MORLEY COLLEGE LONDON

Safeguarding and Prevent Policy for Children and Vulnerable Adults

POLICY OWNER:	Designated Safeguarding Lead *(Vice-Principal Student Engagement)*
FINAL APPROVAL BY:	Governing Body

Policy Category:	Student
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Related documents and Morley College London policies

- [Keeping Children Safe in Education Statutory Guidance for Schools and Colleges 2015 (updated September 2022)](#) This document will form the basis of guidance and actions where not stipulated explicitly in the Morley College London Safeguarding and Prevent Policy for Children and Vulnerable Adults
- [Child Abuse Concerns: Advice for Practitioners](#) This document will form the basis of guidance and actions where not stipulated explicitly in the Morley College London Safeguarding and Prevent Policy for Children and Vulnerable Adults
- [Child Exploitation and Online Protection (CEOP)](#)
- [Working Together to Safeguard Children](#)
- [Children Act 1989](#)
- [Safeguarding Vulnerable Groups Act](#)
- [Prevent Duty Guidance for Further Education Institutions in England and Wales](#)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Statutory Guidance to help keep children and young people from missing education 2017 Education Act 2002 (section 175)](#)
- [2006 Female Genital Mutilation Act 2003](#)
- [Serious Crime Act 2015](#)
- [Borders, Citizenship and Immigration Act 2009 (section 55)](#)
- [United Nations Convention on the Rights of the Child (UNCRC)](#)
- [Local Safeguarding Children Partnership Thresholds of Need Guide (Hammersmith & Fulham, Kensington & Chelsea, Westminster)](#)
- [County Lines Drug Supply, Vulnerability and Harm 2018](#)
- [Morley College London Information Technology Systems Acceptable Use Policy](#)
- [Morley College London Student Harassment and Bullying Policy](#)
- Morley College London Staff Disciplinary Policy – [Senior Post Holders](#) and [Non Senior Post Holders](#)
- [Morley College London Social Media Policy](#)
- [Morley College London Educational Visits and Trips Policy](#)

Safeguarding and Prevent Policy for Children and Vulnerable Adults

1. Purpose

Morley College London is committed to safeguarding and promoting the welfare of staff, visitors and other stakeholders engaged in the breadth of its activities by ensuring that there are appropriate arrangements in place to enable it to provide a safe and secure environment for its students. Morley College London expects all staff, volunteers and partners including associated employers and work placement providers to endorse and demonstrate this commitment, at all times whether onsite or offsite.

The Governing Body takes seriously its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children and vulnerable adults and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children and vulnerable adults who are experiencing harm.

The Governing Body also takes seriously its responsibilities in relation to the Prevent Duty Guidance for Further Education Institutions. Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including schools and colleges, listed in Schedule 3 of the Act, to have "due regard to the need to prevent people from being drawn into terrorism" (Annex 4).

Any information processed by the College pursuant to this Policy will be processed in accordance with our Data Protection Policy. We recognise that this data is sensitive and will handle it in a confidential manner.

2. Objectives

Morley College London takes seriously its duty of pastoral care and will be proactive in seeking to prevent children and vulnerable adults becoming the victims of abuse or neglect. It will do this in a number of ways:

2.1. Create a culture of vigilance:

2.1.1. Working to protect children and vulnerable adults at risk from abuse;

2.1.2. Raising the profile of safeguarding with students and staff in all aspects of our work;

2.1.3. Recognising when there are risk factors and knowing how to respond to these;

2.1.4. Educating students on how to keep themselves and others safe and how to get help when they need it; and

2.1.5. Recognising the importance of wider environmental factors in a child or adult at risk's life that may be a threat to their safety or welfare (Contextual Safeguarding or Extra Familial Harm).

2.2. Work to prevent impairment to physical and mental health and development;

2.3. Ensure provision of safe and effective care;

2.4. Provide education through formal and informal processes, where children and vulnerable adults can learn to identify risk and know how to keep themselves safe;

2.5. Take action to enable all children and vulnerable adults to have the best outcome;

2.6. Safeguard and promote the welfare of all students, including learners on work experience placements;

2.7.   Where appropriate, refer children and vulnerable adults;

2.8.   Co-operate with investigating agencies;

2.9.   Support children in need and contribute toward the early help offer;

2.10. Record and report racist incidents;

2.11. Record and take action with allegations of sexual violence, abuse and harassment;

2.12. Promote safe recruitment practices;

2.13. Name a Designated Safeguarding Lead within the Senior Leadership Team;

2.14. Provide safeguarding training to all staff;

2.15. Offer a curriculum that promotes safeguarding/safety;

2.16. Share information with the key three agencies, Health, Police and Social Services;

2.17. Support students with medical conditions;

2.18. Meet the needs of students with special educational needs and/or disabilities;

2.19. Recognise that children are capable of abusing their peers (Child on Child Abuse);

2.20. Take the wishes and feelings of children into account;

2.21. Respond promptly to instances where children go missing;

2.22. Evidence compliance to the local Safeguarding Children Partnership;

2.23. Appoint a designated person to promote the achievement of students who have been or are care experienced; and

2.24. Take appropriate action, including referrals, to see that such students are kept safe, both at home and at College.

This policy covers the college's statutory responsibilities relating to child protection, safeguarding children and vulnerable adults and duties under the Prevent duty.

3.   Definitions

The Children's Act and the UN Convention on the Rights of the Child define a "child" as a person under the age of 18.

The Care Act 2014 defines adults at risk[1] as:

- Someone aged 18 or above who has a need for care and support
- Someone who is experiencing or is at risk of abuse.

- Someone who as a result of their needs is unable to protect themselves

The Department of Health defines a vulnerable adult as someone aged 18 or above needs community care services for reasons including mental health issues, disability, age or illness. These adults are considered more vulnerable because they may not be able to protect themselves from harm or exploitation.

The College policy applies to all children under 18 or any vulnerable adult aged 18 or above.

The College recognises the definitions of abuse, sexual harassment and other related terms as detailed in Annex 8 and 9.

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[1] At time of writing the sector is shifting from the term *vulnerable adult* to *adults at risk*, to direct focus onto the situation causing the risk rather than the characteristics of the adult concerned. This policy uses *vulnerable adult* in alignment with the current terminology used in KCSE September 2022.

4.   Responsibilities

The Governing Body will approve and regularly review the Safeguarding and Prevent Policy for Children and Vulnerable Adults and will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole College approach to safeguarding. Training will be updated and delivered annually.

Whilst considering their responsibility to safeguard and promote the welfare of children and vulnerable adults and provide them with a safe environment in which to learn, the Governing Body will do all that it reasonably can to limit their exposure to the risks from the College's IT system. As part of this process, the Governing Body will ensure the college has appropriate filtering and monitoring systems in place and will regularly review their effectiveness. The will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Governing Body will consider the age range of Morley College London students, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

The Governing Body will ensure that Morley College London fulfils its legal duties and responsibilities. These include, for example, those under the Equality Act 2010, and those in relation to the 'Prevent' strategy and safeguarding.

They will ensure that the College has an effective culture of safeguarding that enables staff to: identify, help and protect learners who may need early help or who are at risk of neglect, abuse, grooming, exploitation, radicalisation or extremism; help learners to reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help; and manage safe recruitment and allegations about adults and learners who maybe a risk to other learners and vulnerable adults.

Designated Governor with responsibility for Safeguarding

The Designated Governor will be responsible for liaising with the Principal and Designated Safeguarding Lead (DSL) to ensure that:

- The College's Policy meets Local Safeguarding Children's Board requirements (Royal Borough of Kensington and Chelsea And Westminster)
- The policy is subject to annual review by the Governing Body
- The Governing Body is informed of how the College and its staff have complied with the policy (including training undertaken)

The Designated Governor will also be responsible for overseeing liaison with appropriate agencies in connection with allegations against the Principal. This will not involve undertaking a formal investigation but will ensure communication between parties and provide information to assist enquiries.

To assist the Designated Governor to fulfil these duties he/she shall receive appropriate training.

Designated Safeguarding Lead (DSL)

The DSL) is responsible for safeguarding, child protection and Prevent within Morley College London. They will:

- Take the lead responsibility for safeguarding and child protection (including online safety). This will be explicit in the role holder's job description

- Have the appropriate status, authority and availability within the college to carry out the duties of the post (they will be given additional time, funding, training, resources and support they need to carry out the role effectively)

- Ensure they:
    - Manage referrals
    - Work with others
    - Information share and manage the child protection file
    - Raise awareness
    - Have the training, knowledge and skills
    - Provide support to staff
    - Understand views of children
    - Hold and share information

- The College also has two Deputy Designated Safeguarding Leads who are trained to the same standard as the DSL and the role is explicit in their job description

- Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated

Senior Person with responsibility for Staff

The Chief People Officer will:

- Ensure that the recruitment of staff (permanent and temporary) and use of volunteers meets safer recruitment guidelines, including the use of the Disclosure and Barring Service (DBS)

- Work in collaboration with the DSL to ensure that all staff and volunteers receive training and regular updates on recognising, responding and reporting concerns

- Ensure that new staff and volunteers receive training as part of a wider induction on safeguarding procedures within the college and have access to this policy document

- Ensure the mechanisms exist to ensure that the use of temporary and agency staffing comply with the colleges safeguarding responsibilities and procedures

Safeguarding and Wellbeing Manager

The Safeguarding and Wellbeing Manager will:

- Ensure that applicants with a disclosed criminal conviction are appropriately and robustly assessed by investigating disclosures and assessing associated risks to both self and others based on their application to study

- Ensure a safe online environment by filtering and monitoring activity using appropriate software and investigating any online incident reporting logs

- Provide advice, supporting and training to staff and students

- Ensure that all safeguarding concerns are recorded accurately and securely in line with data protection regulations
- Liaise with the LSCB's and ASB's as appropriate (Kensington and Chelsea and Westminster, and Lambeth)

Members of the Safeguarding Team

They have responsibility for:

- Providing frontline contact for the reporting of safeguarding concerns
- Referring cases of suspected abuse, allegations of abuse or incidents of harm to the relevant agencies
- Maintaining accurate records of any safeguarding referral, complaint or concern (even when that concern does not lead to a referral) in line with data protection regulations
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Keeping the Wellbeing and Safeguarding Manager with responsibility for Safeguarding within the College informed about all cases of suspected abuse, allegations of abuse or incidents of harm

All Staff

All Morley College London staff have a responsibility to contact the Safeguarding Team via the College internal channels if they have a concern relating to a student at risk of or experiencing abuse or radicalisation (Annex 1).

All staff have a duty to ensure they participate in and complete regular safeguarding training and updates and must be aware of their roles and responsibilities in preventing violent and non-violent extremism.

Morley College London recognises that positive professional relationships with students will support the best outcomes and that appropriate professional boundaries safeguard students and safeguard staff from unfounded allegations. It is the prime duty of the college to provide a safe and secure learning environment and protect the welfare of its students and staff. It is essential that staff consider their conduct relating to communication with students both face-to-face and electronically.

The college does not endorse connecting with students via personal social media accounts, including accepting friend / follow / connection requests via such platforms. Where curriculum or course related accounts or online spaces are used to communicate with learners the colleges Information Technology Systems Acceptable Use Policy and Social Media Policy should be adhered to.

There are a number of considerations which staff and learners should take into account when engaging in remote or online working and teaching. Support and detailed considerations can be found in Annex 6.

The College does not expect staff to transport individual students. The college does not provide college transport. If student transport is required a taxi should be used and charged to the college account. Ideally there should be a male and female member of staff

accompanying a student. Where students are required to use transport for a college trip or visit a risk assessment will be carried out.

