

CURRICULUM/LEARNER POLICIES AND PROCEDURES		LEWISHAM SOUTHWARK COLLEGE
Policy title:	Child Protection Policy and Procedure	
Applies to:	All staff, volunteers, governors and students under the age of 18	
Owner of Policy	Student Services	

CONTENTS	PAGE
Introduction	2
Policy Statement	2
Policy Aims	3
Safeguarding Definitions	3
The Role of the Governing Body	5
The Role of Staff	6
Dealing with Disclosure of Abuse and Procedure for Reporting Concerns	8
Staff Code of Conduct	11
Children on Site	11
Reporting and Dealing with Allegations Against Members of Staff	12
Partnership Working with Parents/Carers	16
Monitoring Effectiveness	16
Recruitment & Selection	17
Lewisham Southwark College Child Protection Policy and Procedure	

1. Introduction

1.1 This policy is one of a series of policies and procedures intended to ensure that the College fulfils its safeguarding responsibilities. Our core safeguarding principles are:

- The safeguarding and wellbeing of students is of the utmost importance to the College
- Safe students are more likely to stay and succeed
- Students should feel able to report any concerns they may have about safeguarding
- Policies will be reviewed annually (unless an incident or any new legislation or guidance suggests the need for an interim review)
- Information on our safeguarding policies will be made available to students, staff and parents/carers

1.2 Our policies relating to safeguarding include (but are not limited to) Health and Safety, Child Protection, Adults At Risk Protection, Safe Entry to College, Children on College Premises, Bullying Prevention and Offensive Weapons and Screening.

1.3 The College's Child Protection Policy and Procedure has been informed by:

- Amendments to Working Together to Safeguard Children (published) in March 2015)
- Amendments to Keeping Children Safe in Education (published in July 2015).

2. Child Protection Policy Statement

2.1 Lewisham Southwark College recognises that it has a duty to safeguard and promote the welfare of all its students as well as the families that we come into contact with. It has a statutory duty to ensure that it takes action to safeguard and promote the welfare of young people receiving education and training at the College. In this context children and young people applies to those under the age of 18 years.

2.2 The College has developed procedures in line with the London Child Protection Procedures published by the London Safeguarding Children Board and takes account of guidance issued to education providers. The procedures within this policy apply to all volunteers, staff and governors.

2.3 It is the responsibility of all staff to ensure that they carry out their duties in accordance with the duty to safeguard and that they take prompt, appropriate, action when they have concerns about a child or young person. Staff also have a right to be treated fairly if an allegation of abuse is made against them. There is a member of the College's Senior Leadership Team with special responsibility for child protection issues

2.4 The College will register significant concerns about a child or young person through local partnership arrangements and participate as appropriate in follow up action. Where there are concerns that a child or young person has been abused or might be at risk of significant harm a referral will be made to the Referral and Assessment Team in the Children and Young People's Directorate or their current Social Worker should they have one.

2.5 The College has developed a discrete 'Adults at Risk' Protection Policy to address the specific needs of people aged 18 or over who are vulnerable.

2.6 The College has the following policies and procedures in place in order to promote the welfare of and safeguard children and young people:

- Adults at Risk Protection Policy and Procedure

- (Student) Disciplinary Policy and Procedure
- E-Mail, Internet and Social Networking Policy
- Offensive Weapons and Searching and Screening Policy
- Children on College Premises Policy
- Health and Safety Policy
- Bullying Prevent Policy

3. Policy Aims

3.1 The aims of this policy are to:

- Provide staff, volunteers and governors with information needed to enable them to meet their child protection responsibilities
- To ensure consistent, good practice
- To demonstrate the College's commitment to child protection and contribute to the College's safeguarding practice
- Outline how the College will deal with allegations against staff and volunteers including those who are no longer employed by the College
- Set out how the implementation of the policy and procedure and progress to advance safeguarding practice will be monitored

4. Safeguarding Definitions

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

There are four key categories of abuse, and three additional areas to highlight.

