



MORLEY COLLEGE LONDON

Safeguarding and Prevent Policy

POLICY OWNER: Deputy Principal
APPROVAL BY: Governing Body

Policy Category: Corporate
Approved by Policy Committee: 9 January 2020
Approved by Governing Body: 30 March 2020
NEXT REVIEW: 31 March 2024

Equality Analysis Screening

Equality analysis is a way of considering the effects on different groups protected from discrimination by the equality act. Consider if there are any risks within this policy that will adversely affect a particular group or a variety of groups. Are there any changes that need to be made to the policy itself or additional actions that need to be made to mitigate the risks? The protected characteristics are:

- Race
- Sex
- Disability
- Age
- Sexual Orientation
- Gender reassignment
- Religion and Belief
- Maternity and Pregnancy
- Marriage and Civil Partnership

Risks identified:

None identified – the Policy applies to all staff and students irrespective of any protected characteristics they may have. Aiming to promote democratic principles, ensure freedom of speech and protect vulnerable individuals from discrimination is in itself a key tool in the College's mechanisms for ensuring equality.

Evidence used:
(data, consultation)

Reference to best practice
Consultation through Policy Committee

Does this policy need a further action before it can be approved?
(changes made to policy or further equality analysis needed)

No

1. INTRODUCTION AND PURPOSE

1.1 What is Safeguarding?

“Safeguarding”, is the duties and responsibilities that those providing an education service must carry out to protect individuals from harm - “Safer Practice, Safer Learning”, National Institute for Adult Continuing Education (now the Learning and Work Institute)

The Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) describe Safeguarding as meaning that:

“Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about children and young people’s welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.”

The Department for Education’s statutory guidance, “Keeping children safe in education” (2019) defines Safeguarding and promoting the welfare of, 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. This policy takes account of this guidance together with the guidance contained in “Working Together to Safeguard Children (2018), concerning how the various agencies concerned with child protection should interact.

The Safeguarding Vulnerable Groups Act 2006 (“SVGA”) extends this legal duty to vulnerable adults. The Protection of Freedoms Act 2012 (“TPoFA”) amends some of the provisions of the 2006 Act and sets out the type of activity in relation to children and vulnerable adults which is regulated. This policy ensures compliance with the College’s legal obligations under these acts.

1.2 Who Are We Safeguarding?

The Children Act 1989 states the legal definition of a child is ‘a person under the age of 18’. ‘Young person’ is not a legal term, for the purposes of the policy and procedures, a young person is someone who might not perceive themselves as a child, but who is still in the age range of the legal definition, and therefore falls within the term ‘child’.

A vulnerable adult is, as defined by TPoFA, a person aged eighteen and over, ‘and who requires the provision of “regulated” activity’.

“Regulated activity” is defined as:

- Providing health care
- Providing personal care
- Providing social work
- Assisting with general household matters
- Assisting in the conduct of a person’s own affairs
- Conveying
- Day-to-day management or supervision of any person engaging in the above

Adults are not “vulnerable” under the provisions of the Act because of the setting in which they receive this activity or because of their own personal characteristics or circumstances. However, the College recognises that it has a more general moral duty to safeguard the well-being of someone who may be disadvantaged, particularly those who are or may be “in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation’ (Department of Health, 2000).

1.3 Safeguarding from Radicalisation

While Morley College London is committed to providing a secure environment for all of our students, staff and our wider community it recognises this is currently threatened by attempts to exploit vulnerable people, including children, young people and vulnerable adults to involve them in terrorism or activity in support of terrorism. The purpose of this Policy is to set out the means by which the College endeavours to prevent such exploitation.

Statutory Guidance issued under the Counter-Terrorism and Security Act 2015 requires educational institutions to have “due regard to the need to prevent people from being drawn into terrorism”. The College has a duty under the Guidance, issued as part of Prevent, the Government’s strategy to safeguard children and other vulnerable people from becoming radicalised in such a way, to help safeguard learners from being drawn into both violent and non-violent extremism. This Policy therefore sets out the measures put in place to fulfil this duty.

1.4 Why is Safeguarding necessary at Morley?

Morley provides learning opportunities for students aged 16-18 who are by definition “vulnerable” under the SVGA. It also has frequent contact with children through taster days, summer schools, family classes, and other community learning opportunities. The College currently runs crèches at its North Kensington Centre and at the Lewington Centre, its community-based location on the Southwark/Lewisham border. The College is therefore required to adhere to the policies and procedures of the relevant local authorities in respect of child protection and to those of the Ofsted inspectorate and the Office for Students (OfS).

We also take pride in supporting vulnerable adults in their studies, not only by including courses specifically for adults with learning and other disabilities in our course offer, but by facilitating their participation in our main and community learning programmes. The College also acknowledges that given the communities it serves and its open and inclusive ethos means it is likely that there will be members of its student cohort who are vulnerable to being drawn into extremist activity.

