purpose to keep learning and work towards mastery
- **Mutual Respect:** We embrace each other's dignity, rights and responsibilities

3.4 Partnership with Parents/Guardians

LCBT is committed to working with parents/guardians positively, openly and honestly. We respect parents'/guardians' views, rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to ensure the safety of a young person or vulnerable adult.

LCBT will share with parents/guardians any concerns we may have about their child, unless to do so may place the young person at risk of harm. If a child is not well enough to participate at college whilst they are here, in most circumstances they will be expected to remain on site until parental/NOK authorisation has been provided for them to leave, whereby the college is unable to obtain authorisation and the child is well enough to travel relevant managers will inform the NOK by leaving a voicemail or email confirming the actions taken.

When a learner (under 18 years old) is regularly absent without permission or prior authorisation,



staff will implement procedures in line with the colleges safeguarding policy or report direct to the local authority.

LCBT encourages parents/guardians to discuss any concerns they may have with the Personal Lecturer/s, Programme Manager or the Safeguarding Team. In addition, LCBT also informs parents/guardians of our policy through the following insert into the college website.

'LCBT makes every effort to ensure that all our learners are free to learn and achieve in a safe environment. The college has well established links with a wide range of external support services to which learners in need of specialist support can be signposted and referred.'

If you have any concerns regarding the safety or wellbeing of any of our current or future learners, in the first instance you should make contact with our Safeguarding Team by emailing safe@lcbt.co.uk'.

3.5 Partnerships with others

LCBT recognises that it is essential to establish effective working relationships with other agencies and has conducted referrals to the following agencies: *Tri-Borough Safeguarding Team, Multi Agency Safeguarding Teams (MASH), Leaving Care Teams, Metropolitan Police service (MET Police), Westminster Counter Terrorism Focus Desk, Youth Offending Service, Adult Mental Health Services, Child and Adolescent Mental Health Service (CAMHS), London Safeguarding Children's Board (LSCB), B-eat, Solace Woman's Aid, forced marriage unit etc.*

3.6 Working with Employers (Apprenticeship Provision)

Employers have a responsibility to safeguard learners undertaking work placements and are expected to adhere to the LCBT Safeguarding and Child Protection Policy and procedures. If safeguarding concerns arise for any learner undertaking either permanent or temporary work placement the referral process identified in Section 5 should be followed. Employers and staff can access support through the learners' Assessor with this process. Procedures on handling disclosures can be seen in Appendix 5 for what to do if an allegation has been made that someone is being abused/is at risk of significant harm or/and Appendix 6 for what to do if you suspect someone is being abused/is at significant harm.

All employers working with LCBT learners should also refer to the DfE Guidance 'Keeping Children safe in Education', Part 3 under the heading 'Adults who supervise children on work experience', page 50. <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
A number of safeguards will be in place to support the apprenticeship provision including:

- Annual training for the College Apprenticeship assessors conducted by the Safeguarding Team.
- Risk assessment process of employers and premises linked to Health and Safety and Equality Diversity and Inclusion.
- Signpost employers to the colleges Safeguarding and Child Protection Policy.
- Request DBS checks when deemed necessary from employers for staff working with children.

3.7 Training

The college's Safeguarding Team undertakes appropriate Safeguarding and Child Protection Training and refresher training at 2 yearly intervals. All other college staff, including non-teaching staff receive appropriate face to face training at induction and on-line training annually to equip them to carry out their responsibilities for safeguarding effectively.

The College will ensure that the enrichment programme for learners encompasses all elements of

staying safe and awareness on acceptable and unacceptable behaviour; including safeguarding, Equality and Diversity and Personal Development in areas such as resilience, confidence and independence and help them know how to keep physically and mentally healthy, thus preparing them for life in modern Britain.

3.8 14-16 Learners

Where an allegation is made regarding a 14–16 year old learner, members of staff should follow the same procedures as outlined in section 4 of this policy. The Designated Senior Person will liaise with the CPO (Child Protection Officer) from the learner's school or sponsor, ensuring that the learner is informed of this process.

3.9 Learner Information

In order to keep young people safe and provide appropriate care for them, the college requires accurate and up to date information regarding:

- Names and contact details of persons with whom the young person normally lives.
- Names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above.)
- Including those which affect any person's access to the young person (e.g. Residence Order, Contact Order, Care Order, Injunctions, etc.).
- If the young person has a child protection plan and/or Education/Pathway Plan.
- Education Health Care Plans (EHCP), Form 8 or SEND statements.
- Any other factors which may impact on the safety and welfare of the young person.

Further information is requested from those who are in care or leaving care to enhance the support they receive throughout their studies.

3.10 Restraint of Learners and Confiscation of Belongings

Under the Education Act 2011, LCBT's duty to safeguard individuals on college premises is extended to the restraint of learners and/or confiscation of belongings where there is a potential risk to the health and safety of visitors, staff and learners.

If concerns arise for the need to restrain any learner/s or confiscate belongings posing a health and safety risk to others, staff must inform a member of security and the safeguarding team immediately and make appropriate judgments to maintain the safety of themselves and others within their care. All incidents will be noted in the incident report book. See Appendix 8.

In the event of a health and safety breach, security and other trained staff will be responsible for handling such situations until an appropriate external agency arrives on site.

If you suspect that someone is at risk from significant harm to themselves or others refer to Appendix 6 for guidance. If there is an immediate risk this must be reported immediately to the safeguarding team, security staff and/or the emergency services by dialling 999.

3.11 Offenders/Ex-Offenders (OXO)

The College undertakes a risk assessment process for learners who are offenders or ex-offenders (OXO) to ensure they have appropriate support in place should they commence a programme of study at LCBT. It also allows for the assessment and management of risks to learners, staff and visitors at the college.

Initial Assessment

Applicants who declare on application that they have an outstanding or spent convictions are required to complete an OXO form. This form requests them to outline the nature of the conviction as well as the dates they occurred. At this time their application will be placed on hold until the OXO process has concluded. Completed forms are reviewed by the Admissions Team who will make a decision on whether the applicant needs to attend a formal OXO meeting or whether their application can continue. All information is stored in line with the data protection act

Formal OXO Meeting

When the OXO form poses sufficient concern that others could be placed at risk a formal OXO meeting will take place. This process is undertaken by the Head of Safeguarding and Welfare and Programme Manager. Prior to the OXO meeting a risk assessment will be requested from the YOT / Probation Team or other referral agency to identify the level of risk that they feel the applicant poses and to confirm the convictions disclosed on the application. If this risk assessment is not available it will be obtained after the OXO meeting has taken place.