These are:

4.1 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.

4.2 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 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.

4.3 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4.4 Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate 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.

4.5 Notable addition 1 - Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

There are a range of signs which could indicate that someone is being sexually exploited. These can include going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. If you suspect that anyone is or has been subject to CSE, including non-students, this must be reported to a Designated Safeguarding Officer immediately.

4.6 Notable addition 2 - Female Genital Mutilation (FGM)

FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. FGM causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. It is practised by families for a variety of complex reasons but often in the belief that it is beneficial for the girl or woman. FGM is practised in 28 African countries as well as in parts of the Middle East and Asia. The practice is illegal in the UK. If you suspect that anyone is or has been subject to FGM, including non-students, this must be reported to a Designated Safeguarding Officer immediately.

4.7 Notable addition 3 - Extremism and Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and education providers in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. This is referred to commonly as the 'Prevent Duty'. Children and young people can be exposed to extremist influences or prejudiced views, in particular those via the Internet and other social media.

There are many signs that a child or young person may be involved in or vulnerable to radicalisation. These signs can include:

- Spending time with suspected extremists
- Using derogatory names for groups of people
- Significant changes in behaviour (which can include dress) and behaviours becoming significantly centred around a particular extremist ideology
- Attempts to recruit other people to an extremist ideology

The list above is by no means exhaustive. If you require any further information, please speak to a Designated Safeguarding Officer.

There are particular risk factors which can make someone at a higher risk of being radicalised. This can include estrangement from family/friends and housing/homelessness issues. Extremists are often able to capitalise on these and other risk factors leading to the individual who has been groomed developing a sense of belonging which they may not have with others.

If you suspect a student is at risk of being radicalised, has been radicalised or is displaying extremist behaviours, you should contact a Designated Safeguarding Officer immediately. They will then decide whether or not to involve external partners to keep the child or young person safe.

4.8 Notable addition 4 - Forced Marriage

Forced marriage is a form of abuse. It can lead to domestic violence, as it is a form of oppression, which may generate physical violence, emotional, sexual or psychological abuse. Forced marriage is significantly different to an 'arranged marriage' where consent is given. "A marriage is forced when conducted without the valid consent of both parties and where duress is a factor." (Choice by Right, HMO). Where any party to a marriage has not given consent or is in any way put under pressure (e.g. emotional blackmail, threat of violence, abduction, etc.) that is considered to be a forced marriage.

5. The Role of the Governing Body

5.1 The Governing Body is committed to ensuring that the College:

- raises awareness of issues relating to safeguarding and promoting the welfare of children and young people in the College
- provides a safe environment for children and young people
- identifies children and young people who are suffering, or at risk of suffering significant harm and takes appropriate action to see that such children and young people are kept safe
- has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- operates safe recruitment procedures
- provides appropriate training for designated/staff on child protection
- designates a senior member of staff to take lead responsibility for child protection
- remedies any deficiencies in or weaknesses in regard to child protection arrangements that are brought to the Governing Body's attention
- has a robust Staff Code of Conduct (Staff Charter) that sets out the core expectations staff must adhere to

The Governing Body will approve and annually review College policies and procedures.

5.2 Designated Governor

The designated governor is responsible for liaising with the Principal and Chief Executive and Senior Lead Manager for Safeguarding over matters regarding child protection, including:

- ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children's Boards
- ensuring that the governing body considers the College policy on child protection each year
- ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken
- promoting and ensuring inter-agency working in line with statutory guidance

The Designated Governor is responsible for overseeing the liaison between agencies such as the police, Children's Social Care – as defined by the Local Safeguarding Children's Board in connection with allegations against the Principal and Chief Executive or the Senior Lead Manager for Safeguarding. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the designated governor shall receive appropriate training in line with Local Safeguarding Children's Board procedures.