Staff with responsibilities for trips and work placements/work experience

Staff who organise student trips or student work placements/work experience must ensure that a full risk assessment is completed (see Annex 11) and for residential trips the Check List for Residential Trips is completed (Annex 12). In addition, the trip or work placement/work experience organiser should confirm who the identified person is who can be contacted out of normal college hours. Normally this role is assumed by the Centre Principal or their designated nominee.

Assurances

A number of assurances exist to ensure that staff, students, visitors and other stakeholders are aware of our duties and expectations in relation to safeguarding and prevent.

Assurances include:

- Safeguarding Team with responsibility for safeguarding are easily identifiable wearing a purple 'Safeguarding Team' lanyard
- All visitors and contractors sign in at reception and are issued with a visitor badge/lanyard which has safeguarding contacts details on the reverse which must be worn at all times whilst on the premises
- Safeguarding message and email on back of student cards
- Key reporting messages posted on electronic screens across college campuses
- Safeguarding posters at each centre
- Anonymous reporting form posters and prominent link on MyDay
- Mandatory online safeguarding training delivered live
- Online safeguarding training module for all staff
- Referral form on MyMorley Safeguarding Hub

5. Monitoring and Review

Safeguarding is not graded specifically in the Ofsted Education Inspection Framework, but it remains a limiting factor for inspection and will be referenced in the Leadership and Management section of an inspection report. A judgement will be made on whether arrangements for safeguarding learners are effective.

For all inspections, inspectors will be looking for evidence that 'the provider has a culture of safeguarding that supports effective arrangements to identify learners who may be at risk; which responds in a timely way; and that staff recruitment is managed and any allegations are dealt with appropriately.

The Governing Body must ensure that there is liaison with the Chief Executive and Designated Safeguarding Lead and Senior DSLs over matters regarding Safeguarding Children and Vulnerable Adults, including:

- Ensuring that the College has procedures and policies which are consistent with the local boroughs procedures (Royal Borough of Kensington and Chelsea, and Lambeth);

- Ensuring that the Board considers the College policy on Safeguarding and Prevent Policy for Children and Vulnerable Adults annually; and ensuring that each year the Board 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.

The Board also commits to review the implementation of safeguarding across all centres, along with their own obligations and awareness of current issues, including the identification of any further training for Governors as required, on an annual basis.

ANNEX 1: Safeguarding Reporting Procedure

If a child or adult at risk tells a member of staff about possible abuse:

1. Inform the person that you must pass the information on, but that only those that need to know about it will be told. Inform them who you will report the matter to the College's Safeguarding Team.

2. Listen to the person, do not directly question him or her;

3. Never stop a person who is freely recalling significant events;

4. Make a detailed factual note of the discussion, taking care to record when and where it happened and who was present, as well as what the person said;

5. Note facts, using the words of the person disclosing. Do not ask leading questions.

6. The member of college staff who is the first person to receive a report or see an injury should make detailed notes of what is seen or heard of the disclosure;

7. **Immediately contact** the Safeguarding Team to inform them of the disclosure – don't tell other staff or students what you have been told. You must do this via the referral form or email safeguarding@morleycollege.ac.uk

8. Contact with those having parental responsibility for the child or adult at risk involved should not be undertaken by the first person. Contact a DSL for advice and support and if appropriate it will be the DSL who contacts family members.

9. It may be necessary in exceptional circumstances for the child or adult at risk to be seen initially by the DSL on the College premises without the prior knowledge of those having parental responsibility for the child or adult at risk. If such an interview is necessary, then the DSL should be available to attend, particularly if this is requested by the child or adult at risk;

10. If any allegation is made regarding a member of staff, this must be referred immediately to the DSL. The allegation must not be discussed with any other member of staff or student.

11. Never think abuse is impossible at Morley College London, or assume that an accusation against someone you know well and trust is untrue.

12. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people. Social Services and Police staff are the people trained to do this. You could cause more damage and spoil possible criminal proceedings. Any information you have recorded from the disclosure should be reported to the Safeguarding Team (as above).

ANNEX 2: Contacting the College Safeguarding Team and Structure

To make a safeguarding referral you must use the safeguarding referral form. This is at https://forms.office.com/r/75ePcy90j4

If it is not possible to use the referral form then you should email safeguarding@morleycollege.ac.uk

The referral form will go straight to the Safeguarding Team inbox which is monitored

Monday – Friday 9am – 5pm

throughout the year, including holiday periods,

but excluding bank holidays and Christmas closure

If you have any general questions you can contact the Safeguarding Team on safeguarding@morleycollege.ac.uk or speak to them in person. Anyone trained in safeguarding will be wearing a purple lanyard.

Cross-College Lead Safeguarding Team

Role	Name	Job Title
Designated Safeguarding Lead	Craig Hanlon-Smith	Vice Principal (Student Engagement)
Deputy Safeguarding Lead (Students)	Vusa Nkomo	Head of Student Services
Deputy Safeguarding Lead (Students)	Ayo Olaniyan	Safeguarding and Wellbeing Manager
Deputy Safeguarding Lead (Staff)	Alison McNamara	Chief People Officer
Deputy Safeguarding Lead (North Kensington Centre)	Craig Hanlon-Smith	Centre Principal
Deputy Safeguarding Lead (Waterloo Centre)	Bushra Iqbal	Centre Principal
Deputy Safeguarding Lead (Chelsea Centre)	Matias Shortcook	Centre Principal
Safeguarding Governor	Justine Brian	Independent Governor

North Kensington Safeguarding Team

Role	Name	Job Title
Designated Safeguarding Lead	Craig Hanlon-Smith	Centre Principal
Deputy Safeguarding Lead (Students)	Vusa Nkomo	Head of Student Services
Deputy Safeguarding Lead (Students)	Ayo Olaniyan	Safeguarding and Wellbeing Manager
Safeguarding Officer	Nigel Garrigan	Director of Facilities and Estates
Safeguarding Officer	Emily Muntz	Mental Health and Wellbeing Coordinator
Safeguarding Officer	Edozie Ameke	Learning Support Coordinator
Safeguarding Officer	Christy Andrew	Student Experience Officer

Chelsea Safeguarding Team

Role	Name	Job Title
Deputy Safeguarding Lead	Matias Shortcook	Centre Principal
Deputy Safeguarding Lead (Students)	Vusa Nkomo	Head of Student Services
Deputy Safeguarding Lead (Students)	Ayo Olaniyan	Safeguarding and Wellbeing Manager
Safeguarding Officer	Nigel Garrigan	Director of Facilities and Estates
Safeguarding Officer	Katia Cardoso	Mental Health and Wellbeing Officer
Safeguarding Officer	Zena Naidu	Student Progress Advisor
Safeguarding Officer	Edozie Ameke	Learning Support Coordinator

Waterloo Safeguarding Team

Role	Name	Job Title
Deputy Safeguarding Lead	Bushra Iqbal	Centre Principal
Deputy Safeguarding Lead (Students)	Vusa Nkomo	Head of Student Services
Deputy Safeguarding Lead (Students)	Ayo Olaniyan	Safeguarding and Wellbeing Manager
Safeguarding Officer	Emily Muntz	Mental Health and Wellbeing Coordinator
Safeguarding Officer	Sam Waterman	Additional Learning Support Manager
Safeguarding Officer	Janice Ehtash	Crèche Manager

ANNEX 3: Process for Responding Reports of Sexual Violence or Sexual Harassment

It is important to note that students may not find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of Morley staff may overhear a conversation that suggests a student has been harmed or a student's own behaviour might indicate that something is wrong. If staff have any concerns about a student's welfare, they should act on them immediately rather than wait to be told. Immediate consideration should be given as to how best to support the victim and the alleged perpetrator (s) (and any other children involved/impacted).

1. Responding to reports if sexual violence and sexual

1.1 Upon receipt of a disclosure or concern it is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

- When dealing with cases of sexual harassment it is important that two staff members deal with the case one of them being the DSL or deputy DSL. A key consideration is for staff not to view or forward illegal images of a child. It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

- Staff should not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.

- The College is aware that a student is likely to disclose to someone they trust: this could be anyone on the college staff. It is important that the person to whom the student discloses recognises that the student has placed them in a position of trust. They should be supportive and respectful of the child.

- Staff should be aware that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so students may not be able to recall all details or timeline of abuse.

- Staff will keep in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

- Staff will listen carefully to the student, reflecting back, using the student's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the young person where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask students if they have been harmed and what the nature of that harm was.

- Staff will consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the students and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the student and not appear distracted by the note taking. Either way, it is essential a written record is made.

- Staff should only record the facts as the student presents them. The notes should not reflect the personal opinion of the note taker. The College is aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.

- Staff should inform the DSL (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report. This is in addition to completing the safeguarding referral form.

1.2 Risk Assessment

1.2.1 Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other students, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

1.2.2 The risk assessment should be recorded using MyConcern.

1.2.3 The DSL (or a deputy) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the college's approach to supporting and protecting our students and updating the College's own risk assessment.

1.2.4 The College will ensure that they avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups. There may be times when the victim finds it difficult to maintain a full time timetable and may express a wish to withdraw from lessons and activities. This should be because the victims wants to, not because it makes it easier to manage the situation. Due regard will be given to the above by the college whilst ensuring this does not have a detrimental impact on the student's learning.

2. Action Following a Report of Sexual Violence and/or Sexual Harassment

2.1 The College recognises that sexual abuse can happen anywhere, and all staff working with students are advised to maintain an attitude of 'it could happen here'. The College will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the college's initial response. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the college's duty and responsibilities to protect other students.

- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.

- The ages of those involved.

- The developmental stages of those involved.

- Any power imbalance, for example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).

- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.

- Are there ongoing risks to the victim, other students, or college staff?

- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

2.2 All staff will act in the best interests of the student. In all cases, the college will follow general safeguarding principles as set out in Keeping Children Safe in Education. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other students involved/impacted)

2.3 The starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

2.4 <u>Students Sharing a Classroom – Initial Considerations</u>

2.4.1 Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual

harassment. Nor should a victim ever be made to feel ashamed for making a report. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing.

2.4.2 Whilst the college establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The college will also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on college premises (including during any before or after school-based activities) and on transport to and from the college, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt or innocence of the alleged perpetrator(s).

2.4.3 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing college premises should be considered immediately. In all cases, the initial report will be carefully evaluated, reflecting the considerations set out above. The wishes of the victim, the nature of the allegations and the protection of all students in the college will be especially important when considering any immediate actions.

3. Options to Manage the Report

3.1 The College will consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the college will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the college taking immediate action to safeguard students, where required.

3.2 There are four likely scenarios for the college to consider when managing any reports of sexual violence and/or sexual harassment. In all scenarios decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learned. The college will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the college will decide on a course of action. Consideration will be given to whether there are wider cultural issues within the college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

1) Manage Internally

- In some cases of sexual harassment, for example, one-off incidents, the college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

- Whatever the response, it will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2) Early Help

- In line with 1 above, the college may decide that the student involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a student's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support.

- Multi-agency early help will work best when placed alongside the college policy, preventative education and engagement with parents and carers.

- Early help and the option to manage a report internally do not need to be mutually exclusive: the College could manage internally and seek early help for both the victim and perpetrator(s).

- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

3) Referral to Children's Social Care

- Where a student has been harmed, is at risk of harm, or is in immediate danger, the college should make a referral to local children's social care.

- At the point of referral to children's social care, the college will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

- Where statutory assessments are appropriate, the college (especially the designated safeguarding lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other students that require support.

- The colleges will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other students in the college. The designated safeguarding lead (or a deputy) will work closely with children's social care (and other agencies as required) to ensure any

actions the college takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all students at the college should be immediate.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The college (generally led by the designated safeguarding lead or a deputy) will be prepared to refer again if they believe the student remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

4) Reporting to the Police

- Any report to the police will generally be in parallel with a referral to children's social care (as above).