The formal OXO meeting provides the applicant with the opportunity to discuss their previous convictions and the background behind these. It also provides the opportunity to identify any support needs the applicant may have such as basic skills, ALS, low self-esteem. The completed OXO form is reviewed with the relevant Programme Manager before a joint decision is made on whether the applicant can proceed with their application, and what conditions will be placed on their enrolment (e.g. 6 week review of progress, agreed level of attendance, meeting with Learning and Development Assistant etc.).

Learners who declare that they have a conviction, or who are convicted whilst being a learner at LCBT are required to follow the same process identified above, where a decision will be made on whether they can continue with the programme of learning.

All decisions outcomes will be communicated by phone, email or letter. To appeal against a decisions, applicants are advised to follow the Complaints, Praise and Suggestions Policy, which can be obtained from the Customer Services team by contacting 0207 208 1300 or email talkback@lcbt.co.uk in writing.

3.12 Visitors and Speakers

LCBT welcomes visitors and speakers to support the enrichment of learning and delivery of the curriculum. To reflect industry standards we also offer services to clients within fully functioning salon and fitness gym.

To ensure the safety of all learners, staff and visitors everyone is expected to ensure a visitors ID pass is visibly worn at all times and be aware of the colleges safeguarding and health and safety policy and procedures.

The following procedures must be applied by staff and visitors to LCBT:

- All visitors must report to the customer services desk in Ramillies Street upon their visit and retrieve an ID/visitors badge.
- All visitors must adhere to procedures outlined in the health and safety and safeguarding leaflet provided by Customer Services upon their visit.

Organisers of a visiting speaker or organisation event should, in advance of the event, complete the marketing template which includes consideration of the speaker(s) and content of any presentation, and the audience to whom it is intended to be delivered. Refer to appendix 11.

Where any visiting speakers or organisations address learners, the organiser must ensure that at least one member of staff, who has received Prevent training is present at the event to ensure that any extremist views presented can be challenged.

If learners, staff or visitors have concerns over suspicious behaviour demonstrated by those visiting the college or seen in the surrounding area this must be reported immediately to the safeguarding team by completing a suspicious behaviour report form. Refer to appendix 12

4. Handling a disclosure

4.1 Members of Staff and Disclosures of Abuse or Safeguarding Concerns by Learners

A learner may disclose abuse, fear of abuse or a safeguarding cause for concern to any member of staff at any time. When this happens, you must follow the procedure set out below.

4.1.1 If a young person/vulnerable adult states that they have been abused or are at risk due to a safeguarding concern, report this within 2 hours to a senior person in safeguarding using the CP1 referral email (Appendix 4) following guidelines in Appendix 5.

The Senior Persons for safeguarding are:

- Principal and CEO – Christianne Cavaliere de Moncayo, Senior Designated Safeguarding Person (DSP)
- Head of Safeguarding – Elaine Holt, Lead Designated Safeguarding Person
- Learner welfare and support progression officer – Gailene John, Designated Safeguarding Person
- Head of Operations - Sophie Barker, Designated Safeguarding Person
- IT Manager – Manraj Sembi, Designated Safeguarding Person

4.1.2 When a learner discloses abuse or a safeguarding cause for concern, talk to the learner discreetly. The learner has a right to expect their situation to be dealt with sensitively. See appendix 6: flow chart for handling disclosure/ Out of Hours Procedures. For guidance on types of abuse, please see appendix 1.

4.1.3 Do not offer confidentiality. Make the young person/vulnerable adult aware as early as possible that you will need to contact a member of the Safeguarding Team. Reassure them that only those who 'need to know' will be given the information (see confidentiality policy). For guidance on how to conduct the conversation with the learner please see Appendix 2.

4.1.4 Do not ask the learner to make a written statement.

4.1.5 Make a full written record as soon as possible, including date, time, location of incident, full factual details of the cause for concern or disclosure from the learner and the action you have taken (using the CP1 referral in Appendix 4) and forward to the Safeguarding Team via safe@lcbt.co.uk. If appropriate to do so, the parent/carer of the young person making disclosure must also be informed of the disclosure and what action will be taken by staff.

Staff can make direct referrals to an external agency in the absence of the Safeguarding Team or out of normal working hours (all cases must be forwarded to the safe@lcbt.co.uk email box using a CP1 referral)

4.1.6 A learner may disclose to you that another learner or other learners are being abused or that they have been abusing someone. In both cases, points 4.1.1 to 4.1.2 apply and the CP1 referral (Appendix 4) must be completed as instructed on the form. This must be forwarded to safe@lcbt.co.uk.

4.2 Suspected abuse or safeguarding concern not disclosed by a learner

4.2.1 LCBT recognises that young people and vulnerable adults cannot be expected to raise concerns; therefore staff, employers and volunteers are informed of the importance of being vigilant in identifying those that may be at risk of significant harm/abuse.

4.2.2 If you have suspicions that a learner is being abused or is at risk due to a safeguarding issue, but they are keeping it to themselves, do not hesitate to disclose your suspicion to a DSP using the CP1 referral (Appendix 4) and inform your line manager/external assessor. Please see Appendix 6: flowchart for handling suspected abuse.

4.3 Designated Staff and Disclosures of Abuse or Safeguarding Cause for Concern

4.3.1 On receiving a completed CP1 referral (Appendix 4) reporting alleged abuse or a safeguarding concern, a member of the Safeguarding Team will discuss the report with appropriate staff and will decide on the appropriate action to take. This could include informing parents/carers, a referral to the Local Authority (LA) Young people's or Adult Social Care Services in which the learner resides or the Police.

4.3.2 The Safeguarding Team will not hesitate to take advice from the Child/Adult Social Care Services and the Police who are best equipped to assess the situation. A member of the Safeguarding Team should discuss with the Child/ Adult Social Care Services or the Police what action should be taken and a note of that conversation should be made, together with confirmation of any steps the College has agreed to take regarding the safety and welfare of the learner. Staff will share concerns raised to parents/carers where it is appropriate to do so.

4.3.3 A written record of the date and time of the report should be made and the report must include the name and position of the person to whom the matter was reported. The telephone report must be confirmed in writing to the LA Child/Adult Social Care Services Department Safeguarding Team within 24 hours. The confirmation of disclosure may be handwritten, emailed or faxed but, in any event, a copy of the letter/referral must be kept in the confidential safeguarding file.

4.3.4 The Safeguarding Team must notify the Senior DSP as soon as the initial concern is made.

4.3.5 The Safeguarding Team will complete a written report and retain a copy of:

- The report
- Any notes, memoranda or correspondence dealing with the matter
- A copy of the report will be held by the Safeguarding Team and will provide access to the information to the SMT if and when required.

5. Suspicions/allegations against a member of staff

Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with young people and vulnerable adults remain, and are seen to remain, entirely proper and professional. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with young people and vulnerable adults and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and proper associations that staff may have with them.

