



Safeguarding Children and Adults at Risk Policy

London Metropolitan

College

2023-2024

Purpose

At London Metropolitan College (LMC) safeguarding and promoting the welfare of apprentices is everyone's responsibility. Everyone at LMC who comes into contact with apprentices, their families and employers have a role to play in safeguarding children. LMC recognises that we are an important part in the wider safeguarding system. All staff will understand and recognise that a one size fits all approach may not be appropriate for all apprentices and a more personalised or contextualised approach for more vulnerable apprentices, apprentices who are victims of abuse and some SEND apprentices may be needed. In order to fulfil this responsibility effectively, all staff will make sure their approach is apprentice centric. This means that they will consider, at all times, what is in the best interests of the apprentice.

LMC is committed to safeguarding the welfare of all children and adults at risk involved with the college.

In line with national legislation and relevant national and local guidelines relating to safeguarding and the prevent duty the purpose of this policy and supporting documents is to demonstrate this commitment and ensure a culture of zero tolerance of harm to children and adults at risk. This extends to recognising and reporting harm experienced anywhere, including within our activities, in the community, in the person's own home and/or in any care setting.

To achieve this the College will:

- Use safe recruitment and selection practices that reduce the risk of harm to children and adults at risk from people unsuitable to work with them or have contact with them.
- Ensure an appropriate level of safeguarding training is available to its staff members and any relevant persons linked to the College who requires it and as a minimum covers:
 - The Safeguarding Children and Adults at Risk Policy and supporting documents.
 - Their role and responsibilities for safeguarding children and adults at risk
 - The recognition of children and adults who may be at risk and the circumstances which may increase risk.
 - Knowing how abuse, exploitation, neglect, radicalisation and extremism manifests itself.
 - What to do and who to speak to if they have a concern relating to the welfare or wellbeing of a child or adult at risk within the College
- Expect all employees to maintain confidentiality and keep records secure in line with General Data Protection Regulations (GDPR)
- Share information with the appropriate bodies for the purposes of keeping children and adults at risk safe for example: Disclosure and Barring Service, Police, Local Authority/Social Services.

Scope

The Safeguarding Children and Adults at Risk Policy and supporting documents apply to all individuals involved in the College including Board members, staff, students, guest lecturers and to all concerned about the safety of children and adults at risk whilst taking part in college activities.

Whilst this policy is applicable to students who come into contact with children or adults at risk, students themselves do not come within scope of this policy as either a child or an adult at risk.

We expect our partner organisations, including for example, accrediting bodies who may visit the premises and interact with our students to have due regard to this policy.

Responsibilities

All staff, students and individuals working with children and adults at risk on behalf of the College have a responsibility for safeguarding and are asked to support the College's commitment to safeguarding by:

- Knowing the systems and procedures which support safeguarding.
- Understanding their role and responsibility for safeguarding and ensuring they remain up to date with safeguarding training and learning opportunities appropriate for their role,
- Ensuring any concern that a child or adult is not safe is taken seriously, responded to promptly, and followed up in line with this policy and associated processes,
- Ensuring that activities are delivered in a way which keeps all children and adults safe,
- Ensuring that a safe and positive environment is created and maintained with an open, listening culture where people feel able to share concerns without fear of retribution.

Definitions

- Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- Child Protection refers to the situation where a child is suffering significant harm, or is likely to do so, and action is required to protect that child.
- Child/Young Person - anyone under the age of 18 (reference throughout this document will also be made to apprentices who may also be under the age of 18).
- Significant Harm, The Children's Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- Vulnerable Adult – is a person who is aged 18 or over and who is, or may be, in need of community services due to age, illness or a mental or physical disability, and who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.
- Regulated Activity - Those working in specified activities will be classed as engaging in regulated activity. Put simply, this is anyone who is teaching, training, instructing, coaching, caring for or supervising children or providing personal care, healthcare, social work, assistance with household matters and personal affairs, and transportation to vulnerable adults.