- The designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

When to call the police:

- Where a report has been made to the police, the college will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

- At this stage, the college will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a young person at additional risk. In circumstances where parents or carers have not been informed, the college will support the child in any decision they take. This will be with the support of children's social care and any appropriate specialist agencies.

- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. The designated safeguarding lead (and their deputies) are aware of these local arrangements.

- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, the college will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

- Whilst protecting young people and/or taking any disciplinary measures against the alleged perpetrator(s), the designated safeguarding lead (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions the college take do not jeopardise the police investigation.

- If the college has any questions about the investigation, they will ask the police. The police will help and support the college as much as they can (within the constraints of any legal restrictions).

- Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

3.3 Considering Bail Conditions

3.3.1 The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.

3.3.2 Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

3.3.3 Whatever arrangements are in place, the college will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

3.3.4 Particular regard will be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an un-convicted person (e.g. rights to privacy, family life, etc.).

3.3.5 Careful liaison with the police investigators should help to develop a balanced set of arrangements.

3.4 Managing Any Delays Within the Criminal Process

3.4.1 There may be delays in any case that is being progressed through the criminal justice system. The college should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other students in the college.

3.5 The End of the Criminal Process

3.5.1 If a student is convicted or receives a caution for a sexual offence, the college will update its risk assessment, ensure relevant protections are in place for all the children at the college and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the college as the victim, the college will be very clear as to their expectations regarding the perpetrator(s) now they have been

convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

3.5.2 Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the college. It will be important that the college ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

3.5.3 Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the college will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. The College will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

3.6 Unsubstantiated, unfounded, false or malicious reports

3.6.1 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. All information should be recorded on MyConcern.

3.6.2 If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

4. Ongoing response – Safeguarding and Supporting the Victim

4.1 The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the college is a safe space for them.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College is aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

- The College is aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

4.2 Support can include:

- Early help and children's social care

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or the college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.

- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers

- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.

- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.

- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.

- Childline provides free and confidential advice for children and young people.

- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

- Childline / IWF: is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

4.3   Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the College will ask the victim if they would find it helpful to have a designated trusted adult (for example, their progress tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). The College will respect and support this choice.

4.4   A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. The College will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the College will should provide a physical space for victims to withdraw.

4.5   It may be necessary for the College to maintain arrangements to protect and support the victim for a long time. The College is prepared for this and will work with children's social care and other agencies as required.

4.6   The College will do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

4.7   Whilst they should be given all the necessary support to remain in the College, if the trauma results in the victim being unable to do this, alternative provision or a move to another College will be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

4.8   It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

5.   **Ongoing Response - Safeguarding and Supporting the Alleged Perpetrator and Children and Young People who have Displayed Harmful Sexual Behaviour**

5.1   Advice about safeguarding and supporting the alleged perpetrators is set out in departmental advice found here: [Keeping children safe in education 2022 (publishing.service.gov.uk)](publishing.service.gov.uk) (Annex B)

5.2   Points to consider:

   • The age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any student will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

   • Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be

(and often is) a symptom of either their own abuse or exposure to abusive practices and or materials.

- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

If the allegation of sexual assault, in any form, is, in itself, made maliciously then the alleged perpetrator becomes the victim of abuse and should be treated accordingly, within the appropriate sections of this Policy.

ANNEX 4: Awareness of the Prevent strategy

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including schools and colleges, listed in Schedule 3 of the Act, to have "due regard to the need to prevent people from being drawn into terrorism". Therefore Morley College London seeks to protect its students against the messages of violent extremism including, but not restricted to, those linked to Islamic ideology, far right and extremist animal rights movements.

The statutory Prevent Duty Guidance for Further Education Institutions (Updated April 2021) summarises the requirements for colleges as:

1. Colleges are expected to assess the risk of children or vulnerable adults being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.

2. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnerships.

3. The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

4. Colleges must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty which can be found at: [Prevent Duty Guidance for Further Education Institutions in England and Wales](#)

1. Leadership will:

1.1. Establish or use existing mechanisms (e.g. staff training, student workshops, tutorials, etc.) to promote the understanding the risk of radicalisation;

1.2. Ensure staff understand the risk and build the capabilities to deal with it;

1.3. Communicate and promote the importance of the duty;

1.4. Write and regularly update a Prevent Action Plan which includes information on local intelligence which is regularly updated and monitored. In line with Ofsted recommendations the college's PRMAP includes:

- Staff and student awareness of procedures and training
- Compliance - Ensure staff implement the duty effectively
- Links with Fundamental British Values
- Use of college IT facilities

- Links with DfE Prevent Officer, local police officers (e.g. SO15 Local Operations) and LA Prevent Officers (Kensington and Chelsea and Hammersmith and Fulham, and Lambeth)
- Regularly updated with local intelligence information

2. Equality

2.1. This duty will complement the institution's responsibility under the Equality Act 2010 and cover student welfare, including equality and diversity, the safety of students and staff and ensure there is awareness of the risks of being drawn into terrorism through Prevent awareness training.

3. Staff

3.1. All staff must have an understanding of the factors that make people vulnerable to being drawn into terrorism and challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism. Staff must have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.

3.2 There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism or radicalisation. HM Government 'Channel' guidance indicates factors which may have a bearing on someone becoming vulnerable can include:

- Peer pressure.
- Influence from other people or via the internet.
- Bullying.
- Crime against the individual or their involvement in crime.
- Anti-social behaviour.
- Family tensions.
- Race / hate crime.
- Lack of self-esteem or identity.
- Personal or political grievances

Potential Indicators of engagement with an extremist group, cause or ideology are:

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becoming increasingly centred on 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

ANNEX 5: Online safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College makes every effort to ensure that access to inappropriate material and websites on the internet via the College's IT network is discouraged and, where possible, blocked.

There is an Information Technology Systems Acceptable Use Policy which covers access to the College network and the internet and a Social Media Policy.

The College will ensure appropriate filters and monitoring systems are in place to protect students from harmful online material, and the College is committed to educating students in the safe use of online resources (whether in College or outside) through its tutorial programme. Computer activity within the College is monitored at all times and improper use will result in disciplinary action for both staff and students.

The expectations of the college regarding the use of personal mobile phones (where not connected to College IT Systems), are included in the Student Handbook and Code of Conduct.   Our IT Business Continuity processes and data retention policies, provide safeguards against the impact from ransomware. Multi-Factor Authentication is mandated for all staff user accounts, to reduce exposure to hacking.

ANNEX 6: Remote / Online Working, Teaching and Learning

We know that remote and online connectivity is essential in delivering a responsive and agile organisation. We have a responsibility to ensure that all staff and learners are able to access and utilise online opportunities safely.

The parameters and guidance outlined is designed to ensure that everyone can benefit from digital tools and online capabilities, designed to enhance working, engagement and connectivity.

Live Video Calling and Conferencing

- Ensure your work area is clear, well-lit and check your surroundings / backdrop
- Ensure that you are wearing appropriate clothing
- Ensure that others within your location or household are aware that you are on video
- Do not record or photograph a session without knowledge and permission from everyone involved in the session or call
- Do not distribute or share any recordings, photos or screenshots without the knowing and approval of all participants. Failure to do so contravenes legislation governing individual privacy and consent
- Consider whether the audio only option would meet the requirements of the communication, in which case, participants can disable the video functionality

If you have a concern about any action or incident during a video call, you should terminate it and report the facts immediately to a member of the safeguarding team (page 17 of Morley College Safeguarding policy).

Online Platforms

Staff must only communicate with learners via college approved platforms and only for purposes associated with official college business.

Staff must not use personal accounts to connect or communicate with learners (see section 5 of the Morley College Safeguarding policy).

Platforms including (although not exhaustive) including WhatsApp, FaceTime, Houseparty, Facebook or Facebook Messenger must not be used to communicate or connect with learners.

Why?

- To maintain professional boundaries and to reduce any unintended risk.
- Other platforms are not monitored by college online safety software.
- User terms associated with data usage and rights cannot be controlled as personal and enterprise/business licences and terms or use are different
- Free platforms including YouTube and Facebook Live do not allow users to restrict audiences

Staff / Learner Meetings Online

A 1:1 online video meeting between a member of staff and a learner should be avoided. Where circumstances mean that this would be challenging (e.g. assessment), a second member of staff should be present on the call or preferably, the call should be recorded via the feature within Google Meet. Permission should be sought from the learner prior to recording.

Consider whether video is required for the purpose of the communication – could the audio only function have the desired outputs.

Contacting Learners at Home / Remotely

Learners can be contacted via the following methods, and staff must only use their Morley College London user account:

- Microsoft Teams
- Email (from a morleycollege.ac.uk domain account)
- SMS via Columbus/Etrackr
- eILP and comment functions via Etrackr
- Telephone only via the Cisco software when logged in via remote or from a college mobile

Online Bullying and Harassment

See Morley College London's Anti-Harassment & Bullying Policy.

Useful Guidance and Resources

[NSPCC: Undertaking remote working safely](#)

[NSPCC: eSafety (including livestreaming and social media)](#)

[NSPCC: Internet Connected Devices (e.g Google Home or Amazon Alexa)](#)

ANNEX 7: Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to supply staff, contractors and volunteers. The word "staff" is used for ease of description.

1.   Introduction

1.1.   The College accepts that there is a risk in all educational institutions that a member of staff may seek to cause harm to children or vulnerable adults within their institution. Moreover, due to their frequent contact with children and vulnerable adults, staff may have allegations of child abuse made against them. 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. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

1.2.   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, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

2.   Receiving an Allegation from a Child or Vulnerable Adult

2.1.   A member of staff who receives an allegation about another member of staff from a child or vulnerable adult, or who has concerns regarding the behaviour or attitudes of another member of staff - either from direct experience or from reports by a colleague or learner(s) - should follow the guidelines set out hereafter for dealing with disclosure.

2.2   Low Level Concerns are dealt with separately – see Annex 8.

2.3.   In accordance with updates to Keeping Children Safe in Education in Sept 2022, any allegation or concern regarding a member of staff should be reported immediately to the Chief Executive and DSL, or if the Chief Executive and DSL is not available, to one of the Deputy DSL's who will then act to deal with any immediate risk and report the allegation or concern to the Chief Executive and DSL at the earliest opportunity. At the Chief Executive and DSL's discretion, a Deputy DSL and/or the Head of People Operations may be delegated to investigate and address any concerns. Should the allegation be against the Chief Executive and DSL or Deputy DSL it should be reported directly to the designated link Governor for Safeguarding. In all other cases, the Chief Executive and DSL or Deputy DSL should:

2.3.1.   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 Chief Executive and DSL or Deputy DSL; and

2.3.2.   Record information about times, dates, locations and names of potential witnesses.

3. Initial Assessment by the Chief Executive and DSL (or designated person)

The Chief Executive and DSL should make an initial assessment of the allegation, consulting with a Deputy DSL, the designated Governor and the Local Authority Designated Officer (LADO) prior to any investigation.

3.1. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LADO.

3.2. It is important that the Chief Executive and DSL do not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision solely on whether, or not, the allegation warrants further investigation or disciplinary action.

4. Enquiries and Investigations

4.1. Child protection enquiries by Social Services 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.

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

4.3. If there is an investigation by an external agency, for example the Police, the Chief Executive and DSL (or Deputy DSL by delegated authority) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Chief Executive and DSL are responsible for ensuring that the College gives every assistance with the agency's enquiries. They 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. The Chief Executive and DSL (or Head of People Operations by delegated authority) shall advise the member of staff that he/she should consult with any external representative, for example, a trade union.