All staff should be aware of their duty to raise concerns, where they exist, about the unsafe practice of colleagues in regard to young people and vulnerable adults. See LCBT *Whistle Blowing Policy* for procedures on disclosing an allegation against a member of staff.

5.1.1 Any allegation or suspicion of abuse/safeguarding concern by a member of staff must be reported to the DSP within 2 hours of the concern arising by completing a written report using the CP1 referral (Appendix 4), and must be completed by the person who reported the original concern. For guidance on initial response to an allegation or concern against a member of staff refer to Appendix 3.

5.1.2 If the allegation concerns a vulnerable adult the DSP must report the matter to the Police or local Adult Social Care Services Duty Officer, where the vulnerable adult is considered to be suffering or is likely to suffer significant harm.

5.1.3 In any related case the DSP must take such steps that she/he considers necessary to ensure the safety of the learner who has made the allegation and any other vulnerable adult or young person who might be at risk. In the absence of the Senior or Lead DSP another member of the safeguarding team will handle the disclosure and inform the HR Manager.

5.1 Staff Suspension

Suspension (in accordance with the LCBT's Disciplinary Procedure) is deemed a neutral act to safeguard both the young person/vulnerable adult making the allegation and the member of staff in order to ensure that a full and proper investigation can be carried out.

Suspension is recommended in the following circumstances:

- There is a cause to suspect a child is at risk of significant harm; or
- The allegation warrants investigation by the Police; or
- The allegation is so serious that it might be grounds for dismissal

If suspension is to take place, this should be in line with LCBT disciplinary procedures.

5.1.1 At an early stage, staff subject to an allegation should seek advice and support from their professional association or trade union. The matter should remain confidential and information should be disclosed on a need to know basis only. Members of staff may seek guidance from Human Resources, if required.

5.2 Suspected Abuse/Safeguarding Concern by a member of staff

5.2.1 A member of staff may make an allegation of suspected abuse or a safeguarding cause for concern of a learner by a member of staff, even if the learner does not disclose this matter. The member of staff who suspects the abuse/safeguarding concern should complete the CP1 referral (Appendix 4) and discuss their suspicions with a member of the Safeguarding Team. Refer to Appendix 6 for flowchart on what to do if you suspect abuse *and the Whistle blowing Policy for further information and guidance.*

5.2.2 A decision will be made by the DSP in liaison with the HR Manager as to how the matter is to be investigated and the most appropriate action to be taken during the period of investigation. This may include: observation, allocating different duties, supervision, administrative duties or suspension.

5.2.3 All allegations made against a member of staff will be reported to the LADO and/or Metropolitan Police within 1 working day. A referral will also be made to the Disclosure and Barring service for any staff member removed from looking after children.

5.3 Managing the aftermath of an unfounded allegation

5.3.1 Where it is subsequently found that an allegation was made with malice and aforethought, a member of the Safeguarding Team will contact the police to determine an appropriate course of action. The Safeguarding Team will also, in consultation with the LA Safeguarding in Employment Manager, refer matters to the LA Young People's/Adult Social Care Services to determine whether the young person/vulnerable adult is in need of additional support or safeguarding.

5.3.2 Young people/vulnerable adults who make false allegations may be subject to the colleges disciplinary procedures. The circumstances of each case will be reviewed on an individual basis.

5.3.3 Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the vulnerable child/adult, consideration should be given to the child/vulnerable adult studying elsewhere. Permanent exclusion should be considered only as a last resort.

5.3.4 Staff who have been subject to false or unsubstantiated allegations will require either personal or professional support or both. An appropriate member of the HR team should be consulted to assess and advise on any appropriate support mechanisms that can be offered.

5.3.5 If investigations have revealed any competency issues then, following disciplinary or capability procedures, support mechanisms or other professional support may be offered e.g. training.

5.3.6 Support and reassurance may also be necessary for other staff and learners. If needed, this will be arranged via Human Resources and the DSP.

6 Roles and Responsibilities

6.1 Chief Executive Officer

The CEO will ensure that policies and procedures are fully implemented and followed by all staff and:

- Sufficient resources and time are allocated to enable the Designated Senior Person and other staff to discharge their responsibilities *and*
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to young people/young people, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed Procedures

6.2 The Executive Board and Designated Senior Safeguarding Leads

The Executive Board and Designated Senior Leads will:

- Be briefed regularly in respect of its duty to promote and safeguard the welfare of young people and vulnerable adults.
- Ensure any areas for improvement in regard to safeguarding arrangements are brought to its attention and addressed effectively without delay.
- Review annually its policies and procedures, and the discharge of its duties, in respect to promoting and safeguarding the welfare of young people and vulnerable adults.
- Receive an annual report on the number and type of cases dealt with by LCBT with recommendations for improving policy and practice.
- Provide training to all staff/volunteers to equip them to carry out their safeguarding and child protection duties effectively.
- Where learners conduct external work placements, all external stakeholders will be made aware of our duties and procedures to maintain the welfare and safety of our learners.

- Uphold duties to work effectively with other organisations to safeguard and promote the welfare of young people and vulnerable adults, including arrangements for sharing information.

6.3 Senior Designated Safeguarding Person

The Senior Designated Safeguarding Person will:

- Be made aware of any reports of serious abuse by the safeguarding team as soon as possible and certainly within 24 hours of the abuse being reported, who will then report information of the disclosure to the CEO and Designated Safeguarding Senior Leads.
- Make referrals to Young people/Adult Social Care Services and/or the Police as appropriate.
- Receive notification of any allegation made against a member of staff. On receiving the written report or at an earlier stage if judged necessary the DSP in liaison with HR will:
 - Ensure that the individual is immediately moved from their normal work place and from any area where an incident is alleged to have occurred
 - Consider in conjunction with the LA Safeguarding in Employment Manager and a member of HR any immediate suspension under the College Disciplinary Procedure for staff
 - Take such steps as considered necessary to ensure the safety of the young person/vulnerable adult in question and any other learner who might be at risk by reporting the matter to the LA Safeguarding in Employment Manager, Young People/Adult Social Care Services and/or the Police
 - If appropriate to report the member of staff to the Independent Safeguarding Authority
 - If the accusation of abuse or safeguarding concern is against the Designated Safeguarding Person the DSP will carry out the above actions.
 - Liaison with appropriate child protection officers (CPO) within schools
 - Overseas regular monitoring of safeguarding case files
 - Ensure the College policy is reviewed bi-annually or more frequently if required in response to an identified internal issue or an external requirement including legislative changes.
 - Co-ordinates the work of the other DSP's / Safeguarding Team and produce an annual report.

