SAFEGUARDING & PREVENT POLICY

This policy outlines the framework and procedures to be carried out to safeguard children, adults at risk of harm and those at risk of radicalisation at United Colleges group

Policy owner:	Designated Safeguarding & Prevent Lead
Approval/Review Body	Corporation Governing Body /Strategic Leadership Team
Review Date:	September 2025

1. **Purpose:**

   This policy outlines the framework and procedures to be carried out to safeguard young people, adults at risk of harm /vulnerable adults and those at risk of radicalisation at United College Group.

2. **Scope**

   2.1   Safeguarding refers to the process of protecting children (and adults) to provide safe and effective care. This includes all procedures designed to prevent harm to a child or adult.

          Safeguarding is a term that covers all people on site and at sub-contractor premises, e.g. staff, students, visitors, contractors, etc.

   2.2   Throughout the policy and supporting documentation, reference is made to 'children.' That is, those under the age of 18. The College recognises that some adults are also vulnerable to abuse, therefore the procedures may be applied (with appropriate adaptions) when there are allegations of abuse of an adult. Some adults are more vulnerable to abuse because of their care and support needs as defined in The Care Act (2014).

   2.3   See Appendix 1 for key definitions of Children, Adults with Care and Support Needs (also referred to as adults at risk of harm) and Vulnerable Adults.

   2.4   Legislation underpinning the policy is outlined in Appendix 2

   2.5   Appendix 3 outlines indicators of abuse (as described in *Keeping children safe in education 2023*)

3. **Policy Statement**

   United Colleges Group aims to maintain a safe and welcoming environment on all its campuses for students, staff and visitors. It is committed to meeting its statutory duties to safeguard and promote the welfare of children and adults at risk of harm. The College recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agencies. The College will work in partnership with statutory services to support students to be safe.

4. **Policy**

   This policy represents United College's Group response to its role in safeguarding the welfare of students.

   4.1   United Colleges Group (UCG) will set up clear procedures with designated members of staff in charge of these procedures. Each College will have an assigned safeguarding lead who will ensure procedures are followed.

   4.2   UCG will work in partnership with other agencies (including the Police, Local Authorities and Clinical Commissioning groups) to support children and adults at risk of harm to stay safe and to investigate allegations of abuse.

4.3 The College will ensure the student's wishes or feelings are considered when determining what action to take and what services to provide to protect them.

4.4 The College recognises that there are times when the wishes of the individual may be overruled if there is a significant risk of harm to a child or adult.

4.5 The College will ensure that all staff, governors and trustees, as part of staff development (including staff working for contracted out services) receive appropriate training to ensure that they are able to recognise the signs and symptoms of abuse, including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. In addition, all staff will be made fully aware of the procedures for reporting and recording their concerns. The College will deliver training on radicalisation and the action that must be taken if there is a concern that a member of the College community may be drawn into terrorism.

4.6 The staff of the college will work towards ensuring the curriculum offers information and support for issues of safeguarding & Prevent.

4.7 The College will monitor and review annually the Safeguarding Policy and Procedures as part of its equality initiatives.

4.8 The College will ensure that all recruitment checks, as outlined in *Keeping children safe in education (September 2024)* are carried out.

4.9 The College will be represented at Local Authority Safeguarding Board/s and/or multi-agency panels and contribute to review of local/national priorities and/or initiatives.

4.10 The College will recommend and disseminate its "Code of Conduct" for staff working with young people and vulnerable adults for all staff as outlined in guidance published by Government Offices for the English region.

5. Local and National Safeguarding Priorities

The College is mindful of its responsibilities to respond to current local and national priorities.

5.1 Key areas Safeguarding issues include:

- Greater emphasis on emotional wellbeing and mental health

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation

- Child on child abuse: All staff should be aware that children can abuse other children. All staff must challenge inappropriate behaviours between peers and not downplay sexual harassment as 'banter, this is likely to include, but may not be limited to:

    - bullying (including cyberbullying)
    - physical abuse

- sexual violence
- sexual harassment
- upskirting
- sexting
- initiation/hazing   type   violence   and   rituals

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- Serious Violence. All staff should be aware of the indicators, which may signal that children are at risk from, or are involved in serious violent crime.