The governing body has nominated Hilary Moore as the governor with special responsibility for child protection issues.

6. The Role of Staff

6.1 Principal and Chief Executive

The Principal and Chief Executive is responsible for:

- ensuring all staff follow child protection policies and procedures

6.2 Senior Lead Manager for Safeguarding

The Senior Lead Manager for Safeguarding is responsible for:

- taking lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College
- overseeing the referral of cases of suspected abuse or allegations to Children's Social Care Referral and Assessment Team of the Children and Young People's Directorate
- providing advice and support to other staff on issues relating to child protection
- maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- ensuring that parents of children and young people within the College are aware of the College's child protection policy
- liaising with the Children and Young People's Directorate in Lewisham and Southwark, Local Safeguarding Children's Boards and other appropriate agencies
- liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils

- liaising with employers and training organisations that receive children or young people from the College on long term placements to ensure that appropriate safeguards are put in place
- ensuring that staff receive basic training in child protection issues and are aware of the College's child protection procedures.
- reporting annually to the governing body of the College on how the College has discharged its duties.
- reporting deficiencies in procedure to the governing body at the earliest opportunity.
- submitting a monthly report for the College's Senior Leadership Team on safeguarding incorporating Health and Safety, serious incidents and training undertaken/delivered by the College
- undertaking referrals to and liaising with the Local Authority when dealing with 'Adult at Risk' protection issues involving allegations against staff
- disseminating learning from Serious Case Reviews (SCRs) to the Senior Leadership/College Management Team.

The Senior Lead Manager for Safeguarding and child protection issues is the Head of Student Services. S/he will receive training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board (LSCB) and will receive refresher training at least every 2 years. S/he will keep up to date with developments in child protection issues.

In the absence of the Head of Student Services their designated representative will fulfil this role. This will usually be the Student Services Manager who also acts as the College's Lead Designated Safeguarding Officer.

6.3 Designated Members of Staff (Designated Safeguarding Officers)

The Designated Safeguarding Officers:

- report to the Senior Lead Manager for Safeguarding
- know how to make an appropriate referral
- are available to provide advice and support to other staff on issues relating to child protection
- will deal with individual cases, including attending case conferences and review meetings as appropriate.
- have received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children's Board, and will receive refresher training at least every 2 years
- will take children's or young people's wishes into account, and where possible, involve them in decision making

Designated Safeguarding Officers are:

- School Partnerships Manager
- Student Services Manager
- Student Services Team Leader (ALS)
- Student Services Team Leaders
- Safeguarding and Support Officer (who specialise in Looked After Children)
- Wellbeing Officer
- Head of IELTS

6.4 All staff

It is the responsibility of all staff to:

- be aware of the signs and symptoms of abuse and neglect
- behave professionally and in accordance the College's Code of Conduct
- understand the parameters of their role and be aware that (under the Sexual Offences Act 2003) it is an offence for a person over the age of 18, in a position of trust, to have a sexual relationship with a person under the age of 18, even if the relationship is consensual
- be 'professionally curious' particularly where there are warning signs of abuse and/or neglect
- ensure that they carry out their duties in accordance with the duty to safeguard all students and protect children and young people
- follow procedures if they're aware of or suspect a child is missing
- take prompt, appropriate, action when they have concerns about a child or young person.

The Principal and Chief Executive and all staff working with children and young people will receive training adequate to familiarise them with child protection issues and responsibilities and the College policy and procedures, with refresher training at least every three years.

7. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

7.1 Sometimes a member of staff may have suspicions that a student is being abused or is at risk of significant harm. A student may also disclose to a member of staff that s/he is being abused. In these circumstances, the procedure outlined below should be followed:

7.2 Disclosure of Abuse/Suspicion of Abuse:

If a child or young person discloses abuse, or if abuse is suspected, staff should:

- **Receive** - listen carefully and stay calm
- question normally and without pressure, in order to be sure that what the child/young person is saying is understood by the member of staff. *The member of staff should not ask questions about the incident/s*
- **Reassure** the child that by telling a member of staff, they have done the right thing.
- Inform the child/young person that the information must be passed on, but that only those who need to know about it will be told. Inform the child/young person to whom the matter will be reported.
- **Record** the main points carefully.
- make a detailed note of the date, time, place, what the child/young person said, did and the questions asked by the member of staff together with what they said to the child/young person, etc.
- **Report** the matter immediately to a Designated Safeguarding Officer followed up with a completed Safeguarding Referral form

7.3 Staff should not:

- put words into the child/young person's mouth or ask leading questions
- investigate concerns or allegations,
- promise confidentiality.

8. Missing Children or Young People

8.1 Where there are cases of students going missing or repeatedly going missing, the Designated Safeguarding Officer(s) will be notified. The Designated Safeguarding Officer(s) will seek advice and/or refer to Children's Social Care as appropriate.

9. Reporting to Designated Staff

9.1 Staff should report any concerns, suspicions or disclosures of abuse as soon as possible, and within 24 hours, to one of the Designated Safeguarding Officers for child protection via a Safeguarding Referral form. If the Designated Safeguarding Officers cannot be contacted, the report should be made to the Senior Lead Manager for Safeguarding (Head of Student Services).

10. Contact with *Children's Social Care*

10.1 The Designated Safeguarding Officer (or the Principal and Chief Executive) must report the matter by telephone within 24 hours to social workers in the Children's Social Care Department for the local authority where the child or young person lives. A CAF form should be completed and submitted within 48 hours depending on the referral route needed for the appropriate social care team.

10.2 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 is reported. The telephone report must be confirmed in writing, using the appropriate referral form where possible, to the *Children's Social Care* department within 24 hours.

10.3 The Designated Safeguarding Officer/Principal and Chief Executive should discuss with the Social Worker:

- what action will be taken to inform the parents/carers of the child/young person and a note of that conversation should be made.
- the process for keeping the College informed of further action taken

11. 14-16 School Link Students

11.1 In the case of a 14-16 School Link student, the Designated Safeguarding Officer should liaise closely with the school's Child Protection Officer. The Child Protection Officer will be responsible for undertaking the referral to the appropriate *Children's Social Care* team.

12. Allegations against Students

12.1 In the case of an allegation or actual abuse of a child by a student, the Designated Safeguarding Officer having due regard to other college procedures, shall:

- notify the Principal and Chief Executive
- take such steps s/he considers necessary to ensure the safety of the student/child in question and any other student/child who may be at risk
- report the matter to the local *Children's Social Care Department within 24 hours* and in accordance with the College procedure
- ensure that the person who reported the concern completes a written report.

13. Allegations against Volunteers

13.1 A member of staff who receives an allegation about a volunteer from a child/young person should follow the guidelines in Part G for dealing with disclosure. The Designated Safeguarding Officer will:

- notify the Principal and Chief Executive

- take such steps s/he considers necessary to ensure the safety of the student/child in question and any other student/child who may be at risk – this is likely to include
- remove the volunteer from his/her volunteering role and ask him/her not to attend college pending the investigation
- report the matter to the local *Children's Social Care Department within 24 hours* and in accordance with the College procedure.

13.2 Volunteers are expected to adhere to the Staff Charter (Code of Conduct) in the same way as an established member of staff/agency worker.

14. Written Records

14.1 The Designated Safeguarding Officer shall retain a copy of:

- the CAF form
- any written reports, notes or correspondence dealing with the matter
- any other relevant material
- reports, notes should be kept securely at all times. Access to records will be confined to the College's Designated Safeguarding Officers.

14.2 The College recognises the importance of recording interventions and that this could be used as evidence by the Police and Domestic Homicide/Serious Case Reviews. All Designated Safeguarding Officers have access to and record their work on the safeguarding system as part of the College's efforts to safeguarding and support students.