6.4 Designated Safeguarding Person/Safeguarding Team

The Designated safeguarding Person and Safeguarding Team will:

Ensure the College meets its statutory duties defined within the, DfE Statutory guidance Keeping Children Safe in Education, September 2019 and Working Together to Safeguard Children and Young people 2018 guidance, by:

- Making referrals to Young People/Adult Social Care Services and/or the Police as appropriate.
- Working with internal college services to draft procedures and guidelines, which support staff, learners and visitors.
- Providing professional advice, support and guidance to staff regarding any suspicion of abuse, if a young person/vulnerable adult makes a disclosure or in relation to the possible abuse of trust.
- Providing professional advice, support and guidance to staff regarding causes for concern other than abuse with regard to young people and vulnerable adults.
- Making decisions, in consultation with the safeguarding team and Lead DSP regarding appropriate action to safeguard.
- Sharing information with Young People/Adults Social Care services safeguarding Coordinator (within individuals borough of residence) and the police, where appropriate, to support child protection and safeguarding enquiries and young people in need assessments as well as safeguarding vulnerable learner enquiries.
- Producing an annual self-assessment report that reviews the effectiveness of the Safeguarding and welfare of learners.
- Ensuring appropriate training is in place and attended by all staff.
- Liaising with the Local Safeguarding Young people Boards, LADO and the London Safeguarding Board.
- Gather statements and information regarding child and vulnerable adult safeguarding issues and ensure that records are kept safely and securely.
- Monitor learners after a referral is made and ensure that the College is adhering to any work agreed with Young people/Adult Social Care Services or other agencies.
- Undertake appropriate training on Safeguarding and Child Protection and receive professional support as required.
- Contact and liaise with the DSP and Human Resources in cases involving members of staff.
- Ensure that everyone with substantial access to vulnerable adults and young people will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.

6.5 Human Resources

The Human Resources Department will:

- Ensure that all staff appointments are made subject to satisfactory references, qualifications and enhanced CRB checks and that until these reports have been received new staff will not work with learners unsupervised.
- Maintain a single central record with evidence of DBS checks undertaken for all staff/volunteers including qualifications and records of staff safeguarding training.
- Ensure that all new employees are informed via the College Induction Programme of their obligations under the Safeguarding Young People and Vulnerable Adults Protection Policy.
- If suspension of a member of staff is to take place because of allegations of abuse, this should be in line with College procedures. Human Resources will ensure that the correct procedures are adhered to.
- Arrange appropriate support for staff who have been the subject of an allegation and for other members of staff who may have been affected.
- Make reports to the police or Disclosure and Barring Service (DBS) where a potential employee/volunteer/employer has provided false information to enter employment and/or been removed from employment at LCBT.
- Manage and ensure all staff undertake training within 6-8 weeks of starting employment on Safeguarding as part of induction and as required for updating on new legislations.

6.6 All Staff Responsibilities

Staff will:

- Accept and recognise their responsibilities in relation to good practice and the reporting of suspected allegations or concerns about abuse.
- Be ready and receptive to learners who wish to make a disclosure of abuse and to comply with this procedure. Refer to Appendix 2 for guidelines on handling allegation and appendix 3 for handling suspected abuse.
- Be vigilant in identifying any causes for concern other than abuse.
- Disclose to the safeguarding team all relevant information using the CP1 referral (see appendix 4).
- Provide clearly written statements of the concern or disclosure on the same working day, to the Safeguarding Team using the CP1 referral (see appendix 4).
- Undergo training upon commencing employment.
- Attend meetings and further update training in safeguarding as appropriate.

7. Confidentiality

The children, vulnerable adults and parents/carers should be informed at the earliest possible stage of the actions made by staff and that the information will be passed on following a disclosure. Staff must not discuss disclosed information other than with those involved in the case.

The College complies with the requirements of the Data Protection Act 2018, which allows for disclosure of personal data where it is necessary to protect the vital interests of a child or vulnerable adult.

The college has regard to “Safeguarding Practitioners Information Sharing Advice” HM Government, <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

“Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can improve decision-making so that actions taken are in the best interests of the child. The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns”.

The college has a clear and explicit procedure which indicates:

- When information must be shared with police and LA Social Care teams where the child/young person is/may be at risk of significant harm.
- When the learners and/or parent’s/carers confidentiality must not be breached.

Information on how colleges should comply with information sharing is referenced in the Information Sharing Advice for Safeguarding Practitioners document published by the Department for Education (DfE). <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

8. Review

This policy and procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of young people and vulnerable adults or any changes within LCBT.
- Following any issues or concerns raised about the safeguarding of young people or vulnerable adults within LCBT.
- In all other circumstances the college conducts an annual self-assessment review of all concerns logged and reported. The review process will enable the college to continually develop and improve safeguarding practices for all learners, staff and visitors to the college.

Appendix 1: Definitions of Abuse and Safeguarding Issues

Missing from Education

For the purpose of the Statutory Guidance on Children Missing Education (2016), 'Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life'.

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 another child or children' (Working Together to Safeguard Children 2018)

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' (Working Together to Safeguard Children 2018)

Emotional abuse

'The persistent emotional maltreatment of a child such as to cause severe and persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.' (Working Together to Safeguard Children 2018)

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.' (Working Together to Safeguard Children 2018)

Child sexual exploitation

'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology'. (Working Together to Safeguard Children 2018)

Neglect

'The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.' (Working Together to Safeguard Children 2018)

Extremism

‘Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.’ (Working Together to Safeguard Children 2018)

Radicalisation

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

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists.
- Intent and/or capability to cause harm.
- Changing their style of dress or personal appearance to accord with the group.
- Behaviour becoming increasingly centred around an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups).
- Attempts to recruit others to the group/cause/ideology.
- Communications with others that suggest identification with a group/cause/ideology.

Discriminatory Abuse

Includes behaviour towards a student that is racist, sexist, based on a person’s disability and other forms of harassment.

Institutional Abuse

Is inappropriate or disrespectful or insufficient care, which affect the whole setting and denies or restricts dignity, choice of fulfilment of persons at risk.

Financial or Material Abuse

Is stealing possessions or money from a child or vulnerable adult or bullying to force them to hand over money or possessions.

Child criminal exploitation

As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited

even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.’ (Working Together to Safeguard Children 2018)

Child Sexual Exploitation

Is a form of sexual abuse where a child or young person are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. Consent cannot be given (under the age of 18 years) even where a young person believes they are voluntarily engaging in sexual activity with the person who is exploiting them. Sexual exploitation does not always involve physical contact and can happen on-line

County Lines

‘As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of ‘deal line’. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.’ (Working Together to Safeguard Children 2018)

Forced Marriage

Is forcing a person into a marriage which is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Force marriage should be reported to the Forced Marriage Unit (FMU) on

- Telephone: +44 (0) 20 7008 0151 / 999 for an Emergency
- Email: fmu@fco.gov.uk

Honour base violence (HBV)

Encompasses crimes which have been committed to protect or defend the honour of a family and/or community, including FGM, forced marriage and practise such as breast ironing. All forms of HBV are abuse and should be handled and escalated as such.