- 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.

- Female genital mutilation. There is a specific legal duty on teachers to report to the police that an act of GFM appears to have been carried out on a girl under the age of 18.

- Contextualising safeguarding. Safeguarding incidents and/or behaviours can be associated with factors outside college. All staff should consider the context within which such incidents/behaviours occur (i.e. are wider environmental factors present in a child's life a threat to their safety and/or well-being).

- Online safety: It is essential that children are safeguarded from potentially harmful and inappropriate online material. Online safety encompasses various evolving risks, which can be categorized into four areas:
Content: Exposure to illegal or harmful content like pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization, and extremism.
Contact: Harmful online interactions with others, including peer pressure, commercial advertising, and adults posing as children to groom or exploit them for various purposes.
Conduct: Online behaviours that can lead to harm, such as sharing explicit images (consensual and non-consensual), online bullying, and more.
Commerce: Risks associated with online activities like gambling, inappropriate advertising, phishing, and financial scams.

6. Monitoring and Review

6.1 Implementation of this policy is monitored through regularly and end of year reports to the Board of Governors.

6.2 At a local level, a Safeguarding Group will meet formally monthly to review implementation of the policy, emerging themes and priority actions. The Group will include members of staff, who have designated safeguarding responsibilities.

6.3 United Colleges Group Safeguarding Steering group will convene three times yearly.

6.4 A named governor will be responsible for overseeing this policy and related procedures and to liaise with partner agencies in the event of allegations of abuse being made against the Principal or CEO.

7. Safeguarding Procedures

7.1 If any member of staff suspects that a young person or vulnerable adult is being abused, they must share their concerns with a Designated Safeguarding Leads in the College. The Designated Safeguarding Leads will follow guidance and procedures identified in Keeping Children Safe in Education (2024) and Working Together to Keep Children Safe (2018), when deciding the action that needs to be taken.

"If at any point there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately. Anybody can make a referral." Details of all referrals must be shared with the relevant designated safeguarding team.

All concerns must be logged on MyConcern. All staff can access My Concern via the Staff Portal. Concerns will be followed up by a member of the Safeguarding team.

7.2 All complaints, allegations or suspicions must be taken seriously. Absolute promises of confidentially should **not** be given as the matter may develop in such a way that these might not be able to be honoured.

Victims of sexual harassment should be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

7.3 If the complaint comes directly from the child/adult, questions should be kept to the minimum necessary to understand what is being alleged and care is taken to avoid leading questions. Unnecessary questioning could jeopardise future legal proceedings.

7.4 If it is deemed necessary for a safeguarding concern involving an LDD student to be referred to statutory services, the following guidelines must be adhered to:

- If the concern arises out of an incident that occurred at College or while the student is in "the care" of the College, the concern must be reported to the local authority in which the College is based (i.e. Westminster or Brent Social Services in the first instance.
- If the concern arises out of an incident that occurred at the student's home or when they were not at College, the referral must be made to the "home" authority

7.5 Looked after Children: Students will be given the opportunity to declare their Looked After/Care Leaver status at all stages of the recruitment and enrolment process; during induction and while on course. Additional support will be offered to students who fall into these categories by the Careers and Student Advice teams. A senior member of staff in each College will be responsible for promoting the educational achievements of LAC, Care Leavers and young people estranged from family.

7.6 Missing Children: In the case of missing children, the college will work with statutory agencies to ensure the safety of the missing child. In the case of students with high needs, staff will follow Local Authority guidelines on reporting of absences.

7.7 Students on Work Experience: The College has policies and procedures in place to protect students from harm when they are on work placement.