Section 175 of the Education Act 2000, which reinforces the Children Act 1989, places a statutory duty on governing bodies of schools and colleges to promote the welfare and safety of children. The Department for Education’s “Keeping children safe in education” provides statutory guidance for schools and colleges. The SVGA and the Further Education (Providers of Education) (England) Regulations 2006 extend this statutory duty to vulnerable adults. The SVGA as amended by TPoFA places a legal obligation on the College to ensure that every person who is engaged in Regulated Activity has been assessed using data gathered by the Disclosure and Barring Service (DBS), including relevant criminal convictions, cautions, police intelligence and other appropriate sources. Anyone who has been barred by the Disclosure and Barring Service is not permitted to be employed in Regulated Activity. The acts also place a duty on the College to make referrals to the Disclosure and Barring Service in particular circumstances (see Appendix 5)

2. MORLEY COLLEGE LONDON IN CONTEXT

2.1 Morley in overview

Morley College Limited is a company limited by guarantee and a registered charity, in the further and adult education sector. Following merger on 3 February 2020 with the former Kensington and Chelsea College, Morley College London (the name under which Morley trades) operates on three main sites in North Kensington, Chelsea and Waterloo. It also provides courses at two satellite sites in Lambeth (the Stockwell Centre) and Southwark (the Lewington Centre) and delivers learning under contracts it holds with the boroughs of Lambeth and Kensington and Chelsea from a range of community settings. It subcontracts some of its provision for 16-18 year olds to independent training providers who operate on college premises and a small proportion of its adult provision to providers who deliver courses away from the college.

The College welcomes over 17,000 students each year (of which between 400 and 500 each year are aged 16-18) following a wide range of full-time and part-time, accredited and non-accredited courses in the arts, culture and applied sciences. It employs 860 staff including c. 530 tutors engaged on a sessional basis. It also welcomes the public onto its premises to attend a range of events, exhibitions, concerts and other activities.

2.2 Morley's ethos

Through its Prevent strategy, the Government has identified the promotion of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” as being a key aspect in safeguarding people from being drawn into terrorist activity. Those values have been embedded in the culture of the College since its establishment over 130 years ago. Founded in 1889 as the “Morley Memorial College for Working Men and Women”, Morley was the first institution of its kind to admit men and women on an equal basis and its commitment to equality and diversity lies at the heart of its mission and very purpose. Democratic principles have been a feature of the College’s organisation since its inception and remain fundamental to its culture today, through both formal (student representation on College committees, the Student Council, Class Representatives Fora) and informal mechanisms, putting those values into action.

Emanating from those democratic principles, a collegiate dialogue between tutor and student in order to understand and facilitate the meeting of learning goals governs Morley’s teaching approach. The College therefore values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. Both students and teachers have the right to speak freely and voice their opinions. However, that freedom comes with responsibility: free speech that is designed to manipulate the vulnerable, that leads to violence and harm of others or that transgresses the laws and policies governing equality, human rights, community safety and community cohesion will not be tolerated by the College.

2.3 Morley in practice

Notwithstanding its cohort of 16-18 year old students, Morley is predominantly a specialist provider of adult education with a strong culture of equality and diversity and personalised engagement with students either in class, through the democratic structures that run through the College or its range of enrichment activities. Morley therefore recognises that it does not *of itself* constitute a high-risk environment where abuse or radicalisation of vulnerable individuals is likely to take place, while the part-time nature of the majority of its students means there is only limited

opportunity for it to do so. Nevertheless, given its position in the midst of very diverse communities, the College is very aware that it cannot be complacent and that such concerns may impact on students in their lives outside of the College. The College puts the students first in everything it does and considers the safety of its students and staff as a priority.

3. POLICY STATEMENT

Morley College is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults, engaged in the breadth of its activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse or exploitation of children and vulnerable adults, including being drawn into extremist activity.

- The College seeks to ensure that its policy and procedures comply with statutory duties; reflect guidance and good practice in safeguarding children and vulnerable adults; and that Safeguarding arrangements are proportionate and based upon common sense.
- The College recognises that it has a duty to help staff and students recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged. While any definition of what constitutes abuse can never be exhaustive, an outline of those behaviours that are most typically identified as being abusive is set out in Appendix 3.
- The College will ensure that processes are in place to check the suitability of staff and students working directly with vulnerable adults and children. Some staff and students across the College will be in regular or significant occasional contact with children or vulnerable adults in the course of their teaching or other work. Such staff and students must have satisfactory Disclosure and Barring Service (DBS) disclosures, at an appropriate level, before working with children or vulnerable adults.
- Morley considers that exploitation and radicalisation constitute a form of abuse and as such will be viewed as Safeguarding concerns. As Prevent acknowledges, the current threat from terrorism in the United Kingdom is underpinned by the exploitation of vulnerable individuals in order to involve them in terrorism or in activity in support of extremism and terrorism. Further information on vulnerability to radicalisation and extremist views is given in Appendix 6 below. The College therefore considers it essential that students and staff see Morley as a safe place where students can discuss and explore controversial issues safely and in an unbiased way and where staff encourage and facilitate this, but where failure to challenge extreme views or behaviour and to treat them as normal is not accepted.
- The College recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and that failure to challenge extremist views would represent a failure to protect our students and may put vulnerable people at greater risk of future manipulation and exploitation.
- The College will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. It will teach and encourage students to respect one another and to respect and tolerate difference, especially when dealing with others of a different faith or no faith. The College recognises its responsibility to keep students safe and prepare them for life in modern multi-cultural Britain and globally.