Eating Disorders

At LCBT there is a growing awareness of the various types of eating disorders which affect behaviours and the wellbeing of individuals. The college is aware that sufferers experience their eating disorder in their own way. Whatever form it takes, an eating disorder can be beaten. Understanding an eating disorder and having the information about where you can go to find out more information is a good first step towards beating an eating disorder. For more information or support for eating disorders contact the safeguarding team or B-eat help lines:

Helpline 0845 634 1414

Youth Line 0845 634 7650

Risk to self and/or others

May include but is not exclusive to server self-harm, suicidal tendencies or potential risk of harming others which may or may not include children. This may be as a consequence of an individual experiencing a significant level of persona, emotional trauma and/or stress.

Self-Harm

Is a term that covers a range of behaviour used as a coping mechanism where an individual harm themselves by physically inflicting pain or excess to deal with emotional pain. Common methods of deliberate self-harm include:

- Cutting
- Over-eating or Undereating
- Burning your skin
- Inserting objects into your body
- Hitting yourself off walls
- Taking an overdose
- Swallowing hazardous substances
- Exercising excessively
- Scratching and Hair pulling

Female Genital Mutilation

Female genital mutilation (FGM), sometimes known as 'female circumcision' or 'female genital cutting', is illegal in the UK.

It's also illegal to take abroad a British national or permanent resident for FGM, or to help someone trying to do this.

Female Genital Mutilation (FGM) includes procedures that intentionally alter or injure female genital organs for non-medical reasons. FGM is internationally recognised as a violation of the human rights of girls and women.

Suspensions may arise in a number of ways that a child is being prepared for FGM to take place abroad. These include knowing that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school/college. The child may also talk about a 'special procedure/ceremony' that is going to take place.

Indicators that FGM may already have occurred include prolonged absence from school, noticeable behaviour change on return and long periods away from classes or other normal activities, possibly with bladder or menstrual problems. Some teachers have described how young people find it difficult to sit still and look uncomfortable or may complain of pain between their legs.

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.

If you have concerns that a girl or young woman may be at risk of FGM then please inform the Police by calling **999**, or contact the Foreign and Commonwealth Office if you know a British national who's already been taken abroad Telephone: **020 7008 1500**. A member of the safeguarding team will be available to support you through this process.

Domestic Violence (DV):

The college identifies domestic violence as 'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been, intimate partners or family members, regardless of gender or sexuality'.

LCBT has a duty of care to respond to Domestic Violence as a form of abuse which can affect those either directly or indirectly affected. LCBT also recognises the recent changes in legislation which state 16-19 year olds as well as adults can also be victims of Domestic Violence.

E-safety

The college is fully aware that the use of social networking sites, the internet and other communication vehicles present opportunities for child and vulnerable adult abuse. Often through a process known as grooming (whereby predatory adults use a variety of techniques to encourage young people to engage in inappropriate behaviour). Learners can also use these channels to bully others and to carry out a process known as 'Sexting' (the sending of inappropriate images via text messages).

LCBT will be seen to encourage learners to make referrals to the Met Police and other external agencies as appropriate where disclosures or allegations have been made of a serious assault. Tutorials for E-safety are provided for all learners attending the college through the enrichment programme.

Sexting

Generally refers to the sending of sexually explicit images via text, email, instant messaging (eg Snapchat or WhatsApp) or through social networking sites. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (Distribution of child pornography) and can face police action even in their actions are entirely voluntary.

Safeguarding issues may also be recognised in the specific circumstances identified below:

- Online/Internet grooming
- Upskirting
- Looked after young people and young people living away from home
- Bullying/Cyber Bullying and harassment – refer to LCBT Anti Bullying and Harassment Policy

- Faith abuse
- Gender based violence
- Gangs and youth violence
- Mental health
- Trafficking
- Mental Health
- Drug and Substance Misuse

This list is not exhaustive.

Appendix 2: Guidelines for staff on dealing with disclosures of abuse or abuse of trust or safeguarding concerns

Do

- Be ready to listen to what the person is saying. Reassure the person; acknowledge that they have been brave to tell you.
- Make sure the person is comfortable in a secure environment where they cannot be overheard or interrupted.
- Take what they say seriously.
- Offer practical help i.e. glass of water or tissues.
- Remind the young person or vulnerable adult that you have a duty to follow College procedure in order to safeguard and support them and that you will inform one of the College's Designated Officers. Assure them that you will only share the information with the Designated Officer within the Safeguarding Team.
- Tell them what the next steps will be after you have spoken to a member of the Safeguarding Team.
- Refer the matter to a Safeguarding Team immediately.
- Confirm the details of the disclosure in writing using the CP1 referral in Appendix 4 as soon as possible. Information must be noted as accurately as possible and ensure that the time, place and date are noted and that the account is signed then emailed to safe@lcbt.co.uk.
- Avoid any delay in reporting the cause for concern or disclosure to the Safeguarding Team as this could increase the risk to the learner and to other family members or other learners.
- Where abuse or a safeguarding concern is suspected but not disclosed by the learner, the member of staff should report their concerns to someone within the Safeguarding Team.
- Ensure you explore any reasonable support that can be offered to you with the Safeguarding Team or HR Manager.

If the disclosure involves another learner or a member of staff consider carefully how to deal with this. If it is a serious allegation you may need to ensure this person is seen immediately by another staff member.

Do not

- Promise confidentiality or to keep what you are being told secret.
- Appear to be shocked or upset by what the child, young person or vulnerable adult is telling you, even if what they are saying is distressing.
- Touch the person to comfort or reassure them.
- Question the person about the alleged abuse, beyond the minimum necessary to understand what is being alleged.
- Give false reassurances in order to comfort the person.
- Take the person back home.
- Contact the police or local authority.

Appendix 3: Initial response to an allegation or concern against a member of staff

Do

- Make a written record of the information (where possible in the child /adults own words), including the time, date and place of incident/s persons present and what was said).
- Sign and date the written record.
- Immediately report the matter to the designated senior member, or Deputy in their absence or where the senior manager is subject of the allegation.

Do not

- Investigate or ask leading questions in seeking clarification.
- Make assumptions or offer alternative explanations.
- Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

The screenshot shows a Microsoft Word interface with a document titled "Safeguarding CP1 Referral - Message PDFMA". The ribbon at the top includes tabs like "Home", "Insert", "Layout", "References", "Mailings", "Review", and "Developer". The main content area displays a form titled "LCBT Safeguarding Referral Form CP1".