15. Significant Concerns:

15.1 The College recognises that many students require support to safeguard and enhance their welfare, however, this may not warrant intervention by Children's Social Care. In these cases, students should be referred to the College's Admissions and Student Support Team. The Admissions and Student Support Team provide a range of support which includes:

- Counselling and mental health support
- Behaviour management support
- Welfare advice and guidance
- GP Service
- Referral to Internal and External specialist support.

15.2 If a member of staff has significant concerns about a young person, but does not believe that they are being abused or are at risk of immediate significant harm s/he should:

- talk to the child/young person about the concerns
- speak to the Admissions and Student Support Team who will consider whether the concerns about the young person should be discussed with local safeguarding professionals or a 'Team Around the Child' Meeting arranged
- arrange ongoing support for the young person in conjunction with the Admissions and Student Support Team.

16. Notifications to the College

16.1 Occasionally, the College may receive information e.g. a disclosure under MAPPA (Multi Agency Public Protection Arrangements) about an individual attending college who may present a risk to children/young people. In these circumstances the Principal and Chief Executive and Senior Lead Manager for Safeguarding will call a case conference to:

- discuss the case with the professionals supporting and monitoring the individual concerned e.g. Police, Probation, Youth Offending Service
- undertake a risk assessment
- determine what action should be taken to ensure the college fulfils its safeguarding responsibilities

16.2 It is also recognised that students attending the College may have previously had a criminal conviction which may present a cause for concern about the safety of our other students. In the majority of cases, this is picked up as part of the interview and assessment stage, although we recognise that sometimes these students will disclose to College staff after they have enrolled or start learning.

16.3 In this case, the Senior Lead Manager for Safeguarding and the Principal and Chief Executive will meet and follow the process in section H. In the cases of students that are here for short periods of time through Job Centre Plus/Work Programme provision, the College reserves the right to refer students back to the referring agency.

17. Staff Code of Conduct

Lewisham Southwark College recognises that it has a duty to safeguard and promote the welfare of all its students. It has a statutory duty to ensure that it takes action to safeguard and promote the welfare of young people receiving education and training at the College. In this context, children and young people are those under the age of 18.

You must comply with this duty and ensure students are safe. You must take prompt, appropriate action when you have concerns about a child, young person, or vulnerable adult. You also have a right to be treated fairly if an allegation of abuse is made against you.

You are expected to be aware of the Child Protection Policy and Procedure and all are responsible for its implementation.

You should not agree to look after the children of students or applicants while they sit assessments or are being interviewed, or allow students to bring children on to College premises except in those circumstances outlined below.

Failure to follow this may result in disciplinary action.

18. Children on site

Lewisham Southwark College recognises that children frequently need to access public areas of the College with their parents or guardians for the purpose of enrolment, admissions advice, open days and events. For the purpose of this section, children are defined as those under the age of 16 years.

18.1 For enrolment, open days or events targeted at this age group, the safety and security of the children of potential students and visitors will be managed as part of the organisation of the enrolment, open day or event they are attending. The managers involved will be responsible for ensuring that the appropriate risk assessments and safety precautions have been carried out.

Students will be reminded throughout the recruitment process and, if necessary, on arrival at the College to complete enrolment, that no childcare facilities are available.

Under normal circumstances, the children of students and staff should not be brought onto College premises, and child care and other supervision must be considered first. When there is no alternative, or in an emergency, the permission of the Head of Department or Service must be sought first.

It is recognised that employees will, on occasion, be visited by family members or friends, or by colleagues on maternity / paternity leave, who are accompanied by their children. These visits are usually of a short duration and are in public areas of the College, but they still require the permission of the Head of Department / Service.

18.2 Children must be supervised by their parent/ carer at all times; this duty is their sole responsibility and cannot be delegated to another person.