4. POLICY OBJECTIVES

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

- Through the creation of an open culture which respects all individuals' rights, discourages bullying and discrimination of all kinds and, while recognising the right to freedom of speech, does not accept the expression of violent extremist views.
- By identifying a member of the Board of Governors and a member of the Senior Leadership Team who have overall responsibility for vulnerable adult matters and other staff as Designated Persons at each College centre, who will receive training in this field and act as a source of advice and support to other College staff.
- By informing children and vulnerable adults of their rights to be free from harm and encouraging them to talk to College staff if they have any concerns
- Through the ongoing programme of support, at an appropriate level, to promote self-esteem and social inclusion and address the issue of the protection of children and vulnerable adults in the wider context
- By providing a safe environment for all students, staff and visitors by, amongst other measures:
 - Promoting a caring, safe and positive environment within the College
 - Ensuring that our staff are appropriately trained in Safeguarding and child protection according to their role and responsibilities and keep a record of all training undertaken and that all staff receive Safeguarding updates and bulletins on at least an annual basis.
 - Encouraging the self-esteem and self-assertiveness of all students through the curriculum so that the students themselves become aware of danger, risk, and acceptable behaviour and where to seek help and advice if they are concerned for their own or another's safety.
 - Working in partnership with all other services and agencies involved in the Safeguarding of students including the Prevent and the Channel programme
 - Displaying appropriate posters that detail contact numbers for child protection help- lines
 - Always following "safe recruitment" procedures when appointing staff or volunteers to work in our College
 - Welcoming visitors in a safe and secure manner and ensuring visiting speakers are given prior consideration through our Visiting Speaker Policy
 - Undertaking risk assessments when planning out of College activities or trips
 - Ensuring that sub-contractors, outsourced and agency staff and any community groups which use our premises for the provision of services to children or vulnerable adults have Safeguarding knowledge and understanding evidenced by a policy or are prepared to adopt our own policy.
- Ensuring our IT systems and procedures provide and promote e-safety and cyber security, including by ensuring all users of our systems abide by our IT Systems Acceptable Use Policy

5. SCOPE OF POLICY

This Policy applies to all staff (including agency staff and governors), academic and professional services staff employed by the College, temporary staff and volunteers. All have a legal responsibility to take seriously any Safeguarding (including Prevent) concerns that come to their attention and follow the procedures given.

Subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting the Designated Person with responsibility for Safeguarding in relevant College centre.

Students who have concerns about other students or the behaviour of adults towards them rely on this Policy to ensure they are taken seriously.

It is not the College's responsibility to investigate abuse, neglect or possible radicalisation. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

6. RESPONSIBILITY STRUCTURE

The College has identified an organisation structure for safeguarding children and vulnerable adults, with key staff having designated Safeguarding responsibilities including:

Cross-College:

- **Deputy Principal/Deputy CEO:** Designated Safeguarding Lead (overall leadership of Safeguarding)
- **Head of Student Services:** Deputy Safeguarding Lead (students), provides management and coordination role including investigations if required
- **Chief People Officer:** Deputy Safeguarding Lead (staff) supports staff and provides legislative support when required
- **Governor:** a member of the Board has responsibility for overview of Safeguarding

At Centre level:

- **Centre Principals:** Deputy Safeguarding Leads, with overall responsibility for safeguarding within each College Centre
- **Specific members of the Student Services Team:** Safeguarding Officers to provide support to the Centre Principals to deal with student-related Safeguarding issues.

The above structure with relevant names and contact details will be displayed across all College Centres.

In those areas where staff and students work with children and vulnerable adults as part of their roles, responsibility for ensuring Safeguarding arrangements are in place and are adhered to rests with the manager of the area concerned.

All staff and students are required to take a shared responsibility for the protection and safety of any children and vulnerable adults. They must be aware of and abide by the College's Policies and Codes of Good Practice.

The Chief People Officer is responsible for ensuring the College operates safe recruitment procedures and ensures that appropriate checks are carried out on all new staff and volunteers.

Where an allegation of abuse or inappropriate behaviour is made against a member of staff and relates to their actions as a member of the College, Human Resources will advise and guide the line manager of the member of staff against whom allegations have been made in relation to employment issues. Further information on what constitutes abuse is given in Appendix 3.

Where an allegation of abuse or inappropriate behaviour is made against a student and relates to their actions as a member of the College, the Centre Principal will advise the relevant staff on the student disciplinary procedure. Further information on what constitutes abuse is given in Appendix 3.

7. RESPONSIBILITIES OF STAFF

Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility. Everyone who comes into contact with children and vulnerable adults and their families and carers has a role to play in safeguarding them. In order to fulfil this responsibility effectively, all professionals should consider, at all times, what is in the best interests of the child or vulnerable person.

Staff and students working in direct contact with children and vulnerable adults on a day-to-day basis may come across signs of harm and/or abuse. Staff must ensure that significant concerns for the wellbeing of a child or vulnerable adult are reported to the appropriate member of the Safeguarding Team detailed in Section 6 above via the form provided in Appendix 8 or in person when it is more practical to do so. This will invoke the appropriate procedures to protect the child or vulnerable adult, involving Social Services and/or the Police as appropriate. Where staff members are unsure and need guidance about Safeguarding issues, they should seek support from their line manager or a member of the Safeguarding Team.

If a child or vulnerable person is suffering abuse then the likelihood is that they will talk to someone they know and trust. False allegations of abuse do occur, but they are rare. Any allegations of abuse, or suspicions of abuse, need to be taken seriously and handled in a sensitive manner. No College member of staff carries out investigations or decides whether a student has been abused. Our obligation is to notice and report.

Individual members of staff should never deal with child abuse disclosures in isolation and must always report them as outlined below. Information will be kept confidential and only be shared with people where it is necessary for the protection of the student.

In the event of any concern by any member of staff, or if any member of staff is approached by a child or vulnerable adult student, regarding any matter concerning abuse, they must tell the child or student that they are bound to pass on the information to the designated person. The person receiving the information should pass it on as a matter of urgency to ensure the matter can be dealt with as soon as possible. This should be done using the referral form in Appendix 8 or by speaking directly to a member of the Safeguarding Team. If for whatever reason, none of this is possible the staff member should contact a member of the Senior Leadership Team. No one must be promised that anything they say will be kept confidential if the matter is related to a child or vulnerable adult protection or abuse. It is helpful for a member of staff to tell the person raising the concern they will jot down anything they actually say to ensure as exact a record as possible is kept for future reference.