Section 1: About the Learner

Learner name:			
Course:		Learner Group No.:	

Section 2: Details of Concerns and Actions Taken

Outline of Concerns: please note the person who is completing this form should keep questions to a minimum. This section should record as much as possible the nature of the allegation and any other relevant information. Please distinguish between fact, observation, allegation and opinion. Please ensure that you include date / time and location of incidents.

Any actions taken so far (by learner) please state:

Any actions taken so far/advice given (by LCBT staff) please state:

Details of witnesses or other people involved if any please list:

The contents of the form and discussion leading to its completion must remain confidential and should not be discussed with any members of staff, learners or personal acquaintances or other Designated Senior Persons and Programme Managers.



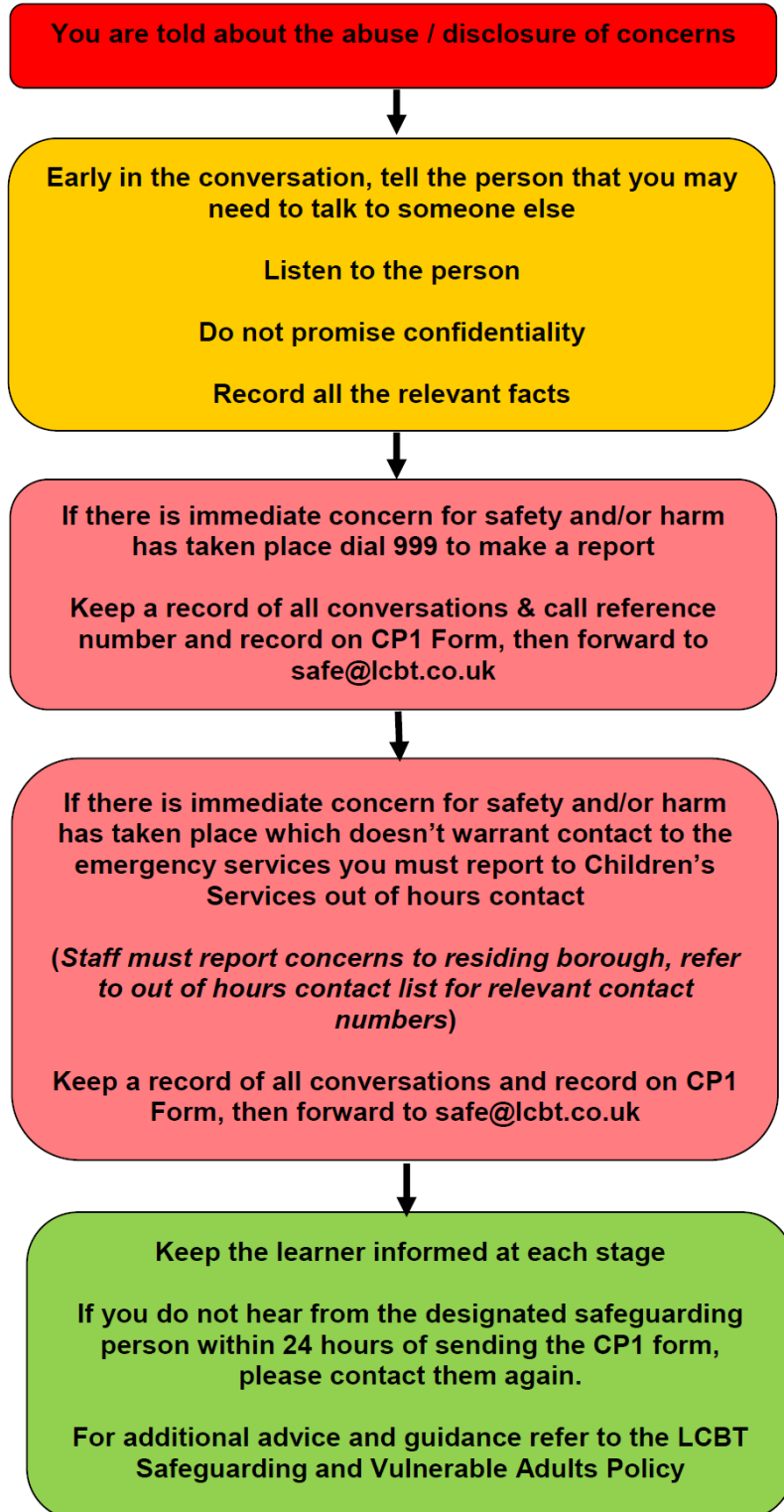
Appendix 5: Flowchart 'What to do if an allegation has been made that someone is being abused / is at risk of significant harm



Appendix 6: Flowchart 'What to do if you suspect someone is being abused / is at risk from significant harm'

Safeguarding Out of Hours Procedures

What to do if an allegation has been made that someone is being abused / is at risk from significant harm.



Appendix 7: Child Protection Contacts

<p>Tri Borough contact details for consultation and referrals concerning Safeguarding and Child Protection</p>	<ul style="list-style-type: none"> Westminster – 020 7641 4000 9-5pm Out of hours – 020 7641 6000 Hammersmith & Fulham – 020 8753 6610 9-5pm Out of hours – 020 8748 8588 Kensington & Chelsea – 020 7361 3013 9-5pm Out of hours - 020 7361 3013
<p>Local Authority Designated Officer contact if you are worried about a professional working with young people</p>	<ul style="list-style-type: none"> Westminster – 020 7641 7668 Email: lado@westminster.gov.uk Hammersmith & Fulham - 020 8753 5125 Email: lado@lbhf.gov.uk Kensington & Chelsea – 020 7361 3013 Email: kclado.enquiries@rbkc.gov.uk
<p>Tri-Borough Adult Social Care</p> <p>Tri-Borough Adult Social Care 4th Floor, 77-89 Glenthorne road Hammersmith London W6 0LJ</p> <p>Contact if you suspect or know of an adult being abused.</p>	<ul style="list-style-type: none"> Westminster – 020 7641 7668 Hammersmith & Fulham - 020 8753 5339 Kensington & Chelsea - 020 7361 3013
<p>Tri-borough Educational Psychology Service</p>	<p>Tel: 020 7361 3311</p>
<p>Westminster Child and Adolescent Mental Health Service</p>	<p>Tel: 020 3317 5999 Email: westminstercamhs.cnwl@nhs.net</p>
<p>Havens Sexual Assault Referral Centre</p>	<p>Telephone: 020 3299 6900</p>

Chelsea and Westminster Hospital	Telephone: 020 3315 8000
Ofsted whistleblower hotline	Telephone: 0300 123 3155 whistleblowing@ofsted.gov.uk
Police emergency and Non- emergency contact	Telephone: 999 Emergencies or 101 for Non-Emergencies
NSPCC Helpline	Telephone: 0808 800 5000
ChildLine	Telephone: 0800 1111
Channel Programme – referrals for cases involving extremism and radicalisation	Telephone: 020 7641 5071 Email: kmalik@westminster.gov.uk

Appendix 8: Restraining Learners and Confiscation of Belongings

Restraint of Learners/Belongings

Under the Education Act 2011 the college's duty to safeguard individuals on college premises is extended to the restraint of learners and/or confiscation of belongings where there is a potential risk to the health and safety of visitors, staff and learners.