Supervision means that children are in the immediate vicinity of their supervisor and close enough for accidents to be prevented. Particular care must be taken when children are negotiating staircases and children should not be allowed outside the buildings unaccompanied. The College does not accept responsibility for the safety of children brought on College premises by a member of staff.

18.3 Some areas of the College are unsuitable for children. All workshops, laboratories, preparation rooms, stores and learning centres are strictly out of bounds to children, unless children are participating in an authorised visit. Children should not be allowed to use any College equipment, including computers.

Children of staff are not allowed to accompany parents / guardians on College trips, visits or residential activities.

18.4 An accident involving a child whilst on College premises must be reported on an accident report form (on StaffNet), which should be sent to the Health and Safety Manager in Facilities. A number of qualified first aiders are available on site at all times and can be contacted via Security or the Duty Manager.

Where the accident results in a child attending hospital, the College's Health and Safety Manager must be informed immediately and a report will also need to be submitted to the Health and Safety Executive. Any parent or carer found in breach of this policy will be asked to take their child / children off site immediately.

19. Reporting and Dealing with Allegations of Abuse Against Members of Staff

19.1 The College recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. The College recognises that the Children Act (1989) states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, allegations of abuse by a member of staff shall be handled with sensitivity.

19.2 If an allegation is made regarding a staff member who is no longer volunteering or employed by the College, the matter will be immediately reported to the Police.

19.3 Where concerns are raised regarding a member of staff's suitability to work with children and/or young people, all relevant checks must be undertaken again as if they were joining the organisation

20. Receiving an Allegation from a Child/young person

20.1 A member of staff who receives an allegation about another member of staff from a child/young person should follow the guidelines in Part G for dealing with disclosure. The allegation should be reported immediately to the Principal and Chief Executive, unless the Principal and Chief Executive is the person against whom the allegation is made, in which case the report should be made to the Senior Lead Manager for Safeguarding or the Designated Governor for Safeguarding. The Principal and Chief Executive (or designated person if the allegation is against the Principal and Chief Executive) should:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- The written details should be countersigned and dated by the Principal and Chief Executive (or Senior Lead Manager for Safeguarding).

21 Initial Assessment by the Principal and Senior Lead Manager for Safeguarding

21.1 The Principal and Chief Executive should make an initial assessment of the allegation, consulting with the Senior Lead Manager for Safeguarding. Where the allegation is considered to be either a potential criminal act or indicates that the child or young person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported *within 24 hours* to the Local Authority Designated Officer (LADO) in the Children's Social Care Department and the local Safeguarding Children's Board. The LADO for Lewisham is Finola Owens. Her contact details are Finola.Owens@lewisham.gov.uk.

21.2 The LADO for Southwark is Jackie Cook, Head of Social Work Improvement and Quality Assurance who can be contacted at Jackie.cook@southwark.gov.uk.

21.3 It is important that the Principal and Chief Executive (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation. Other potential outcomes are:

- the allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the College disciplinary procedures.
- the allegation can be shown to be false because the facts alleged could not possibly be true.

22 Enquiries and Investigations

22.1 Child protection enquiries by Children's Social Care, or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the Police, have no power to direct the College to act in a particular way, however, the College should assist the agencies with their enquiries. The College shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation.

22.2 Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the Principal and Chief Executive (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal and Chief Executive (or designated person) is responsible for ensuring that the College gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

22.3 The Principal and Chief Executive (or designated person) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

22.4 Subject to objections from the police or other investigating agency, the Principal and Chief Executive (or their designated representative) shall:

- inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- inform the Chair of Governors and/or the designated governor of the allegation and the investigation.

22.5 The Principal and Chief Executive (or their designated representative) shall keep a written record of the action taken in connection with the allegation.

23 Suspension of Staff

23.1 Suspension should not be automatic. In respect of staff other than the Principal and Chief Executive, suspension can only be carried out by the Principal and Chief Executive. In respect of the Principal and Chief Executive, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Vice Chair).