Policy Statement

All staff at LMC have a duty and responsibility to safeguard the young people attending our training centre, irrespective of their role:

- All staff will be responsible for identifying concerns early and providing help for young people, to prevent concerns from escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989; i.e., Section 17 (Children in Need) and Section 47 (a child suffering harm, or likely to suffer significant harm). These concerns will be discussed with LMC's Designated Safeguarding Lead (DSL) or their deputy.
- All staff will be aware of the process and principles for sharing information within LMC which supports safeguarding.

- All staff should be aware of the local early help process and understand their role within it.
- All staff will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the training centre and/or can occur between young people outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) will consider whether apprentices are at risk of abuse or exploitation in situations outside the home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) child sexual exploitation, criminal exploitation and serious youth violence.

Equalities Statement

We are committed to anti-discriminatory practice and recognise young people and families' diverse circumstances. We ensure that all apprentices have the same protection, regardless of ethnicity, nationality, age, gender, race, economic condition, disability, and religion. With regards to safeguarding we will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination, and our Public Sector Equality Duty.

Raising a concern

Safeguarding concerns must be raised when there is either disclosure of harm, exploitation, or abuse or where there is a risk of such. LMC does not expect staff or students to decide whether someone has been harmed or is at risk. However, the university do expect concerns to be raised as per this policy, so that action can be taken. Situations where concerns should be raised (but are not limited to):

- A child or vulnerable adult discloses that they have been subject to harm, exploitation, or abuse.
- A student or staff member discloses information about their family member which suggests there is a risk of harm, exploitation, or abuse to a child or vulnerable adult.
- There is a concern that a child or vulnerable adult is at risk of harm or manipulation.
- Changes have been noticed regarding a child or vulnerable adults' appearance which could suggest harm, exploitation, or abuse.

Designated Safeguarding Lead (DSL) will:

- Play a lead role in developing and establishing the College's approach to safeguarding and in maintaining and reviewing the College's implementation plan for safeguarding in line with current legislation and best practice.
- Coordinate the dissemination of this policy, processes and resources throughout the college
- Contribute to ensuring other policies and processes are consistent with the College's commitment to safeguarding.
- Advise on the College's training needs and the development of its training strategy.
- Receive reports of and manage cases of poor practice and abuse reported to the college - including an appropriate recording system.
- Co-ordinate the case management process through the Senior Management and Leadership Team (SMLT)
- Manage liaison with, and referrals to, external agencies for example adult social-care services and the police.
- Create a central point of contact for internal and external individuals and agencies concerned about the safety of children or adults at risk within the College.

- Provide advice and support to staff and play a lead role in their training.
- Represent the organisation at external meetings related to safeguarding.
- Manage reports to SMLT summarising the cases that have been addressed and their outcomes, and, as any issues that require action by the College such as changes to policy or procedures.
- Ensure confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy and Procedures
- Delegate activities of the Deputy Designated Safeguarding Lead (DDSL) to appropriately trained deputies as required.

Overall Aims

This policy will contribute to the safeguarding of apprentices by:

- Clarifying standards of behaviour for staff and apprentices.
- Contributing to the establishment of a safe, resilient, transparent, and robust safeguarding culture at the centre, built on mutual respect, and shared values.
- Teaching apprentices about safeguarding, including online safety, through teaching and learning opportunities, as part of a broad and balanced curriculum.
- Alerting staff to the signs and indicators of safeguarding issues including abuse and neglect.
- Developing staff awareness of the causes and consequences of abuse and neglect.
- Developing staff awareness of the risks and vulnerabilities their apprentices face by addressing concerns at the earliest possible stage.
- Reducing the potential risks apprentices face of being exposed to violence, extremism, exploitation, or victimisation.
- Working in partnership with apprentices, parents, employers, and agencies.

This policy will contribute to supporting the apprentices at LMC by:

- Identifying and protecting the most vulnerable.
- Taking a contextual safeguarding approach to understanding the risks presenting to young people outside the family home, taking into consideration extra familial harm.
- Taking seriously the risks presented to children and young people, with particular vigilance for sexual harassment and sexual violence between them.
- Assessing individual needs where possible.
- Designing plans to meet those needs.