If concerns arise for the need to restrain student/s or confiscate belongings posing a health and safety risk to others, staff must inform a member of security as a matter of urgency and make appropriate judgments to maintain the safety of themselves and others within their care.

In the event of a health and safety breach, security and other trained staff will be responsible for handling such situations until appropriate external agencies arrive on site, if required.

If you suspect that someone is at risk from significant harm to themselves or others refer to Appendix 6 for guidance or as a matter of emergency contact a member of security and/or police on 999.

It is unlawful to use force as a punishment as this would fall within the definition of Corporal Punishment, abolished by section 548 of the Education Act 1996.

POLICY

At the London College of Beauty Therapy we believe that the use of reasonable force may be necessary to prevent a student from:

- Committing a criminal offence.
- Injuring themselves or others.
- Causing damage to property including their own.
- Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its learners, whether that behaviour occurs in the classroom during a teaching session or elsewhere.

The use of restraint will always be a last resort and if practical, before intervention, a calm warning or instruction will be given and every effort will be made to achieve a satisfactory outcome without physical intervention. Help will be sent for if it is possible to achieve this.

Restraint can take a variety of forms, which include:

a) Passive physical contact from standing between learners or blocking a student's path

b) Active physical contact such as:

- Leading a student by the hand / arm.
- Ushering a student away by placing a hand in the centre of the back.
- In more extreme circumstances, using appropriate restrictive holds, which may require specific expertise or training.

C) Confiscation of belongings and the seizing of items such as

- Alcohol or its container
- A controlled drug
- Stolen articles
- Electronic devices used for cyber bullying or other safeguarding concerns
- Other items that pose a risk to health and safety

Security and the safeguarding team may examine any data or files on the device, if there is a good reason to do so.

Following an examination, if it is decided to return the item to its owner, retain it or dispose of it, the appropriate staff may erase any data or files from the device if there is a good reason to do so in order to maintain the safety of others.

Where there is a high and immediate risk of death or serious injury, any member of staff will be justified in taking any necessary action using the minimum force required to achieve the desired result.

Staff will make every effort to avoid acting in a way that might reasonably be expected to cause injury. However in extreme circumstances it may not always be possible to avoid injury to a student.

Staff will seek to avoid touching or restraining a student in a way that could be interpreted as sexually inappropriate conduct.

Holds to be avoided except in the most extreme circumstances

The following holds MUST NOT generally be used other than in the most extreme emergency to prevent the risk of SERIOUS injury or loss of life:

- Holding a student around the neck, or by the collar, or in any other way that might restrict breathing.
- Slapping, punching, and kicking a student.
- Twisting or forcing a limb against a joint.
- Tripping a student.
- Holding a student by the hair or ear.
- Holding a student face down on the ground.

Recording an Incident

All incidents that result in non-routine/ emergency intervention will be recorded in detail.

Notes will be made IMMEDIATELY (or as soon as possible) after the incident and certainly before the end of the day on which the incident occurred, by the member of staff involved in the original incident.

Notes will also be made in the same way by any other member(s) of staff involved either giving support or as a witness.

All notes will be signed and dated.

Notes MUST contain the following information:

- Name / job title of member(s) of staff using reasonable force.
- Name of student(s) involved.
- When and where incident took place.
- Names of any witnesses – staff and learners.
- Reason why the reasonable force was necessary.
- Progress of the incident including details of:
 - behaviour of student which led up to incident
 - any attempts to resolve the situation
 - what was said by staff / learners
 - degree of reasonable force used
 - how reasonable force was applied
 - how long for
- Student response and eventual outcome.
- Details of any injuries suffered by either staff / learners.

- Details of any medical / first aid treatment required / given (accident form completed where appropriate).
- Details of any follow up, including contact with parents / carers of the student involved.
- Any other relevant details e.g. involvement of other agencies such as police etc.
- Student witnesses may be asked to provide written statements, which will be kept on file.
- The parents / carers of the student being restrained will be contacted immediately following the reporting of the incident.

Learners with Special Needs

Routine incidents of physical intervention, usually for learners with identified needs as set out in ILP will be recorded as follows:

- name of student
- date
- name of member of staff who intervened
- name(s) of witnesses
- brief description of reason for intervention
- brief description of action taken
- details of follow up with parents / carers
- first aid record

Post Incident Support

The London College of Beauty therapy will:

- Ensure that the student and staff have immediate access to first aid for any injuries - this should be recorded.
- Will give the student time to become calm while staff continue to supervise him / her.
- Ensure a senior member of staff discuss the incident with the individual, giving his / her point of view as soon as is practicably possible when the student is calm.
- Take steps to re-establish the relationship between student and member(s) of staff involved in the incident.
- Ensure all members of staff are allowed a period to recover from the incident and support will be provided where necessary.
- Ensure that the Head or Deputy Head of Education and Training is informed of the incident at the earliest possible opportunity.
- Initiate the recording process and review each incident to ensure lessons learned.
- Inform parents / carers of any incident involving physical intervention as soon as possible after the incident and certainly before the student arrives home.



- Ensure that the relevant H&S accident reports are completed where appropriate.
- Deliver confiscated items to the police.
- Return confiscated items to its owner.
- Dispose of confiscated items.

Training of Staff

In cases where it is known that a student may require physical intervention, (e.g. in the case of special needs) appropriate training will be provided for relevant staff (both teaching and support). Staff training will be updated at regular intervals.

Risk Assessment

LCBT acknowledges that some learners may behave in ways that make it necessary to consider the use of restrictive physical intervention as part of our behaviour management plan.

In the case of learners with special needs any techniques and methods for controlling and restraining such learners using restrictive physical interventions must be risk assessed to ensure they are safe, suitable and appropriate for the named student.

The techniques will be agreed between parents / carers / student / staff and any other agencies working with the student.

Risk Assessments for named learners with special needs should be held within the student file.

Arrangements for informing parents of the policy

Parents / carers will be informed following an incident where physical intervention has been used with their child.