23.2 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

22.3 Suspension should only occur for a good reason. For example:

- where a child/young person is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

22.4 If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

22.5 Prior to making the decision to suspend, the Principal and Chief Executive (or Chair/Vice Chair of Governors) should interview the member of staff. This should occur with the approval of the appropriate agency from the Local Safeguarding Children's Board. In particular, if the Police are engaged in an investigation, the officer in charge of the case should be consulted.

22.6 The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be represented by a Trade Union representative or workplace colleague. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

22.7 During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

22.8 If the Principal and Chief Executive (or Chair/Vice Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.

22.9 Where a member of staff is suspended, the Principal and Chief Executive (or Chair/Vice Chair of Governors) should address the following issues:

- the Chair of Governors should be informed of the suspension in writing.
- the Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the Governing Body should be minimal
- where the Principal and Chief Executive has been suspended, the Chair/Vice Chair of Governors will need to take action to address the management of the College
- the parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension
- senior staff who need to know of the reason for the suspension should be informed
- depending on the nature of the allegation, the Principal and Chief Executive should consider with the nominated Governor whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity
- the Principal and Chief Executive (or Chair /Vice Chair of Governors) shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The *LADO* and external investigating authorities should be consulted.
- the suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.
- the suspension should remain under review in accordance with the College disciplinary procedures.

24 The Disciplinary Investigation

24.1 The disciplinary investigation should be conducted in accordance with the College's existing staff disciplinary procedures.

24.2 The member of staff should be informed of:

- the disciplinary charge against him/her.
- his/her entitlement to be accompanied or represented by a trade union representative or friend.

24.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work.

24.4 The child/young person or children/young people making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

24.5 The Principal and Chief Executive (or designated person) should give consideration to what information should be made available to the general population of the College.

25 Allegations without foundation

25.1 False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Children's Social Care Department in order that other agencies may act upon the information.

25.2 In consultation with the Senior Lead Manager for Safeguarding and/or the designated Governor, the Principal and Chief Executive shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken.
- inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

26 Partnership Working with Parents/Carers

26.1 is our policy to work in partnership with parents/carers to secure the best outcomes for our children and young people. We will therefore communicate as clearly as possible about the aims of the College. We will

- use clear statements in our parent/carer guide and other correspondence.
- involve parents/carers and students in the review of key policies and procedures of
- liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families
- be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary.

27 Records

27.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform *the Disclosure and Barring Service*.

28 Monitoring Effectiveness

28.1 Where an allegation has been made against a member of staff, the nominated Governor, together with the Senior Lead for Safeguarding should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Children's Board. Consideration should also be given to the training needs of staff.

29 Recruitment and Selection Procedures

29.1 The College will have in place recruitment procedures which will ensure that every care is taken to ensure that children/young people are protected from unsuitable people. The recruitment procedures will apply to all staff and volunteers (*for volunteers where attendance is long term and unsupervised*) within the College who may work with children or young people. The recruitment procedures will include the following:

- the post or role will be clearly defined
- the key selection criteria for the post or role will be identified.
- the requirement to produce documentary evidence of academic/vocational qualifications.
- obtaining professional and character references
- verification of previous employment history
- DBS checks
- use of a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

29.2 Recruitment and Selection processes are designed to assist managers to recruit and select the best candidates for a vacancy. The College takes account of all relevant legislation.

In addition to the above, all staff will:

- complete Lewisham Southwark College application form
- be asked about significant gaps in their CV/application form

29.3 Where the candidate:

- has been disqualified from working with children, young people or 'adults at risk'
- has provided false information, on or in support of, his or her application
- is a cause for concern with regard to their suitability to work with children, young people or 'adults at risk'

The facts will be reported to the Disclosure and Barring Service

Approved by: Quality Recovery Board, November 2016

Publication date: November 2016

Next review date: November 2017