4.4. The Chief Executive and DSL (or Deputy DSL) will consult with the Police or other investigating agency (e.g. Social Services) particularly in relation to timing and content of the information provided and shall:

4.4.1. Inform the learner or parent/carer/guardian making any allegation that the investigation is taking place and what the likely process will involve;

4.4.2. Ensure that the parents/carers/guardians of the any learner under the age of 18 or vulnerable adult making any allegation have been informed that the allegation has been made and what the likely process will involve;

4.4.3. 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; and

4.4.4. Inform the Chair of the Corporation (and/or designated Governor) of the allegation and the investigation.

4.5. The Chief Executive and DSL (or Deputy DSL) shall keep a written record of the action taken in connection with the allegation.

4.6. In the event of an allegation or concern that has already had an impact on one or more students, the Deputy DSL will coordinate with the safeguarding team to ensure appropriate support is offered to any affected individuals, including external support if required.

5. Suspension of Staff

5.1. Suspension should not be automatic, but reasonable precaution should be employed in each case to ensure the safety of learners primarily, and of the member(s) of staff involved. In respect of staff other than the Chief Executive and DSL, suspension can only be carried out by the Chief Executive and DSL (or by the Head of People Operations by delegated authority). In respect of the Chief Executive and DSL, by the Board of Governors.

5.2. Suspension may be considered at any stage of the allegation. 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.

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

5.3.1. Where a child is at risk; and/or

5.3.2. Where the allegations are, potentially, sufficiently serious to justify dismissal on the grounds of gross misconduct;

5.4. Where necessary for the good and efficient conduct of the investigation.

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

5.6. If the Chief Executive and DSL (or Chair, Vice Chair, of Governors) considers that suspension is necessary, the member of staff (other than a Senior Postholder) 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.

5.7. Where a member of staff (other than a Senior Postholder) is suspended, the Chief Executive and DSL (or Chair, or Vice Chair of Governors) should address the following issues:

5.7.1. The Chair of Governors should be informed of the suspension in writing;

5.7.2. The Chair should consider providing the Board of Governors with a report that a member of staff has been suspended pending investigation; the detail given to the Board of Governors should be minimal;

5.7.3. The senior staff who need to know of the reason for the suspension should be informed, but strict confidentiality should be observed, particularly in cases of criminal investigation to minimise the risk of jeopardising any police investigation; and

5.7.4. Depending on the nature of and reasons for suspension, the Chief Executive and DSL should consider with the nominated Governor, whether a statement to the students of the College and/or parents/carers/guardians should be made, taking due regard of the need to avoid unwelcome publicity.

5.8. 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. In the case of a criminal investigation, the Police would be responsible for providing updates.

5.9. The suspension should remain under review, in accordance with the College's disciplinary procedures.

6.   The Disciplinary Investigation

6.1.   The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

6.2.   Where the member of staff has been suspended but 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. It may be appropriate to offer counselling or further support.

6.3.   The child or children or vulnerable adult making the allegation and/or their parents/carers/guardians 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).

7.   Allegations without foundation

7.1.   False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the local Social Services or agency as determined by local arrangements in order that other agencies may act upon the information.

7.2.   In consultation with the Deputy DSL's, Head of People Operations, and/or designated Governor, the Chief Executive and DSL shall:

7.2.1.   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. Consideration should be given to offering counselling/support to that member of staff;

7.2.2.   Inform the parents/carers/guardians of the alleged victim that the allegation has been made and of the outcome;

7.2.3.   Where the allegation was made by a child or adult at risk other than the alleged victim, consideration to be given to informing the parents/carers of that child or vulnerable adult; and

7.2.4.   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.

8.   Records

8.1.   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. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained for ten years.

8.2.   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 LADO

ANNEX 8: Low Level Concerns

1. Introduction

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. This behaviour may be deemed as a Low Level Concern. A member of staff who has a concern about another member of staff should inform the DSL about their concern using a Low-Level Record of Concern Form. If the DSL cannot be contacted or the concern relates to the DSL, the CEO should be contacted instead. If the concern relates to the CEO the Chair of Governors will be contacted.

This policy ensures that low level concerns are dealt with effectively and will also protect those working in the college from becoming the subject of potential false low-level concerns or misunderstandings.

2. Keeping Children Safe in Education September 2022

The following is taken from Keeping Children Safe in Education September 2022:

423. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

424. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- *Encourage an open and transparent culture*
- *Enable schools and colleges to identify inappropriate, problematic or concerning behaviour early*
- *Minimise the risk of abuse, and*
- *Ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

What is a low level concern?

425. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- *Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and*
- *Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO*

Examples of such behaviour could include, but are not limited to:

- *Being over friendly with children*
- *Having favourites*
- *Taking photographs of children on their mobile phone, contrary to school policy*
- *Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or*
- *Humiliating pupils*

426. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

427. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

428. It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

3.   Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegations that may meet the harm threshold
- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

Appropriate Conduct
Behaviour which is entirely consistent with Morley College's Code of Conduct and the law

4.   Purpose of Low Level Concerns Policy
To ensure that this policy is effective the College will:
- Ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- Empower staff to share any low-level safeguarding concerns (see below)
- Address unprofessional behaviour and supporting the individual to correct it at an early stage
- Handle and respond to such concerns sensitively and proportionately when they are raised, and
- Help identify any weakness in the colleges safeguarding system

5.   Sharing Low-Level Concerns

5.1.   All low level concerns should be reported to the DSL, who will inform the Chief Executive in a timely manner according to the nature of each particular low-level concern. The Chief Executive will be the ultimate decision maker in respect of all low-level concerns. The Chief Executive may consult with the DSL and take a collaborative decision making approach.

5.2.   Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

5.3   If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the LADO will be consulted.

5.4.   The College will create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

6.   Recording Low Level Concerns

6.1.   All low-level concerns will be recorded in writing. The record of the concern will include:

- Details of the concern
- The context in which the concern arose
- Action taken

The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

6.2.   The DSL will keep low level concern information on a password protected file. All information will be kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

6.3.   Records will be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the college will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (see per Part four, Section one KCSIE 2022). Consideration will be given to whether there are wider cultural issues within college that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again.

6.4.   Low Level Concern information will be kept for at least the duration that the individual is in employment with the College.

7.   References

7.1.   The college will only provide substantiated safeguarding concerns/allegations that meet the harm threshold in references. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates

exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

7.2. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

8.   Responding to Low Level Concerns

8.1. If a concern has been raised via a third party, the DSL will collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously, and
- To the individual involved and any witnesses

8.2. The information collected will help the DSL to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for the decisions and action taken.

ANNEX 9: Definitions and Categories of Abuse

9.1   Definition of abuse updated in KCSiE, September 2022, to reflect updated departmental guidance. '**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children'.

9.2   **All staff** should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific Safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always refer to the Safeguarding team any concerns.

9.3   **All staff** should be aware that abuse, neglect and Safeguarding issues are rarely stand-alone events and cannot be covered by one definition of one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the Safeguarding team.

9.4   **All staff** should be aware of how Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should be clear as to the College procedure with regards to child-on-child abuse. All concerns of this nature should be reported to the Safeguarding team.

9.5   **All staff** should be aware that technology is a significant component in many Safeguarding and well-being issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online; this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, specifically around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the Safeguarding team.

Child on Child Abuse (Called Peer on Peer if involves two adults)	All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.
	All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).
	It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios

a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- upskirting,12 which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
Child Criminal Exploitation (CCE)	Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As

| | children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Potential signs and symptoms
- Students who appear with unexplained gifts or new possessions.
- Students who associate with other young people involved in exploitation.
- Students who suffer from changes in emotional well-being.
- Students who misuse drugs and alcohol.
- Students who go missing for periods of time or regularly come home late.
- Students who regularly miss school or education or do not take part in education |
|---|---|
| **Child Sexual Exploitation (CSE)** | CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Potential signs and symptoms
- Students who appear with unexplained gifts or new possessions.
- Students who associate with other young people involved in exploitation.
- Students who suffer from changes in emotional well-being.
- Students who misuse drugs and alcohol.
- Students who go missing for periods of time or regularly come home late.
- Students who regularly miss school or education or do not take part in education |

	• Students who have older boyfriends or girlfriends • Students who suffer from sexually transmitted infections or become pregnant.
County Lines	A term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and adults at risk are exploited to move, store and sell drugs and money. Offenders will often user coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of location including further education. Children are also increasingly targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be work off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: • Go missing and are subsequently found in areas away from their home • Have been the victim or perpetrator or serious violence (eg knife crime) • Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs • Are exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection • Are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity • Owe a 'debt bond' t their exploiters • Have their bank accounts used to facilitate drug dealing
Discriminatory Abuse	Includes behaviour towards a student that is racist, sexist, based on a person's disability and other forms of harassment.
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal

	social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
	Possible signs and Symptoms: • physical, mental and emotional development lags; • sudden speech disorders; • continual self-depreciation ("I'm stupid, ugly, worthless, etc."); • over-reaction to mistakes; • extreme fear of any new situation; • inappropriate response to pain ("I deserve this"); • neurotic behaviour (rocking, hair twisting, self-mutilation); and/or • extremes of passivity or aggression
Extremism	The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
Female Genital Mutilation (FGM)	Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.
Forced Marriage	Forcing a person into a marriage 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.
Honour Based Violence	Encompasses crimes which have been committed to protect or defend the honour of a family and/or community, including female genital mutilation, forced marriage and practices such as breast ironing. All forms of HBV are abuse and should be handled and escalated as such.
Institutional Abuse/Poor Practice	Is inappropriate or disrespectful or insufficient care, which affects the whole setting and denies or restricts dignity, choice or fulfilment of persons at risk.
Mental Health	**All staff** should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a student they should refer to the safeguarding and wellbeing team
Neglect	This is the persistent failure to meet a child's/individual's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.
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. **Possible signs and symptoms:** • unexplained recurrent injuries or burns; • improbable excuses or refusal to explain injuries; • wearing clothes to cover injuries, even in hot weather; • refusal to undress for activities; • bald patches; • chronic running away; • fear of medical help or examination; • self-destructive tendencies; • aggression towards others; • fear of physical contact - shrinking back if touched; • admitting that they are punished but the punishment is excessive (such as a child being beaten every night to "make him study"); and/or • fear of suspected abuser being contacted
Radicalisation	Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
Risk to self and/or others	May include but is not exclusive to server se lf - 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 personal, emotional trauma and/or stress. Self-harm is a term that covers a range of behaviours used as a coping mechanism where an individual harm themselves by psychically 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 or walls • Taking an overdose • Swallowing hazardous substances • Exercising excessively • Scratching and hair pulling

Serious Violence	All staff should be aware of the indictors, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts of new possessions could also indicate that children/ individuals have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Staff who have any concerns of this nature should speak to the Safeguarding team.
Sexual Abuse	Sexual abuse involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult at risk 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. Abuse may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, images or other media of sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming and the apparent consent of the child or adult in preparation for abuse (including via the internet). Sexual abuse can be carried out by anyone including children and vulnerable adults. **Possible signs and symptoms:** • Being excessively affectionate or knowledgeable in a sexual or inappropriate way; • medical problems such as chronic itching, pain in the genitals, venereal diseases; • other extreme reactions, such as depression, self-mutilation, suicide attempts, running • away, overdoses, anorexia; • personality changes such as becoming insecure or clinging; • regressing to younger behaviour patterns such as thumb sucking or bringing out • discarded cuddly toys; • sudden loss of appetite or compulsive eating; • being isolated or withdrawn; • inability to concentrate; • lack of trust or fear of someone they know well, such as not wanting to be alone with

	• a babysitter or child minder; • starting to wet again, day or night/nightmares; • become worried about clothing being removed; • suddenly drawing sexually explicit pictures; and/or • trying to be "ultra-good" or perfect; overreacting to criticism

9.6 *Specific Safeguarding Issues and other forms of abuse:*

9.6.1 All staff members need to be aware of specific Safeguarding issues and be alert to any risks.

9.6.2 Lambeth Safeguarding Children Partnership has detailed information about other specific issues and the local procedures for responding to risks.