Responsibilities and Expectations

All staff will:

- Be familiar with this safeguarding policy, in addition to this all staff will be aware of the systems in place which support safeguarding including reading the Behaviour Policy; the Staff Behaviour Policy (code of conduct); and the role of the Designated Safeguarding Lead (DSL).
- Know who the DSL and DDSL are and how to contact them.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- Read and understand Part 1 or Annex A of statutory guidance Keeping Children Safe in Education (2022). Those working directly with apprentices will also read Annex B.
- Be involved, where appropriate, in the implementation of integrated support plans, child in need plans and inter-agency child protection plans.

- Be alert to signs and indicators of possible abuse and neglect or at risk of harm and be able to identify vulnerable apprentices and take action to keep them safe.
- Be clear as to the training centres policy and procedures with regard to apprentice-on apprentice abuse, and apprentices requiring mental health support.
- Understand the potential risks for apprentices under the age of 18 when on block placement and staying at off-site accommodation.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- Be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the training centre.
- Have the skills, knowledge and understanding to keep looked after children and previously looked after children safe and understand why they are more vulnerable than others.
- Be aware of signs of abuse or neglect and the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND) and those with relevant health conditions.
- Be aware of their legal responsibility to report cases of FGM to the police. (Whilst all staff should speak to the Designated Safeguarding Lead (or deputy) regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on trainers.
- Report their concerns to the DSL if they think an apprentice may be at risk of radicalisation or involvement in terrorism.
- Be aware that upskirting is now a criminal offence.
- Be aware of LMC's whistleblowing procedures and policy. (Where a staff member feels unable to raise an issue with the senior leadership 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: Advice on whistleblowing <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 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.)

Information or concerns about apprentices will be shared with the DSL where it includes those:

- who need a social worker and may be experiencing abuse or neglect?
- requiring mental health support,
- who may benefit from early help
- where there is a radicalisation concern
- where a crime may have been committed
- where there is the potential for child-on-child abuse/child on child sexual harassment or
- sexual violence.

If an apprentice is in immediate danger or is at risk of harm, a referral should be made to MASH and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made. See [When to Call the Police](#)

Deputy Designated Safeguarding Lead (DDSL) will:

- Undertake activities as delegated by the DSL.

Senior Management and Leadership Team (SMLT):

SMLT will convene extraordinary meetings as the need arises in response to a safeguarding concern raised by the DSL to:

- Ratify any actions already taken by the DSL.
- Initially assess and agree immediate response to a safeguarding case.
- Identify appropriate 'route' for case (e.g., internal/ disciplinary action alone or referral to statutory agencies plus internal/ disciplinary action).
- Decide the level (from local to national) at which the organisation will deal with the concern.
- Consider the need for temporary/interim suspension order.
- Review progress of case(s).
- Identify/communicate learning from cases.

Role of the SMLT:

The SMLT will ensure that there is a whole training centre approach to safeguarding by ensuring safeguarding is at the forefront and underpins all relevant processes and policies. These systems, policies and processes will be readily available and easy to understand.

The SMLT will ensure that there is a senior board member with responsibility for LMC's safeguarding arrangements and that member of staff from the senior leadership team is appointed to the role of Designated Safeguarding Lead (DSL). They will also ensure that the DSL has the additional time, funding, training, resources and support they need to carry out this substantial role effectively.

The SMLT will ensure:

- That safeguarding and apprentice's protection, practice, process, and policy (including online safety) is effective and is compliant with legislation, statutory guidance, and local safeguarding arrangements.
- That the Training centre has a safeguarding policy which is accessible and understood by all staff.
- That the Training Centre has key policies in place to cover LMC's specific activities and any further policies as appropriate to the centre, e.g. Staff Code of Conduct, Apprentice Code of Conduct.
- That the Staff Code of Conduct is explicit in expected behaviours, particularly in relation to socialising with apprentices outside of the centre.
- That LMC's safeguarding policies/procedures are reviewed annually or as required due to changes in statutory guidance.
- That where possible more than one emergency contact telephone number is recorded for each apprentice, and this is checked on a regular basis.
- That LMC operates "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers.
- That those involved in recruiting new staff have undertaken safer recruitment training.
- That LMC has procedures for dealing with allegations of abuse against staff/volunteers.
- That, as a SMLT, they liaise with the Local Authority Designated Officer, Police, and other partner agencies in the event of allegations of abuse being made against the Managing Director.
- That LMC will maintain a Single Central Record of relevant pre-employment checks as detailed in KCSIE 2022 and that details of individuals should be removed from the single central record when they leave the employment of LMC.
- That all staff who work with children undergo safeguarding and child protection training, including online safety, at induction and this training is regularly updated.