Responding to a Complaint

If a parent / carer or student makes a complaint about the management of an incident requiring physical intervention, they should follow the normal college complaints procedure by emailing:

talkback@lcbt.co.uk

Appendix 9: Providing images to maintain safety of learners

As part of LCBT safeguarding strategy and procedures for safeguarding learners at a risk, members of the safeguarding team may request pictures of known perpetrators to increase the level of safety for individuals that may be at risk of harm.

Images will be referred onto members of the security team who will be informed to contact the relevant external agency .i.e., Met Police and members of the safeguarding team if a perpetrator was visible in and around the college premises.

Risk assessment

To evidence the need to retrieve photos and to manage risks to safety a member of the safeguarding team will assess the following:

- Is there a history of abuse in this case or not?
- Does the perpetrator's abusive behaviour toward the victim put them or others at imminent risk of serious harm?
- How does the perpetrator's abusive behaviour toward the victim impact the ability on the learners focus at college?
- Are there concerns for other family members/siblings?
- Whether there are any ongoing court cases and safety is at risk at college and outside.
- Whether an injunction/protection order has been imposed on perpetrator.
- Whether there are external agencies already involved, if not the college will make appropriate contact with the relevant agency.
- How the college can increase the safety for the victim and for others involved.

Safety strategy

1. Risk assess harm to self and others with above questioning.
2. Learners to provide suggestions of maintaining their safety at college.
3. Ask learners to supply pictures of perpetrators to maintain their safety at college.
4. Report any abusive messages through internet or phone.
5. Suggest to learner to report perpetrator if not done so prior to disclosure.
6. Ensure they have access to safety devices such a panic alarm.
7. Only notify staff that 'need to know' of safety precautions put in place to maintain safety of learner on site, i.e. security staff and safeguarding team etc.
8. Learners at risk should keep the college informed of any developments of their situation and risks to safety.

Risk assessment for providing images to staff

Is there a history of abuse in this case or not?
Does the perpetrator's abusive behaviour toward the victim put them or others at imminent risk of serious harm?
How does the perpetrator's abusive behaviour toward the victim impact the ability on the learners focus at college?
Are there concerns for other family members/siblings?
Whether there are any ongoing court cases and safety is at risk at college and outside
Whether an injunction/protection order has been imposed on perpetrator
Whether there are external agencies already involved, if not the college will make appropriate contact with the relevant agency.
How the college can increase the safety for the victim and for others involved young people?
Provide images of perpetrator to safeguarding team and uniformed security staff etc. Safeguarding team by emailing safe@lcbt.co.uk

Appendix 10: Information Sharing Consent Form

Information Sharing Consent Form

Section 1 – Full Name of Young person/s		
Last Name		First Names
Other Names		Date of Birth
Address		
Post code		Borough
Section 2 – Consent to share information		
<p>I have been told of the assessment and information sharing process and who the information about me/my child will be shared with, and I understand what I am giving consent for.</p> <p>I do/do not give consent for information relevant to the care and well-being of the child/ren or young person(s) named above to be shared with the appropriate organisations during the course of their study.</p> <p>I understand I can withdraw my consent at any time by contacting the Lead Social Worker below.</p>		
Parent	Guardian	Young person
Full name		Contact Number
Signature		Email
Parent	Guardian	Young person
Full name		Contact Number
Signature		Email
Section 3 - Lead Support Worker Details		
Lead Social Worker	Key Worker	Personal advisor
Full Name		Name of organisation and key support offered:
Borough		Address
Telephone Number/s		Email address
Signature		Date



Appendix 11 Risk Assessment for Visiting Speakers /Event

Risk assessment for Visiting Speaker /Event

Date:
Name of Event and/or Speaker:
Date of Event:
Member of staff organising visit/ Point of contact:
Nature of event (talk, demonstration, Interactive learning, etc.):
Outline of what will be taking place during visit:
Tick to confirm due diligence has been carried out on speak and the organisation they are affiliated to <input type="checkbox"/>
Tick to confirm that the reception staff/ customer services have been informed of the visit and who to contact upon visitor arrival <input type="checkbox"/>
Tick to confirm the visitor has been sent a copy of the safeguarding and health and safety leaflet in advance to their visit <input type="checkbox"/>
Tick to confirm that you agree to ensure that the visitor will be accompanied at all times whilst on college premises <input type="checkbox"/>
Tick to confirm visitor will not remain on college property during visit <input type="checkbox"/>
Notes/Actions required before visit:

Please send this form to the safeguarding team by emailing safe@lcbt.co.uk at least 10 days before visit/event date to ensure appropriate timescales are in place for due diligence, should this be required and to keep records of external visitors.

Appendix 12 Suspicious Behavior Report Form



Suspicious Behaviour Report Form

Job role or Group number (if learner):

Name of person making report:

Name (s) of witness(ess)

To report suspicious behaviour please provide the following information:

- Time, date & location of incident
- Approximate age and Height
- Ethnicity
- Build
- Description of clothing
- Direction of travel, if they walk away
- What was witnessed taking place

Email to safe@lcbt.co.uk or contact 999 with above information



References

<http://www.londoncp.co.uk/>

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

<http://www.b-eat.co.uk/get-help/about-eating-disorders/>

<https://www.gov.uk/government/publications/drugs-advice-for-schools/>

<http://www.talktofrank.com/>

http://safe.met.police.uk/knife_crime_and_gun_crime/other_help_and_advice.html

<https://www.gov.uk/female-genital-mutilation-help-advice>

<https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/recognising-domestic-abuse/>

<http://www.iwf.org.uk/>

http://www.londoncp.co.uk/chapters/ch_miss_care_home_sch.html#app2

Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By:
19/08/2016	3.0	Page 3	Keeping Children Safe in Education statutory Guidance	Executive Board
08/12/2016	4.0	Page 18	FGM guidance update	Executive Board
16/01/2017	5.0	Page 17 / ALL	Confidentiality Updated / General formatting of document updated	Executive Board
10/03/2017	6.0	Page 29	LADO Contact Details	Executive Board
01/05/2017	7.0	Page 27-28	Designated Safeguarding Officer	Executive Board
21/08/2017	8.0	3.4	Procedures for Children Missing in Education	Executive Board
21/08/2017	8.0	3.6	Included Additional Learning Support needs and Documentation	Executive Board
21/08/2017	8.0	6.2	Renamed Executive Board and Designated Senior Safeguarding Leads	Executive Board
02/10/2017	8.0	4.1.1 p11	Added apprenticeship manager as designated safeguarding person	Executive Board
26/03/2019	8.0		Updated safeguarding personnel	Executive Board
02/12/2019	9.00	Whole policy	Full Policy review and update	Executive Board