9.6.3 The Government Website, GOV.UK has broad government guidance on a variety of issues. The following is not a comprehensive list and staff members should search the GOV.UK website and *Lambeth Safeguarding Children Partnership* for advice on other issues:

- Bullying including cyberbullying
- Children missing from home or care
- Children missing from education
- Child criminal exploitation (CCE) /sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- missing children and adult's strategy
- Private fostering
- Preventing radicalisation and the Prevent duty
- Teenage relationship abuse
- Sexting
- Trafficking
- Sexual violence and sexual harassment
- Child-on-child abuse
- Host families – during exchange visits
- Adults who supervise children on work experience
- Children and the court system
- Children with family members in prison
- Up-skirting
- County lines
- Homelessness

- So called 'Honour' based violence
- Children with SEN and disabilities
- Care leavers/previously Looked after children
- Looked after children

ANNEX 10: Key Terms

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
British Values	Values identified as part of the Prevent Duty: democracy, the rule of law, individual and mutual respect, tolerance of different faiths and beliefs.
Child or young person	Anyone who has not yet reached their 18th birthday
Child in need	A child is a child in need if: • he/she is unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority • his/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services or • he/she is disabled
Child Missing in Education	Relates to the non-attendance of a student believed to be at risk or where concerns are raised associated to a non-attendance. In line with the Government statutory guidance on helping prevent children and young people from missing education, the college will endeavour to ensure that the Local Authority is notified where a concern is raised relating to the non-attendance of a student believed to be at risk or where concerns are raised associated to a non-attendance.
Child Protection	Child protection is a part of safeguarding and promoting welfare. This refers to the activity which is undertaken to protect specific children who are suffering or are at risk of suffering significant harm as a result of abuse or neglect.
Confidentiality	The duty of confidentiality is not absolute and may be breached where it is in the best interest of the student and in wider public interest. If professionals judge that disclosure is necessary to protect the young person or others from serious risk of harm, confidentiality may be breached. Staff must not disclose information relating to a student, their welfare or personal information without express authorisation to do so from the Designated Senior Person (DSP) or Safeguarding and Wellbeing Manager. This stipulation includes where a member of staff may receive an information request from a parent, guardian or the police. The police are required to provide the college with a Personal Data Request Form completed by a Detective Inspector.

Conspiracy Theory	A belief that an event or situation is the result of a secret plan made by powerful people. Some examples of conspiracy theories are: • 5G/ mobile phones cause coronavirus • Vaccines cause autism • The moon landing was faked • The US Government was behind 9/11
Development	Physical, intellectual, emotional, social or behavioural development.
Early Help	All those working for or on behalf of the College, including paid and unpaid staff, full time or part time staff, temporary, casual, agency staff, self-employed people and contractors
Early Help Assessment (EHA)	A way of identifying the strengths and needs within a family in order to provide the right help and support at the right time.
Extremism	Vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.
Fitness to Study	Morley College sets out to create an inclusive learning environment where students from a range of backgrounds and experiences can be successful. However, it recognises that there will be times where a student's physical or mental health is such that academic progress cannot be maintained, or where it is considered a risk to the student's, or the wider student body's wellbeing. The Fitness to Study Policy is designed to provide a supportive framework through which this can be identified and discussed, and appropriate alternatives can be agreed.
Harm	Ill-treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
Harmful Sexual Behaviour	Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour"
Health	Physical or mental health.
Ideology	A set of beliefs.
Intra familial harm child sexual abuse (CSA)	Intra-familial child sexual abuse refers to child sexual abuse that occurs within a family environment. Perpetrators may or may not be related to the child. The key consideration is whether the abuser feels like family from the child's point of view. The UK Government's definition of CSA for England is: "……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".
LADO	Local Authority Designated Officer
Online platforms	An online platform is an e-learning platform that has been created using Internet technology. The term "online platform" is used to describe a series of services available online, such as: • Marketplaces (e.g. Amazon) • Search engines (e.g. Bing, Yahoo, Google) • Social media (e.g. Facebook, LinkedIn, YouTube) • Online website builders (e.g. Wix, BigCartel) • Payment systems (e.g. Payfit) An online platform is a digital service that uses the Internet to facilitate interactions between two or more separate but interdependent users (whether they are companies or private individuals). There are main stream and non-mainstream online platforms. Staff should be particularly alert to students who mention use of non-mainstream platforms such as: • 4Chan • NeinChan • 8Kun • Telegram • Parler • Discord • BitChute • Gab
Parent	Birth parents or adoptive parents i.e. those with parental responsibility. It is recognised, however, that other adults may be in a parenting role, for example step parents and foster carers.
Radicalisation	The process by which a person comes to support terrorism and forms of extremism that may lead to terrorism. Warning signs include: • Becoming increasingly argumentative • Refusing to listen to different points of view • Unwilling to engage with students who are different • Becoming abusive to students who are different • Embracing conspiracy theories • Feeling persecuted • Changing friends and appearance • Distancing themselves from old friends • No longer doing things they used to enjoy • Converting to a new religion • Being secretive and reluctant to discuss their whereabouts • Sympathetic to extremist ideologies and groups

Safeguarding	The action that we take to promote the welfare of children and vulnerable adults/adults at risk and protect them from coming to any harm. To protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
Significant harm	Section 31(10) of the Children Act 1989 states that "where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child".
Staff	All those working for or on behalf of the College, including paid and unpaid staff, full time or part time staff, temporary, casual, agency staff, self-employed people and contractors
Terrorism	An action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with intention of advancing a political, religion or ideological.
Vulnerability	Factors and characteristics associated with being susceptible to abuse, harm or radicalisation.
Vulnerable Adult (adult at risk)	A vulnerable adult is any person who is aged 18 or above and at risk of abuse or neglect because of their needs for care and or support. They may be in need of community care services by reason of mental or other disability, age or illness; and is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.
Wellbeing	WHO definition: A state of wellbeing in which the individual realises his or her abilities, can cope with the normal stresses of life, work productively and fruitfully, and is able to contribute to his or her community. In relation to a child, "well-being" also includes: a. physical, intellectual, emotional, social and behavioural development b. "welfare" as that word is interpreted for the purposes of the Children Act 1989.

ANNEX 11: Risk Assessment for Educational Visits and Trips

SIGNIFICANT RISKS AND HAZARDS: Key points to consider when completing your Risk Assessment.

1. Identify the hazard
2. Decide who may be at risk and how
3. Evaluate the risks and decide on appropriate control methods.
4. Record findings and their implementations.

Legislation to be Considered

- Health and Safety (Display Screen Equipment) Regulations.
- Health and Safety at Work Act.
- Manual Handling Operations Regulations.
- Working at Height Regulations.
- Electricity at Work Regulations.
- Control of Substances Hazardous to Health Regulations.
- Regulatory Reform (Fire Safety) Order

General Considerations

- General causes of injuries and hazards.
- Examples of good practice

Persons at Risk

- Employees
- Students
- Visitors
- Persons with disabilities

HSE Risk Matrix: To be assessed before and after control methods. Risk rating to be expressed numerically.

Severity / Likelihood	No Injury	First Aid Injury	Lost Time (over 3 days)	Major Injury or Disabling Disease	Death
Improbable	1	2	3	4	5
Remote	2	4	6	8	10
Possible	3	6	9	12	15
Probable	4	8	12	16	20
Very Likely to Occur	5	10	15	20	25

Risk Rating	Action Required
16 to 25	**High Risk** and may require the provision of considerable resources involving special equipment, training, high levels of supervision and consideration of the most effective methods of eliminating or controlling hazards.
6 to 15	**Medium Risk** and will require an appropriate level of resources.
1 to 5	**Low Risk** but actions should be taken to try to reduce these risks further, if possible, within reasonable limits**.**

ANNEX 12: Check List for Residential Trips

This checklist should be used when residential trips or tours are organised by Morley College London.

Schedule	
Supervision Schedule	
Room lists	
Floor plan of residential venue	
Register	
Bus register	
Fire register	
Student emergency contacts	
Staff emergency contacts including who can be contacted out of normal college hours. Normally this role is assumed by the Centre Principal or their designated nominee.	
Medical lists	
Confirmation of bookings	
Must have telephone numbers: - Bus company - Staff mobile - Residential venue - Home contact - Disaster recovery team - NHS 24 - All Morley College work numbers (landline and mobiles where applicable) If abroad then appropriate numbers as per the country trip is in must be listed	
Directions to/from nearest hospital nearest children's hospital (if different from above)	
Dentist	
Optician	
Safeguarding Young People and Vulnerable Adults Policy	
Student and Staff Codes of Conduct	
Completed Risk Assessment (see Annex 10)	
Student Feedback Forms	
Quality Assurance checklist	

Date: Date:

Trip Organiser: Centre Principal:

ANNEX 13: Criminal and Pending Convictions Procedure

1.   Introduction

The College is committed to the fair treatment of all learners and welcomes applications from a wide range of individuals including those with criminal convictions. We are committed to equality of opportunity and select individuals based on their skills, qualifications and experience and not on their background or personal circumstances. Having a criminal conviction, pending sentencing or bail conditions will not necessarily prevent someone from studying at the College. The College, however, has a duty of care to its students, staff and the wider community to act reasonably to protect their health, safety and welfare. As a consequence, the College requires applicants to disclose all unspent convictions (save for minor motoring offences) at application, on the enrolment form and upon re-enrolment.

If a student is convicted or placed on bail while on a college course, they must advise their personal tutor or one of the College's Designated Safeguarding Leads.

2.   Scope

In order to meet the above responsibilities the college requires all students to disclose or otherwise bring to the College's attention any convictions, pending sentencing or bail conditions to enable the college to review the potential risk posed by their enrolment. The college will assess the risk with each applicant, or learner if the disclosure is made following enrolment on a course, to determine the level of risk posed by the conviction or bail condition to both the individual and/or to others using the *Criminal Record Risk Assessment Form*.

The individual will be required to complete the form with a member of the College Safeguarding Team providing the College with further information about the offence and, if required, contact details for any relevant third party e.g. a probation officer or YOT. As necessary additional information will be sought from relevant agencies with the agreement of the individual involved. Continuing enrolment at the college may be dependent on the individual's co-operation in the process including providing agreement for the college to contact the necessary eternal agencies.

Sex offences must be disclosed if the applicant/student is included on the Sex Offenders Register.

If a student does not disclose a criminal conviction, pending sentencing or bail conditions at application or enrolment which are later disclosed, the college reserves the right to withdraw the student from their course and/or request that the student does not return to college until the risk assessment process has been completed. The college will take all reasonable steps to respond to any disclosure at the time of application/enrolment. However it is the responsibility of the student to advise their personal tutor or to contact one of the college's safeguarding designated persons (details are displayed on all campus sites and/or the college intranet) to ensure the necessary risk assessment processes are completed.

3.   Spent Convictions

Spent convictions are not considered to be relevant and an applicant or student is not required to reveal them unless that applicant/student is intending to enrol onto a Child Care or Health and Social Care course or any course where a Disclosure and Barring Service (DBS) check is required. Advice regarding whether a conviction is spent and should be declared can be obtained from the appropriate agency e.g. youth Offending Team/ Probation service or by visiting the online calculator www.disclosurecalculator.org.uk or www.unlock.org.uk for advice.