- That LMC will contribute to multi-agency working in line with statutory guidance (see Working Together to Safeguard Children 2018).
- That any hotel accommodation for young people and vulnerable adults is checked to ensure that all individuals who have a responsibility to the apprentice have completed a DBS check. This applies to all individuals aged 18 or above.
- That a service level agreement is in place with the nominated hotel ensuring that each party is aware of their safeguarding responsibilities and have appropriate policies and procedures in place to ensure the safety of apprentices.
- That LMC consider their duties as required in the Prevent Duty and has in place a Prevent risk assessment.
- That all apprentices are taught about safeguarding including online safety.
- That LMC has appropriate filters and monitoring systems in place to support work online, but these will not act as an unreasonable restriction – these filters and monitors will be informed by LMC Prevent risk assessment.
- That LMC remedies any safeguarding deficiencies or weaknesses brought to its attention without delay.
- That where facilities or premises are hired, appropriate arrangements are in place to keep apprentices safe. This will include seeking assurances that there are appropriate safeguarding and child protection policies and procedures in place (including inspecting these if needed), these arrangements will be included in any lease or hire agreement.

Training

LMC is committed to training staff in safeguarding, so they have the knowledge and confidence to do the right thing. In addition to this policy, all staff working directly with children will read and understand Part One and Annex B of Keeping Children Safe in Education (KCSIE) 2022. Staff members who do not work directly with children will either read and understand Part One or Annex A of KCSIE 2022.

- All staff members will receive appropriate safeguarding and child protection training on induction. This will be refreshed annually considering current key learning points and trends from serious case reviews and local current and emerging issues and trends. In addition, all staff will receive safeguarding and child protection updates (for example, via email, ebulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively,
- Whistle blowing procedures will be covered in LMC training so that staff know what to do if they have concerns relating to safeguarding practice within the training centre,
- The DSL and any deputies will undergo a comprehensive programme of training to provide them with the knowledge and skills required to carry out the role. The formal DSL training will be updated every two years. Deputies will be trained to the same level as the DSL.
- LMC will ensure all persons on any appointment panel will have undertaken safer recruitment training,
- The DSL will undertake relevant Prevent awareness, prevent referral and Channel training and in turn will provide training, advice, and support to staff on protecting children from the risk of radicalisation. All other **LMC** staff members will complete appropriate training, this will include FGM and Prevent training using quality assured provision such as the [Government Online Prevent E-training learning package](#).
- Online and internet safety training for staff will be integrated, aligned, and considered as part of the overarching safeguarding approach,
- That as a minimum, the director with safeguarding responsibility will be trained in safeguarding (including Prevent) however where possible more members of the Board will receive this training to ensure suitable succession and robustness of knowledge, skills, and support to the centre.

Staff Support

It is recognised the stressful and traumatic nature of safeguarding and child protection work. LMC will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support, as appropriate. Further, LMC will endeavour to create a robust safeguarding culture and environment, so that staff feel comfortable to discuss matters that occur outside the workplace, which may have implications on their practice to safeguarding of apprentices in our centre.

Anonymous reports

Anonymous concerns will be acted on due to the fact LMC understands that there may be reasons behind someone not feeling able to identify themselves. However, support may be limited dependent on the detail of information received.

Malicious reports

Disciplinary action may be taken against an individual raising a concern that is deemed to be malicious, frivolous or in hope of seeking revenge.