7.8 All children aged under 16 must be supervised whilst on college premises and access to college premises is restricted as follows:

- Students are only permitted to bring young children on to campus during enrolment periods, open evenings, parent carer evenings and disciplinary meetings, they must be always supervised and access to high-risk areas and activities is restricted.
- In exceptional circumstances staff can bring young children on to campus if they are supervised and access to high-risk areas and activities is restricted
- Risk assessments are completed for enrolment, group visits by children under the age of 16 and for staff bringing children on to the premises.

7.9 Information shared with the Student Advice Team will be kept securely in accordance with DPA/GDPR requirements.

Safeguarding concerns relating to a child (under 18yrs) or a Vulnerable Adult will be held for 7 years after school leaving age. (For a child this will be until they are aged 26.

7.10 When college premises are used for non-school activities, it is essential to prioritise child safety. If the college's staff directly manage these activities, the existing child protection policy should be followed.

However, if the services are provided by external organisations, it is crucial to ensure that these providers have appropriate safeguarding policies and procedures in place.

8.   Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff through the normal course of their interaction, and promotion of learning activities, with children.

The college must notify the local authority if they are made aware that a child is being privately fostered to allow the local authority to check the arrangement is suitable and safe for the child.

9. **Procedure for Allegations Against Staff**

9.1 Allegations of abuse against a member of staff including supply teachers, volunteers and contractors must be referred to the Designated Senior Person as soon as possible and in any case within 2 hours of the initial concern arising. If the nominated member of staff cannot be contacted a member of the Executive team must be contacted. The principal should be notified and will follow College Disciplinary procedures. The College will inform the Local Authority Designated Officer (LADO) of any allegations that might indicate a person would pose a risk of harm to children. Where the Principal or CEO is the subject of an allegation, this will be referred to the Chair of Governors

9.2 All allegations and investigations against members of staff will be conducted in line with legislation and good practice outlined in the revised statutory guidance "Keeping children safe in education."

9.3 In response to revised guidance (*KCSIE 2024),* the College will take appropriate action if a member of staff has displayed behaviour which may indicate a person poses, or may pose, a risk of harm, if they continue to work in regular or close contact with children. This is commonly known as the "harm test." It can be applied to behaviours/incidents that occur outside the learning environment, and did not involve children but could have an impact on their suitability to work with children or vulnerable adults. Where a concern is regarded as 'low level' (*KCSIE 2024*) the Staff Code of Conduct will be implemented.

9.4 When conducting an investigation involving a safeguarding issue (where the alleged victim is under 18 or a vulnerable adult) the investigating officer must take guidance from the Designated Safeguarding Leads in relation to the interviewing procedure to be followed and where there is significant risk student interviews could be conducted by the Designated Safeguarding Leads.

9.5 The Designated Safeguarding Leads may decide to stop proceedings and refer the case to the police for further investigation where this is deemed necessary.

9.6 If a member of staff is dismissed or removed from "regulated activity" (or would have been had they not already left) because they harmed or posed a risk of harm to vulnerable groups including children, the College will be under a legal obligation to forward information about that person to the DBS. It is the responsibility of the DBS to decide on the barring or not of any individual. The member of staff may make representation to the DBS against being barred.

10. **Procedures for Sexual Abuse**

In response to the *Ofsted Review of Sexual Abuse in Schools and Colleges* (June, 2021), existing procedures for addressing sexual abuse and harassment among students, including online sexual abuse have been amended.

Student guidance and support:

All students will receive a safeguarding briefing during Induction, and a tailored tutorial throughout the year. The tutorials will be:
- delivered by trained staff,
- will signpost internal and external support,
- will empower students with information about how to identify, report, and cope with incidents of sexual abuse and harassment.

10.1 **Training for staff:** All teaching staff, student-facing support staff, and senior leadership (including governors) will participate in online Safeguarding training before and during employment. This e-training includes a section on sexual abuse and harassment and will be supplemented by a refresher training once a year. The staff members delivering sexual abuse and harassment tutorials will receive tailored training to equip them to present tutorial information in a sensitive and thorough manner and to answer all relevant questions from students.

10.2 **Students will be encouraged to report** -report incidents of sexual abuse and harassment in an accessible and confidential manner both face to face and online.

10.3 **Local Safeguarding Partnerships (LSPs):** The Designated Safeguarding Leads work closely with LSPs in the boroughs of Brent, Westminster & Camden to keep up to date on support resources and maintain an awareness of what is happening in the community.

11. Training of Staff

Designated staff receive multi-agency safeguarding training every 2 years, and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up to date with developing local and national priorities.

All other staff and governors receive mandatory training as part of their induction, to ensure they are aware of their safeguarding responsibilities and of the college's policies and procedures. The training includes recognising signs of abuse and recording and reporting suspected abuse. They receive updates on safeguarding and child protection at least annually.

All staff are made aware of our duties under the Prevent agenda.

All staff are required to read of Keeping Children Safe in Education (2024) Part One.

All staff should be familiar with 'What to do if you are worried a child is being abused.'

12. Subcontracted Provision

Safeguarding and Prevent duties are included in service level agreements and form part of the mandatory requirement for all subcontracted partners. All partners have a nominated safeguarding nominee. Safeguarding and Prevent are addressed as

part of annual due diligence, Quality Monitoring Visits and Standard Review Meetings.

Safeguarding and prevent is embedded into teaching and learning, is addressed through the induction programme, ILP, learner reviews and observations. Annual partners staff and curriculum development days update partners on Safeguarding and Prevent.

13. **Supporting Documentation**

The following College documents give further guidance on the application of this policy and matters relating to the wider child protection agenda:

- Admissions Policy
- Anti-Bullying Policy
- Local borough Safeguarding Children Board Procedures
- Children Act 1989 and 2004
- Confidentiality Procedure
- Education Act 2002 (s175)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2009)
- ICT Acceptable Use Policy
- Keeping Children Safe in Education (2024)
- Prevent Duty Guidance (2021)
- Procedure for Visiting Speakers and Events
- Learning & Behaviour Framework
- What to do if you are worried a child is being abused (2015)
- Working Together to Safeguard Children (2018)
- UCG Safeguarding Agreement
- Staff Code of Professional Conduct

Appendix 1   Key Definitions

1.   **Children -** Children includes everyone under the age of 18

Any child may benefit from early help, but all College staff should be particularly alert to the potential need for help for a child who:

- Is disabled or has certain health conditions and has specific needs.
- Has special educational needs (whether or not they have an EHCP)
- Has a mental health need?
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently/goes missing from care or from home.
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- Is in family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is privately fostered.
- Is in the care of the local authority.
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Are lesbian, gay, bi or trans.

2.   **Adults with Care and Support Needs**

An adult with care and support needs may be:
- an older person
- a person with a physical disability, a learning disability or a sensory impairment
- someone with mental health needs, including dementia or a personality disorder.
- a person with a long-term health condition
- someone who misuses substances or alcohol to the extent that it affects their ability to manage day to day living.
- victims of sexual exploitation

3.   **Vulnerable Adult -** Current NHS definition of a Vulnerable Adult is:

A vulnerable adult is aged 18 or over, receives or may need community care services because of a disability, age or illness, and who is or may be unable to take care of themselves or protect themselves against significant harm or exploitation.

From September 2012, a vulnerable adult is defined by the Protection of Freedoms Act 2012 as a person aged 18 or over who is in receipt of **regulated activity.** This definition informs the level of DBS check required of people who provide support for adults.

4   **Regulated Activity (applies to children and vulnerable adults)**

The term **Regulated Activity** is a statutory term used to describe working or volunteering with children or vulnerable adults. Regulated activity covers anyone working closely with children or vulnerable adults, either paid or unpaid, not part of a family or personal arrangement, on a frequent, intensive or overnight basis.

Frequent means once a week or more (except in health or personal care services where frequent means once a month or more); **intensive** means four times in a month or overnight.

Appendix 2- legislation that underpins safeguarding policies and procedures.

1.1 **Keeping children safe in education**" Statutory guidance for schools and colleges, (September 2024)

1.2 This guidance replaces all previous versions of the document. This document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply. The guidance stresses the need for effective and timely multi- agency action which promotes the best interest of the child.

The guidance should be read alongside *Working Together to Safeguard Children (April 2018) and What to do if you are Worried a Child is Being Abused- Advice for Practitioners (March 2015)*

1.3 The revised guidelines make reference to "Safeguarding and promoting welfare of children." Safeguarding and promoting the welfare of children is defined as "protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes".

1.4 The guidance states "Where a child is suffering significant harm, or is likely to do so, action should be taken to protect the child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk".

1.5 Legislation that underpins "Keeping children safe in education" Statutory guidance for schools and colleges that applies directly to education includes:

- Education and Training (Welfare of Children) Act 2021
- The Rehabilitation of Offenders Act 1974
- The Children Act 1989 and 2004
- The Education Act 2011
- The Further Education (Providers of Education) regulations 2006
- Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2010
- The Protection of Freedoms Act 2012
- Children and Families Act 2014
- Counter Terrorism and Security Act 2015
- Prevent Duty Guidance (2015)
- Female Genital Mutilation Act 2003 (Serious Crime Act 2015)

1.6 The Care **Act.2014**. In the context of the legislation, specific adult safeguarding duties apply to an adult who:

- has care and support needs and
- is experiencing, or is at risk of, abuse or neglect and
- is unable to protect themselves because of their care and support needs.

The Care Act 2014 explicitly requires local authorities to work with partner organisations, to actively promote people's independence and well-being, not just to respond to crises when they occur. People with care and support needs

are not inherently vulnerable, but they may come to be at risk of abuse or neglect at any point due to:

- ☐ Physical or mental ill health
- ☐ Becoming disabled
- ☐ Getting older
- ☐ Not having support networks
- ☐ Inappropriate accommodation
- ☐ Financial circumstances
- ☐ Being socially isolated

Legislation and Guidance which underpins safeguarding of vulnerable adults includes:

- Health Act (1999) includes provision for the protection of vulnerable adults.
- No Secrets (2000)
- Care Standards Act (2000)
- Sexual Offences Act (2003)
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act (2006)
- Care Act 2014
- Children and Families Act 2014
- Counter Terrorism and Security Act
  2015 Prevent Duty Guidance

1.7 The purpose of the **Safeguarding Vulnerable Groups Act (2006)** as amended by the **Protection of Freedom Act 2012** is to restrict contact between children and vulnerable adults and those who might do them harm. The level of DBS check required and whether a prohibition check is required will depend on the roles and duties of staff in an institution.

1.8 **The Counter-Terrorism and Security Act (2015)** places a public sector duty on Colleges to have due regard to the need to prevent people from being drawn into terrorism. The *Prevent*-related responsibilities include helping prevent people being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

1.9 Section 5B of the **Female mutilation Act 2003** (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty on teachers along with other professionals, where they discover (either through disclosure by the victim or through visual evidence) that FGM appears to have been carried out on a girl under 18.

Appendix 3. Indicators of abuse and neglect (taken from keeping *Children safe in education* 2023)

3.1 All staff members should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another,

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocation or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after.

Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone. Types of emotional abuse include:

Bullying: Bullying is the oppression or persecution of a weaker person by a stronger person. It is sometimes included as a type of child abuse. The difference is that bullying is often inflicted by a peer rather than by an adult. However, adults and older children are capable of bullying behaviour and it is frequently an element of all types of child abuse.

Cyberbullying: Cyberbullying is the use of Information Communications Technology (ICT), particularly mobile phones and the internet, deliberately to upset someone. It is different from other forms of bullying because: it can take place at any time and can intrude into spaces that have previously been regarded as safe or personal; the audience can be exceptionally large and reached rapidly. Cyberbullying can take place between peers and across generations and some instances of cyberbullying are known to be unintentional.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. This may include non-contact activities, such as involving children in looking at or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

The DfE's definition of '*child-on-child*' *sexual abuse* includes:
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Sexting (see below)
- Upskirting (see below)

Sexting: Sexting (also known as 'youth-produced sexual imagery') is when someone sends or receives a sexually explicit text, image or video including consensual and non-consensual sharing of nude and semi-nude images and videos on their mobile phone, usually in a text message.

Upskirting: Upskirting typically involves someone taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.

Grooming is the term used to describe how an adult gets to know a child gradually and in quite natural ways, with the intention of sexually abusing and /or exploiting them. With increased internet usage more children are being targeted for this form of abuse.

Many of these activities and behaviours are now conducted online. Typical platforms include WhatsApp and Snapchat. This includes:
- Receiving unsolicited explicit photographs or videos, for example 'dick pics'
- Sending, or being pressured to send, nude and semi-nude photographs or videos ('nudes')
- Being sent or shown solicited or unsolicited online explicit material, such as pornographic videos

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food or shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

3.2 Specific safeguarding issues identified in *Keeping children safe in education* (September 2023)

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. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that all staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policies.

Child on child abuse

- Bullying (including cyber bullying)
- Physical abuse
- Sexual violence and sexual harassment between children in schools and Colleges Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children,
- Sexting
- Initiation/hazing type violence and rituals
- Young people are sometimes required to give evidence in criminal courts, the Ministry of Justice has launched an online child arrangement to support people going through the process.

Children missing from education

Unexplainable and/or persistent absences from education can act as a warning sign of safeguarding possibilities. This may include abuse, neglect, child sexual exploitation, child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage.

Children with family members in prison

Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child (or vulnerable adult) into sexual or criminal activity. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to t complex organised abuse. Victims can be exploited even when activity appears consensual, and exploitation as well as being physical can be facilitated and/or take place online.

Domestic abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Homelessness

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. It is important to recognise that some 16- and 17-year-old young people could be living independently from their parent/guardian and will require a different level of intervention and support.

So called "honour-based crime".

So called "honour-based violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, physical abuse and forced marriage.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of female genitalia or other injury to female genital organs.

Section 5B of the FGM Act 2003, places a statutory duty upon teachers to report to the police where they report to the police where they discover that FGM appears to have been carried out on a girl under 18.

Forced marriage

A forced marriage is a crime in England and wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Preventing radicalisation

Colleges have a responsibility to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. All schools and colleges are subject to a duty under Section 26 of the counter-terrorism and Security Act 2015 in the exercise of their functions to have "due regard to the need to prevent people from being drawn into terrorism".

The Prevent duty is an integral part of the College's safeguarding obligations. (see Appendix 4 for Prevent/Channel processes)

Terrorism

Defined in the Act as 'The use or threat of action designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; made for the purposes of advancing a political, religious, racial or ideological cause'

Extremism
Defined in the Prevent Strategy as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Radicalisation

Defined as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Abuse of position of trust

Under the Sexual Offences Act 2003 it is an offence for a person over 18 e.g. teacher, to have a sexual relationship with a young person under 18 where that person is in a 'position of trust' in respect of the young person, even if the relationship is consensual.

Vulnerable Adults – descriptions and categories of abuse (identified in Care and support statutory guidance 2015)

Physical Abuse:

This includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

Sexual Exploitation:

Sexual exploitation is the sexual abuse of children and vulnerable adults through the exchange of sex or sexual acts for drugs, food, shelter, protection, other basics of life, and/or money. Sexual exploitation includes involving children and vulnerable adults in creating pornography and sexually explicit websites.

Psychological Abuse:

This includes emotional abuse, threats of abandonment or harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial or Material Abuse:

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation.

Neglect and Acts of Omission:

This includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

Discriminatory Abuse: including forms of harassment, slurs or similar treatment because of:

- Race
- Gender and gender identity
- Age
- Disability
- Sexual orientation
- Religion

Organisational Abuse:

This is the mistreatment of a vulnerable adult by a regime or individuals in an institution. It can be through repeated acts of poor or inadequate care and neglect, or poor professional practice.

Domestic Violence and Abuse:

an incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Sexual
- Financial
- Emotional
- physical

Modern slavery:

Includes slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Appendix 4. Prevent Policy

Background and aims.

The aim of the government's Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This is part of an overall counter-terrorism strategy called CONTEST. In the new Counter-Terrorism and Security Act 2023 this has simply been expressed as "*prevent people from being drawn into terrorism*".

The government's Prevent strategy has three specific strategic objectives:

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
2. Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

Prevent work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats is currently from Al-Qaeda associated groups and from other terrorist organisations in Syria and Iraq. But terrorists associated with the extreme right also pose a continued threat to our safety and security.

The Government has defined extremism in the *Prevent* strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces."

Aims

The aim of this policy is to ensure, as far as possible, is that the College is fulfilling the duty in sections 26 and 29 of the Counter-Terrorism and Security Act 2015. United Colleges Group will participate fully in work to prevent people from being drawn into terrorism and that should this occur there are procedures to deal with them.

The Legal Position

The Counter-Terrorism and Security Act 2015

This places a duty on colleges to have due regard to the need to prevent people from being drawn into terrorism. While this duty is not new to colleges the secretary of state has been given new powers to place specific duties on colleges. These are outlined in the Prevent duty statutory guidance (March 2015 HM government) as follows:

Specific Duty	Response
Partnership: To demonstrate effective compliance with the duty, Colleges must demonstrate active engagement from governors, boards, principals, managers and leaders with regional Prevent co-ordinators, the police and local authorities, and co-ordination through multi-agency forums, for example Community Safety Partnerships.	The engagement with other partners including police and local authority Prevent co-ordinators is explained below in section 3.
Where the size of an institution warrants, management and co-ordination arrangements should be implemented to share information across the relevant curriculum areas within an institution, with a single point of contact for operational delivery of Prevent-related activity.	The Designated Lead for Safeguarding is the single point of contact, working closely with the Head of Security. Staff are trained to refer all matters of this type to them.
Risk assessment: Each institution should carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.	United Colleges Group's risk assessment appears in appendix 1.
The risk assessment to address the physical management of United Colleges Group Campuses, including policies and procedures for events held by staff, students or visitors, and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.	Information on this duty is included below in section 7.
Action Plan: Any institution that identifies a risk should notify the relevant Prevent co-ordinator and others as necessary and develop a Prevent action plan to set out the actions they will take to mitigate the risks.	Ad specified in the UCG Risk Assessment & Action Plan
Staff Training: United Colleges Group must demonstrate that it undertakes appropriate training	United Colleges Group will provide appropriate training for all staff and governors, see risk assessment in appendix.

and development for principals, governors, leaders and staff.	
At a corporate level there is an expectation on the institution to have robust procedures both internally and externally for sharing information about vulnerable individuals. This should include information sharing agreements where possible.	United Colleges Group shares prevent information at corporate level via safeguarding reports and through the safeguarding steering group meetings. United Colleges Group may need to share personal information externally to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). Information sharing must be assessed on a case by-case basis and is governed by legislation such as the Data protection act and the Common Law Duty of Confidentiality. United Colleges Group is committed to sharing information within the confines of legislation.
Welfare, pastoral care and support: The College has a clear role to play in the welfare of their students and is expected to have sufficient pastoral care and support available for all students.	Student Support provides this role across the College group and deliver tutorials and induction sessions to explain their role to students.
The College is expected to have clear and widely available policies for the use of prayer rooms and other faith-related facilities. These policies should outline structures in place for the management of prayer and faith facilities (for example an oversight committee) and mechanisms for managing any issues arising from the use of the facilities.	There are student instructions on location regarding the use of the facilities which are managed as appropriate by the student support team.
IT policies: Colleges should have policies relating to the use of IT on the premises which contain specific reference to the duty.	The College's IT code of conduct states that staff and students must not 'display, store, print or transmit images or text which could be considered offensive e.g. material of a terrorist nature.'

Institutions must have clear policies in place for students and staff using IT equipment to research terrorism and counter terrorism during their learning.	The College's IT code of conduct will be updated to include the process for this.
Monitoring and enforcement: Where Ofsted finds a publicly funded further education institution or independent training provider inadequate for safeguarding intervention action would be taken. This could lead to governance and leadership change, restructuring or even dissolution under the Secretary of State's reserve powers.	United Colleges Group has a quality process and full reporting schedule to ensure that it meets the requirements of Ofsted.

The Equality Act 2010 and Keeping Children Safe in Education

The Prevent duty is relevant to fulfilling other responsibilities such as the duty arising from section 149 of the Equality Act 2010.

The College, as a public body, recognises this duty placed upon it by the above Act to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic & those who do not.

For further information refer to the College's Equality and Diversity Policy.

United Colleges Group also has a Safeguarding and Child Protection Policy which should be referred to in conjunction with this policy.

Engagement with other partners including police and local authority *Prevent* co-ordinators.

The Designated Safeguarding Leads are members of the HE and FE Prevent London Region Group chaired by the Prevent co-ordinator for London Brent Prevent Delivery Group & The Brent Prevent Steering Group.
They also in direct contact with the Brent & Westminster Channel Multi Agency Programme (Front Door).
All referrals are made to the Police through the Designated Safeguarding Leads.

Staff responsibilities and examples of suspicious activity

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to the safeguarding team and/or the Head of Security.

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

Example indicators that an individual has an intention to use violence or other illegal means include:
- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- Using insulting or derogatory names or labels for another group.
- Speaking about the imminence of harm from the other group and the importance of action now.
- Expressing attitudes that justify offending on behalf of the group, cause or ideology.

- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy/

Management of events and speakers

The College is committed to denying access to those persons who promote extremist views that support or are conducive to terrorism. United College Group only provide external speaking events to known and authorised local authority partners and approved by the Head of Student Support Services. All events are monitored by Student Support Services and the aims agreed in advance.
The Events & Letting Manager is responsible for providing event specific risk assessments to the Safeguarding Team for private lettings events taking place at any UCG campus during college hours.

Code of Practice on Freedom of Speech

Section 43 of the Education (No 2) Act 1986: requires the College to issue and keep up to date a code of practice to be followed by members, students, and employees of the College for the organisation of meetings and other events, which are to be held on College premises, and for the conduct required of members, students, and employees of the College in connection with meetings and other events.

Staff, visiting speakers and students at the College must conduct themselves to ensure that freedom of speech is within the law. The College believes that a culture of free, open and robust discussion can be achieved only if all concerned avoid needlessly offensive or provocative action and language.

Any external speakers must be approved by the and all concerns and final decisions will be the responsibility of the Head of Student Support Services. In these incidences the Head of Student Support Services will rate the risks associated and decide on the appropriate outcome.

There should be sufficient information about the event including topics and any speakers and sufficient notice to allow for checks to be made and cancellation to take place, if necessary, prior to the event.
Any staff or students that become aware of any incidents or instances where off-campus events of concern are promoted on campus should be reported immediately to the Head of Student Support Services and/or the Security Team.

Fundamental British values

As part of United Colleges Group commitment to delivering the Prevent agenda students will be engaged through promotional events and tutorials to understand the dangers associated with involvement in extremism and the promotion of fundamental British values. Furthermore, students will be encouraged to develop their critical thinking skills through tutorials and as part of the curriculum.

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Useful Links

Channel: Protecting vulnerable people from being drawn into terrorism
HM Government 2012
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/ch annel-guidance.pdf
Keeping children safe in education Statutory guidance for schools and colleges
April 2014 https://www.gov.uk/government/publications/keeping-children-safe-in-education
Information booklet on Syria http://www.met.police.uk/Syria/booklet.pdf