4.   Procedure

Following disclosure, a *Criminal Record Risk Assessment Form* will be completed to assess the applicant/student's suitability for college and to review any risk mitigation measures that may be required. The risk assessment will be used to make a final decision about whether the college can offer/continue with enrolment. Staff members who are aware of a disclosure are required to inform their Centre Principal and the Head of Student Services and/or one of the college's Designated Safeguarding Persons. For certain courses, further investigation of criminal convictions may be a requirement of any work placement or experience and whether any criminal convictions may impact on an individual's ability to pursue certain employment opportunities.

The Risk assessment will:

- Determine the level of risk posed by the conviction, pending sentencing or bail conditions to both the applicant and/or to others, for example any increased risk of reoffending or of breaching any bail conditions or ability to continue with an enrolment following sentencing.

- Identify what support needs may be required to be put in place for the applicant/student, including any multi-agency meetings a college representative would need to attend.

- If a place at college is agreed, identify support applicant once enrolled can access to achieve and succeed on their course and reduce the impact of internal and external barriers to learning; develop employability skills; and, to support progression onto further study and employment.

The applicant/student will be advised of the outcome of the Risk Assessment Process by the member of staff who has completed the risk assessment. If an application to enrol is declined or the student's place at college is to be withdrawn, the applicant/student will be advised in writing. All information will be dealt with in a confidential manner and shared only with relevant staff/agencies as required. If the applicant/student wishes to appeal the decision, they may submit a written appeal within 10 working days to the Designated Safeguarding Lead (Vice-Principal (Student Engagement)).

5.   Equality and Diversity

Students can expect an inclusive and supportive learning environment whatever their background. This policy will ensure a fair and equitable process is applied when reviewing an applicant/student's suitability for a course.

CRIMINAL RECORD CHECK RISK ASSESSMENT FORM

This form is to be completed and used for the following purposes:
1. When a successful student has been offered a place.

   - **Where required, the risk assessment needs to be completed before students can commence the course.**
   - **If further action is necessary, this should be agreed between the relevant member of the Safeguarding team and the line manager.**
   - Once completed this form should be signed by both the relevant member of the Safeguarding team and the line manager and stored on MyConcern.
   - A review of the risk assessment should be carried out whenever a risk is presented.

SECTION A: TO BE COMPLETED BY THE RELEVANT MEMBER OF THE SAFEGUARDING TEAM AND THE LINE MANAGER

Please complete in full:

Name of applicant:				
Course applied for:				
Level of disclosure required:	Enhanced and barred ☐	Enhanced ☐	Standard ☐	Basic ☐
Programme area:				
Date of assessment:				
Name of assessor one (Safeguarding team):				
Name of assessor two (Line Manager):				
Name of assessor three (DSL):				

Question	Yes/No	Please provide details
Has the applicant declared any cautions, convictions, reprimands, final warnings or bind overs in the UK or any other country, or are they under police investigation?		
Is this a single offence or has there been more than one offence?		
Has any police intelligence been disclosed at chief policy officer discretion which causes concern (if applicable)?		

Nature of conviction(s) or police intelligence disclosed (Continue on separate sheet if necessary):	
Offence(s):	
Date of conviction(s):	
Sentence(s) received:	
Age at time of offence(s):	
Length of time since conviction(s):	

SECTION B: TO BE COMPLETED BY THE RELEVANT MEMBER OF THE SAFEGUARDING TEAM AND INDIVIDUAL DURING RISK ASSESSMENT MEETING

Question (Please provide details)		
What were the circumstances surrounding the offence(s)?		
Attitude to the offence(s):		
Efforts made to not reoffend:		

Question	Yes/No	Please provide details
Have the individual's circumstances changed since the offence(s)? If so, how?		
Are the offence(s) relevant to the course?		
Is the individual taking part in a specific remedial/action programme?		
Does the nature of the course present any opportunities for the student to reoffend?		
Does the course involve regular one-to-one/ unsupervised contact with vulnerable people?		
Does the course involve direct contact with the public?		
Does the course involve direct responsibility for finance or items of value?		

Does the course involve a significant level of trust i.e. nursing or caring for people?		
Is the individual barred from working in regulated activity? (If applicable)		
Were suitable references obtained and ID checked? (If references gave cause for concern please state details)		
What level of supervision does the student receive?		

Enter below any further questions you feel may be relevant to the post in relation to criminal convictions.

Question	Please provide details

Signed:	
Print name:	
Date:	

SECTION C: TO BE COMPLETED BY THE RELEVANT MEMBER OF THE SAFEGUARDING TEAM AFTER RISK ASSESSMENT MEETING HAS TAKEN PLACE

Please enter below any precautionary measures recommended for the individual in light of the above information to minimise the risk of any reoccurrence of any potential criminal activity or associated behaviour. This can be expanded on as necessary for the particular role as required.

1.	
2.	
3.	
4.	
5.	

SECTION D: CRIMINAL RECORD RISK HAZARD FORM

Please record below any organisational risk of harm. This should relate specifically to the impact on the organisation and not the individual.

Nature of hazard? e.g. reputational risk, risk of sexual harm, risk of theft
Who might be harmed?
What is already/will be done to minimise risk?
Likelihood of hazard/risk occurring? Please select from: 1 = Very unlikely   2 = Fairly unlikely   3 = Fairly likely   4 = Very likely
Impact of hazard/risk? Please select from: 1 = Minor impact   2 = Fairly serious impact   3 = Very serious impact
What is the remaining risk based on likelihood and impact? e.g. low/medium/high
What further action is required?
Who is responsible for taking this action and by when?

SECTION E: TO BE COMPLETED BY ALL PARTIES CARRYING OUT THE RISK ASSESSMENT

☐ The information above has been considered and we are/are not satisfied that it is safe to allow the named applicant/student to commence their course.

Detail action to be taken below:

Signed: *Relevant member of Safeguarding Team*	
Print name and job title:	
Date:	
Signed: *Head of Student Services*	
Print name:	
Date:	
Signed: *Designated Safeguarding Lead*	
Print name:	
Date:	

Form A: Criminal Record declaration form for Courses covered by ROA

This form must be completed by all applicants. The information disclosed on this form will not be kept with your application form during the application process.

Statement on recruiting applicants with criminal records

We recognise the contribution that ex-offenders can make and welcome applications from them. A person's criminal record will not, in itself, debar that person from being accepted. Suitable applicants will not be refused a place because of offences which are not relevant to, and do not place them at or make them a risk.

All cases will be examined on an individual basis and will take the following into consideration:

- Whether the conviction is relevant to the course applied for.
- The seriousness of any offence revealed.
- The age of the applicant at the time of the offence(s).
- The length of time since the offence(s) occurred.
- Whether the applicant has a pattern of offending behaviour.
- The circumstances surrounding the offence(s) and the explanation(s) offered by the person concerned.
- Whether the applicant's circumstances have changed since the offending behaviour.

It is important that applicants understand that failure to disclose all unspent convictions could result in disciplinary proceedings or exclusion. Further advice and guidance on disclosing a criminal record can be obtained from Nacro.

Criminal record declaration form

Surname:		Forename:	

This post is not exempt from the Rehabilitation of Offenders Act 1974. We only ask applicants to disclose convictions which are not yet spent under the Rehabilitation of Offenders Act 1974. If you are not sure whether your convictions are spent, please contact Nacro for further advice.

Do you have any unspent convictions?   **Yes** ☐   **No** ☐

If you have answered yes, you now have **two** options on how to disclose your criminal record.

Option 1: Please provide details of your criminal record in the space below.

Option 2: You can disclose your record under a separate cover provided that you mark a cross on the line below and attach the details in an envelope stapled to this form. The envelope should be marked **CONFIDENTIAL** and state your name and the details of the post.

I have attached details of my conviction separately_____ **(Please mark with an X if appropriate.)**

Form B: Criminal Record declaration form for Courses exempt from the ROA

This form must be completed by all applicants. The information disclosed on this form will not be kept with your application form during the application process.

Statement on recruiting applicants with criminal records

This course is exempt from the Rehabilitation of Offenders Act 1974 and therefore applicants are required to declare any cautions, convictions, reprimands and final warnings that are not protected (i.e. that are not filtered out) as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013).

For further information on filtering please refer to Nacro guidance and the DBS website.

We recognise the contribution that ex-offenders can make and welcome applications from them. A person's criminal record will not, in itself, debar that person from being accepted. Any information given will be treated in the strictest confidence. Suitable applicants will not be refused a place because of offences which are not relevant to, and do not place them at or make them a risk.

All cases will be examined on an individual basis and will take the following into consideration:

- Whether the conviction is relevant to the course applied for.
- The seriousness of any offence revealed.
- The age of the applicant at the time of the offence(s).
- The length of time since the offence(s) occurred.
- Whether the applicant has a pattern of offending behaviour.
- The circumstances surrounding the offence(s), and the explanation(s) offered by the person concerned.
- Whether the applicant's circumstances have changed since the offending behaviour.

It is important that applicants understand that failure to disclose all cautions, convictions, reprimands or final warnings that are not protected could result in disciplinary proceedings or exclusion. Further advice and guidance on disclosing a criminal record can be obtained from Nacro.

Criminal record declaration form (exempt courses)

Surname:		Forename:	

Do you have any cautions, convictions, reprimands or final warnings which are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013)?

Yes ☐   **No ☐**

If you have answered yes, you now have **two** options on how to disclose your criminal record.

Option 1: Please provide details of your criminal record in the space below.

Option 2: You can disclose your record under a separate cover provided that you mark a cross on the line below and attach the details in an envelope stapled to this form. The envelope should be marked

DECLARATION

I declare that the information provided on this form is correct. I understand that the declaration of a criminal record will not necessarily prevent me from being offered a place at Morley College London.

Signed: **Date:**

ANNEX 14: Searching, Screening and Confiscation Procedure

Key Points

This purpose of this procedure is to ensure the safety of our staff and students in a flexible and open campus.

This procedure should be used in conjunction with the Student Disciplinary Procedure.

Searching

- Staff can search a student for any item if the student agrees.[2]
- Heads of Curriculum and staff authorised by them have a statutory power to search students or their possessions, with consent, where they have reasonable grounds for suspecting that the student may have a prohibited item.
- Prohibited items are:
    - knives or weapons
    - alcohol
    - illegal drugs
    - stolen items
    - fireworks
    - pornographic images

Possession of such items may raise concerns that the student is, or is at risk of, being involved in criminal behaviour/gang involvement.

Screening

What the law allows:

- Colleges can require students to undergo screening by a walk-through or hand-held metal detector (arch or wand) even if they do not suspect them of having a weapon and without the consent of the students.
- Colleges' statutory power to make rules on student behaviour[3] and their duty as an employer to manage the safety of staff, students and visitors[4] enables them to impose a requirement that students undergo screening.
- Any member of college staff can screen students.

Also note:

- If a student refuses to be screened, the college **will** refuse to have the student on the premises. Health and safety legislation requires a college to be managed in a way which does not expose students or staff to risks to their health and safety and this would include making reasonable rules as a condition of admittance.

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[2] The ability to give consent may be influenced by the child's age and needs of pupils being searched or screened, including any special educational needs (SEN) and/or disabilities (including behavioural disabilities)

[3] Section 89 of the Education and Inspections Act 2006 for all maintained schools, PRUs and NMSS and the Education (Independent School Standards) (England) Regulations 2010 for academy schools and alternative provision academies

[4] Section 3 of the Health and Safety at Work etc. Act 1974

- If a student fails to comply, and the college does not let the student in, the college has not excluded the student and the student's absence should be treated as unauthorised. The student should comply with the rules and attend.

- This type of screening, without physical contact, is not subject to the same conditions as apply to the powers to search.

Confiscation

College staff can seize any prohibited item found as a result of a search. They can also seize any item, they consider harmful or detrimental to college discipline.