Reports of allegations against members of LMC

As mandated by statutory guidance, any concerns raised against a member of LMC which suggests a child or vulnerable adult is being harmed will be escalated to the Local Area Designated Officers (LADO). A LADO is an employee at the local authority who can give advice to employers and organisations and individual who have concerns about an adult who works with children and/ or vulnerable adults. Allegations about a staff or students may be considered under Staff Disciplinary Policies or Student Disciplinary procedures.

Low-Level Concerns

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the DSL and Managing Director. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of LMC may have acted in a way that:

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

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

- Being over friendly with apprentices,
- Having favourites,
- Taking photographs of apprentices on their mobile phone, contrary to centre policy,
- Engaging with an apprentice on a one-to-one basis in a secluded area or behind a closed door
- Humiliating apprentices.

It is crucial that all low-level concerns are shared responsibly with the DSL and Managing Director and recorded and dealt with appropriately. LMC understands low-level concerns will provide them with the opportunity to learn lessons and develop policies and procedures accordingly.

Support for Apprentices

Opportunities will be provided for apprentices to develop skills, concepts, attitudes, and knowledge that promote their safety and wellbeing. LMC understand that if apprentices are at risk or have suffered abuse, that they will need support and all staff will understand their responsibilities to always act in their best interests. Apprentices will always be encouraged and supported to report any incidences of abuse to a member of staff who will liaise with the DSL.

LMC will take a zero-tolerance approach to any sexual harassment or sexual violence. Apprentices at LMC will never be made to feel ashamed or feel that they are the problem for making a report. Support for apprentices will be tailored on a case-by-case basis.

Staff will understand that if an apprentice has experienced abuse, harassment, or a sexual assault then they will likely to be traumatised and may struggle in normal classroom environments. LMC will always endeavour to seek the apprentices' views and if required allocate a designated trusted adult, as far as reasonable this will be the apprentices choice.

LMC will also consider the needs for support for any alleged perpetrator and understand that such behaviour may be as a result of adverse childhood experiences.

Apprentices at Increased Risk

Certain groups of apprentices are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include those in care and care leavers, young carers, those with mental health problems and those living in households where there is domestic abuse, mental health concerns and/or substance misuse, apprentices with parents who are currently in prison etc.

LMC will take steps to identify those at greater risk, regularly monitor and put appropriate measures in place to support their needs.

Confidentiality and information sharing

Staff should only disclose information or sensitive information about students with nominated safeguarding or prevent contacts. All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard minors, adults and those at risk of radicalisation. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Person.

Involving Parents and Carers

In general, the DSL will discuss any child protection concerns with parents/carers before making a referral to another agency including the Multi Agency Safeguarding Hub (MASH). There may be occasions when the DSL will contact another agency before informing parents/carers because they consider that by contacting them it may increase the risk of harm to the child.

FGM Mandatory Reporting Guidance

All staff, particularly trainers at LMC understand the duty to report to the police where they discover that FGM appears to have been carried out on a girl under the age of 18. It will be rare for trainers to see visual evidence, and they should not be examining apprentices.

Staff at LMC understand that if there is a suspicion that a girl may be travelling for the purposes of FGM, the trainer or DSL will report this directly to Police as they may be in immediate risk of harm.

If a trainer, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the trainer must report this to the police (KCSIE 2022).

Regulated professionals have a mandatory reporting duty to report cases of known FGM. Trainers are considered regulated professionals. The duty requires that they themselves report known incidents to the police. This cannot be delegated to the Designated Safeguarding Lead.

Abuse between Apprentices, Sexual Violence and Sexual Harassment

We recognise that apprentices are capable of abusing their peers and that sexual abuse is a specific safeguarding issue and that this can happen both inside and outside of the centre including happening online.

Abuse will never be tolerated or passed off as “banter” or “part of growing up”. All staff at LMC understand that even if there are no reports in the training centre that it does not mean it is not happening, it may be the case that apprentices are just not reporting it.

All staff will be vigilant to what they hear, are told, and see and will report all concerns, disclosures, or incidents to the DSL. Staff at LMC will challenge any inappropriate behaviour between apprentices, they will not downplay or dismiss behaviours as ‘just banter’, ‘just having a laugh’, ‘part of growing up’ or ‘Boys being boys’.

All Staff at LMC will develop and model the ethos and culture of our Training centres zero tolerance of this type of behaviour and will support and encourage apprentices to come forward and report any issues or concerns they have.

All staff will be trained to recognise signs and symptoms which may signal a child is at risk from sexual harassment or sexual violence and all other types of abuse.

If an apprentice makes an allegation of abuse against another apprentice:

- Staff will inform the DSL and record the allegation, but will not investigate it,
- The DSL will contact the local authority MASH, where necessary and follow its advice, as well as the police if the allegation involves a potential criminal offence,
- The DSL will put a risk assessment and support plan into place for all apprentices involved - both the apprentice who experience the abuse and the apprentice against whom the allegation has been made - with a named trusted adult they can talk to if needed.

The DSL will manage any incidents in line with the guidance contained in Part 5 KCSIE 2022 and Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2021. In addition to existing advice about managing a disclosure contained in this policy, staff will follow Searching, Screening and Confiscation Advice 2018.

LMC will minimise the risk of apprentice-on-apprentice abuse by:

- Challenging any form of derogatory or sexualised language or behaviour,
- Being vigilant to issues that particularly affect different vulnerable groups,
- Ensuring our curriculum helps to educate apprentices about appropriate behaviour and consent,
- Ensure apprentices know they can talk to staff confidentially to ensure their concerns are heard and their wishes are understood,
- Ensure staff are trained to understand that an apprentice harming another apprentice could be a sign that they are being abused themselves, and that this would fall under the scope of this policy.

Incel

Incel is short for ‘involuntary celibate’.

An incel is a member of an online subculture of people who define themselves as unable to get a romantic or sexual partner despite desiring one. Discussions in incel forums are often characterized by resentment and hatred, misogyny, misanthropy, self-pity and self-loathing, racism, a sense of entitlement to sex, and

the endorsement of violence against women and sexually active people.
What we are doing:

- Ensuring staff understand what an incel is and how to recognise the signs and symptoms of radicalisation.
- Discussing safeguarding as part of progress reviews with learners.
- **Keeping learners safe.** Our curriculum promotes tolerance, understanding and respect.
- Staying safe online by ensuring our approach to online safety is integrated across the college.
- Working closely with our local Prevent co-ordinator for advice and guidance.

County Lines

'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phone lines or other forms of "deal line".

They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. (Home Office).

Factors that make a county lines gang more likely to target, groom and exploit a child include:

- the child having experienced neglect, physical and/or sexual abuse in the past
- social isolation or social difficulties
- poverty
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a learning disability
- having mental health problems
- having substance misuse issues
- being in care or having a history of being in care
- being excluded from mainstream education

(Home Office)

What we are doing

- Ensuring staff understand what county lines is and how to recognise the signs, such as deteriorating grades, attendance, and escalating behaviour problems.
- Discussing safeguarding as part of progress reviews with learners.
- Clear ways for learners to report anonymously concerns.
- Ensuring that all safeguarding concerns raised are put in writing and evaluated by the college's designated safeguarding officer.
- Holding regular team meetings with a safeguarding focus.

Martyn's Law

Provides a duty on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. (Home Office)

The duty requires owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there.

Proportionality is a fundamental consideration for this legislation. It establishes a tiered model, linked to the activity that takes place at a location and its capacity:

- A standard tier. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.
- An enhanced tier will see additional requirements placed on high-capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. This could include live music venues, theatres, and department stores.

Premises fall within the scope of the Duty where “qualifying activities” take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions, temporary events, Places of Worship, health, and education.

What we are doing

- Following counter-terrorism advice and training.
- Conducting vulnerability assessments.
- Having in place a mitigation plan for the risks created by the vulnerabilities.
- Following the three-step plan to terrorist incidents, called Guide, Shelter, Communicate. Guiding people towards an appropriate location, either inside or outside the venue; Sheltering people in lockdown for several hours if necessary; and communicating with visitors and authorities. Making sure staff know how to enact these steps.

Clare's Law

Following the murder of Clare Wood, by an ex-partner, in 2009, British Law provided a new protective measure for partners and ex-partners to request information from the police regarding any history of allegations, cautions & convictions of violence.

Any partner or ex-partner at risk, or concerned about their partner's behaviour or previous violent activities, is permitted to make the request. Family members and concerned friends may also make the request although the information can only be shared with the individual at risk themselves.

Some reasons individuals may make the request: (The list is not exhaustive.)

- Concern that a partner or ex-partner has abused the individual or is threatening to do so.
- Concern that a partner's ex has contacted the individual to warn them they have a violent past.

- An ex-partner is concerned for their safety or that of their child due to threats made or stalking/harassing behaviour.
- A concerned family member or friend feels that their friend/family member is in a toxic relationship or in a dangerous situation.

What we are doing

- Ensuring staff are trained and aware of Clare's Law.
- Ensuring our learners are aware that we will safeguard them and act in their best interests, with their consent.
- The safeguarding team will provide advice and guidance to learners who have disclosed incidents of domestic violence or expressed fear that they are at risk.
- Listening to the concerns of fellow students who are concerned about their peers/colleagues.

Online Safety

Online safety is an increasing concern within the educational sector. Cyber bullying, grooming and the rise of violent and discriminatory sites can all impact a student's physical health, mental health & welfare. It is important to note that the apprentices at LMC are all adults and further, they provide their own IT equipment for the purpose of learning with us. However, our duty of care remains to protect our learners and ensure that they are kept as safe as possible.

What we are doing

- Providing a safe and open culture where learners can discuss any concerns they may have.
- Ensuring all staff receive training in this area and are aware the signs of online issues.
- Embedding online safety in our classrooms and learner/employer meetings.
- Encouraging learners to use the internet and social media platforms in a safe and constructive way.
- Addressing any concerns raised promptly and confidentially.

Sharing of Information

LMC recognises the need to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children. Whilst the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children; if unsure, staff should contact the DSL to discuss. LMC will use the government's guidance 'Information Sharing: Advice for practitioners providing services to children, young people, parents, and carers' (2018) to help manage information sharing in LMC.

Legislation and Regulation

This policy is based on:

- The Department for Education's (DfE) statutory guidance for schools and colleges, *Keeping Children Safe in Education* September 2022
- The Department for Education's (DfE) statutory guidance for schools and colleges, *Working Together to Safeguard Children* 2018
- Prevent duty guidance for further education institutions in England and Wales April 2021
- The Care Act 2014
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2021
- Searching, Screening and Confiscation Advice 2018
- Equality Act 2010.

Supporting Policies and Procedures

The following policies and procedure are consistent with this Safeguarding Children and Adults at Risk Policy:

- Equality, Diversity, and Inclusion Policy
- Student Complaints
- Whistleblowing Policy
- Staff Recruitment Policy
- Information Security and Compliance Policy
- Data Protection Policy and Process.

Document Change History

This is version 3 of the Safeguarding Children and Adults at Risk Policy and replaces the Safeguarding Learners (including prevent) Policy. This version replaces all previous ones, and it is the responsibility of the Designated Safeguarding Lead (DSL) to ensure that new versions are communicated across the College. It is the responsibility of the reader to familiarise themselves with this version of the document.

This document is subject to revision and is maintained electronically. Electronic copies are version controlled and printed copies are not subject to this control.

Summary of Changes

Version 3, July 2023	
Ref.	Change
N/A	New laws and strategies as detailed below.

Version 3, July 2023

Change – Additions: Martyn’s Law, Clare’s Law, Incel, County Lines

Review and Approval

This Policy and supporting documents are reviewed no less than on a yearly basis and whenever there are changes in relevant legislation and/or government guidance or as a result of any other significant change or event.

Approval Date:	July 2023	Approval By:	Board of Governors
Review Date:	July 2024	Policy Holder:	Designated Safeguarding Lead