Summary Guidance is set out in Appendix 1; Detailed Guidance is set out in Appendix 2. Staff should make themselves familiar with these documents.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's Safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. The College's whistleblowing procedures should be followed where there are such concerns.

Where a staff member feels unable to raise an issue with their manager or member of the Safeguarding Team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at <https://www.gov.uk/whistleblowing>
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 0280285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

8. CONTROLS

Risk assessments must be carried out for all activities involving children and vulnerable adults, and reasonable, proportionate adaptations made to those activities as a result in order to safeguard the wellbeing of such individuals.

The College reserves the right to refuse to admit a child or vulnerable adult to a programme of study, or other college-managed activities, if we judge that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate, including measures to manage inappropriate or disruptive behaviour.

Where children or students work or volunteer on specified activities or in specified settings they will be subject to the relevant checks as outlined in the relevant departmental procedures.

Where children or students, staff members or visitors are present on College premises, they remain the responsibility of their parent/guardian. However, this does not remove the obligations of College staff or volunteers outlined above in section 7.

Safeguarding the wellbeing of any children visiting the College without their parent/guardian is the responsibility of the organiser of the activities in which the child is participating. However, nor does this remove the obligations of College staff or volunteers outlined above in section 7.

Safe Recruitment

The College will carry out pre-employment identity, right-to-work and qualification checks and take out appropriate references in line with para 138 of Keeping Children Safe in Education. Disclosure check will be carried out for all staff as required by law. For those engaged in Regulated Activity before a DBS certificate is available, a barred list check must be carried out.

Enhancement DBS checks will be obtained when required by the designation of work as "regulated" under TPoA, or by the Disclosure and Barring Service. The definition of what constitutes Regulated Activity is set out in Appendix 4. The College will also normally undertake a disclosure check where an employee is engaged in work which was previously designated as

regulated under the SVGA. Appendix 4 also sets out the where this applies.

These requirements will be reviewed annually and updated where necessary:

- Disclosure checks will be obtained for new starters prior to the commencement of any work where the Disclosure check is required.
- The College will adhere to all relevant regulations and codes of practice as issued by the DBS.
- All information regarding Disclosure certificates will be processed by Human Resources and will not be passed to third parties.
- Human Resources will confirm to the relevant programme / service manager whether a satisfactory disclosure has been obtained. This information will be recorded securely on the Human Resources database. If items appear on the Disclosure that give cause for concern, Human Resources will discuss these with the relevant line manager. Human Resources will then discuss with the applicant whether the employment can continue or whether any conditions are to be applied.

Employing Persons with Criminal Records:

- The possession of a criminal record is not a bar to employment at Morley. If an offer of employment has been made that is dependent on the obtaining of a Disclosure by the successful applicant the offer will only be withdrawn if the disclosed information is relevant to the duties of the post or the selection criteria for that post. If appropriate consideration will be given modifying the offer of employment rather than withdrawing it.
- Where a post is exempt from the Rehabilitation of Offenders Act, 1974. (where it involves working with children, the elderly or the sick) this will be identified in the job description.
- If employment is not dependent on a Disclosure and the applicant declares convictions the offer will only be withdrawn if the conviction(s) is relevant to the duties of the post or the selection criteria for that post.

Agency and Third Party Staff:

- Where the College engages agency or third-party staff, including those staff delivering provision through a College sub-contractor, written notification must be obtained that the organisation concerned has carried out checks on an individual that the College would otherwise have undertaken.

9. RECORD KEEPING

The Designated Safeguarding Lead and Deputy Safeguarding Leads will retain the central record of all allegations and actions taken. This will include:

- The formal reports made via the formal reporting systems in use at the time
- Any notes, memoranda or correspondence dealing with the matter
- Any other relevant material

Copies of reports, notes etc. will be kept securely locked at all times, but will be shared in accordance with the Data Protection Act 2018.

From the academic year 2020-21 the College has adopted a software package called My Concern to report, record and monitor Safeguarding incidents. My Concern allows the Safeguarding Team to easily manage and record all Safeguarding and wellbeing concerns. It also helps to protect those at risk by allowing early intervention using a secure platform. The College-wide Safeguarding Team described in Section 6 of this Policy will be responsible for receiving and recording all Safeguarding referrals onto My Concern.

10. TRAINING

All staff within the College, including those engaged by contracted-out services, will undergo training so that they are fully aware of this policy and their responsibilities.

- Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities.
- Staff and volunteers involved in the direct supervision of children will receive appropriate Safeguarding and child protection training which is regularly updated, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- The College has adopted a Protocol for staff development in Safeguarding and Prevent awareness to ensure staff and volunteers are aware at a proportionate level of the risks of a vulnerable individual suffering abuse or of being radicalised (see Appendix 6).
- The College-wide Safeguarding Team will receive training in the use of My Concern

11. REVIEW AND MONITORING OF POLICY AND PROCEDURES

The Deputy Principal/Deputy CEO will, as Designated Safeguarding Lead, keep under review and monitor the policy and procedures and recommend and implement approved changes necessary on an annual basis. If required, a revised version of the policy will be submitted to the College's Audit Committee and then to the Governing Body as required to ensure that any identified deficiencies or weaknesses have been dealt with without delay.

The Deputy Principal/Deputy CEO will report to each meeting of the Audit Committee any formal Safeguarding or Prevent disclosures that have been made to the relevant authority. In addition, the Deputy Principal/Deputy CEO will submit an annual report to the Audit Committee on the steps the College has taken in the past year to implement this Policy.

APPENDIX 1

SUMMARY PROCEDURE FOR REPORTING DISCLOSURES

This procedure **must** be followed whenever any member of College staff hears an allegation from a child or vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child or vulnerable adult may be abused, or where there are concerns that there has been a vocal or active expression of extremist views or behaviour:

RECEIVE

- What is said
- Accept what you are told – you do not need to decide whether or not it is true
- Listen without displaying shock or disbelief

REASSURE

- The person making the disclosure
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)

REACT

Do not delay in registering your suspicions or concerns

- Respond to the person making the disclosure but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next, i.e. inform a Designated Safeguarding Officer or a member of the Senior Leadership Team

RECORD

- Make notes as soon as possible – during the interview if you can
- Follow the College’s reporting procedures using the Safeguarding Referral Form in Appendix 8
- Include: time, date, place, the individual’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

SUPPORT

- Consider what support is needed for the person making the disclosure – you may need to give them a lot of your time or they may need to be referred
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask

APPENDIX 2

Detailed Guidance & Procedure for staff in dealing with instances of abuse

Morley College London recognises its legal duty to work with other agencies in safeguarding children and vulnerable adults and in responding to abuse or to vocal or active expressions of extremist views or behaviour. All members of staff involved with children and vulnerable adults (teaching and non-teaching) have a responsibility to be mindful of issues related to their safety and welfare and a **duty** to report and refer any concerns however “minor” they appear to be.

IT IS NOT THE JOB OF COLLEGE STAFF TO INVESTIGATE THESE CONCERNS

In cases where it is deemed that a vulnerable person lacks sufficient understanding to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed about any concerns about the vulnerable person’s welfare or any action taken to safeguard and promote the vulnerable adult’s welfare, providing this does not compromise the individual’s safety. Where there are possible concerns about their safety, unconditional confidentiality cannot be guaranteed and should not be offered.

Where there is a suspected child protection issue the Department for Education’s advice “What to do if you are worried a child is being abused- Advice for practitioners”,¹ provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website² also provides useful additional information on types of abuse and what to look out for.

Morley College London will be proactive by taking positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns:

- information regarding Safeguarding of children and vulnerable adults and a summary of the College’s policy will be included in the student handbook
- the Safeguarding Policy will be made available on the College website
- staff most likely to encounter children and vulnerable adults will be provided with appropriate training

When students make allegations about abuse or neglect, they should always be listened to, have their comments taken seriously and, where appropriate, the allegations should be investigated thoroughly.

If you suspect that a student is going to discuss abuse, either towards themselves or another, establish GROUND RULES CONCERNING CONFIDENTIALITY. This information will need to be shared with a nominated person for safeguarding vulnerable adults and possibly with a counsellor.

¹ <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused>

² <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

The designated person will then contact the relevant authority (the local authority's social services child or adult protection unit or, in cases where the College is safeguarding against people being drawn into terrorism, the Regional HE/FE Prevent Co-ordinator), in order to discuss appropriate action. The relevant authority is responsible for coordinating action in their respective areas of concern, including liaison with police.

If the individual making the disclosure is fully aware of what could happen, they can:

- choose whether they want to speak now or have time to think about it
- be as informed as possible regarding the implications of passing on this information.

If the individual making the disclosure is the vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

What is Abuse?

Abuse is behaviour towards a person that either deliberately or unknowingly causes a vulnerable adult harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated. Appendix 3 sets out fuller definitions but abuse can take various forms, including:

- physical
- neglectful
- sexual
- financial
- psychological/emotional
- institutional or
- discriminatory in nature

Procedure for staff dealing with suspicions or allegations of abuse to a child or vulnerable adult

Any suspicion, allegation or incident of abuse must be reported to a designated member of staff with responsibility for safeguarding as soon as possible and in any event within 2 hours, as described in Section 7 above. If this is not possible, a member of the Senior Leadership Team must be notified.

The designated member of staff must immediately discuss the matter with the appropriate local authority social services team or in cases concerning the Safeguarding of individuals against being drawn into terrorism, the Regional HE/FE Prevent Co-ordinator. Where a vulnerable adult is concerned, if consent has not been gained from the vulnerable adult, the designated member of staff should discuss with the relevant authority what action will be taken to inform the parents /carers of the vulnerable adult and a note of that conversation should be made. The designated member of staff must notify the Deputy Principal of the College as soon as practicable and in any event within 2 hours of the initial concern arising.

A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing within 24 hours.

Responding to a Disclosure

It is likely to be extremely difficult for a student to disclose abuse and all staff have a role in supporting students through this process and ensuring we help them give as much information as possible. If a student makes a disclosure, staff should:

- React calmly so as not to make the student more anxious or discourage them from telling more.
- Listen carefully to what the student says without interruption.
- Use open questions to encourage further information, but do not probe.
- It is OK to have periods of silence
- Take what the student says seriously.
- Reassure the student that he/she was right to tell, and that he/she is not to blame.
- Reassure the student that there are many sources of help and that you will help and support them in seeking help.
- Explain to the student that you will need to discuss with the DSL/ ADSL naming them – and state that you can be with them when they meet. It is often most appropriate to take them to meet the DSL or one of the Safeguarding Officers straight away, provided they are comfortable with this.
- Make a full record of what was said, using their own words (don't assume or paraphrase) ensuring you record includes:
 - The date
 - The time
 - The place where the disclosure of information took place
 - The place where the alleged abuse happened
 - Your name and the names of others present
 - The name of the complainant and, where different, the name of the vulnerable adult who has allegedly been abused
 - The nature of the alleged abuse
 - A description of any injuries observed
 - The account which has been given of the allegation

Report the matter to the DSL/ Safeguarding Team without delay according to the relevant procedure described in Section 7 above using the referral form in Appendix 8.

Responding to an allegation about a member of staff

Any suspicions, allegations of actual abuse of a child or vulnerable adult by a member of staff must be reported to the lead designated member of staff immediately. On being notified of any such matter, the designated member of staff shall:

- **Notify** the Principal, who will initiate an investigation of this incident in line with the disciplinary procedure,
- **Take** such steps as he/she considers necessary to ensure the safety of the person in question and any other person who might be at risk.
- **Report** the matter to the relevant authority
- **Ensure** that a report of the matter is completed by the person who reported the original concern. If the complaint is made against any member of the Senior Leadership Team or a designated Safeguarding officer, then the person dealing with the complaint must be either the Principal, or Deputy Principal/Deputy CEO. If the complaint is made against the Principal then the Chair of the Governing Body should be immediately notified.

APPENDIX 3

Definitions of Abuse

Physical Abuse

Physical abuse is the physical ill treatment, which may or may not cause physical injury and causes harm to the individual's person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring.

In certain communities physical abuse may include Female Genital Mutilation (FGM). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon staff to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. If staff discover that FGM appears to have been carried out, this must be reported immediately to the DSL/ Safeguarding Team who provide assistance in reporting to the Police.

Psychological and Emotional Abuse

Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of cyber abuse or bullying. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse.

Sexual Abuse

Sexual abuse involves a vulnerable individual participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual. The activities may include: physical contact, including penetrative or non-penetrative acts, e.g. rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person's body (e.g. breasts, buttocks, genital area); Non-contact activities, e.g. exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

Neglect

Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for vulnerable individuals to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk. Neglect may involve: failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs

Financial/Material Abuse

Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person's financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual, obtaining money by deception,

or stealing money. It includes the withholding of money or the improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

Institutional Abuse

Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users' relationships and activities.

Discriminatory Abuse

Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal access to health or social care.

Significant Harm

Sometimes, a single traumatic event may constitute significant harm, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adult's physical and psychological development.

General

Psychological and emotional abuse, perhaps combined with physical or other forms of abuse can, especially when exercised against a child or vulnerable person, lead to the individual being forced into violent extremism, gangs and other criminal activity or, in certain communities, into Forced Marriage (FM). Concerns in these areas require immediate reporting to the police.

Current national and local Safeguarding issues which could affect our students include:

- radicalisation
- bullying including cyber bullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- sexting
- teenage relationship abuse
- trafficking
- peer on peer abuse
- county lines drug trafficking associated with grooming

APPENDIX 4

Disclosure Checks

The College will require an Enhanced Disclosure Check by the Disclosure and Barring Service for any staff, volunteers or students who are undertaking Regulated Activity at the College. All staff will require a Basic Disclosure Check even if they are not undertaking Regulated Activity.

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

Regulated activity includes:

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

The College will also normally undertake a disclosure check where an employee is engaged in work which was previously designated as regulated under the SVGA. Such work includes duties which involve regular contact with someone who:

- is in residential accommodation, (Section 59 (2)(a) indicates this in connection with care or nursing or a residential special school)
- is in sheltered housing,
- receives domiciliary care,
- receives any form of health care,
- is detained in lawful custody,
- is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000
- receives a welfare service of a prescribed description, (Section 16 (5)(a) indicates this includes counselling or advice)
- receives any service or participates in any activity provided specifically for persons who has particular needs because of his/her age, has any form of disability or has a prescribed physical or mental problem. (Dyslexia, dyscalculia and dyspraxia are excluded disabilities)
- receives payments (directly or via payments made to another on his/her behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001
- requires assistance in the conduct of his/her own affairs. (Section 59 (10)(a) indicates this is where a lasting power of attorney exists.

APPENDIX 5

Duty to refer

The College is under a duty to refer information to the Disclosure and Barring Service (DBS) in certain circumstances, for example, where there is a concern relating to the risk of harm to children or vulnerable adults.

Information that is required to be referred:

If the College holds information on disciplinary proceedings related to a person engaged in regulated or controlled activity, ***it will be under a duty to provide the DBS with information if the College 'withdraws permission for the person to engage in the activity'.***

The College may take action to stop an employee working in regulated or controlled activity when:

- the person has committed an offence that is subject to an automatic bar, or a bar with the right to make representations;
- the person has engaged in 'relevant conduct' as defined in the Act (see below); or
- the 'harm test' is satisfied (see below).

'Relevant conduct' is:

- conduct which endangers or is likely to endanger a child or vulnerable adult;
- conduct which, if repeated against or in relation to a child or vulnerable adult, would endanger or would be likely to endanger that child or vulnerable adult;
- conduct involving sexual material relating to children (including possessing such material);
- conduct involving sexually explicit images depicting violence against humans; and
- conduct of a sexual nature involving a child or vulnerable adult. .

The ***'harm test'*** is that the person may:

- harm a child or vulnerable adult;
- cause a child or vulnerable adult to be harmed;
- put a child or vulnerable adult at risk of harm;
- attempt to harm a child or vulnerable adult; or
- incite another to harm a child or vulnerable adult.

Where the College takes action to stop an employee working in regulated or controlled activity for any of these reasons, there will be a legal duty to refer information to the Independent Safeguarding Authority (ISA). This could be a situation involving:

- dismissal;
- a case that could have resulted in dismissal had the employee not resigned before the procedure concluded; or
- where the College stops a person working in regulated/controlled activity but continues to engage him/her in other that is neither regulated nor controlled activity.