Colleges' obligations under the European Convention on Human Rights (ECHR)

- Under article 8 of the European Convention on Human Rights students have a right to respect for their private life. In the context of these particular powers, this means that students have the right to expect a reasonable level of personal privacy.

- The right under Article 8 is not absolute, it can be interfered with but any interference with this right by a college (or any public body) must be justified and proportionate.

- The powers to search in the Education Act 1996 are compatible with Article 8. A college exercising those powers lawfully should have no difficulty in demonstrating that it has also acted in accordance with Article 8. This advice will assist colleges in deciding how to exercise the searching powers in a lawful way.

Searching with informed consent

Colleges' common law powers to search:

- College staff can search students with their informed consent for any item.

  Also note:

- Before any search takes place, the member of staff conducting the search should explain to the student why they are being searched, how and where the search is going to take place and give them the opportunity to ask any questions.

- Colleges are not required to have formal written consent from the student for this sort of search – the student must understand the reason for the search and how it will be conducted so that their agreement is informed.

- Colleges should make clear in their College Behaviour policy and in communications to parents and students what items are banned.

- If a member of staff suspects a student has a banned item in his/her possession, they can instruct the student to turn out his or her pockets or bag and if the student refuses, the tutor can apply an appropriate punishment as set out in the college's behaviour policy.

- A student refusing to co-operate with such a search raises the same kind of issues as where a student refuses to stay in a detention or refuses to stop any other unacceptable behaviour when instructed by a member of staff – in such circumstances, colleges can apply an appropriate disciplinary penalty.

1. **Can I search?**
   - Yes, if you are a member of college staff and authorised by the Head of Student Services, the Centre Principal or a member of the Senior Leadership Team.

2. **Under what circumstances?**

- You **must** be the same sex as the student being searched; and there must be a witness (also a staff member) and, if possible, they should be the same sex as the student being searched.

- There is a limited exception to this rule. You can carry out a search of a student of the opposite sex to you and / or without a witness present, but only where you reasonably believe that there is a risk that serious harm will be caused to a person if you do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff. If conducting a search without a witness, staff must immediately report this to another member of staff and keep a record of the search.

3. **When can I search?**

- If you have reasonable grounds for suspecting that a student is in possession of a prohibited item.

Also note:

- The law also says what must be done with prohibited items which are seized following a search.

- The requirement that the searcher is the same sex as the student and that a witness is present will continue to apply in nearly all searches. Where it is practicable to summon a staff member of the same sex as the student and a witness then the tutors wishing to conduct a search must do so.

- The designated safeguarding lead (or deputy) should be informed of any searching incidents where the member of staff had reasonable grounds to suspect a student was in possession of a prohibited items as listed on page 1. The staff member should also involve the designated safeguarding lead (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

- If the designated safeguarding lead (or deputy) finds evidence that any child is at risk of harm, they should make a referral to children's social care services immediately (as set out in part 1 of Keeping Children Safe in Education). The designated safeguarding lead (or deputy) should then consider the circumstances of the student who has been searched to assess the incident against potential wider safeguarding concerns. See page 3 paragraph 2 on recording searches.

4. **Authorising members of staff**

- Heads of Curriculum should oversee the College's practice of searching to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all students and staff with support from the designated safeguarding lead (or deputy).

- Heads of Curriculum should decide who to authorise to use these powers. There is no requirement to provide authorisation in writing.

- Staff, other than security staff, can refuse to undertake a search. The law states that Heads of Curriculum may not require anyone other than a member of the college security staff to undertake a search.

- Staff can be authorised to search for some items but not others; for example, a member of staff could be authorised to search for stolen property, but not for weapons or knives.

- Heads of Curriculum can require a member of the college's security staff to undertake a search.

- If a security guard, who is not a member of the college staff, searches a student, the person witnessing the search should ideally be a permanent member of the college staff, as they are more likely to know the student.

- The College will always notify the police if guns, knives or drugs are found in a student's possession.

5. Training for college staff

- The Head of Curriculum should ensure that a sufficient number of staff are appropriately trained in how to lawfully and safely search a student who is not co-operating, so that these trained staff can support and advise other members of staff if this situation arises. However, it is vital that all staff understand their rights and the rights of the student who is being searched.

6. Establishing grounds for a search

- Staff can only undertake a search if they have reasonable grounds for suspecting that a student may have in his or her possession a prohibited item. The staff member must decide in each particular case what constitutes reasonable grounds for suspicion. For example, they may have heard other students talking about the item or they might notice a student behaving in a way that causes them to suspect that the student is concealing a prohibited item.

- Staff must consider in advance how urgent the search is and if not urgent it doesn't need to be done there and then and they should seek advice from the Designated Safeguarding Lead, or Deputy before conducting the search.

- In the exceptional circumstances when it is necessary to conduct a search of a student of the opposite sex or in the absence of a witness, the member of staff conducting the search should bear in mind that a student's expectation of privacy increases, as they get older.

- The powers allow college staff to search regardless of whether the student is found after the search to have that item. This includes circumstances where staff suspect a student of having items such as illegal drugs or stolen property which are later found not to be illegal or stolen.

- College staff may wish to consider utilising CCTV footage in order to make a decision as to whether to conduct a search for an item.

7. Searches for items banned by the college rules

- An item banned by the college rules may only be searched for under these powers if it has been identified in the college rules as an item that can be searched for.

- The college rules must be determined and publicised by the Heads of Learning in accordance with section 89 of the Education and Inspections Act 2006.

8. Location of a search

- Searches can only be carried out on the college premises or, if elsewhere, where the member of staff has lawful control or charge of the student, for example on college trips in England or in training settings.

- Searches should where possible be carried out away from other learners.

- The powers only apply in England.

During the search

9. Extent of the search – clothes, possessions, desks and lockers

What the law says:

- The person conducting the search may not require the student to remove any clothing other than outer clothing.

- 'Outer clothing' means clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear but 'outer clothing' includes hats; shoes; boots; gloves and scarves.

- 'Possessions' means any goods over which the student has or appears to have control – this includes desks, lockers and bags.

- A student's possessions can only be searched in the presence of the student and another member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff.

Also note:

- The power to search enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

10. Lockers and desks

- Under common law powers, colleges are able to search lockers and desks for any item provided the student agrees. Colleges can also make it a condition of having a locker or desk that the student consents to have these searched for any item whether or not the student is present.

- If a student does not consent to a search, the staff member will then need to assess whether it is appropriate to use reasonable force to conduct the search.

11. Use of force

- It is the expectation that staff will **not** use force. However, in exceptional circumstances members of staff can use such force as is reasonable given the circumstances when conducting a search for knives or weapons, alcohol, illegal drugs, stolen items, fireworks, pornographic images or articles that have been or could be used to commit an offence or cause harm. Such force cannot be used to search for items banned under the college rules.

- Separate advice is available on tutors' power to use force – see Associated Resources section below for a link to this document:
  https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

After the search

12. The power to seize and confiscate items – general

What the law allows:

- Colleges' general power to discipline, as circumscribed by Section 91 of the Education and Inspections Act 2006, enables a member of staff to confiscate, retain

or dispose of a student's property as a disciplinary penalty, where reasonable to do so.

Also note:

- The member of staff can use their discretion to confiscate, retain and/or destroy any item found as a result of a search so long as it is reasonable in the circumstances. Where any article is reasonably suspected to be an offensive weapon, it must be passed to the police.

- Staff have a defence to any complaint or other action brought against them. The law protects members of staff from liability in any proceedings brought against them for any loss of, or damage to, any item they have confiscated, provided they acted lawfully.

13. **Items found as a result of a search**
    What the law says:

- A person carrying out a search can seize anything they have reasonable grounds for suspecting is a prohibited item or is evidence in relation to an offence.

- Where a person conducting a search finds alcohol, they may retain or dispose of it. This means that colleges can dispose of **alcohol** as they think appropriate but this should not include returning it to the student.

- Where they find **controlled drugs**, these must be delivered to the police as soon as possible but may be disposed of if the person thinks there is a good reason to do so.

- Where they find **other substances** which are not believed to be controlled drugs these can be confiscated where a tutor believes them to be harmful or detrimental to good order and discipline. This would include, for example, so called 'legal highs'. Where staff suspect a substance may be controlled they should treat them as controlled drugs as outlined above.

- Where they find **stolen items**, these must be delivered to the police as soon as reasonably practicable – but may be returned to the owner (or may be retained or disposed of if returning them to their owner is not practicable) if the person thinks that there is a good reason to do so.

- **Fireworks** found as a result of a search may be retained or disposed of but should not be returned to the student.

- If a member of staff finds a **pornographic image**, they may dispose of the image unless they have reasonable grounds to suspect that its possession constitutes a specified offence (i.e. it is extreme or child pornography) in which case it must be delivered to the police as soon as reasonably practicable.

- Where an article that has been (or is likely to be) used to commit an offence or to cause personal injury or damage to property is found it may be delivered to the police or returned to the owner. It may also be retained or disposed of.

- Where a member of staff finds **an item which is banned under the college rules** they should take into account all relevant circumstances and use their professional judgement to decide whether to return it to its owner, retain it or dispose of it.

- Any **weapons or items which are evidence of an offence** must be passed to the police as soon as possible.

14. **Statutory guidance on the disposal of controlled drugs and stolen items**

- It is up to the tutors and staff authorised by them to decide whether there is a good reason not to deliver stolen items or controlled drugs to the police. In determining what is a "good reason" for not delivering controlled drugs or stolen items to the police the member of staff must have regard to the following guidance issued by the Secretary of State:

- In determining what is a 'good reason' for not delivering controlled drugs or stolen items to the police, the member of staff should take into account all relevant circumstances and use their professional judgement to determine whether they can safely dispose of a seized article.

- Where staff are unsure as to the legal status of a substance and have reason to believe it may be a controlled drug they should treat it as such.

- With regard to stolen items, it would not be reasonable or desirable to involve the police in dealing with low value items such as pencil cases. However, college staff may judge it appropriate to contact the police if the items are valuable (iPods/laptops) or illegal (alcohol/fireworks).

15. **Statutory guidance for dealing with electronic devices**

- Where the person conducting the search finds an electronic device that is prohibited by the college rules or that they reasonably suspects has been, or is likely to be, used to commit an offence or cause personal injury or damage to property, they may examine any data or files on the device where there is a good reason to do so. They may also delete data or files if they think there is a good reason to do so, unless they are going to give the device to the police. This power applies to all colleges and there is no need to have parental consent to search through a young person's mobile phone if it has been seized in a lawful search and is prohibited by the college rules or is reasonably suspected of being, or being likely to be, used to commit an offence or cause personal injury or damage to property.

- If the member of staff conducting the search suspects they may find an indecent image of a child (sometimes known as nude or semi-nude images), the member of staff should never intentionally view the image, and must never copy, print, share, store or save such images. When an incident might involve an indecent image of a child and/or video, the member of staff should confiscate the device, avoid looking at the device and refer the incident to the designated safeguarding lead (or deputy) as the most appropriate person to advise on the school's response. Handling such reports or concerns can be especially complicated and schools should follow the principles as set out in Keeping children safe in education

- The UK Council for Internet Safety also provides the following guidance to support school staff and designated safeguarding leads. Sharing nudes and semi-nudes: advice for education settings working with children and young people

- The member of staff must have regard to the following guidance issued by the Secretary of State when determining what is a "good reason" for examining or erasing the contents of an electronic device:

- In determining a 'good reason' to examine or erase the data or files the staff member should reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the college rules.

- If an electronic device that is prohibited by the college rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, they must give the device to the police as soon as it is reasonably practicable. Material on the device that is suspected to be evidence relevant to an offence, or that is a pornographic image of a child or an extreme pornographic image, should not be deleted prior to giving the device to the police.[5]

- If a staff member does not find any material that they suspect is evidence in relation to an offence, and decides not to give the device to the police, they can decide whether it is appropriate to delete any files or data from the device or to retain the device as evidence of a breach of college discipline.

