

Safeguarding Policy

Katherine and King's College of London has a duty of care to "Safeguard and promote the welfare of children".

This means:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

'Working Together to Safeguard Children', DCSF 2013

We are committed to practices which safeguard children from harm. Staff in this organisation accept and recognise their responsibilities in respect of the issues which cause children harm and we are committed to raising awareness of safeguarding children and vulnerable adults at all times. Children are defined as anyone under the age of 18.

This will be achieved by:

- Adopting child protection guidelines through procedures and a staff code of conduct
- Following carefully the procedures for safer recruitment and selection of staff
- Having staff CRB / DBS checked or sign declarations of suitability to work with children and vulnerable adults, and to read and adhere to this policy
- Providing effective management for staff through supervision, support and training in issues relating to child protection
- Taking all reasonable steps to ensure the health, safety and welfare of any child or vulnerable adult in contact with KKCL
- To ensure that no member of staff physically, emotionally or sexually abuses any child or vulnerable adult who comes into contact with KKCL
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from putting any child in a situation where there is unreasonable risk to their health and safety
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from physically, emotionally or sexually abusing any child or vulnerable adult
- Reporting to the appropriate manager any evidence or reasonable suspicion that a child or vulnerable adult in contact with KKCL has been physically, emotionally or sexually abused
- Sharing information about good practice and child protection with children, parents and carers, staff and volunteers
- Sharing information about concerns with the relevant agencies and involving parents and children where appropriate
- Implementing this policy in conjunction with the health & safety and anti-bullying and anti-harassment policies
- Appoint a Designated Safeguarding Lead (DSL): **Janice Cheung**
- Appoint a Designated Safeguarding Person (DSP): **Stephen O'Sullivan**
- We are also committed to reviewing our policy at regular intervals (annually)

Aims

The aim of this policy is to promote good practice by:

- Providing children with appropriate safety and protection whilst in the care of KKCL
- Allowing all current staff to make informed and confident responses to specific child protection issues

Promoting Good Practice

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgment about the appropriate action to take.

Abuse can occur within many situations including the home, school and other youth sector environments. Some individuals will actively seek employment or voluntary work with young people in order to harm them. All suspicious practice shall be reported following the guidelines in this policy. All Staff must adhere to the Code of Conduct outlined in the Staff Handbook.

Incidents that must be Reported / Recorded

If any of the following occur you should report this immediately to an appropriate member of KKCL staff and record the incident.

- If you accidentally hurt a child or young person
- If he/she seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

If a child has an accident which does not require hospital treatment:

- Management should be notified and monitor the individual
- The child's parent should be notified of the incident at an appropriate time
- The accident/incident should be completed
- A member of KKCL staff should be informed immediately

Responding to a child making an allegation of abuse

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain it is likely that the information will need to be shared with others – do not promise to keep any secrets.
- Allow the child to continue at their own pace.
- Ask questions for clarification only and always avoid asking leading questions (questions that suggest a particular answer). Do not make assumptions or offer explanations.
- Remember that an allegation of child abuse may lead to a criminal investigation, so **do not attempt to personally investigate any allegations** of abuse.
- Even allegations that appear less serious must be taken seriously and followed up according to procedure.
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next and with whom the information will be shared.
- **Do not** ask the child to make a written statement.
- Record in writing everything that was said as soon as possible using the child's own words.
- Note date, time, and names of persons to whom the information was given.
- Ensure that the record is signed and dated by these persons.
- Report immediately to the DSP/DSL.f
- **Do not** confront any person against whom an allegation has been made.

Advice for Personal Communications with Students

Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with students, and the following advice from child protection/teaching agencies:
If students do try to make contact with you on your personal email or phone, discourage this and inform your line manager.

Exercise extreme caution in connection with internet sites / messaging systems and avoid inappropriate communication with all individuals under 18, or others with whom you may be in a position of trust. Take care to avoid becoming personally involved in a student's personal affairs.

Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence. The legal responsibilities of people working with minors extend past the end of any contract they have with Katherine and King's College of London.

Risks to Students and Staff

Students may be able to find information about your personal life that may be inappropriate for minors, and may damage your working relationship with your students.

By allowing students access to friendship groups you may be inadvertently introducing them to a wider circle of adults, over which you have no control, and may facilitate inappropriate contacts.

Sexual predators and bullies are known to use information available on web pages and social networking sites to gain information about children, such as their interests, tastes and location. Staff who post information about students (e.g. photos of their summer holiday, names etc) on a personal web page may make them vulnerable to inappropriate attention.

Our Policy and Standards of Behaviour for Staff

1. It is paramount the member of staff to distance themselves from any potentially inappropriate situation.
2. Students are clients of Katherine and King's College of London. Staff should not attempt to instigate private contact with students of any age during or after the course.
3. Staff must not give their personal email/postal addresses or telephone number to students, or ask for theirs, during or after the course.
4. Staff must not add any students to any social networking sites (e.g. Facebook, MySpace, etc), nor allow themselves to be added to any student's social networking site.
5. Staff must use common sense and professional judgement to avoid circumstances which could be perceived to be of an inappropriate nature.
6. Staff must not, by any means or in any circumstances, make, view or access illegal or inappropriate images of children.
7. Staff must not distribute (by any means) images or information about students of any age. This includes the use of student images or details on blogs, social networking sites, messaging systems or any internet sites.

Code of Conduct for All Adults

This code of conduct must be followed by all KKCL employees, clients, contractors and third party suppliers over the age of 18.

Do's and Don'ts for Working with Children

Do:

- ✓ Remember the child comes first
- ✓ Behave professionally
- ✓ Treat everyone with respect and communicate at their level
- ✓ Listen to children
- ✓ Be aware of policies and procedures
- ✓ Report any suspicion within KKCL guidelines
- ✓ Be aware, approachable and understanding

Do not:

- ✗ Touch inappropriately
- ✗ Use inappropriate language
- ✗ Harm or frighten a child
- ✗ Be alone with a child unless absolutely unavoidable
- ✗ Threaten, shout or be aggressive
- ✗ Mistreat, demean, ignore or make fun of a child
- ✗ Force a child to do something they do not want to do
- ✗ Let a child expose him/herself to danger

- ✘ Take photos of children without the consent of KKCL senior staff

Additionally, all students must remain under the supervision of KKCL staff or nominated persons who have undergone a similar screening process that can be sufficiently evidenced.

Rules and follow-up procedure for under 18s

Students on LSH courses are expected to attend all lessons and activities unless otherwise specified by their parents or guardians. Students should register their arrival at reception every morning and their departure when leaving in the afternoon or evening. Any student on LSH courses who wishes to be excused from any lesson or activity needs to provide written permission in advance from their parent or guardian. Written notes handed in by students will be verified by phone.

Attendance registers will be taken at every lesson and activity and any absences will be followed up and investigated.

If a student does not arrive at school for a scheduled lesson or activity, KKCL will make every effort to contact the student and/or their parent or guardian or host family to ascertain the reason.

Students who wish to travel unaccompanied on public transport to and from school need to have written permission from their parent or guardian.

Resources on Safeguarding

Organisation Name	Website	Tel	Email	Contact Name
Coram Children's Legal Centre	www.protectingchildren.org.uk	Child Protection Project Advice Line for Practitioners: 0207 636 1245	cpp@essex.ac.uk	Catherine Williams
Department for Education (CWDC)	http://www.education.gov.uk/e-learning			
Harrow Local Safeguarding Children Board	http://www.harrowlscb.co.uk/	020 8424 1147	lscb@harrow.gov.uk	
Child-Safe	http://www.child-safe.org.uk/	+44 (0) 1275 816133		

Supervision Ratios Policy for Junior Courses

There is a student to staff ratio of at least 15:1.

Off-site excursions or activities require a minimum of two accompanying activity staff to ensure that in an emergency situation one staff member can remain with the main group of students at all times.

Welfare in the Classroom

- Equality and fairness, teaching and learning inclusive of all students
- Positive attitude and mutual respect
- High expectations from all but differentiated instruction and individual pace taken into account
- Attention to disabilities, cultural issues and other individual or group elements
- Teaching materials for a variety of learning styles
- Valuing individual differences
- Working together and supporting each other – peer support and peer learning
- Class/group and individual feedback on homework and performance in tests

- Getting to know the students (student information form, class profile and informal discussions)
- Some differentiated materials and support, attention to pairing students in order to enhance learning
- Study skills support
- Guidance on self-study outside the classroom
- No age or disabilities discrimination but attention to these issues in terms of approach to pair work and class activities that involve moving and mingling
- Planning solutions for possible problems or difficulties (lesson plan), including student levels, personalities and learning styles

Support for Learning Difficulties and Disabilities

- Literacy: specific exercises for working on reading and writing, enhanced support, more time allowed in tests
- Dyslexia: questionnaire, info pack for teachers, coloured paper, using a specific font, extra time allowed in tests
- Visual impairment: making bigger size copies, bigger writing on the board
- Hearing impairment: written instructions
- Mental disabilities: no provision
- Motor disabilities: no provision

Pastoral Care

- Monitoring attendance and performance (both in terms of results and of involvement in class activities and doing homework) and following up on any possible issues in this order: teacher, welfare officer, DOS
- Informal discussion with students before the class, during the break and after the break
- Inclusion of suggestions for learning and development on ILPs (can include notes on possible student problems, although these are usually noted in the database – absences, illnesses etc)
- Tutorials – group and individual discussions with the students following progress tests
- Opportunity to provide feedback (feedback questionnaires, suggestions forms, complaints forms) or discuss personal or class problems, e.g. with the teacher or in drop-in sessions

Whistle Blowing Policy

Introduction

Employees are often the first to realise that there may be something seriously wrong within a college. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the college. They may also fear harassment or victimisation.

In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

KKCL is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the college's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This Confidential Reporting Policy is intended to encourage and enable employees to raise serious concerns within KKCL rather than overlooking a problem or "*blowing the whistle*" outside.

The policy applies to all employees working for KKCL or any contract staff, for example, cleaners and drivers. It also covers suppliers and those providing services under a contract with the college in their own premises, for example, working with taxi organisations.

These procedures are in addition to the college's complaints procedures and other statutory reporting procedures.

Aims

This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Confidential Reporting Policy is intended to cover major concerns that fall outside the scope of other procedures.

These include:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of college funds
- possible fraud and corruption
- sexual or physical abuse of students, or
- other unethical conduct.

Thus, any serious concerns that you have about any aspect of staff of KKCL or others acting on behalf of the college can be reported under the *Confidential Reporting Policy*. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe KKCL subscribes to; or
- falls below established standards of practice; or
- amounts to improper conduct.

This policy does not replace the college's complaints procedure.

Safeguards

KKCL is committed to good practice and high standards and wants to be supportive of employees.

KKCL recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

KKCL will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary procedures that already affect you.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of KKCL.

In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

How to Raise a Concern

You should normally raise concerns with your head of department or the Director of Studies. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that senior management is involved, you should approach one of Directors.

Concerns may be raised verbally or in writing. Staffs who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why you are particularly concerned about the situation.
- you should also, as far as possible, provide evidence to support your concern.

The earlier you express the concern the easier it is to take action.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

If you feel unable or do not wish to discuss your concerns with the college, you can contact a charity called "**Public Concern at Work**" which can provide free confidential advice on how an issue should be dealt with. Their telephone number is **0207 404 6609**.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

How KKCL will respond

KKCL will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may be investigated by a member of the senior management or through the disciplinary process.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which KKCL will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, the member of the senior management team will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling you whether any initial enquiries have been made
- supplying you with information on staff support mechanisms, and
- telling you whether further investigations will take place and if not, why not.

The amount of contact between the member of the senior management team considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, KKCL will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend.

KKCL will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, KKCL will arrange for you to receive advice about the procedure.

KKCL accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

The Responsible Officer

The Director of Studies and Directors have overall responsibility for the maintenance and operation of this policy. The Director of Studies and Directors will retain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality).

How the matter can be taken further

This policy is intended to provide you with an avenue within KKCL to raise concerns. KKCL hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the college, the following are possible contact points:

- the designated independent organisation (i.e. Public Concern at Work)
- your local Citizens Advice Bureau
- relevant professional bodies or regulatory organisations
- a relevant voluntary
- the Police.

If you do take the matter outside KKCL, you should ensure that you do not disclose confidential information.

KKCL is committed to reviewing our policy at regular intervals (annually).

Behaviour guidelines for staff

DO NOT:

- use your position to gain access to information for your own advantage or another's detriment
- intimidate, threaten, coerce or undermine anyone
- engage in any sexual activity (even consensual) with a student under 18 years who is attending KKCL
- play games or have physical contact that is inappropriate
- jump to conclusions about people's behaviour without checking facts
- investigate any allegations yourself
- make suggestive remarks or gestures, tell jokes of a sexual nature or engage in inappropriate verbal banter
- create a personal relationship with a student where one does not already exist
- give **any** personal details about yourself or others to a student unless you have agreed this with a senior member of staff
- allow any student to access any of your personal accounts on social networking sites
- rely on your good name to protect you - it may not be enough
- believe that an allegation could not be made against you, it could

DO:

- report all health & safety issues without delay
- keep students safe and protect them from physical and emotional harm
- look after yourself
- treat **everyone** with respect
- provide a positive example you wish others to follow
- work with another appropriate adult in all planned activities whenever possible
- risk assess all situations when you are working alone with a student and make sure you are seen and/or heard by others
- respect peoples' right to personal privacy
- create an environment in which people feel comfortable in pointing out attitudes and behaviours they don't like
- report and challenge all inappropriate and/or abusive activities, such as ridicule or bullying
- familiarise yourself with KKCL code of behaviour
- report any gifts you receive & ensure they are not of significant value or intention
- give gifts to students **only** as part of an agreed reward system
- follow procedures for reporting all allegations against staff, carers and volunteers