Information that may be referred:

If the College has a concern about an employee's behaviour, they may report this to the ISA. The DBS will consider all relevant information. For example, if a disciplinary case has not been completed but the college suspects that the individual may pose a risk of harm, it may refer him/her to the DBS.

APPENDIX 6

Safeguarding Individuals from being drawn into violent extremism

1. Under the Counter-Terrorism and Security Act 2015 the Government has issued statutory Guidance on Prevent, its strategy “to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions”
2. The Guidance includes sector specific duties, and FE is one of the specified sectors. Those duties are monitored by Ofsted as part of its inspection regime and by the OfS as a condition of registration.
3. It is therefore vital that all staff are aware of the College’s responsibilities in this respect and are aware of what to do should they have a concern about a student or colleague who they believe may be vulnerable to being drawn into violent extremism.
4. Prevent duties can be viewed as a particular aspect of a College’s Safeguarding arrangements and as such the College’s Safeguarding leads also have responsibility for ensuring the College meets its obligations. A risk assessment, using the template provided by the local Prevent Regional Co-ordinator, has been developed and is used by the College management teams to identify and monitor the actions required to meet these obligations.
5. The Prevent Strategy has a clear focus on tackling all forms of terrorism and extremism that is related to terrorism. Extremism is understood to be “vocal or active opposition to fundamental British values”, and in turn British values are defined as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”. Extremism also includes “calls for the death of members of our armed forces”.
6. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - seek to provoke others to terrorist acts;
 - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - foster hatred which might lead to inter-community violence in the UK.
7. Staff should be aware that there is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences. Most individuals, even those who hold radical views, do not become involved in violent extremist activity.
8. Where members of staff raise a concern about an individual, the College Safeguarding leads will consider the evidence and the circumstances and may then make a referral to the Prevent Regional Co-ordinator. The Prevent Regional Co-ordinator may then take further action under “Channel”, the Government’s “multi-agency approach to protect people at risk from radicalisation”. Channel aims to identify individuals at risk, assess the nature of that risk, develop a support plan and provide early intervention to protect and divert people away from the risk they face before any illegality occurs.

9. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
10. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to alienate students from their families and communities.
11. In considering individuals who may be vulnerable to radicalisation, any concerns may not relate only to those who are defined as “vulnerable” under the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012). Indicators of vulnerability in the context of radicalisation include:
 - identity crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - personal crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - personal circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - unmet aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement or reintegration; and
 - special educational need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

Identifying those who may be vulnerable to being drawn into terrorism which may lead a member of staff to make an internal referral, may be prompted by any of the following, although it is stressed that this list is not exhaustive:

- disclosures by students that they have been exposed to extremist actions, views or materials of others either inside or outside of college
 - graffiti, symbols, writing or art work promoting extremist messages or images
 - accessing extremist material online, including through social media, chat rooms, blogs, websites
 - unexplained changes in behaviour including poor attendance
 - expressing extremist or anti-western or anti-British (“democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs) views
 - use of extremist or “hate” terms to exclude others or incite violence
 - intolerance of difference
 - attempting to impose extremist views or practices on others
12. In assessing individuals’ vulnerability to being drawn into terrorism regard will be given to:
 - **Engagement** with a group, cause or ideology
 - **Intent** to cause harm; and
 - **Capability** to cause harm

APPENDIX 7

Safeguarding and Prevent Awareness – Staff and Volunteer Development Protocol

The College acknowledges the necessity for all staff and volunteers to have an appropriate level of awareness of the College's Safeguarding arrangements and the Government Prevent strategy and to have confidence about the course of action they should follow should they encounter a Safeguarding issue or an issue covered by Prevent.

In determining the appropriate level of staff development required for the College to fulfil its Safeguarding duties and meet its obligations under the statutory Prevent guidance, a risk-based approach has been adopted. This takes account of the likelihood that a member of staff will encounter an issue covered by the Prevent arrangements, based on an assessment of the potential for the cohort of students they may have contact with to include individuals vulnerable to radicalisation.

In addition to the requirements listed below, the College will, as part of its staff development programme provide scheduled updating sessions on Prevent awareness which any member of staff may attend to enhance or refresh their knowledge

All staff are required to read the briefing in the annex below within the first two days of their employment. Their line manager will discuss it with them to confirm their understanding of it as part of their induction and probation.

Additional Safeguarding and Prevent Training

In addition staff in any of the following categories must also have additional awareness training in Safeguarding and Prevent :

- All staff requiring a DBS check
- All other salaried staff
- Sessional teaching staff in Essential Skills, Community Learning, Advanced Learning and Higher Education
- ALS staff providing in class support and volunteers providing in class support in the above curriculum areas.

This additional training should be undertaken through:

- Attendance at one of the Safeguarding and Prevent awareness sessions delivered on a regular basis at the College. Please see the Professional Development Programme on the staff Development page of EMMA for details. However,
- the College recognizes that for some sessional tutors this may not be possible and staff unable to attend one of the sessions during their probation must complete the online training modules made available by the College; details of how to access the modules are issued to staff on joining the College and made available on the College intranet

The requirements above form part of staff probation and satisfactory completion of the required level of awareness training will be a condition of passing the probation period.

Sub-contracted (outsourced) and agency staff will be required to receive and note the College's Prevent Awareness Briefing which will be arranged in partnership with the sub-contractor or

through their line manager as appropriate. Such staff will be welcome and encouraged to attend the College based Prevent Awareness training that may be available.

Members of the Governing Body are also required to receive and note the College's Safeguarding and Prevent Awareness Briefing which is arranged through the Clerk as part of Governor induction. Additionally the Chair, Vice-Chair, Chair of the Curriculum and Standards Committee and the Governor Safeguarding lead will be required to undertake the additional awareness training outlined in (5) above. Regular Safeguarding and Prevent awareness sessions will form part of the Governor Development programme.

Annex: Staff Safeguarding and Prevent Briefing

What is Safeguarding?

Like all colleges, Morley has a *legal* duty to ensure that the risks of harm to the welfare of individuals are minimised and to take appropriate action to address any concerns about the welfare of vulnerable people. Morley is committed to Safeguarding and promoting the welfare of children, young people and vulnerable adults engaged in the breadth of its activities by ensuring there are appropriate arrangements in place to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse of children and vulnerable adults.

How does that affect my role at Morley?

As part of your probation you are required to undertake staff development in Safeguarding awareness either by attending one of the regular workshops the College provides or by completing an on-line training module. Staff are also encouraged to take up these opportunities while in post to refresh their knowledge. You should also familiarise yourself with the College's Safeguarding Policy which can be found in the College Documents section of the EMMA intranet site.

The key aspect of your Safeguarding responsibility is to know what to do if you encounter a Safeguarding issue. This could be something you have witnessed or something that has been disclosed to you by a student or colleague which suggests to you that a vulnerable individual is suffering some form of abuse. The Safeguarding Policy provides more information on what might constitute abuse.

Such circumstances are thankfully rare at Morley, but if you encounter them **doing nothing is not an option!** You must follow the College's simple procedure and ensure you report the incident or concern to the appropriate person. This could be to your line manager or one of the College's Safeguarding Officers.

Further details about how best to report your concerns are given in the Safeguarding Policy and a summary procedure is attached to this note.

What is Prevent

Prevent is the Government's strategy "to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals and working in key sectors and institutions".

Since colleges are considered one of those key institutions, Prevent places certain specific duties on Morley and its staff.

What is my Prevent duty?

Prevent is a particular aspect of Safeguarding: safeguarding against radicalisation. Your responsibility if you encounter an issue concerning extremist behaviour is therefore the same as for other Safeguarding issues: **receive** the concern, **record** it and **report** it as outlined in Appendices 1 and 2 of the College Safeguarding and Prevent Policy and in the summary below.

Those concerns might include:

- Expression of views which discriminate against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the College's expectations of behavior
- Possessing or accessing extremist materials.
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on Facebook.
- Use of extremist language
- Threats of violence

This list is not exhaustive: **If your professional experience gives you concerns about the behaviour of individuals then discuss this with a member of the Safeguarding Team.**

What else do I need to be aware of?

As part of your Safeguarding and Prevent duty all staff and volunteers have a duty to demonstrate and help develop values which underpin an awareness of social and moral responsibility in modern Britain.

Complying with the Prevent duty includes promoting and exemplifying the values of: **democracy, the rule of law, individual liberty, tolerance and mutual respect for those with different faiths and beliefs.**

This includes complying with the Equality Act 2010 by not discriminating against others on the basis of the following characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

All staff and volunteers are expected to uphold the values embedded within the Equality Act 2010 at all times. The College's Equality and Diversity Policy (also available on the EMMA intranet site) provides more information about your duties and sets out our expectations about what training you should undertake to help your awareness.

All staff and volunteers should use any relevant opportunities to promote the values of: democracy, the rule of law, individual liberty, tolerance and mutual respect for those with different faiths and beliefs. Staff and volunteers are welcome and encouraged to attend one of the College's termly Safeguarding awareness workshops to enhance their understanding or to undertake one of the Education and Training Foundation's on-line training modules which can be accessed at: <http://www.preventforfeandtraining.org.uk/>

At Morley you will come into direct contact with students and others and may get to know them well. You may witness activity and behaviour or receive information which other staff are not privy to. You should use your professional judgement to decide when concerns should be referred to the Safeguarding Team. If in doubt... report your concerns.

SUMMARY PROCEDURE FOR REPORTING DISCLOSURES

This procedure **must** be followed whenever any member of College staff hears an allegation from a vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a vulnerable adult may be abused, or where there are concerns that there has been a vocal or active expression of extremist views or behaviour:

RECEIVE

- What is said
- Accept what you are told – you do not need to decide whether or not it is true
- Listen without displaying shock or disbelief

REASSURE

- The student
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)

REACT

Do not delay in registering your suspicions or concerns

- Respond to the student but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next, i.e. inform a Designated Safeguarding Officer of a member of the Senior Leadership Team.

RECORD

- Make notes as soon as possible – during the interview if you can

- Follow the College's reporting procedures as described in Section 7 and in Appendix 8 (Safeguarding Referral Form) of the College Safeguarding and Prevent Policy
- Include: time, date, place, the student's own words – do not assume – ask, e.g. "Please tell me what xxxxx means".
- Describe observable behaviour and appearance
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

SUPPORT

- Consider what support is needed for the student– you may need to give them a lot of your time or they may need to be referred
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask

APPENDIX 8

Safeguarding Referral Form

Please email this form to safeguarding@morleycollege.ac.uk or return/email it directly to one your Centre Safeguarding Team

Date or referral:	Name of member of staff making referral:	
Name of student:	Student Number (if known):	
Is the student under the age of 18 – Y/N:	Student Telephone number (if known):	
Detail of concern. Please be sure to log all details and individuals concerned clearly		
Have you escalated this concern to an external organization? If so please insert details here.		
<i>For use of Morley College Safeguarding Team</i>		
Has this case been logged on My Concern?	Y	N
Date of log:	My Concern ref number:	
Member of Safeguarding Team who processed concern:	Date Processed:	