- All college staff should be aware that behaviours linked to sexting put a child in danger. Governing bodies should ensure sexting and the college's approach to it is reflected in the child protection policy. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published the advice - sexting in schools and colleges - responding to incidents and safeguarding young people

Also note:

- Tutors should also take account of any additional guidance and procedures on the retention and disposal of items that have been put in place by the college.

16. Informing Safeguarding, Parents and dealing with complaints

- Colleges are not required to inform parents before a search takes place or to seek their consent to search their child.

- The DSL, or deputy must be informed without delay whenever a search is conducted for a prohibited item, and/or where the circumstances surrounding a proposed search suggest that there may be a safeguarding risk, with a referral being made to Children's Social Care Services immediately where there is a risk of harm to any person.

- Colleges should inform individual student's parents or guardians where alcohol, illegal drugs or potentially harmful substances are found.

- Record of the search should be recorded on MyConcern.

- Complaints about screening or searching should be dealt with through the normal college complaints procedure.

- The School Behaviour (Determination and Publicising of Measures in Academies) Regulations 2012

- Health and Safety at Work etc Act 1974

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[5] Section 62 of the Coroners and Justice Act 2009 defines prohibited images of children. Section 63 of the Criminal Justice and Immigrations Act 2008 defines extreme pornographic images.

ANNEX 15: Visible ID Procedures

1.   College Statement

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

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

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

2.   Scope

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

3.   ID and Lanyard Colours

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

4.   Staff Wearing of ID and College Lanyards

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

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

- Staff should wear their college lanyard and ID at all times, except when engaged in practical activity where entanglement or other risks have been identified

- Teaching staff and ALS staff should not permit any learner into the classroom who is not wearing their lanyard

- Students who wish to use the services of the Library/LRCs, Student Services or the canteen facility must be wearing their lanyard in order to be served

- Students must always remove their lanyards when undertaking practical tasks where entanglement or other risks have been identified by the tutor. Lanyards must be put on again before leaving the teaching space

- Security staff and members of the management team will conduct lanyard spot checks at specific points in the year

- Line Managers will conduct regular spot checks in their department to ensure staff and students are wearing lanyards.

5.   Replacement ID Cards for Students

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

5.1   If a full-time **day time** student loses or forgets their ID card, they should report to the student services desk and their ID checked on etracker. They will be issued with a visitors lanyard and day pass which will be recorded in the spreadsheet on Sharepoint (insert link). Curriculum staff must collect the student from reception and reinforce expectations of wearing their ID badge and lanyard. If a student arrives at class without their ID card they must be instructed to visit student services for a temporary pass immediately. Repeat 'offences' will lead to disciplinary action being taken.

5.2   If an **evening class** student forgets their ID card, they must sign in at reception, their ID should be checked on e-trackr and a visitor sticker will be issued.

5.3   If a student loses or forgets their ID card more than 3 times, they will not be allowed into the College unless they pay for a new ID. The cost for replacement ID cards is £5. Payable at Student Services.   However, of the student is vulnerable and in receipt of financial support then payment can be waived at the discretion of the Centre Principal.

5.4   For students who forget their ID cards but are attending an examination:

- Student services will contact the Exams Team/check ProMonitor to confirm the student has an examination that day

- The student will be issued with a temporary day pass

- Student Services will issue the student with a print out of their E-tracker student details page to take to the exam as evidence of identification

6.   Staff or Governors who forget their ID cards

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

7.   Contractors

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

**8.	Visitors**

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

Details required:
- Visitors name
- Name of the person they are visiting

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

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

1) When a planned event is held that is open to the public e.g., Open Event. Registration however is completed upon arrival.

2) To service providers such as mail delivery, delivery drivers who drop off resources to the kitchens etc.

3) A pre-planned group event hosted by the College Marketing Team, where delegate badges will have been pre-prepared.

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

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

9.2	*Wearing headwear for religious or medical reasons.*

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

9.3	*Wearing a Niqab or Burka.*

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

9.4	*Wearing of hoods and baseball caps/hats*

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

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

10. Withdrawn or excluded students

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

11. Unknown and uninvited visitors

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

Risk Assessment for Access to Learning and Community Events at Waterloo

The College operates a visible ID policy for all staff, Governor, students, contractors, commercial and professional visitors to the College. This enables the College to ensure that only authorised persons are admitted to the buildings to maintain a safe and secure environment. This is a key measure to support our Safeguarding and Prevent strategies.

All students, staff and Governors must wear their College lanyards around their necks at all times to confirm at a glance that they are a registered member of the College community. The Waterloo centre is a community centre which also includes art galleries and library facility for local adults and takes positive and pro-active engagement strategies with a range of community groups to positively encourage engagement in learning and events. Therefore, to ensure free access to the community, students are not required to wear ID badges. This risk assessment has been completed to manage and mitigate any potential risks.

Waterloo Centre Context

The Waterloo Centre is a community, library and gallery facility serving adults across Lambeth and wider boroughs of London. It runs over 1700 learning courses each year of which 1500 are non-accredited and 220 are accredited. The Waterloo Centre is extremely successful in engaging with adults with over 14,000 student enrolments each year.

RISK	HOW WILL THIS RISK BE MITIGATED?
Unwanted and unknown visitors on site	1. Visible ID policy for staff, governors, contractors and visitors is enforced 2. 24 hour security staff presence monitoring CCTV cameras and common areas 3. Staff are trained to be vigilant and monitor learners' activities in class for any concerns and report to 4. Reception and student services teams are vigilant and observe the flow of visitors
Violent intruder on site	1. Emergency Centre handbooks in place and well understood 2. Staff are aware 'run, hide, tell' protocol 3. Highly visible security presence who are easily reachable
Staff do not know how to stay safe .	1. All staff complete mandatory Safeguarding and Prevent training recorded on the single central record 2. The Wellbeing and Safeguarding team service is well publicised throughout the centre and staff know how to make a referral 3. Vulnerable adults are well identified; they are known and supported through the Safeguarding and Wellbeing team and flagged on the system 4. Staff are trained on being vigilant to identifying any potential threats from those who hold extremist views through annual staff training from the local Prevent Education Officer

Students do not know how to stay safe	1. Safeguarding and prevent forms part of student induction 2. Safeguarding, prevent and wellbeing service is promoted throughout the centre 3. Information is available on the website for students and parents 4. Students self-refer to the wellbeing service
Unattended packages are left in the centre	1. Staff are trained to be vigilant and report anything suspicious to security 2. Security staff closely monitor CCTV throughout the day and evening and are trained in dealing with any unattended packages
Governors and Senior Leaders are not aware of the risks	1. Waterloo safeguarding meeting runs termly to review and assess any new potential risks 2. Safeguarding lead meeting meets regularly and has oversight and decision making of any recommendations or additional risk management 3. Regular reporting the SLT and Governing body to ensure everyone is kept abreast of updates and changes

ANNEX 16: External Lettings and Speakers Assessment Procedure

1.   External Lettings

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

Assessment of proposed external letting

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

- *Question 1*: Has the organization or any speaker involved in the event, to the best of the College's knowledge, previously been prevented from speaking at Morley College, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the College's External Speaker Code of Conduct?

- *Question 2:* Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct?

- *Question 3*: Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?

If the answer to all three questions is NO:

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

If the answer to any of the questions is unclear:

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

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

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

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

2.   External Speakers
Aim

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

Objectives

The objectives of this procedure are:

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

External Speaker and their Responsibilities

Any external speaker hosted by the College or within any of its associated premises must be aware of, and comply with, the External Speaker Code of Conduct.

It is the responsibility of the person who is organising the event to ensure that the speaker receives the Code of Conduct and has their attention drawn to its contents.

It is also the responsibility of the person who is organising the event to ensure that the provisions of the External Speaker Assessment Procedure are duly followed.

Where the team making a room booking at the request of the organizer is aware the event involves and external speaker, they must seek confirmation that the organiser has undertaken an external speaker assessment in accordance with the procedure

External Speaker Initial Assessment Form

Part 1: Event Organiser details:
Name:
Curriculum Area or Professional Service Area:
Contact details (tel no. and email):

Part 2: Proposed event details:
Speaker's name: **Speaker's role:** **Speaker's organisation:**
Proposed event title: **Proposed event date:** **Event description (max 100 words, include topics to be discussed):**

Part 3: Assessment of Proposed External Speaker (s)
Prior to the confirmation of any external speaker or organisation, the event organiser will be responsible for assessing them against the following set of questions: Question 1: Has the speaker/organisation previously been prevented from speaking at Morley College London, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct? Question 2: Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct? Question 3: Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct? Question 4: Does the external speaker go by any other names? If yes, please list other names. Question 5: Is the speaker affiliated to any other organisation? If yes, name the other organisations.
If the proposed speaker is unable to attend who will be his/her/their deputy? **Name and title of deputy:**

Contact number of deputy:
Is this a registered charity? If yes, please given registered charity number:
Is there any known or likely media interest in the proposed event?

If the answer to all questions is NO:

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

If the answer to any of the questions is unclear:

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

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

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

1.   Complete all sections of the form below with as much detail as possible.

2.   Send the form as an attachment to the DSL/Vice Principal (Student Engagement)

In all cases where the event will proceed please:

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

Initial assessment completed by:

Name……………………………………………………………

Date……………………………………………………………...

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

External Speaker Referral Form

Part 1: Event Organiser details:
Name:
Curriculum Area or Professional Service Area:
Contact details (tel no. and email):

Part 2: Proposed event details:
SPEAKER DETAILS **Speaker(s) name:** **Speaker(s) contact address:** **Speaker(s) contact phone number:** **Speaker(s) email:** **Speaker(s) website/Social Media handles:** **Speaker(s) organisation (if applicable):** **Organisation details (address, website, company number, social media handles):**   **Does the speaker or members from the organisation they represent have a reputation for causing disruption at venues: YES / NO** **Are there likely to be any health and safety or public order issues that may occur as a result of this event: YES / NO**
EXPANDED ASSESSMENT OF PROPOSED EXTERNAL SPEAKER(S) Provide an explanation of the following questions from the Initial Assessment you answered Yes to: i. Has the speaker previously been prevented from speaking at Morley College, another HE/FE/SDI provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct?   ii. Does the proposed topic or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the External Speaker Code of Conduct?

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

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

EVENT DETAILS

Event title:

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

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

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

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

If Yes, what has been requested:

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

If Yes, provide additional details:

Part 3: Response to external Speaker Referral Form:

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

    B. The event may not proceed because:

_____
DSL/Vice Principal (Student Engagement)

_____
Date

External Speaker Code of Conduct

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

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

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

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

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

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

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

Segregation

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

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

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

ANNEX 17: Guidance and expectations for staff and volunteers

In your role as a staff member or volunteer, you are acting in a position of trust and authority and have a duty of care towards the young people and adults we work with. Morley College London expects you to be seen as a role model, and therefore act appropriately at all times, including behaviour outside of college and online.

You are responsible for:
- prioritising the welfare of young people and vulnerable adults
- providing a safe environment and taking action when appropriate
- following our safeguarding policy
- challenging all inappropriate behaviour and reporting any breaches of the behaviour code to your line manager, the DSL or HR

You should:
- listen to, respect and value our students at all times
- treat everyone fairly and without prejudice or discrimination
- understand that young people and vulnerable adults are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable

When working with our students, you must not:
- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances
- develop inappropriate relationships with our students
- make inappropriate promises
- engage in behaviour that is in any way abusive, including having any form of sexual contact with a child or young person
- allow students have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle students
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures